

13 September 2019

Paul Reid  
Assist Director Utility Services Regulation  
Economic Regulation Authority  
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Via email: [publicsubmissions@erawa.com.au](mailto:publicsubmissions@erawa.com.au)

Dear Mr Reid

**Re: Draft Decision – Proposed amendments to the Compendium of Gas Customer Licence Obligations**

Thank you for the opportunity to comment on the Economic Regulation Authority (Authority) proposed amendments to the Compendium of Gas Customer Licence Obligations (Compendium), as published on 26 August 2019. This letter outlines a submission from ATCO in response to the proposed amendments.

ATCO is supportive of the proposed amendments to the Compendium as outlined in the Draft Decision to achieve consistency across the regulatory framework for electricity and gas. However, ATCO submits that proposed amendments 8 and 9 require additional consideration.

**Proposed 8 - Reconnections requiring excavation**

Proposal 8 is to amend clause 8.2(3)(e) of the Compendium to require reconnections requiring excavation to be performed within seven business days instead of 10 business days. The proposed amendment is to address a potential inconsistency in reconnection timing under clause 99(4)(a) of the AEMO Retail Market Procedures (WA) (Procedures) and clause 8.2(3)(e) of the Compendium.

As summarised in the Draft Decision, a network operator may be required under the Procedures to undertake a special meter reading when a transfer is for a customer “move in”. Under clause 99(4)(a) of the Procedures, if a special meter reading is required and AEMO does not receive the metering data within seven business days of the earliest transfer date, then AEMO must cancel the requested transfer.

ATCO wishes to clarify that the majority of reconnections which require excavation under clause 8.2(3)(e) relate to non-payment of bills and do not involve reconnection for a customer “move in”. Potential misalignment in timing would only arise in circumstances where a customer “move in” relates to a property with a gas supply previously disconnected at the street. In this situation, the special meter read can only be performed after ATCO has reconnected the delivery point to restore gas supply at the street requiring excavation, which takes more time to plan and perform (to meet system safety and network supply management requirements) compared to other types of reconnection and can take up to 10 business days.

To preserve the customer experience, ATCO supports the proposed change to clause 8.2(3)(e) to reduce the reconnection timing. ATCO will need to review and consider the system and process changes that may be required to achieve the proposed shorter reconnection timeframe. ATCO seeks a 12 month transition period to undertake the internal review and implement the required system and process changes to meet the new requirement.

### **Proposed 9 – Gas customer safety awareness programmes**

Proposal 9 is to remove the requirement on retailers to have in place a gas customer safety awareness program (CSAP), which follows the Authority's draft decision to amend the Gas Marketing Code of Conduct to remove the obligation on retailers to give a customer general information on their gas CSAP.

Whilst ATCO agrees that AS/NZA 4645.1:2018 Gas distributions networks Part 1: Network management (Standard) requires network operators to have in place consumer safety awareness programs, the Standard also acknowledges that retailers are the main party in direct communication with consumers, given that they have a direct contractual relationship with consumers that gas producers, transmission pipeline and distribution network service providers do not have, and have a key role to play in gas safety awareness.

ATCO does not oppose the removal of the obligation on retailers to have in place a CSAP, but submits that there should still be an obligation on retailers to support network service providers to provide consumers with essential gas safety information.

If you have any questions or would like to discuss any of these issues further please contact me or Tony Yiu, Senior Manager Business Services, Risk & Compliance.

Yours sincerely



**Matthew Cronin**  
General Manager – Strategy & Regulation