

To Executive Director, Economic Regulation Authority

Dear Paul,

WorleyParsons Asset Management (WAM) welcomes the opportunity to comment on the ERA's draft Gas Customer Code (GCC) for the gas industry.

As a general comment, WAM supports the revised GCC which has been designed to streamline the Code and Trading and Distribution licence conditions. As you are aware, WAM is dedicated to providing excellence in gas services and in ensuring customer protection in Esperance.

We would like the Authority to consider the following comments in formulating the GCC.

- a) WAM believes the definition for a 'small retailer' should mean a retailer with less than 3,000 residential customer connections. The viability for a small company like ours is in ensuring low overheads are maintained. It is therefore conceivable that almost all small gas utilities would have a very small operational staff with simple spreadsheets or low cost off-the-shelf packages to manage their business. Almost all low cost off-the-shelf billing and accounting softwares are for between 2,000 to 4,000 customers.
- c) As WAM's business system is an off-the-shelf package, the incorporation of the exhaustive list of billing information contained under Clause 4 (Division 2 -Contents of Bill) would be costly and extremely difficult to implement. Our existing business systems could only be upgraded if the high development cost is passed on to consumers.
- d) We believe that a small retailer should be exempted from the items listed under Clause 4.5 (1), particularly items (k), (l) & (bb).
- e) A number of items under Clause 4.5, such as (q), (s), (t), (z) and (aa), are already in the Customer Service Charter. It is suggested that these items be omitted as a copy of the Charter is already provided to customers and also available for viewing on the licensee's website.
- f) WAM concurs with the requirement under Clause 10.5A regarding the inclusion of a separate Gas Safety Awareness document.

Whilst WAM is generally supportive of the Authority's wish for improved clarity of the Code, it is important that licensees are not burdened with excessive administrative workloads and forced to allocate substantial resources to provide irrelevant or unnecessary information.

Regards
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