

Our ref: EDM 69884340  
Contact: Sabina Roshan

21 October 2024

Sara O'Connor  
Chair  
ECCC  
PO Box 8469  
PERTH BC WA 6849

Dear Sara

**ECCC Draft Review Report – 2024 Review of the Code of Conduct for the Supply of Electricity to Small Use Customers 2022**

I refer to the 30 September 2024 Electricity Code Consultative Committee (ECCC) invitation for public submissions on the draft recommendations proposed in the Draft Review Report and also the four issues in section 5, on the ECCC's Review of the *Code of Conduct for the Supply of Electricity to Small Use Customers 2022 (Code)*.

Western Power welcomes the opportunity to respond to the Draft Review Report. Western Power is providing comments on *Draft Recommendations* 4, 8, 10 and 11 of the Draft Review Report, as well as *Other Issues seeking feedback* at items 5.1, 5.2 and 5.3.

Should recommendations be developed by the ECCC for the *Other Issues seeking feedback* for inclusion in the Final Review Report to the Economic Regulation Authority (ERA), Western Power believes that a further opportunity to comment on proposed changes be provided prior to the Final Review Report being submitted to the ERA.

- 1. Draft recommendation 4 of the Draft Review Report – Amend clause 23(3) of the Code to allow an estimate to be based on the longest available data series, where an accumulation meter has been exchanged for an interval meter.**

***Western Power's response:***

Western Power supports the recommendation for change to clause 23(3) of the Code. However, removing the reference to "Meter exchange" introduces more flexibility for retailers and specific products and or business process changes to support other specific scenarios not related to a meter change, where a blend of accumulation meter data and interval meter day occurs within the same bill period.

Western Power would like to raise that in support of the bill being classed as an actual bill (in relation to the recommendation proposed) that the customer is provided information that "substitutes are a make-up of the bill". This is relevant in the event that estimates are replaced with actual reads and a rebill occurs. Western Power would expect retailers to provide information to their customers on the



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TIS 13 14 50

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reasoning of the rebill, avoiding unnecessary downstream operational activities for Western Power to accommodate enquires of this nature.

2. **Draft recommendation 8 of the Draft Review Report - Clarify that where multiple persons require LSE at one supply address, the licensee is only obligated to notify the customer or other nominated person under clause 84.**

*Western Power's response:*

Western Power supports draft recommendation 8.

3. **Draft recommendation 10 of the Draft Review Report – Increase the service standard payment amounts as set in clauses 94, 95, 96, 97 and 98 by CPI since 2010.**

*Western Power's response:*

Western Power supports draft recommendation 10, and recognises that there will be some impact from the increased charges provided by clauses 94, 97 and 98.

4. **Draft recommendation 11 of the Draft Review Report –**
  - a) **Remove acknowledgement times under subclause 88(a) from the Code.**
  - b) **Remove service standard payments where retailers and distributors fail to meet complaint acknowledgement times in clauses 96(1) and 98(1) of the Code.**
  - c) **Amend clause 87(2)(c) to include acknowledgement times.**

*Western Power's response:*

Western Power supports draft recommendation 11.

## **5. Other issues seeking feedback**

### **5.1 Question 1 - Notification times of a planned interruption for life support customers**

- a) **How has the current three-day notice period impacted your ability (or any LSE customers that you are aware of) to prepare for planned interruptions?**
- b) **What concerns do you have with extending the notice period?**

*Western Power's response:*

Western Power is not in favour of increasing the long established three (3) business day notice to Life Support Equipment (LSE) customers of a planned interruption.

The process to notify all customers (including LSE customers) of a planned interruption commences 10 business days prior to the date for the planned interruption. The notifications are provided by either letter, email or SMS. Any LSE customer who has recorded a preference with their retailer or Western Power to receive notifications by email or text will receive a notice for a planned interruption 10 business days prior to the interruption date.

If the notice is provided by letter, it will generally be received by the customer in accordance with published Australia Post delivery speeds, which within Western Australia is 3-5 business days, including rural areas. However, the timeframe for delivery is dependent on Australia Post and outside of Western Power's control. In normal circumstances, LSE customers receive planned interruption notification letters more than three (3) full business days prior to the interruption and possibly five (5) business days or more prior to the interruption.

It is worth clarifying how the *Code of Conduct for the Supply of Electricity to Small Use Customers 2022* (Code) and Western Power determine "3 business days". As an example, if a planned interruption is scheduled for a Friday, the notice must be received by the LSE customer on Monday,

which allows three (3) full business days' notice before the interruption on Friday. In essence this is already more than three (3) business days' notice.

LSE customer notifications are sent at the same time as all other customers, so to notify LSE customers more than three days prior to the interruption would mean that notifications would need to be provided to all impacted customers more than 10 days before a planned interruption. Customer feedback has confirmed that if notifications are received too far ahead of the interruption date, customers tend to overlook the date and are less prepared for the interruption.

Planned interruptions are approved internally at least 20 business days prior to the interruption date, but on occasion due to urgent operational requirements, planned interruptions are conducted in a shorter timeframe, which reduces the time available for Western Power to notify customers. The timing challenge is driven by the presence of LSE customers within the interruption area and the need to provide notice in accordance with Clause 84 of the Code, which is three (3) business days. If the notice period is increased, this could have an impact on Western Power's operations and the ability to respond to urgent network issues and maintain a reliable supply to customers.

A change to Clause 84 (1) (a) of the Code to increase the notification time for LSE customers from three (3) business days would require substantial changes to Western Power procedures, processes and systems as detailed below. Please note that this is a preliminary analysis and the timeframe and resourcing required to implement the changes have yet to be determined.

1. **Outage Notification and Evidence (ONE) system** – This system initiates notification of a planned interruption to all customers and system enhancements would need to be made.
2. **eNAR System** - The eNAR (Electronic Network Access Request) is the formal request to Western Power's network operations area to access the Western Power network. It is the primary tool used for customer interruption management. It also summarises customers affected by the interruption; LSE identification information and covers market and operational impact information.

Currently the eNAR is submitted to Network Operations at least 20 business days prior to the planned interruption, and this would have to be increased. The change to this process would need to be documented and training provided to operational staff who initiate eNARs.

3. **Updating documentation** – Various documents such as the *Planned Outages Customer Notification and Compliance Procedure* and the *Depot Pack* used by operational staff would require amendment.
4. **Training** – Retraining would be required for eNAR requestors and other relevant employees and contractors of the amended timeframe requirements and changes to the relevant procedures and systems.

In addition to the information provided above, Western Power would like to present information obtained from a recent survey undertaken in September 2024 of LSE customers. The survey posed a number of questions, with particular focus on LSE customer preparedness for power interruptions and preferences with regard to the notice period for planned interruptions and the mode of notification.

The survey was sent to all 2,914 LSE customers registered on 6 September 2024 and at the close of the survey period on 24 September 2024, 1,104 responses had been received. The full survey result has already been provided to the ECCC, but a summary of the survey results are shown in the Table below.

The survey results are a strong indication that LSE customers are generally able to prepare for a planned interruption quite quickly, with the majority able to put their back up plan in place within one day of being notified by Western Power.

With regard to how much notice LSE customers require for a planned outage, out of 1,096 responses, 730 (67%) of the LSE customers surveyed only require one to two days' notice to prepare themselves.

Question	Response	Total Responses
Do you have a back-up plan for planned and unplanned interruptions?	717 - YES 387 - NO	1,104
For a planned interruption, has there been a time when your plan could not be put in place?	74 - YES 616 - NO	690
Approximately how long does it take to get your backup plan in place for a planned interruption?		690
<ul style="list-style-type: none"> <li>• 1 day</li> <li>• 2 days</li> <li>• 3 to 5 days</li> <li>• 6 to 7 days</li> <li>• Other (various)</li> </ul>	607 61 16 1 5	
How much notice do you require to prepare for a planned interruption?		1,096
<ul style="list-style-type: none"> <li>• 1 day</li> <li>• 2 days</li> <li>• 3 to 5 days</li> <li>• 6 to 7 days</li> <li>• Other (various)</li> </ul>	295 435 228 114 24	
How would you like to be notified of a planned interruption?		1,104
<ul style="list-style-type: none"> <li>• SMS</li> <li>• Email</li> <li>• Email &amp; SMS</li> <li>• Letter</li> <li>• Letter, Email &amp; SMS</li> <li>• Letter &amp; SMA</li> <li>• Letter &amp; Email</li> </ul>	532 233 172 89 33 31 14	

It is Western Power's view that the survey results do not support amending clause 84(1)(a) of the Code to increase the notification time of three business days for a planned interruption for LSE customers.

The most efficient way for planned interruption notices to be received by LSE customers is via electronic means being either SMS or email, or both. The survey shows that out of 1,104 responses, 937 (85%) preferred electronic notification, with only 89 (8%) preferring notification by letter alone.

Western Power has a number of protections in place to ensure that LSE customers being impacted by a planned interruption have been notified as required by the Code:

- Clause 84(1)(b) of the Code requires Western Power to use its best endeavours to obtain acknowledgment from the customer, someone else residing at the supply address, or other nominated person, that the notice has been received. LSE customers are contacted several days prior to the planned interruption by telephone to confirm receipt of the notification.

- Western Power also undertakes an additional action over and above the Code requirements, by contacting LSE customers on the morning of the planned interruption by either SMS, telephone or a physical door knock, as a final check that the LSE customer is aware that the planned interruption is about to commence.

## **5.2 Question 2 - Door knock prior to disconnection**

- a) Could the benefits of the 'Knock to stay connected' initiative being trialled in other jurisdictions be replicated in Western Australia?**
- b) What operational challenges and concerns do you have with this initiative?**

### *Western Power's response:*

Western Power does not support the introduction of the requirement to door knock prior to a customer disconnection. In the age of Advanced Meter Infrastructure (AMI), which allows for remote meter reading and management, the requirement to door knock prior to a disconnection would be a backward step for both retailers and distributors.

The AMI program was promoted on the back of savings being made in meter reading and not having to provide field staff for disconnections, as well as having current metering data available at all times. Approximately 70% of customer meters in the Western Power network are now AMI meters and are remotely read and operated. The program to replace the remaining manually read and operated accumulation meters with remotely read and operated meters, will be completed by the end of 2027.

Western Power currently door knocks customers with manually read and operated accumulation meters, which require field staff to perform the disconnection. The Western Power door knock is both a customer courtesy as well as a safety matter, so customers can finish what they are doing and turn appliances off, so when the power is reinstated there are no safety issues in the property.

The safety of employees or contractors undertaking the door knocks needs to be seriously considered, as some customers may be abusive or aggressive and some properties are unable to be accessed due to locked gates and dogs in the property.

Western Power currently charges retailers around \$80 per manual disconnection and door knock. If the door knock is extended to AMI customers, and based on the 11,488 residential customer disconnections in Western Australia for the non-payment of bills in 2022/23, there would be an increase in costs for retailers to around \$1M/annum, whether they perform the doorknock, or the distributor does.

## **5.3 Question 3 - Disconnection moratorium during a heatwave or extreme fire danger**

- a) Is there a need to amend the Code or can the benefits of a moratorium for disconnecting customers in a heatwave or extreme fire danger be better realised in other ways?**
- b) What are the operational challenges with including this proposal in the Code?**

### *Western Power's response:*

The ECCC Draft Review Report has highlighted the difficulty of introducing a process to not allow customer disconnections for non-bill payment during periods of extreme fire danger and heatwaves. The areas of the State impacted by each moratorium would need to be clearly identified, with clear boundaries set for the benefit of retailers. Heatwave conditions would not cover all of the State at any one time, and in the case of the Western Power network, weather conditions on any day could be quite different for Kalbarri and Albany.

The decision to disconnect a customer and the obligation to provide the customer with the disconnection warning rests with their retailer. Western Power receives the disconnection request

from the retailer and carries out the work. That is, we do not determine whether a customer needs to be disconnected and only ensure that the disconnection complies with the Code obligations – the allowed disconnection timeframes, that the customer has no existing complaint and is not an existing LSE customer. Were a moratorium declared, then the responsibility rests with the retailers to cancel any existing disconnection service orders, and not issue any further service orders until the moratorium is lifted.

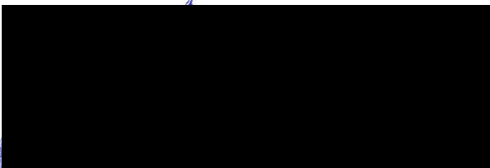
As currently allowed under clause 52(3) of the Code, a distributor may disconnect a customer's supply address if there is a health or safety reason warranting the disconnection, or there is an emergency warranting disconnection.

Additionally, the distributor will determine whether feeder disconnections (rather than meter disconnections) are required to maintain the integrity of the network in an emergency situation such as a bush fire or an emergency event.

These powers must be retained in any future amendment of the Code.

Should you have any queries regarding this letter, please do not hesitate to contact Sabina Roshan on (08) 9326 7141.

Yours sincerely

A large black rectangular box redacting the signature of Zahra Jabiri.

Zahra Jabiri

Head of Regulation and Investment Assurance