

## **INVITATION FOR PUBLIC SUBMISSION - WESTERN POWER STANDARD FORM CONTRACTS**

### **WESTERN POWER NETWORKS COMMENTS on WESTERN POWER RETAIL STANDARD FORM CONTRACT**

#### **Section**

5.1 - "However, you can agree to read the meter yourself and provide us with the meter readings"

#### **Response**

Leaves it very open to everyone requesting to read their own meter, which would be impractical. Request the following rewording or similar, such that there is no conflict with Section 10:

"However, in special circumstances, you can agree ..."

#### **Section**

8.1(a)

#### **Response**

The words "inspect and" should be removed. We maintain the meter, but not regularly inspect it. The present words create an unrealistic expectation for customers about regular inspection & servicing.

#### **Section**

8.2

#### **Response**

"You must" suggests that customers themselves have to do this but obviously aren't licensed to perform any work. Suggest "You are responsible for keeping ..." is better wording.

#### **Section**

10(b)

#### **Response**

This should be changed to "3" business days, to align with other statutory requirements, such as notification of planned interruptions (which may require access to the premises) in section 14.5 of the Customer Code.

In (1), please add “or *your equipment*” after “*equipment*”. Part 3 of the Energy Coordination Act 1994 (Inspectors) gives designated electrical inspectors powers of entry to inspect customers’ internal electrical work. Section 14 (a) allows a designated inspector to enter any land, premise or thing without notice.

The last sentence under (b) is confusing since it talks about giving notice after explaining that notice is often not required. Suggest deleting and adding a new point:

“(c) Where *Western Power Networks* needs to enter *your premises* for the above reasons, *Western Power Networks* is required to give *you* the appropriate notice.”

and renumbering existing point (c) as (d).

### **Section**

11.1

### **Response**

Suggest adding “(specialist)” after “qualified” for further emphasis and clarity of intent.

### **Section**

12.5

### **Response**

A 6th dot point needs to be added as follows, or similar:

“(f) *You* fail to keep *your equipment* in good working order or condition.”

### **Section**

12.5 & 12.6

### **Response**

Suggest these sections should also make reference to “*Western Power Networks*” as well as “we”, similar to section 10.

### **Section**

12.7

### **Response**

It is *Western Power's* responsibility to investigate illegal use of electricity, not Energy Safety. Suggest replacing “the Director of Energy Safety” with “*Western Power Networks*”.

**General comment**

Various sections, including “definitions” and “further information”, need to be updated to reflect the names and other details of the new business entities. In particular, this will be a “Synergy” contract and all references to “Western Power Networks” could become “Western Power”.

ENDS