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DEPARTMENT OF FINANCE
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Ms Chloe Upton
Principal Policy Officer - Regulation
Public Utilities Office
Locked Bag 11
Cloisters Square WA 6850

FILE REF:.....

HORIZON
POWER
energy for life

Dear Ms Upton

2012 METERING CODE - DRAFT RECOMMENDATIONS REPORT

After reviewing the Draft Recommendations Report, Horizon Power fully supports implementation of the changes contained in the two recommendations.

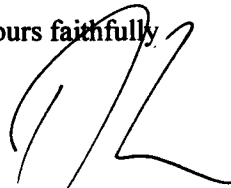
To comply with sub-clauses 5.19(2)(c)(iii) and (iv) of the Metering Code 2012 would require Horizon Power to upgrade its metering (distribution) and billing (retail) information systems. This cost has not been estimated, but would be significant as can be seen through the cost estimates provided by Synergy and Western Power. Given the small number of people with life support equipment in the non SWIS area, it is not cost effective for Horizon Power to make this change. Manual solutions would have to be put in place impacting on the efforts to reduce the subsidy required to fund Horizon Power.

Additionally, Horizon Power has no relationship with people supplied through an on-selling arrangement. There would be an ongoing cost in establishing and maintaining an up to date register of the ones with life support equipment. Given the dependence such a process would have on the cooperation and input from on-sellers the register would be inherently unreliable, possibly creating an emergency situation following a planned power outage.

Implementation of the two recommendations is therefore essential to provide the safest and most cost effective solution for those people with life support equipment, supplied with electricity through an on-selling arrangement.

Please contact Terry Corfield on telephone number 6310 1816 if you wish to discuss any of the above comments or require additional information.

Yours faithfully



DAVID TOVEY
COMPANY SECRETARY
GENERAL MANAGER CORPORATE SERVICES

CS#:3082603

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