



23 July 2013

Queensland Competition Authority
Level 27, 145 Ann Street
Brisbane QLD 4000

Submitted electronically to electricity@qca.org.au

Dear Sir/Madam,

Re: Draft Decision on Requested Amendments to the Electricity Industry Code Customer Disconnection Provisions

Lumo Energy welcomes the opportunity to make a submission to the Queensland Competition Authority (the Authority) in relation to its Draft Decision on Requested Amendments to the Electricity Industry Code Customer Disconnection Provisions (Draft Decision).

Lumo Energy supports the ongoing installation of meter isolation links being made to each premises in accordance with the requirements in the *Electrical Safety Act 2002* and *Electrical Safety Regulation 2002*. The Authority's position is correct in proposing a solution that incentivizes distributors to install fusible links and reduce the number of Main Switch and Sticker (MSS) disconnections.

Compensation to retailers for consumption post-MSS disconnections that is reflective of the current wholesale market arrangements is strongly supported by Lumo Energy. This will ensure that the compensation reflects the current costs and remain reflective into the future. Lumo Energy also supports the preclusion of network tariffs being charged by the distributor whilst the premises is disconnected via the application of a MSS. Lumo Energy envisages that these arrangements will meet the desired outcome of the Authority, to incentivize distributors to install meter isolation links in accordance with the current, best practice safety obligations.

In relation to the use of MSS disconnections due to safety, Lumo Energy support the Authority's position of using B2B Procedures to allow retailers to contact their customer and ensure that any issues are corrected before re-requesting the service order. Lumo Energy also supports the Authority's miscellaneous amendments to the Electricity Industry Code.

Please do not hesitate to contact Stefanie Macri on 03 8683 2427 to discuss this submission further.

Yours sincerely


Aneta Graham
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