



Horizon Power submission to the Economic Regulatory Authority

2016 review of the Water Services Code of Conduct

November 2016

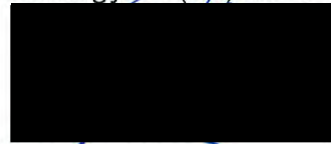
INTRODUCTION

While Horizon Power does not currently provide water services it welcomes the moves to, where possible, align the Water Services Code of Conduct to the existing equivalent codes for WA energy licensees.

A table of comments on a number of the issues raised in the Consultation Paper is attached. Where no comment is provided, Horizon Power has no feedback on that issue.

Should further information be required please contact
Strategy on

– Manager



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COMPANY SECRETARY
GENERAL MANAGER CORPORATE SERVICES

Issue	Comment
General	Horizon Power notes ERA's position on the consideration of tenants under the <i>Water Services Act</i> and is supportive of proposed amendments.
Issue 3	Not supported. Preference is for the code to apply to all customers and to apply the contracting out clause, rather than blanket rule application. For instance, an exemption for Rottnest (~60 customers) due to the demographics of the customer base, but not for Aboriginal communities of a similar size.
Issue 4	Not supported. Preference would be for Code to apply to all licensees. For example, location or number of connections should not be reasonable grounds to exclude some customers of a licensee from the provisions of the Code and may lead to disadvantage or poor service standards particularly in rural and remote areas.
Issue 6	Provisional support. To remove the contracting out clause, further flexibility is required within the Code for customers and service providers, in particular, Aboriginal customers in remote and regional WA, as per the State Government's remote service level guidelines.
Issue 7	Support.
Issue 8	Support. 3 monthly frequency is the preferred option.
Issue 9	Support.
Issue 10	Support, with the option to offer the information via app-based smart phone billing technologies.
Issue 11	Support.
Issue 12	Support. Note that interest charges would not accrue under a prepayment services mode.
Issue 13	Support.
Issue 14	Support.
Issue 15	Support. Note that this is not required or applicable in prepayment metering mode.
Issue 16	Provisional support. Agree that simplicity is required and note that the Code should ensure compatibility with app based billing mechanisms.
Issue 19	Support.
Issue 20	Support.

Issue	Comment
Issue 21	Not supported. If direct debit is offered by a licensee, propose that the Code is amended to require consent for the commencement date and the frequency of the direct debit rather than prior to each payment. It is not typical to require consent prior to each payment.
Issue 24	Support. Including the ability to offer remote communities prepayment service delivery options to manage consumption and reduce chronic debt accrual issues.
Issue 26	Support.
Issue 30	Support. Propose that new mechanisms for dealing with hardship are considered, such as prepayment metering; similar to energy services.
Issue 31	Support. As above.
Issue 34	Preference to achieve user pays in remote communities through prepayment mechanisms, in line with the State Government's <i>Regional Services Reform Roadmap</i> ¹ .
Issue 35	Preference to potentially offer trickle flow as a baseline, with tag-on/tag-off pre-payment arrangements at individual premises.
Issue 37	Not supported. Note 35 above.
Issue 41	Note 34 & 35 above.
Issue 48	Support.
Issue 49	Note 35 above.
Issue 51	Support. Provided that for remote areas, services are regulated under the remote service level guidelines ² .
Issue 52	Note 51 above.
Issue 53	Support.
Issue 55	Support, provided that for remote regions services are regulated (and standards are set) based on the State Government's <i>remote service level guidelines</i> .

¹ Regional Services Reform Unit, 2016. *Resilient Families, Strong Communities: a roadmap for regional and remote communities*. Department of Regional Development, State Government of Western Australia.

² Department of Housing, 2013. *Remote service level guidelines for essential services in remote settlements in Western Australia*. State Government of Western Australia.