

20 March 2009

Mr Paul Kelly
ECCC Chairman
c/o Level 6, 197 St George's Terrace
PERTH WA 6000

Dear Mr Kelly

REVIEW OF THE CODE OF CONDUCT FOR THE SUPPLY OF ELECTRICITY TO SMALL USE CUSTOMERS

I refer to the Electricity Code Consultative Committee's (ECCC) request for submissions in respect of the proposed revisions to the Code of Conduct for the Supply of Electricity to Small Use Customers (the **Code**).

Western Power has reviewed the Draft Review Report and wishes to make the following comments:

1. Recommendation 18

"A new clause be added to Part 10 of the Code to require retailers to inform customers at least annually regarding the availability of service standard payments from both retailers and distributors."

Western Power supports the inclusion of the new clause within Part 10 of the Code. However, Western Power believes that the requirements under Part 10 should not be limited to payments identified under Part 14 of the Code but should extend to all penalty payments to be made by retailers and distributors. For example, payments under section 21 of the Electricity Industry (Network Quality and Reliability of Supply) Code should also be captured under Part 10 obligations.

2. Recommendation 22

"Insert the following new clauses:

13.3(1)(e) percentage of complaints from residential customers resolved within 15 business days.

13.3(1)(f) percentage of complaints from non-residential customers resolved within 15 days.

13.7(e) percentage of complaints from pre-payment meter customers, other than those complaints specified in clause 13.13(a) concluded within 15 business days

13.10(1)(e) percentage of customer complaints concluded within 15 business days

13.13(d) percentage of complaints relating to the installation and operation of a pre-payment meter at a customer's supply address concluded within 15 business days."

As you would be aware, clauses 14.3(1)(b) and 14.4(1)(b) of the Code require a retailer or a distributor to address the matters in a customer's written query or complaint within

20 business days. Consequently, Western Power's complaints management system has been set up to monitor and report on complaints resolutions within this timeframe.

In reality, Western Power could have a very low 15-day resolution rate but still have a high compliance rate with the 20-day requirement. Thus, Western Power considers that the complaints resolution reporting under the proposed clauses 13.3(1)(e) and (f), 13.7(e), 13.10(1)(e) and 13.13(d) could be a grossly inaccurate representation of Western Power's compliance with the requirements of the Code. Further, such reporting will not provide information that will allow an accurate or fair comparison with other jurisdictions (whose compliance requirements appear to be different).

Therefore, Western Power proposes that reporting in respect of customer complaints resolution process be maintained at 20 business days.

Please do not hesitate to contact Mr Gino Giudice on 9326 4609 or myself on 9326 4535 if you wish to further discuss Western Power's submission.

Yours sincerely

Margaret Pyrchla
Manager Compliance