

Our ref: EDM#44922337
Contact: Rudi James

26 March 2018

Mr Paul Kelly
Chairman ECCC
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Dear Paul

Proposed amendments to the *Code of Conduct for the Supply of Electricity to Small Use Customers*

I refer to the 1 March 2018 Electricity Code Consultative Committee (ECCC) invitation for public submissions on the amendments proposed by the Economic Regulation Authority (ERA) in the Final Review Report for the *Code of Conduct for the Supply of Electricity to Small Use Customers 2016 (Code)*.

Western Power wishes to provide comments on the amendments proposed by Recommendations 11 and 12 of the Final Review Report, to clauses 7.6(3) and 7.7(4) (b) of the Code, respectively. Western Power has no comment on the remaining recommendations in the Final Review Report.

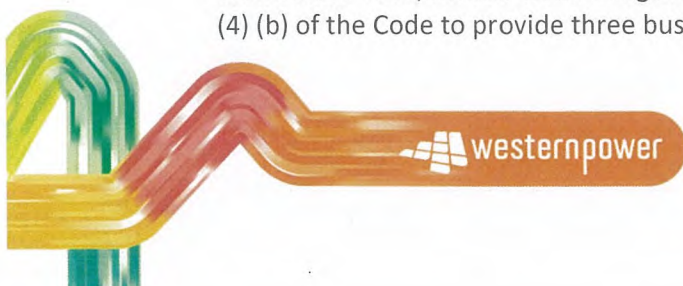
Recommendation 11 of the Final Review Report- disconnection or interruption

Western Power notes that the ERA proposes to amend clause 7.6(3) of the Code by including the ability for a customer to request an interruption of supply of electricity to their supply address.

Western Power notes the following definitions of an interruption:

- The Code defines an *interruption* as the temporary unavailability of supply from the distribution network to a customer.
- The *Electricity Industry (Network Quality and Reliability of Supply) Code 2005 (NQRS)* defines *interruption* as a loss of electricity supply for more than one minute that is due to a cause beyond the control of the person to whom the electricity is supplied.

Western Power believes that enabling a customer to request an interruption creates confusion as to how the request is to be addressed. That is, should a distributor manage the customer's request in accordance with the planned interruption process notwithstanding that, the interruption may or may not be for the purposes of maintaining or augmenting the network, and may impact other customers? If so, further Code obligations are triggered, such as the requirement under clause 7.7 (4) (b) of the Code to provide three business days' notice of the interruption to any impacted life



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support equipment (**LSE**) customers, or clause 11 of the NQRS, which requires 72 hours' notice to be provided to all other impacted customers.

Western Power seeks clarity of the circumstances under which the customer would make a request for an interruption of supply of electricity. If the customer's intent is to seek a temporary or permanent disconnection of their supply of electricity, then this can be achieved by the customer requesting a disconnection under clause 7.6 (3) of the Code.

Consequently, Western Power proposes that clause 7.6(3) of the Code be amended as follows:

A *retailer* or a *distributor* may arrange for *disconnection* or *interruption* of a *customer's supply address* if ~~the *disconnection or interruption*~~ –

- (a) the *disconnection* was requested by the *customer*; or
- (b) the *disconnection or interruption* was carried out for *emergency reasons*

Recommendation 12 of the Final Review Report – notice of interruption

Western Power wishes to raise the following issue for further consideration by the ECCC and the ERA.

As at 20 February 2018, Western Power had 2,881 registered LSE customers, of which 564 listed a different postal address to their supply address. To ensure compliance with the Code, Western Power currently provides written notice of a planned interruption to a customer's supply address. However, Western Power is aware that a number of customers (such as in rural areas) do not collect their mail from the letterbox at the supply address. Instead, that mail is delivered to a post office box or a remote mail box. To ensure these customers receive their planned interruption notices in a timely manner, Western Power also provides a notice to their nominated postal address.

The current practice results in a duplication of effort and is expensive. Also, Western Power is aware that some LSE customers do not want to receive two notices for the one event, especially when multiple interruptions are undertaken over a number of days to complete a major network upgrade. This has been found to be an annoyance for a number of LSE customers.

The proposed amendments to clause 7.7 (4) (b) included in the Final Review Report do not remove the requirement for Western Power to provide a written notice to both the supply address and any other nominated address.

Western Power notes that clause 4.4 of the Code permits a retailer to issue a bill to a customer at the address nominated by the customer. Western Power believes it would be beneficial to align the two clauses of the Code and permit the provision of a written notice of a planned interruption to the address nominated by the customer, either by mail or electronically.

The Code amendment proposed by Western Power will eliminate inefficiency, while still providing the customer with the choice to determine how notices of planned interruptions are to be received.

Western Power notes the potential issue highlighted by MIDLAS, which is included in section 5.2 of the Final Review Report. The issue relates to notice of a planned interruption, which may not be received by a LSE customer where their notices are delivered to a nominated address, such as a carer's address.

In response to the issue identified by MIDLAS, Western Power wishes to highlight that clause 7.7(4) (b) of the Code requires a distributor to use best endeavours to obtain a confirmation from the customer or someone residing at the supply address, that the notice has been received. This process further mitigates the risk of the LSE customer not being aware of the planned interruption.

Amendment proposed by Western Power:

Western Power's proposed wording for clause 7.7 (4) (b) of the Code is:

"prior to any planned *interruption*, provide at least 3 *business days* written notice to the *customer's supply address* or ~~to~~ any other address nominated by the *customer*, or notice by *electronic means* to the *customer* and, unless expressly requested in writing by the *customer* not to, use best endeavours to obtain verbal acknowledgement, written acknowledgement or acknowledgement by *electronic means* from the *customer* or someone residing at the *supply address* that the notice has been received."

Should you have any further queries, please do not hesitate to contact Rudi James, Regulatory Compliance Manager on 9326 6413.

Yours sincerely

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Head of Regulation and Investment Management

