



December 12, 2011

Mr. Tyson Self
Manager, Access Projects
Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

Dear Tyson,

The Western Australian Farmers Federation (Inc.) (WAFarmers) thanks you for the opportunity to provide comment to the Economic Regulation Authority's Inquiry, '*New Facilities Investment Test Application for the Mid West Energy Project (Southern Section)*'.

As background, WAFarmers is the State's largest and most influential rural lobby and service organisation. WAFarmers represents approximately 4,000 Western Australian farmers from a range of primary industries including grain growers, meat and wool producers, dairy farmers, pastoralists, horticulturalists, commercial egg producers and beekeepers. Collectively our members are major contributors to the \$7.1 billion gross value of production that agriculture in its various forms contributes annually to Western Australia's economy. Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental well being of that land.

In this submission, WAFarmers comments on three issues of significance to our members, being the:

1. Conduct of Western Power staff and contractors when working on farm land.
2. Sighting of future Western Power infrastructure
3. Western power's asset management program.

Conduct of Western Power staff and contractors when conducting work on farm land

As WAFarmers has previously noted in submissions to the Economic Regulation Authority, Western Power repeatedly breaches its own customer charter in its dealings with farm businesses, and we believe that this presents a significant increase the biosecurity risk to Western Australia's natural environment and its agricultural industry.

Western Power's Customer Charter ⁽¹⁾ states:

Your property - Access to your premises

At times we need to access your property to read the electricity meter, inspect new electrical work, carry out maintenance on our electrical equipment, connect or disconnect the electricity supply and prune vegetation away from powerlines.

Our guarantees:

- We or our representatives will wear or carry official Western Power identification, and show that identification to you on request.*
- If you have powerlines (transmission or distribution) running through your property, and we need to carry out work on them, we will contact you beforehand to arrange a suitable time.*
- We will respect your property and only remain there for the time it takes us to perform our role of supplying electricity safely to you and others.*

Despite this clearly defined commitment (recalling it is a 'guarantee'), WAFarmers members report that this customer charter is continually breached on farm land. WAFarmers has raised these issues with Western Power over a number of years however this has not led to meaningful outcomes in terms of improvement in their service delivery.

A project entitled 'Working Together' in 2007 and 2008 saw WAFarmers and Western Power identify a number of key areas which need attention, including biosecurity and a level of reimbursement for damages and/or production losses. Disappointingly, Working Together never eventuated in formal policy, and therefore practice change from Western Power's staff and contractors. As such, these issues remain unresolved.

Western Power's current response is to simply recommend that WAFarmers advise their members to lodge their grievance with Western Power's complaints line. WAFarmers has no doubt that this simply masks the issue, as many of our members have advised us that they are unwilling to do so, through sheer frustration that "nothing will change" under Western Power's current management.

Sighting of future Western Power infrastructure

WAFarmers recognises that future development and population growth in regional areas places increasing demands on existing power supplies and upgraded infrastructure is required to meet this demand. In the majority of cases, smaller communities stand to benefit from the improved infrastructure.

WAFarmers raises concerns however with the methods undertaken by Western Power in determining its transmission line corridors and the impact these will have on farm business, whose productive agricultural land falls within the boundaries of the corridor. For far too long,

farmers have carried the burden of public good expectations across a range of issues without adequate financial recognition for doing so. WAFarmers believes that farmers are seen to be soft options in route selection as the government's agency, Western Power has the legislative firepower of "compulsory acquisition" to fall back on if farmers refuse to negotiate the inequitable once off payment to compensate for a significant easement on their property which has major impacts on future land use by the farmer.

In the majority of cases, alternative transmission line routes are available through government owned land, particularly unallocated crown land yet, continually, the government places a higher value on the preservation of native vegetation (which will regenerate after being disturbed) than it does on (fairly) compensating farmers for the permanent loss of productive capacity.

Western power's asset management program

WAFarmers notes that on December 9, 2011 the Economic Regulation Authority released its '2011 Asset Management System Review Report' which details that:

"the Authority is not satisfied with the effectiveness of Western Power's distribution wood pole management. The review report has disclosed significant problems with Western Power's recordkeeping in relation to the inspection of wood poles in the distribution network and the replacement of poles that have failed inspection and need to be replaced. Accurate and up to date records are central to Western Power's capacity to manage the wood poles in its network."

WAFarmers could list a number of comments from members on this issue but rather believes that the Economic Regulation Authority is aware of the problem and should be ensuring change occurs to what is clearly and inadequate management system.

In closing, WAFarmers lists these issues with the Economic Regulation Authority as Western Power seems uninterested, unwilling or unable to respond to these concerns. Without their consideration by the Economic Regulation Authority, we are unable to see where these issues will be addressed. WAFarmers believes that the Economic Regulation Authority should consider these factors as it makes a determination on Western Power's application.

WAFarmers thanks you for your consideration of this submission. Should you wish to further discuss the issues raised in this submission, please do not hesitate to contact myself or WAFarmers Director of Policy, Alan Hill on (08) 9486 2100.

Yours sincerely



Mike Norton
President