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Dear Mr Kroon

**Further Consultation Report: Review of the *Electricity Industry (Metering Code) 2012 Life Support Provisions***

Thank you for the opportunity to comment on the Further Consultation Report for the Review of the *Electricity Industry (Metering) Code 2012 Life Support Equipment Provisions (Report)*.

Western Power supports the Public Utilities Office's recommendation in the Report to introduce conditions into on-selling licence exemptions to require on-sellers and caravan park operators to:

1. register their supply address as a life support equipment address with the electricity retailer by providing the retailer with the resident's medical certification;
2. notify their retailer if a resident with life support equipment vacates the on-seller's premises, or no longer requires life support equipment;
3. comply with the retailer's annual certification requests;
4. pass on planned outage notifications from the network service provider to the resident with life support equipment within no more than 48 hours;
5. not disconnect a resident relying on life support equipment for a failure to pay a bill; and
6. obtain consent from the resident to pass on their life support information to the retailer.

Western Power agrees that this is the most cost-effective solution to ensure that life support equipment residents in on-selling arrangements are afforded a suitable level of customer protection.

As the on-seller has the direct relationship with the resident, they are in the best position to provide this protection to residents by passing on notice of planned interruptions (which have been provided by the network service provider), protecting against disconnection, interfacing with the retailer to notify if the supply address requires/no longer requires registration and providing information for re-certification.

Further, the proposed condition which requires on-sellers to notify their retailer if a resident no longer requires life support equipment will provide further certainty for retailers and Western Power that the life support equipment register remains accurate and up-to-date. As the *Code of Conduct for the Supply of Electricity to Small Use Customers 2016* contains extensive notification requirements, there can be cost and time implications for Western Power when undertaking planned interruptions if a supply address remains on the register when a resident no longer requires life support equipment. Accordingly, this condition may have cost savings for Western Power in addition to those referred to in the Report.

If you have any queries, or require any further information, please do not hesitate to contact.

Yours sincerely

**Margaret Pyrchla**  
**Regulatory Compliance Manager**