

Submission to Gas Distribution System Code of Practice review: Issues Paper

Submission received through Engage Victoria

From 21 March to 4 May 2023, the commission accepted submissions on our Issues Paper for the Gas Distribution System Code of Practice review via Engage Victoria. On the 20 April 2022 we hosted a public stakeholder information session on the project. We will use these submissions to inform our draft decision.

Only consultation questions with a response are included.

Date submitted: 21 March 2023

Anonymous submission

1. Overall, do you support the scope of our proposed review of the code?

yes.

2. Are the proposed criteria in our assessment framework appropriate?

yes.

3. Do you consider the current connections framework for gas retail customers appropriate? Why or why not?

it is as per my expectation.

4. What options should we consider when reviewing the connections framework for gas retail customers?

digital metering.

5. Do you agree with the introduction of obligations to provide information to customers about changes in the type of gas supplied?

yes.

6. Are there other options to introducing equivalent obligations proposed for the

National Energy Retail Rules that we should consider?

nil.

7. Should we remove the overlap of metering obligations in the code and in Part 19 of the National Gas Rules?

nil.

8. What options to the regulation of metering requirements for non-declared distribution systems should we consider?

not sure.

9. Do you consider that the current arrangements for deemed distribution contracts and customer obligations results in uncertainty for customers and industry that is burdensome or harmful?

some what.

10. Should we include customer obligations and prohibitions in the code?

no.

11. Do you have any views on the removal of Part D of Schedule 1 from the code?

nil.

12. Do you have any views on the removal of Schedule 3 from the code?

nil.

13. Are any clarifications needed in relation to disconnection and reconnection obligations?

yes, more clarity with less headaches to customer..

14. Should we specify clearer timeframes for when Guaranteed Service Levels payments must be made?

yes.

15. Are there any further consequential changes to the code required due to the recent amendments to the National Gas Rules relating to distribution connected facilities?

nil.

16. What factors should we account for when considering our role in the framework for setting unaccounted for gas benchmarks in Victoria?

not sure.

17. What factors should we consider when assessing whether or not to assign obligations in the code as civil penalty requirements?

not sure.

18. Do you have any views on our proposed approach in relation to compliance and performance reporting obligations?

distributed gas, should be available with price online.

19. Can you identify any other changes we may need to make as a consequence of remaking the Gas Distribution System Code of Practice?

nil.

20. Are there any other issues we should consider as part of this review?

nil.