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Mr Alex Kroon  
Assistant Director (Licensing)  
Economic Regulation Authority  
Level 4, Albert Facey House  
469 Wellington Street  
PERTH WA 6000

Dear Alex

### **Electricity Licences Review 2015 - Discussion Paper**

Thank you for the opportunity to comment on the above. Synergy's comments are as follows:

#### **Proposals 1-3**

Supported.

#### **Proposal 4**

Generally supported provided a review is undertaken to ensure the definitions used within a licence is consistent with relevant legislation. For example, the definition of "customer" in clause 28.1 of ERL 1 is incorrect. This should be "small use customer".

#### **Proposals 5- 7, 9-13**

Supported.

#### **Other matters**

A licensee under clause 16.1:

"must provide the Authority with any information the Authority may require in connection with its functions under the Act."

Synergy is concerned the ERA's information gathering powers within a licence is broader than that permitted under the Act as clause 1 schedule 1 to the *Electricity Industry Act 2004* specifies:

“a licence may include provisions - requiring the licensee to provide to the Authority, in the manner and form determined by the Authority, specified information on any matter relevant to the operation or enforcement of the licensee, the operation of the licensing scheme provided for in Part 2, or the performance of the Authority's functions under that Part;”.

Consequently, this matter requires clarification given the Authority has functions beyond licensing under the *Electricity Industry Act 2004*.

Please contact me should you wish to discuss any aspect of this submission.

Yours sincerely

**SIMON THACKRAY**  
**MANAGER, REGULATION AND COMPLIANCE**

