

29 May 2025

Ms Dharti Modi
Assistant Director
Australian Energy Regulator (AER)
Submitted electronically

Dear Ms Modi

Ring-fencing waiver request – RTO registration services

I am writing to request a waiver from provisions 3.1 and 4.2 of the Distribution Ring-Fencing Guideline (the guideline) for services Endeavour Energy intends to provide to another Distribution Network Service Provider.

Services to be provided by Endeavour Energy to EVO Energy

Endeavour Energy is a Registered Training Organisation (RTO). We hold this registration to provide accredited training to our employees to ensure they have the necessary skills, qualifications and experience to safely and competently carry out the necessary works to build, maintain and operate our electricity network. Relatedly, we also provide training to Accredited Service Providers on Endeavour Energy's safety rules (specific to our network) as part of authorising third parties to conduct contestable work on or in connection to our network (this is classified as an Ancillary Network Service). We therefore possess and maintain a team of trainers, assessors, facilities and course curriculum as an RTO.

Recently, we have been approached by Evoenergy with a request to utilise our facilities and RTO registration. Our understanding is that they have been unable to source a training provider that provides the quality and scope of training in the specialised competencies required to safely and reliably conduct distribution overhead line work. Specifically, Evoenergy are looking to obtain a Certificate III in Electricity Supply Industry (ESI) – Distribution overhead¹ which covers the installation, maintenance and inspection of poles, structures, hardware, electrical apparatus and the use of support plant, tools and equipment.

Evoenergy have proposed that they use our facilities and RTO registration to suitably train their staff in the competencies required to conduct network services for a period of 4 years before re-assessing the arrangement.

As set out in our earlier correspondence of 8 April 2025, this would entail the following:

1. **Endeavour Energy** to provide Evoenergy with access to its RTO curriculum and facilities;
2. **Evoenergy** to use these resources to train its employees (refer to **Appendix A** of our letter dated 8 April 2025 for the full list of units to be undertaken); and

¹ <https://training.gov.au/training/details/UET30621/qualdetails>

3. **Endeavour Energy** to allow Evoenergy to rely on its RTO registration to issue valid training qualifications (i.e., the certificate of competency will be issued under Endeavour Energy's RTO registration).

Our letter of 8 April 2025 provides further information on this arrangement and why we consider it in the interests of customers for a waiver to be granted.

Should you have any further questions, please do not hesitate to contact me or alternatively Patrick Duffy, Manager Regulatory Transformation and Policy, via email at

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Yours sincerely

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Emma Ringland
Head of Regulation and Investments