

Gas Distribution System Code of Practice Review

Submissions received through Engage Victoria

Date submitted: 21/12/2023

Submission written by: EnergyAustralia

On 15 November 2023 Stakeholders were invited to provide feedback on the Gas Distribution Code of Practice draft decision, via a survey through [Engage Victoria](#). On this website, the public was given the opportunity to send us responses to a set of questions we provided. Our consultation process closes on Thursday 21 December 2023.

Q Do you agree with the proposed introduction of upfront charges for new gas connections?

yes

Q Are there any implementation costs, advantages or disadvantages to the options considered that we should take into account?

Retailers will have implementation costs, as is the case for most changes to existing process; however, we believe where there is reasonable justification and where it is in the best interest of all consumers (as this is) that it is acceptable.

Q Should the proposed code be more specific about how distributors calculate the costs of a new connection, as an upfront charge to customers?

Yes

Q How?

Distribution networks can provide a charge based on a standard service or as a negotiated service, as new connections to the gas distribution network will have different costs associated (length from connection to the service line, ease of connection, size of connection required, etc), we suggest that the code preferences that the majority of new connections are considered as negotiated services. This will ensure that the costs for connection are assigned appropriately and will limit any cost pass through to existing distribution connected customers.

Q Do you agree with the proposed implementation of new connection charges to begin from 1 January 2025?

Yes

Q Please discuss.

EnergyAustralia believes that 1 January 2025 will provide ample implementation time to accommodate the changes.

Q Do you agree with the proposed definitions and processes for disconnection and abolishment?

Yes

Q Please discuss.

EnergyAustralia agrees with the proposed definition for disconnection and abolishment. We do not believe it is necessary or prudent to establish a process that requires retailers to provide written confirmation the customer is the owner of the premises, as if this is within regulation it will impose a requirement on retailers which will incur unreasonable cost to implement (new processes and systems for recording information/substantiation) and obligations on retailers for action which is not our responsibility.

We accept that receiving confirmation for the abolishment charge can be recorded in the retailers interaction with the customer, and this is reasonable as the charge is a standard service charge (i.e. a set fee); however, if the abolishment or any charge is based on a negotiated charge (value dependent on the specific work) our view is this is an agreement between the customer and the distribution network; therefore, the acceptance of the charge, even payment, can be handled by the distributor directly.

Retailers can provide confirmation of customer acceptance within the existing service order to the distributor, and this is the preference for providing this information, as it will reduce the cost associated with implementing the ESC's requirement.

Q Do you agree with the proposed new provision of information obligations for gas distributors?

Yes

Q Please discuss.

Yes, we support the information obligations proposed. In particular, the requirement to advise on the type of gas supplied, as the Distribution Code of Practice should aim to align with the requirements established in the AEMC's Review of Extending the Gas Regulatory Framework to Hydrogen and Renewable Gases. Which requires distribution networks to advise customers on the types of gas it supplies to customers, both prior to allowing blended gases and subsequent.

Q Do you agree with our proposed amendments to remove duplication with other regulatory instruments and to streamline the code?

Yes

Q Please discuss.

EnergyAustralia agrees with the proposed amendments and the removal of duplication. Aside from removing superfluous duplication, we believe there is merit in considering what additions are required, such as, the protections for customers impacted by family violence. We believe the Gas Distribution Code of Practice should mirror the Electricity Distribution Code of Practice's obligations and requirements relating to Family and Domestic Violence; specifically, that retailers are not required to provide contact information to distributors where a customer is affected by family violence.

Q Do you agree with the removal of the overlap of metering requirements between our code and the National Gas Rules?

Yes

Q Please discuss.

Yes, EnergyAustralia supports removing overlapping of metering requirements between ESC Code and National Gas Rules.

Q Should we retain the requirements in clause 7 on meter accreditation, certification and testing?

Q Please discuss.

EnergyAustralia does not have a view on this question.

Q Please share any feedback you may have on our proposed compliance and performance reporting requirements.

EnergyAustralia does not have a view on this question.

Q Please share any feedback that you have on our proposed variations to gas distribution licences.

EnergyAustralia does not have a view on this question.

Q Can you identify any other changes to codes of practice, guidelines, licences or other instruments we may need to make as a consequence of the proposed Gas Distribution Code of Practice?

Q Please discuss.

EnergyAustralia does not have a view on this question.

Q If there are any issues with implementing the proposed Gas Distribution Code of Practice that we should consider, please outline these below.

EnergyAustralia does not have a view on this question.

Q Do you have other comments, feedback or suggestions about our draft decision or the proposed new code?

N/A