

23rd April 2010

Ms Lanie Chopping
PO Box 8469
St Georges Terrace
PERTH WA 6849

Dear Ms Chopping

RE: Amendments to the Compendium of Gas Customer Licence Obligations

The Western Australian Council of Social Services (WACOSS) welcomes the opportunity to provide comment on the Economic Regulation Authority's (ERA) proposed amendments to the Compendium of Gas Customer Licence Obligations (Gas Compendium).

WACOSS is the peak body of the community services sector across Western Australia. Since 1956, WACOSS has been developing and strengthening the non-government community services sector's capacity to assist all Western Australians.

With over 350 members, WACOSS has strong relationships with the community services sector and seeks to represent their interests, and those of the disadvantaged individuals and families they assist at a service level. Given this relationship, WACOSS is in a unique position to comment on issues in our society that socially impact upon disadvantaged members of the community.

The ERA has proposed a number of amendments to the Compendium to bring it in line with the amendments made to the *Code of Conduct for the Supply of Electricity to Small Use Customers* during the recent Code Review.

WACOSS was involved in the 2009 Electricity Code review and made a number of recommendations for amendments to the Electricity Code to enhance protections for customers. The Code review saw a considerable strengthening of protections for customer experiencing financial hardship.

New amendments to the Electricity code include the abolition of late payment fees for financial hardship customers and a requirement for the ERA to review the financial hardship policies of retailers and publish the findings. These amendments are strongly supported by WACOSS.

WACOSS supports the proposed amendments to the Gas Compendium and the ERA's intention to align it with the Electricity Code. It is appropriate that gas customers have the same legislative rights and responsibilities as electricity customers and that there is consistency between the two industries.



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WACOSS notes however an important inconsistency between the two documents. Part 5.2 of both the Electricity Code and Gas Compendium refers to *Minimum Payment Methods*. Part 5.2 (1) of each document states that “*a retailer must offer a customer at least the following payment methods...*”.

Part 5.2 (1)(c) of the Electricity Code states “*for residential customers, by Centrepay.*” However this provision has not been carried over to the Gas Compendium. This may just be an error in the transferring of amendments, however if it is not an error WACOSS would ask why this payment option has deliberately been excluded from the Gas Compendium. Centrepay should be offered as a payment option for residential gas customers by retailers, particularly if they are on a low income or experiencing financial hardship.

WACOSS would like to thank the ERA for the opportunity to comment on the proposed amendments to the Compendium of Gas Customer Licence Obligations. For further information please contact Misty Hayden, Senior Policy Officer, on 08 9420 7222 or misty@wacoss.org.au.

Yours Sincerely,

Sue Ash
WACOSS CEO