

20 September 2023

Alex Kroon
Assist Director Utility Services Regulation
Economic Regulation Authority
Level 4, Albert Facey House
469 Wellington Street
Perth WA 6000

Via: <https://www.erawa.com.au/current-consultations>

Dear Mr Kroon

Re: Draft Decision – Proposed amendments to the Compendium of Gas Customer Licence Obligations

Thank you for the opportunity to comment on the Economic Regulation Authority (Authority) proposed amendments to the Compendium of Gas Customer Licence Obligations (Compendium), as published on 23 August 2023. This letter outlines a submission from ATCO in response to the proposed amendments.

ATCO is supportive of the proposed amendments to the Compendium as outlined in the Draft Decision to achieve consistency across the regulatory framework for electricity and gas. However, ATCO submits that proposed changes in the following areas requires additional consideration or clarification.

Please note this submission will be referring to specific Compendium clauses that have proposed changes.

Part 7, Division 2, Section 45 – General Limits on Disconnection

ATCO seeks clarification on the removal of the phrase “the *interruption* was a planned *interruption*,” from clause **45(3)(c)**, and specifically the potential impact this would have on the exemption ATCO planned maintenance programmes have under the *General Limits on Disconnection* outlined in Section **45(1)** and **45(2)**.

The use of *Interruption* is now limited to **Division 4, Section 57 Disconnection or Interruption for Emergencies**, which outlines Distributor obligations to provide information, by way of a 24-hour emergency line; and the obligation for the Distributor to restore supply to the customer’s supply address as soon as possible. This clause makes no reference to planned interruptions, nor does the definition of *interruption* contained in **Part 1, Section (3)**.

ATCO would clarify that removal of this exemption, in as far as ATCO Planned Maintenance Programmes are concerned, has the potential to adversely impact network performance and customer experience.

Part 9, Division 3, Section 56 – Special Information Needs

ATCO seeks clarification on the changes to **Part 9, Division 23, Section 56(2)**, where the requirement for the TTY symbol on *relevant documents* has been replaced with the phrase in subclause **(2(b))** that reads “the telephone number (or numbers) for services that can assist *customers* with a speech of hearing impediment”. Can the regulator please clarify the intent of this change, regarding specifying a telephone-based service, or does this change support the adoption of website-based messaging systems, which would align with the draft decisions approach to *Consolidating information provision requirements* (**Section 2.1.6.1**).

Part 4, Division 3, Section 14 – Basis of bill

ATCO have produced a separate submission directly addressing this issue (Draft decision issue 4).

Part 10, Section 58 - Obligation to establish complaints handling process.

ATCO seeks clarification on the changes to **Part 10, Section 58(3)**, that require ATCO to establish processes compliant to ISO 10002:2022. Can the regulator please confirm that the staged commencement for the new Compendium, including the commencement of Parts 1-10 on 1 January 2024, would include the adoption of the 2022 revision ISO 10002.

This change, one which ATCO welcomes, would impact (including but not limited to) staff training needs, how we handle anonymous complaints, complaints at first point of contact, and how we interact with social media from a complaints perspective. It also has areas that do not align with our overarching licence requirements (such as a suggested 3 working-day complaint acknowledgement timeframe). ATCO would like clarification on the adoption timeframe to inform our ongoing review and amendment of systems and processes to ensure compliance.

Part 11, Section 63 – Protection from Disconnection

As per the above entry regarding clarification on **Part 7, Division 2, Section 45 – General Limits on Disconnection**

ATCO would seek clarification on the absence of any subclause under clause **63(1)**, that would provide an exemption, considering the proposed 9-month disconnection protection, for any works pertaining to ATCO Planned Maintenance Programs.

ATCO would again clarify that removal of this exemption, in as far as ATCO Planned Maintenance Programmes are concerned, has the potential to adversely impact network performance and customer experience.

If you have any questions or would like to discuss any of these issues further, please contact.

Yours sincerely

Michael Beer
Risk & Compliance Advisor