

Your Ref: 1278/05

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31 October 2005

Mr Alistair Butcher
Acting Director, Electricity Access
Economic Regulation Authority
Level 6, Governor Stirling Tower
197 St Georges Terrace
PERTH WA 6000

Dear Alistair,

COMMENTS ON THE REVISED PROPOSED CUSTOMER TRANSFER CODE COMMUNICATION RULES

Thank you for the opportunity to comment on the amended proposed Customer Transfer Code communication rules and accompanying report.

Retail has reviewed the amended draft and has some minor comments on its contents, which are documented in Attachment A.

Of more importance is whether the specific issues that were raised by Retail in its previous comments on the Communication Rules (25 July 2005) have been adequately addressed by the amended Communication Rules and the process used to develop those rules. These concerns included:

- A lack of detail provided in relation to the messaging infrastructure and protocols;
- The incomplete development of the customer transfer transactions; and
- A lack of detail provided in relation to the functionality of the Web Portal.
- That retailer's are consulted in a comprehensive manner to help develop the rules and not simply be required to review proposed rules.

Since making the submission, Retail has seen some progress in the areas mentioned above, but has found that the consultative process did not always allow Retail to make or provide comprehensive suggestions or recommendations.

Retail is prepared to approve the proposed communications rules and the 'Build Pack' format providing Retail is given sufficient assurances, from both the ERA and Networks, that sufficient and ongoing consultation will be undertaken during the development of the Build Pack. In addition, if after the fifteen-business day period has elapsed (specified in the revised Communication Rules) and the Build Pack is not completed to the satisfaction of retailers and/or consistent with the Customer Transfer Code, then Networks should be granted an extension to complete the Build Pack.

Should you have any queries in regard to this letter or the attachment, please do not hesitate to contact me (08) 9326 4521.

Yours sincerely

**GRANT DRAPER
MANAGER, BUSINESS STRATEGY & REGULATION
WESTERN POWER RETAIL**

ATTACHMENT A
MEMORANDUM OF COMMENTS BY WESTERN POWER RETAIL BUSINESS UNIT ON THE
REVISED DRAFT CUSTOMER TRANSFER CODE COMMUNICATION RULES

Section 4.1 – The list of Build Pack component documents has been reviewed and modified by the working party since the submission of the draft rules. The list shown here is no longer correct.

Section 4.2 – The approval process for the initial version of the Build Pack is not clearly documented and does not explain what would happen if the network operator failed to produce an acceptable Build Pack within the fifteen business day limit.

Section 5.4 (e) – The details of any change would need to be provided well before the date of implementation.

Annexes 1- 4 – The sequence diagrams contain some minor errors and omissions (eg retailers cannot currently view the status of a historical consumption data request in the Web Portal, Customer Transfer Notifications are expected to be aseXML rather than manually sent emails, some business receipts and business acceptance/rejections are missing, transfer withdrawals and erroneous transfer corrections are not covered). More importantly, their inclusion in this document may ‘lock down’ these processes before they have been fully reviewed, which may cause difficulties if they later need to be modified. As this information is expected to be fully covered in the Build Pack, it is suggested that the annexes be removed from this document.