



WorleyParsons Asset Management

Level 5,
QV1 Building 250 St Georges Terrace
Perth, WA 6000, Australia
Telephone: +61 8 9278 8345
Facsimile: +61 8 9278 8110
Web: <http://www.esperance-energy.com.au>

ACN 102 863 918

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5th March 2009

The Assistant Director Monitoring
Economic Regulation Authority
GPO Box 8469
Perth Business Centre
WA 6849

Attention: Mr Paul Reid

Dear Sir

RE: Draft incident reporting manual for Western Australian electricity, gas and water licensees

Thank you for the opportunity to comment on the draft incident reporting manual for licensees in the three industries.

We wish to highlight that the 5 business days requirement for failure to issue customer bills after the due date, under Section 7.2 Table 8, is deemed unreasonable for licensees of small gas networks like ours.

We believe that 10 business days would be more achievable due to our available operational resources without passing on development costs to consumers.

Yours faithfully,
WorleyParsons Asset Management Pty Ltd

Lawrence Teo
Business Manager