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16 July 2008

Mr Paul Kelly
Executive Director
Licensing, Monitoring & Customer Protection
Economic Regulatory Authority
Level 6, Governor Stirling Tower
197 St Georges Terrace
Perth WA 6000

Dear Paul

Draft Gas Customer Code

I refer to your recent correspondence in regard to the abovementioned and requesting interested persons to provide comment and submissions.

Alinta Sales Pty Ltd as an interested party has reviewed the Draft Code and provides the following comments:

Alinta, as part of the Gas Customer Code Review Workgroup has demonstrated throughout the consultation process that it supports the concept of consistency in relation to customer protection and conduct requirements across the energy industry.

As Alinta was a representative of the workgroup, there was ongoing consultation throughout the time members met and there were considerable opportunities for representatives to discuss and address the matters raised. As a result Alinta has minimal comments at this time, with the following comments more of a general nature.

Our comments are outlined below:

Small Retailer

Alinta is of the opinion that a proposed supply threshold for a "small retailer should be in the vicinity of less than 100 connections. As for exemptions from some parts of the code, Alinta is of the view that rather than exemptions being automatically included as part of the code, that "Small Retailers" should advise the "Authority" as to which components of the code, they seek exemption from as part of the license process. This way the "Authority" can make a determination based on the level of information provided.

It would seem impractical to provide Retailers automatic exemption from certain provisions of the code which address customer protection, based solely on the number of connection points a Retailer has.

Moratorium

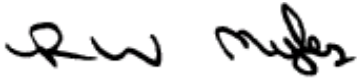
As Alinta is the party most impacted by the implementation of a new Code, once the requirements are finalised then Alinta requests that a period of time (12 months) be permitted to allow Alinta to investigate and implement any changes, including those to systems that will require technical amendments.

These are expected to be minimal based on the draft proposal, however as with any technical systems, changes do require lead in time.

Alinta appreciates the opportunity to be invited to comment on this matter and is pleased to offer these comments in an effort to achieve an acceptable outcome for all parties involved.

Please contact Ray Myles on (08) 9486 3328 if you wish to discuss these matters further or seek clarification on any of the information provided.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ray Myles'.

Ray Myles
Customer Services Manager
Alinta Sales Pty Ltd