

Your Ref: 2017 review
Our Ref: 14101688
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24 October 2017

Mr Paul Kelly
Chairman ECCC
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Dear Mr Kelly

CODE OF CONDUCT FOR THE SUPPLY OF ELECTRICITY TO SMALL USE CUSTOMERS (CODE) – 2017 REVIEW

Reference is made to the consultation notice published on 27 September 2017 calling for submissions on the draft review report dated 26 September 2017 (**report**) to the Electricity Code Consultative Committee (**committee**) for consideration.

Synergy is a state owned utility and electricity retailer to nearly one million small use customers and as such is grateful for the opportunity to comment on the committee's draft recommendations to amend the Code, a critical regulatory instrument affecting its customers.

In summary Synergy supports the recommendations contained in the report, subject to additional comments on recommendation 1 and answers the question raised by the committee.

Recommendation 1

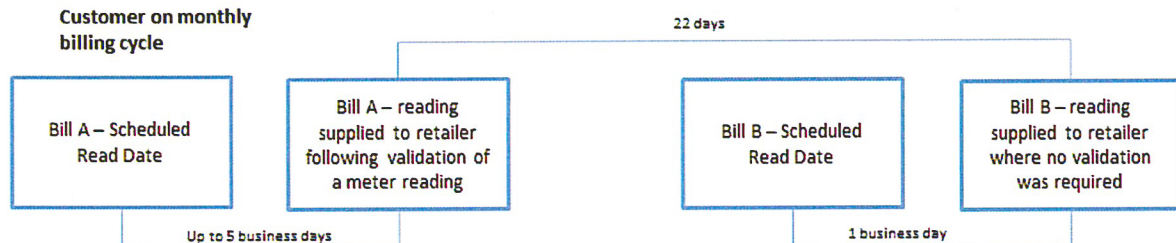
Amend the minimum billing cycle under clause 4.1(a) from "no more than once a month" to "no more than once every 26 days".

Synergy supports the recommendation however also proposes a new sub clause 4.1(a)(iv) and (v) be inserted to align with 4.1(b)(ii) as per the following:

"(iv) has received the requiring metering data from the distributor for the purposes of preparing the bill earlier than the scheduled read date; or

(v) a bill has been issued less than 26 days from the last bill due to the distributor needing to validate the meter reading applicable to the last bill."

The distributor has five business days under the Metering Code to validate a meter reading where required and then issue that reading to a retailer. Consequently if a meter reading requires validation in relation to bill A this can result in bill B being issued for a period of less than 26 days especially if bill B does not require a meter reading validation. In that event the distributor would be compliant with its Metering Code obligations but the retailer would be non-compliant with the billing requirements under the Code of Conduct.



Recommendations 2 – 21

Synergy supports the proposed amendments.

The committee also called for comments on the question of consultation with relevant consumer representatives.

Question 1

The ECCC is interested in stakeholders views on whether clauses 6.10(6) and 6.10(8) should be amended to require 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.

Synergy considers consumer representative consultation to be a valuable input and it is our standard practice to engage with consumer stakeholders prior to any material amendment to our financial hardship policy. Synergy is therefore pleased to support the consultation requirement and we advocate its inclusion within the ERA's Hardship Guidelines.

Yours sincerely

SUZANNE LLOYD
REGULATION AND COMPLIANCE ANALYST