



17 October 2017

Paul Kelly  
ECCC Chairman  
Economic Regulation Authority  
PO Box 8469  
Perth BC WA 6849

via email: [publicsubmission@erawa.com.au](mailto:publicsubmission@erawa.com.au)

Dear Paul

### **2017 Review of the Electricity Code of Conduct**

Alinta Sales Pty Ltd (**Alinta Energy**) is pleased to provide comment on the Draft Review Report (**Report**) which presents the preliminary findings of the statutory review of the *Code of Conduct for the Supply of Electricity to Small Use Customers* (**Code**) carried out by the Electricity Code Consultative Committee.

Alinta Energy agrees with the recommendations in the Report and will restrict its response to the question below.

#### Question 1

*The ECCC is interested in stakeholders' views on whether clauses 6.10(6) and 6.10(8) should be amended to require that a retailer consult with relevant consumer representatives when it is directed by the ERA under clause 6.10(6) to review its financial hardship policy and procedures, or when it materially amends the policy on its own initiative under clause 6.10(8).*

*Alternatively, the ECCC is interested in stakeholders' views on whether it may be more suitable for this requirement to be included in the ERA's Hardship Guidelines instead of the Code.*

Alinta Energy agrees there should be a requirement for a retailer to consult with relevant consumer representatives when directed by the ERA to review its financial hardship policy and procedures, or when the retailer makes a material amendment to its hardship policy of its own accord.

Alinta Energy suggests the above requirement could be included in the Code under clause 6.10, with any detailed obligations specified in the ERA's *Financial Hardship Policy Guidelines*, which serve as a "one stop shop" for retailers concerning hardship policies and procedures.

If you have any questions concerning this submission please contact me on 9486 3191 or [catherine.rousch@alintaenergy.com.au](mailto:catherine.rousch@alintaenergy.com.au).

Yours sincerely

**Catherine Rousch**  
Manager Regulatory Compliance  
Alinta Energy