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	ADMIN <input type="checkbox"/> LMCP <input type="checkbox"/> REF/RES <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
ACTION: ALISTAIR	



Alinta

Alinta Sales Pty Ltd
ABN 92 089 531 984

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Perth WA 6846

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14 October 2005

Mr Alistair Butcher
Acting Manager – Electricity Access
Economic Regulatory Authority
Level 6, Governor Stirling Tower
197 St Georges Terrace
Perth WA 6000

Dear Mr Butcher

RE: Revised Proposed Communication Rules – Invitation for Submissions

I refer to your correspondence of 10 October 2005 in regard to the amended proposed communication rules made pursuant to Part 5 of the *Electricity Industry Customer Transfer Code 2004* (Customer Transfer Code).

Alinta Sales Pty Ltd has reviewed the amended Proposed WA Customer Transfer Code Communication Rules and the revised Introduction and Consultative Process Report, dated 30 September 2005 as prepared by Western Power Networks.

Our review of these documents has resulted in some minor matters for clarification and a spreadsheet is attached outlining our comments. Alinta requests that these comments be reviewed and if agreed, be incorporated within the Customer Transfer Code Communication Rules.

The proposed Customer Transfer Communication Rules as provided, do now in the opinion of Alinta Sales Pty Ltd, outline in sufficient detail the format or protocols required to enable retailers to design appropriate systems or processes to operate in the market.

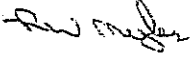
Alinta Sales Pty Ltd is satisfied that the due processes as outlined under Part 3 – Amendment of Rules and Part 6 – Change Control Management For Documents Under the Control of These Rules, provides sufficient consultative processes to ensure effective and efficient market transactions.

As a result of reviewing these documents I can confirm that based on the information made available within these documents, Alinta Sales Pty Ltd is now in a position to accept and sign off on the Customer Transfer Code 2004 Communication Rules.

In order to assist with timely assessment of the communication rules and implementation, Alinta is prepared to work closely with all parties involved and staff can be made available to meet to discuss all relevant issues in relation to these rules and the development of the "Build Pack".

For any enquiries or additional information regarding this matter, please contact Ray Myles on telephone 08 – 94863328 or email: ray.myles@alinta.net.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ray Myles', written in a cursive style.

R W Myles
FRC Co-ordinator
Alinta Sales

Alinta Sales - Comments
Proposed WA Customer Transfer Code
Communication Rules

No	Reference	Issue Description	Alinta Comment
1	2.1(a)	Current wording is: enable means of communication that are feasible and practicable to the network operator and all registered retailers; and	Alinta believes that under the objectives the matter of "cost effective" needs to be included as we must ensure that methods and protocols are cost effective. Alinta recommends that this part should be amended to: enable means of communication that are cost effective, feasible and practicable to the network operator and all registered retailers; and
2	3.1	This section refers to methods and protocols of communication.	Alinta considers that reference to "electronic" should be included as this is the only forum for customer transfers. Suggested wording be amended to reference electronic communication.
3	3.2	Protocols - There is reference to the protocols to be used however reference as to where these formats are defined is required.	Suggest that an additional statement be added outlining that formats for these protocols are defined in the "Build Pack"
4	4.1	Required documentation	Are there any additional requirements required in relation to CSV templates. If so, they should be added here.

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5	4.4	<p>Time frame to publish. This section refers to the requirement as to publishing the "Build Pack" within 15 business days following the approval of these rules. Is this feasible and will the Build Pack be agreed within this timeframe. We also need to cover off the timeframe when the "Build Pack" is amended.</p>	<p>The Build Pack is to be developed in consultation with all participants. Alinta seeks clarification re a Build Pack being published within 15 business days of these rules being approved as the development and consultation process will still be occurring during this time. An additional statement required as to: The network operator will publish approved amendments to the "Build Pack" within 15 business days following the approval of any amendment.</p>
6	5.4	Implementation	<p>There needs to be a statement re "backing out" an agreed change in the event that should a new change be implemented and despite testing is found to be unacceptable and not fit for purpose, then a process to back out is required and a process via agreement is required to be noted within this code.</p>