

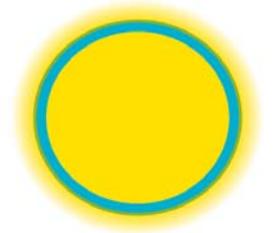
18 February 2009

PoPowerco Tasrco
Tasmania Pty Ltd

Office of the Tasmanian Economic Regulator
GPO Box 770
Hobart TAS 7001

Via Email: office@economicregulator.tas.gov.au

POWERCO



PROPOSED AMENDMENTS TO:

**GAS CUSTOMER TRANSFER AND RECONCILIATION CODE
GAS DISTRIBUTION CODE
GAS RETAIL CODE**

Thank for the opportunity to comment on the proposed amendments to the three gas codes. Powerco Tas notes that the proposed amendments are aimed to better achieve the objectives of the Gas Act.

Our comments regarding these proposed amendments are as follows:

LAUNCESTON OFFICE

Level 3
87 George Street
PO Box 858
Launceston
Tasmania 7250
T + 61 3 6336 9350
F + 61 3 6336 9355

GAS CUSTOMER TRANSFER AND RECONCILIATION CODE

Amendment 1

Powerco Tas agree with the definitional change to “customer transfer(s)” and the use of the MIRN as the unique identifier when transferring between retailers.

Amendment 2

Powerco Tas agree with the intention of the amendment to have special reads dealt with within a reasonable period of time and this reflects current practice. Powerco Tas suggests the wording “within 48 hours of the request.” be changed to “within two business days of the request.”

This ensures consistency within in the code as business days is defined and used within the codes and deals with problematic situations where it is unreasonable to expect a special read of a meter within 48 hours from the request being made. For example, a special request made at 3pm on a Friday afternoon.

Amendment 3

Powerco Tas support this amendment as it appears to be sound commercial reason for objecting to a customer transfer between retailers.

Amendment 4

Powerco Tas agree that the use and the definition of correction factor is more appropriate terminology within the code. It is noted that as 3.6.3(a)(x) will be contained within the definition of 3.6.3(a)(iii) then the clause (x) should be deleted.

Amendment 5

- a. This proposed amendment appears to correct an original drafting error and agree that this proposed change which now correctly portrays the roles of the respective parties.
- b. It is agreed that this information would be very beneficial for the metering provider. Powerco Tas suggest that a time frame be considered for notification to the metering provider such as 1 business day rather than as soon as practicable.

Amendment 6

Powerco Tas agree with this proposed amendment which reflects that the metering provider record metering pressure information at the delivery point in the installation database.

Amendment 7

Powerco Tas agree with the intention of this amendment. Guidance regarding access to NATA listings would be useful however it is presumed that this can be adequately managed outside of the Gas Codes.

Amendment 8

- a. Agreed.
- b. This proposed amendment is ambiguous about how Rotary Meters are to be sampled. If Powerco Tas employ the batch methodology sampling plan, Powerco Tas are likely to be sampling almost all rotary meters annually. This would be expensive, inefficient and inconvenient to most consumers. Powerco Tas suggest that this amendment is revised to specify an appropriate sampling methodology that draws a reliable sample size from all installed rotary meters or implements a manageable rolling testing system for rotary meters. Powerco Tas would like to discuss this matter with you further.
- c. Agreed.

Amendment 9

Powerco Tas agree with the amendment as proposed.

Amendment 10

Powerco Tas agree with the amendment as proposed.

Amendment 11

This appears now to clarify the definition of on-site rather than in-situ. Powerco Tas are supportive of this amendment.

GAS DISTRIBUTION CODE

Amendment 12

This amendment deals primarily with connections.

- a. Powerco Tas suggests the title to clause 3 read "Connection, Disconnection and Reconnection" and the following clauses are structured in this logical sequence.
- b. Clause 3.1A(b)(i) & (ii) has default timelines, Powerco Tas believe these are based on a mature network (SA & VIC) which is not reflective of Tasmanian situation. Certainly Powerco Tas believe that it is worth working towards these benchmarks as the network matures but not while it is in a growth phase. It is our belief that one business day for previously supplied connections and 20 business days for a new supply is unrealistic at this time and certainly will be counterproductive in achieving the objectives of the Gas Act at this stage. It is suggested that the default timelines relating to both sections be deleted.
- c. Agreed.
- d. Powerco Tas agree with the intention of this amendment. However a cost is associated with the preparation of these requests depending on complexity. Powerco Tas suggests the last sentence should read "the information should be provided on fair and reasonable terms and conditions."

GAS RETAIL CODE

Amendment 13

It is our understanding that the Distributors 24/7 Emergency number (1802111) is presently included on gas accounts. This now formalises this arrangement and was the original intention of this clause.

Amendment 14

- a. Powerco Tas agree with the amendment as proposed.
- b. Powerco Tas agree with the amendment as proposed.
- c. Powerco Tas agree with the amendment as proposed.

Amendment 15

- a. Powerco Tas suggest that the lodgement date for Annual Returns be 31 October. This date better aligns with the preparation and auditing of the annual report at the conclusion of each financial year.
- b. Powerco Tas suggest that the lodgement date for Annual Returns be 31 October. This date better aligns with the preparation and auditing of the annual report at the conclusion of each financial year.

Amendment 16

Powerco Tas agree with the amendment as proposed.

If you require further information or clarification on any point, please contact me.

Yours faithfully,

**RICHARD SHEATHER
GENERAL MANAGER**