

Our ref: DM# 12955258

22 May 2015

Ms Chloe Upton
Principal Policy Officer – Regulation
Markets & Regulation Division
Public Utilities Office, Department of Finance
Locked Bag 11
Cloisters Square WA 6850

Review of the *Electricity Industry (Metering) Code 2012* Life Support Equipment Provisions

Dear Ms Upton

I refer to the 'Review of the *Electricity Industry (Metering) Code 2012* Life Support Equipment Provisions, Draft Recommendations Report' dated May 2015 inviting interested parties to make submissions on the recommendations outlined in the report.

Western Power recognises and appreciates the consultation process undertaken by the Public Utilities Office to review clause 5.19(2)(c) of the *Electricity Industry (Metering) Code 2012 (Metering Code 2012)* to date.

The recommendations outlined in the report are:

- **Recommendation 1**

It is recommended that:

"Sub-clauses 5.19(2)(c)(iii) and (iv) of the Metering Code 2012 are amended to remove the requirement for retailers to collect and maintain details of the street address and phone number of persons residing at a site who require life support equipment. In effect, the amended clauses will replicate the former provisions in the Metering Code 2005."

Western Power supports the proposed change.

- **Recommendation 2**

It is recommended that:

"The Exemption Order and Caravan Park Order are amended to include conditions requiring residential on-sellers and caravan park operators, to the extent reasonably practicable, to collect and maintain details of residents who

have a person residing at the customer's premises that requires life support equipment.

Confirmation must be provided in the manner prescribed in clause 5.19(2A) of the Metering Code 2012.

If confirmation is provided in the manner prescribed in clause 5.19(2A), the on-seller/caravan park operator must:

- maintain a record of all residents on life support equipment residing on the premises; and
- pass on planned outage notifications received from the network operator to the resident."

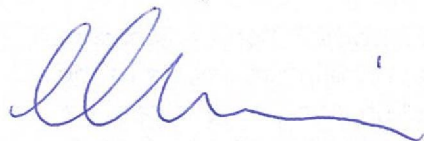
Western Power supports the proposed change.

Further, Western Power considers it important that the amendment to the relevant exemption orders also includes a requirement for on-sellers and caravan park operators:

- to notify their retailer that a person residing at the supply address requires/no longer requires, life support equipment. This will ensure that the supply address is registered by the retailer and the distributor as a life support equipment address and an appropriate planned outage notification is provided (notification required under the *Code of Conduct for the Supply of Electricity to Small Use Customers 2014* rather than the notification pursuant to the *Electricity Industry (Network Quality and Reliability of Supply) Code 2005*); and
- after receiving the planned outage notification from the distributor, notify the life support equipment customer of the timing of the planned outage.

Should you have any further queries, please don't hesitate to contact Margaret Pyrchla, Regulatory Compliance Manager on 9326 4535.

Yours sincerely



Mathew Cronin
Head of Regulation and Investment Management