

⊖ ⊕ ⊕ Economic Regulation Authority Received	
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Action Officer	PAUL REID

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09/05/2011

RELATED RECORD D66627

Mr Paul Reid  
Assistant Director Monitoring  
Economic Regulation Authority  
PO Box 8469  
Perth Business Centre  
PERTH WA 6849

Dear Mr Reid,

**COMPLIANCE ENFORCEMENT POLICY – ELECTRICITY, GAS AND WATER LICENCES**

Thank you for the opportunity to provide a submission in respect of the Authority's draft Compliance Enforcement Policy – Electricity, Gas and Water Licences (**Compliance Policy**).

In general, Western Power supports the Authority's initiative to publish and make available a Compliance Policy to ensure transparency of all compliance enforcement processes. However, Western Power has identified a number of areas that may require further consideration. These areas are:

<u>Section</u>	<u>Western Power comment</u>
<i>Licence Compliance Audits</i>	No reference to the asset management system review is made under this section.
<i>Contravention of Type 1 Obligations</i>	<p>At times the language used in the Compliance Policy appears inconsistent with the applicable licensing legislation or the 2010 Electricity Compliance Reporting Manual (<b>the Manual</b>).</p> <p>For example, the approach to reporting of Type 1 obligations set out under this section is not entirely consistent with the approach set out under section 5.2 of the Manual.</p>

Should you have any queries regarding the above please do not hesitate to contact me on 08 9326 4535.

Yours faithfully,



**MARGARET PYRCHLA**  
MANAGER, RISK & COMPLIANCE