

5 November 2014

Mr Alex Kroon
Regulation Branch, Public Utilities Office
Department of Finance
Locked Bag 11
Cloisters Square
WA 6850

Sent via email: alexander.kroon@finance.wa.gov.au

Electricity Industry Customer Transfer Code Review – Recommendations Paper

Dear Alex,

Thank you for the opportunity to provide a response to the Electricity Industry Customer Transfer Code Issues Recommendations Paper. Perth Energy is generally supportive of the recommendations made by the PUO, they should help the electricity industry as whole operate in a more efficient manner.

Clause 4.15

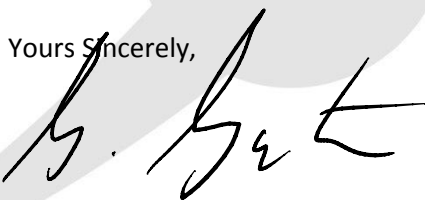
With respect to the request for comment on Clause 4.15 regarding time limits to rectify erroneous transfers, Perth Energy would support a 3 month time limit. The 3 months would provide the incoming retailer more than ample time to discover through billing and other contractual means that an erroneous transfer has taken place.

Recommendation 31 – Objections to customer transfer relating to debt

Perth Energy acknowledges the reasons given by the PUO regarding not recommending a provision for retailers to object to a transfer on the ground of outstanding debt and agrees that customer contracts have provisions with dealing with debt – that include disconnection. In general, retailers will only disconnect as a last resort, after trying to negotiate payment plans, deposits etc, and only where the customer is clearly in breach of their obligations under the contract. After a disconnection occurs, a customer can contact another retailer and request a transfer and reconnection. This leads to higher costs as the retailer must now resort to legal means to recover any losses. Perth Energy would like to suggest that objections to customer transfers relating to debt be allowed for large use customers only and that small use customers continue to be covered under the Small Use Customer Code.

Please do not hesitate to contact me if there are any questions.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "G. Gaston".

Geoff Gaston
General Manager Commercial