

# Evoenergy Annual Ring-fencing Compliance Report

1 January 2024 – 31 December 2024

29 April 2025



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## 1. DOCUMENT MANAGEMENT

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### 1.1 Version Control

Date	Version	Description	Author
17/12/2024	1.0	Draft	Chloe Fox
09/04/2025	1.1	Internal review	Jane Godkin
09/04/2025	1.2	Internal approval	Bronwen Butterfield
15/04/2025	1.3	Changes made post auditor comments	Chloe Fox
22/04/2025	1.5	Review and edits	Jane Breden

### 1.2 Approval

Date	Name	Position	Signature
16/04/2025	Tomas Keraitis	Group Manager, Strategy and Operations	
16/04/2025	Peter Billing	General Manager	
16/04/2025	John Knox	Chief Executive Officer	

## 2. INTRODUCTION

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### 2.1 Statement of Compliance

Icon Distribution Investments Ltd and Jemena Networks (ACT) Pty Ltd (Trading as Evoenergy/ActewAGL Distribution) considers it has complied with its obligations under the Australian Energy Regulator's (AER) Ring-fencing Guideline - Version 3 (the Guideline) for this regulatory period from 1 January 2024 to 31 December 2024.

### 2.2 Background

The AER updated the Guideline in November 2021.

The Guideline is binding on distribution network service providers (DNSPs) and seeks to promote competition in the provision of electricity services, whilst preventing DNSPs from providing competitive advantages to its affiliates, operating in unregulated markets.

A key objective of Ring-fencing is to provide a level playing field for participants in contestable electricity markets through accounting and functional separation of the provision of direct control services by DNSPs from the provision of other distribution services by them, or their affiliated entities.

ActewAGL Distribution (AAD) has an internal Ring-fencing procedure which reflects the clauses set out in the Ring-fencing Guideline (Guideline Version 3).

### 2.3 Purpose of Report

This report sets out AAD's compliance with the Guideline (Version 3) for the period 1 January 2024 – 31 December 2024 including:

- the measures taken to ensure compliance with the Guideline
- all other services provided by AAD in accordance with the Guideline
- the purpose of all transactions between AAD and its affiliated entities.

Key AAD documents to ensure compliance with the Guideline are included in this report at Appendix A.

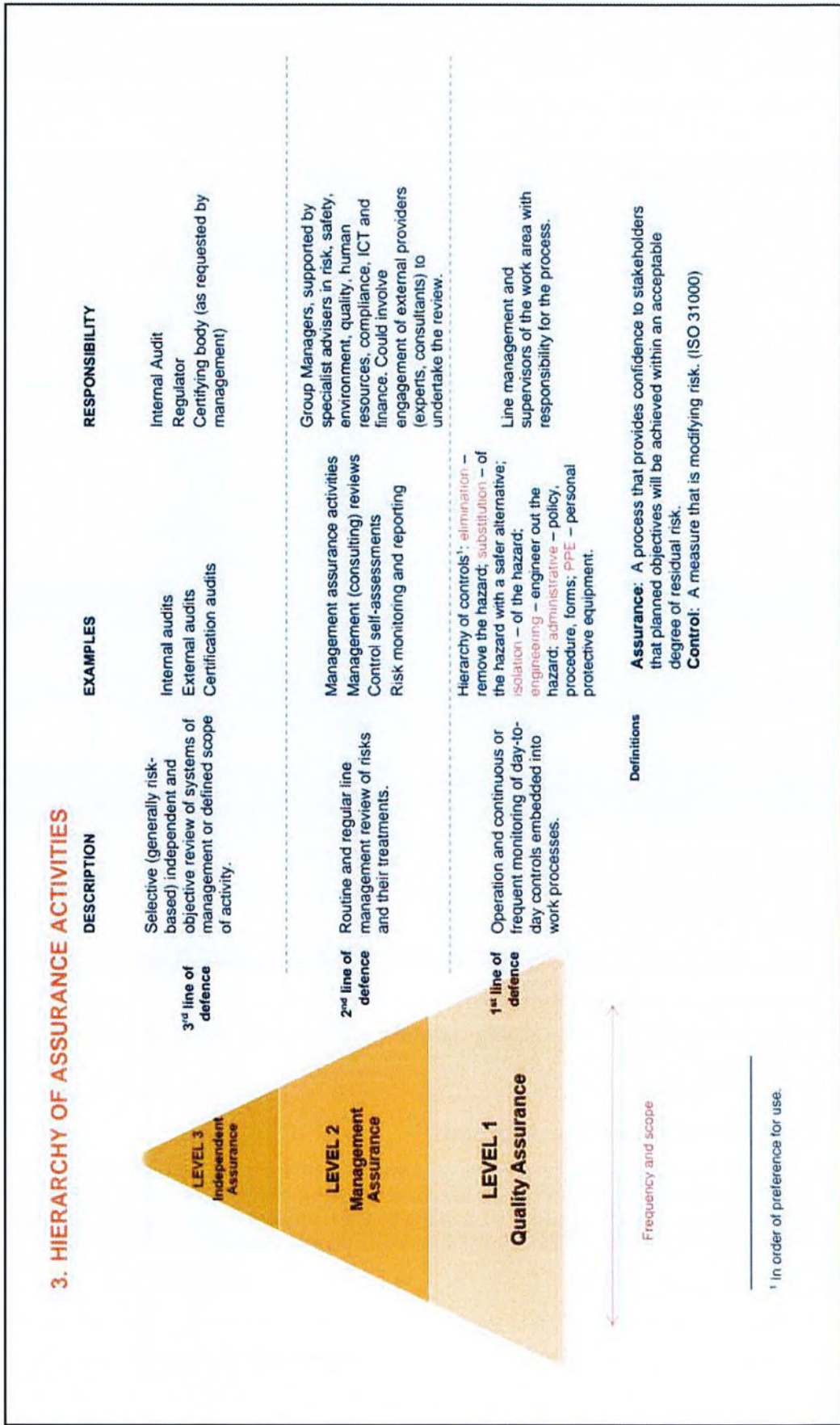
This report is also accompanied by an independent assessment of AAD's Ring-fencing compliance for the period 1 January 2024 – 31 December 2024.

### 2.4 Compliance Management Framework

Compliance with the Guideline is managed in accordance with AAD's Compliance Management Framework, which sets out three lines of assurance as shown in Figure 1.



FIGURE 1 – AAD ASSURANCE LEVELS



### 3. COMPLIANCE MEASURES

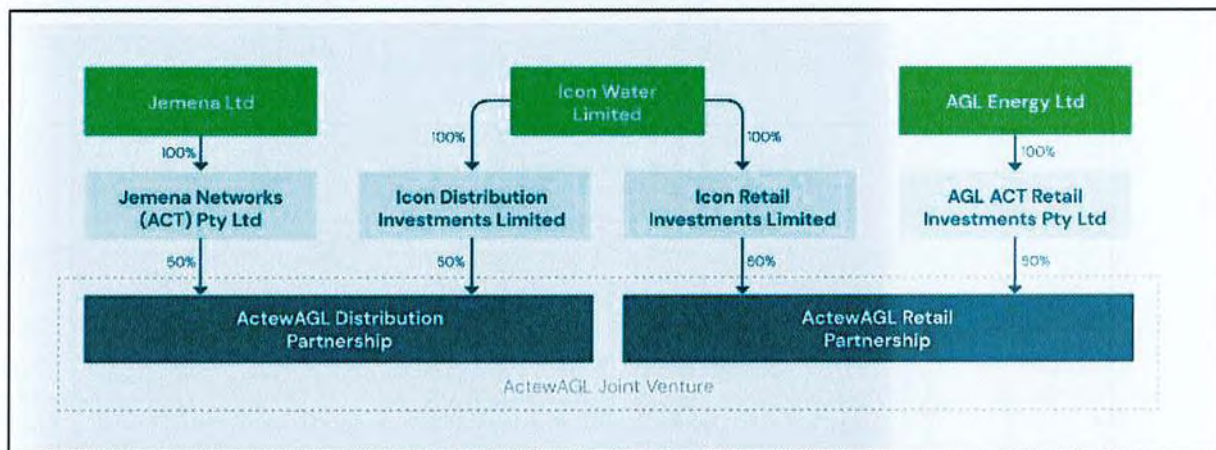
#### 3.1 Prevent cross subsidies

##### 3.1.1 Legal Separation - Considerations

ActewAGL comprises two partnerships – the ActewAGL Distribution (AAD) partnership and the ActewAGL Retail (AAR) partnership. The AAD partnership owns and operates the ACT electricity network and owns the gas networks in the ACT, Queanbeyan and Palerang shires, and Nowra. AAR sells electricity and natural gas, along with managing customer service and marketing functions in a competitive market.

The AAD partnership is a legal entity and is the DNSP for the purposes of the Guideline. AAD is owned equally by Icon Water Ltd and Jemena Ltd via subsidiary companies. The AAR partnership is owned equally by Icon Water Limited and AGL Energy Ltd via subsidiary companies. This ownership structure is shown in Figure 2 below.

FIGURE 2 – ACTEWAGL JOINT VENTURE OWNERSHIP STRUCTURE



AAD comprises two business units:

- Evoenergy – which provides direct control services (and other non-electricity services under a waiver).
- Corporate Services, which provides shared corporate services.

The legal separation obligations in the Guideline prevent AAD from using regulated funds to subsidise services provided by Related Electricity Service Providers (RESPs).

##### 3.1.2 Establish and Maintain Accounts

Evoenergy allocates costs to distribution services in a manner that is consistent with the Cost Allocation principles and the Cost Allocation Methodology approved by the Australian Energy Regulator and maintains appropriate records to comply with clauses 3.2.2 of the Guideline. Evoenergy's financial data is audited annually and provided to the AER via the annual Regulatory Information Notice (RIN) process.



## 4. SUMMARY OF PREVIOUS AUDIT FINDINGS

TABLE 1 – SUMMARY OF OBLIGATIONS AND AUDIT FINDINGS

Ring-fencing Obligation	Regulatory Period 2022 Audit Findings	Regulatory Period 2023 Audit Findings
Legal separation	AAD complies with the Guideline	AAD complies with the Guideline
Establish and maintain accounts	AAD complies with the Guideline	AAD complies with the Guideline
Obligation not to discriminate	AAD complies with the Guideline	AAD complies with the Guideline
Physical separation/co-location	AAD complies with the Guideline	AAD complies with the Guideline
Staff sharing	AAD complies with the Guideline	AAD complies with the Guideline
Branding and cross-promotion	AAD complies with the Guideline	AAD complies with the Guideline
Office and staff registers	Breach identified. Controls implemented to support better compliance to the Guideline.	Breach identified as a continuation for the breach identified in the 2022 audit. Controls implemented to achieve compliance to the Guideline in Q2, Q3, & Q4 of the regulatory period.
Protection of confidential information	AAD complies with the Guideline	Deficiency in IT access controls identified by AAD and reported to the AER. Incident identified as a breach by external auditor in AAD's external Ring-fencing audit.
Disclosure and sharing of information	AAD complies with the Guideline No requests received.	AAD complies with the Guideline
Information register	AAD complies with the Guideline	AAD complies with the Guideline
Conduct of service providers	AAD complies with the Guideline	AAD complies with the Guideline
Waivers	AAD complies with the Guideline	AAD complies with the Guideline
Compliance and enforcement	AAD complies with the Guideline	Breach Identified. Evoenergy providing services other than distribution services. Court enforceable issued by the AER with key milestones to meet and report to AER quarterly, leading to network boundary separation in May 2026.
Compliance reporting	AAD complies with the Guideline	AAD complies with the Guideline



## 5. COMPLIANCE AND ENFORCEMENT

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### 5.1 1 January 2024 – 31 December 2024 compliance activities

AAD's Ring-fencing Compliance and Staff Information Manual (PO0307) and online training sets out AAD's commitment to comply with the Guideline and the process for staff to make enquiries or identify potential breaches via the Ring-fencing enquiry mailbox.

AAD has delivered targeted Ring-fencing training to all personnel across the Joint Venture. Online training was conducted throughout 2024 for all AAD and AAR staff. The training is delivered as part of compulsory compliance training package via AAD's online training platform, Ignite your Learning. The Regulatory Compliance Team has reviewed AAD's Ring-fencing training package during the compliance period to ensure currency and alignment to The Guideline. Additional components were added to the training which are more relevant to Evoenergy field crews to broaden application of Ring-fencing knowledge.

All new AAD and AAR staff complete Ring-fencing training as part of the standard induction process and must agree to the clauses of The Guideline as part of their contract of employment to ensure all staff are familiar with Ring-fencing obligations before engaging in any work for either AAD or AAR. Ring-fencing training has also been recommended as a crucial part of the procurement process for all contractor providers to provide an additional line of compliance assurance following the identification of a deficiency in IT access controls in August 2024 (outlined in section 5.5 of this report).

The Regulatory Compliance team has designed and implemented the use of several new resources for Ring-fencing enquiries and breach investigations, including a new Ring-fencing register to record all internal Ring-fencing enquiries and potential breaches. This register has been published on AAD's internal SharePoint site and is now more accessible to the organisation, providing more consistency, clarity and transparency in the reporting and recording of Ring-fencing matters and AAD's response. In addition, the Regulatory Compliance team has also implemented the use of Ring-fencing incident investigation templates to standardise the investigation process and effectively identify root causes of Ring-fencing incidents across the organisation.

During the period 1 January 2024 to 31 December 2024, there were ten Ring-fencing enquiries received regarding compliance with Ring-fencing obligations. This is double the number of enquiries compared to the prior regulatory period, demonstrating that staff are assessing potential Ring-fencing issues with care and ensuring potential risks are identified, assessed, and managed appropriately dependent on findings. Of the ten Ring-fencing enquiries, six were considered to be a potential failure of a control and were managed to prevent potential for breach of the Ring-fencing Guideline.

### 5.2 Related Electricity Service Providers (RESPs)

AAD's acknowledges the following RESPs:

- - ActewAGL Retail (a partnership of AGL Retail Investments Pty Ltd and Icon Retail Investments Limited)
- - Ovida Pty Ltd
- - Illuminact Pty Ltd
- - Smart Renewables Pty Ltd (disposal of Smart Renewables as a RESP effective 17 May 2024)

AAD has developed and maintains a series of resources to assist in effective management of Ring-fencing obligations in relation to RESPs. These are made available to all staff on AAD's intranet SharePoint and include flow charts, fact sheets and other compliance information in relation to the Guideline clauses 4.1, 4.2 and 4.3.

### 5.3 Disclosure and sharing of information


During the period 1 January 2024 to 31 December 2024, AAD did not share any electricity information with a third party or RESP.



## 5.4 Regulated Stand-Alone Power Systems

During the period of 1 January 2024 to 31 December 2024, Evoenergy maintained an up to date and accurate SAPS register on its website, as required by clause 6.2.3 of the Guidelines, capturing each regulated Stand-Alone Power System (SAPS) used by Evoenergy. Evoenergy currently has two Regulated SAPS listed on its Register; listed below in Figure 3.

FIGURE 3 – EVOENERGY SAPS REGISTER

<div>  </div>						
Evoenergy Regulated Stand-Alone Power system (SAPS) Register						
Date of Update: 31/12/2024						
This register is intended to be a living document and must be updated quarterly under the Electricity Distribution Ring-Fencing Guideline) (by 15 January, 15 April, 15 July and 15 October of each year), though can be updated more frequently if required. This register includes information about all regulated stand-alone power systems under Evoenergy's Network in accordance with cl. 6.2.3.						
ID	Local Government Area	Number of premises	Maximum demand	Average energy consumption	Revenue earned by DNSP	Other services
	<i>Please provide the name of LGA where the regulated stand-alone power system is deployed</i>	<i>Please provide the number of premises serviced by the regulated stand-alone power system</i>	<i>Please provide the maximum demand (KW) served by the regulated stand-alone power system</i>	<i>Please provide the annual energy consumption (KWh) of the premises served by the regulated stand-alone power system</i>	<i>Please include the revenue earned by the DNSP by providing other services by means of the regulated stand-alone power system</i>	<i>Please state whether the DNSP has made a request for the supply of other services by another legal entity (other than the RESP)</i>
ACT1	Australian Capital Territory	2	n/a	2776	\$0	No
ACT2	Australian Capital Territory	2	n/a	2110	\$0	No

ActewAGL House 10 Bunda Street Canberra ACT 2600 | GPO Box 366 Canberra ACT 2601 | t 13 23 36 | [evoenergy.com.au](http://evoenergy.com.au)

Jointem Networks (ACT) Pty Ltd (ABN 24 005 052 662) and Joint Distribution Investments Limited (ABN 03 073 025 224) (Jointem Networks (ACT) Pty Ltd 513 561 600)

## 5.5 Information Access and Disclosure

AAD self-identified one incident of deficiency in IT access controls during a transition to a new financial system with a potential failure of a control related to the Guidelines during the compliance period. The ActewAGL Joint Venture went live with its new Financial Information Management System (FIMS) on 8 July 2024. Access was restricted to the core project team as they performed Product Verification Testing (PVT).

An external System Integrator party was engaged to prepare customised reports which included appropriate staff access permissions to ensure that Ring-fenced information would be protected and available only to AAD staff. The external System Integrator trained AAD employees in the preparation of said reports, however, failed to advise the AAD employees of the precise security settings to restrict access to AAD information to ensure Ring-fencing obligations are adhered to.

As a result, access to a financial report containing AAD information was available to one AAR staff member when the report was released into production on 1 August 2024. The AAR employee that had access to the report immediately notified their manager of the incident and ceased access to the document on Friday, 2 August 2024. Access permissions were corrected on 5 August 2024 (the following business day after identification of the incident) to ensure no further potential for access by any AAR employee to the Accounts Payable report.

Investigations determined that the data contained in the Accounts Payable report was limited to supplier name and the amount paid with the remaining data being generic (e.g. dates, etc.). It was also noted that the report contained only one week of data with no possibility of access to any information. There was no information that identified an Evoenergy asset, customer or project available in the report. For this reason, the incident was not deemed a breach of the Guideline, but a deficiency in controls which gave rise to the potential for a breach of clause 4.3.1(a) of the Guideline. In fact, a breach was mitigated by the immediate remediation measures taken.

AAD notified the AER of the incident, the investigation outcomes and corrective actions taken on 14 August 2024. The AER did not provide guidance to indicate a breach had occurred.

As part of this incident, a sample-based user access review was performed and AAD were made aware of another four RESP staff that had permissions set enabling access to the AAD reports.

During the Ring-fencing audit, AAD provided an assessment against its compliance obligations including:

- the roles of each of the RESP staff who had access,
- the AAD data within Oracle Fusion that was accessible to each of the RESP staff,
- an audit log of changes to user access and
- representations from each of the RESP staff the AAD data was not accessed.

Refer to the auditors Compliance Opinion and Findings Report for their assessment of this matter.

## **5.6 Physical Separation**

AAD self-identified two incidents of deficiencies in its physical separation of AAR staff from the Evoenergy Greenway Depot.

The first incident involved an AAR staff member that was previously seconded to AAD, who entered the Greenway AAD Depot using their security access pass. The staff member was no longer in an AAD seconded role and therefore had unauthorised access to the depot. The AAR staff member was attending Contact Officer training for the Thrive committee which did not contain any electricity information. AAD determined that there was a lack of control regarding the Security Pass and ID Procedure to clearly identify the persons responsible for ensuring that access is updated when onboarding or offboarding temporary transfers and have since updated the procedure and communicated the updated procedure to the JV.

The second incident involved two AAR staff members, who registered for an in-person JV Bullying and Harassment training at the AAD Greenway Depot, in the Central Conference Room. The training did not include any electrical information, and the AAR staff were escorted at all times to ensure no Ring-fenced information could be accessed. AAD determined that there was a lack of control regarding the training calendar providing AAR staff the opportunity to book training at AAD premises, this has since been rectified to separate out AAR and AAD staff to only book at their respective buildings and communicated to the JV.

AAD did not notify the AER of either incident as it was deemed that while there was potential risk, the controls in place ensured that Ring-fenced information remained confidential and there were no costs incurred by AAD associated with the short-term visit. Refer to the auditors Compliance Opinion and Findings Report for their assessment of this matter.

## **5.7 Obligation not to Discriminate**

During the regulatory period 1 January 2024 to 31 December 2024 all AAD staff completed Ring-fencing training. There were eight staff on long-term leave, who did not complete training due to being on leave for the regulatory period.

## **5.8 Office and Staff Sharing**

During the period of 1 January 2024 to 31 December 2024, Evoenergy maintained an up to date and accurate Office and Staff Sharing registers on its website, as required by clause 4.2.4 of the Guidelines, capturing any changes to the status of Evoenergy's office and staff sharing. Evoenergy currently has eight shared staff which consists of the upper executive team including the Chief Executive Officer.



## 5.9 Establish and Maintain Accounts

Evoenergy allocates costs to distribution services in a manner that is consistent with the Cost Allocation principles and the Cost Allocation Methodology approved by the Australian Energy Regulator and maintains appropriate records to comply with clauses 3.2.2 of the Guideline. Evoenergy's financial data is audited annually and provided to the AER via the annual Regulatory Information Notice (RIN) process.

## 5.10 Branding and Cross Promotion

During the period 1 January 2024 to 31 December 2024, AAD did not have any instances of cross promotion with ActewAGL and do not share any marketing or communications officers.


## 6. ACTEWAGL DISTRIBUTION (AAD) OTHER SERVICES

AAD has been granted a waiver to continue to own and operate the following:

- Natural gas distribution pipelines located in the ACT and the Queanbeyan Palerang council area east of Canberra (ACT Gas Network) until 30 June 2029.
- Natural gas distribution pipelines located in the Nowra network in the Shoalhaven local government area on the NSW south coast (Nowra Gas Network) until 30 June 2029.

Details of all waivers granted to AAD are available on the Evoenergy Waiver Register and in Figure 4.

FIGURE 4 – EVOENERGY WAIVER REGISTER

					
Evoenergy Waiver Register					
Date of Update: 31/12/2024					
This register is intended to be a living document and is maintained and made publicly available in accordance with clause 5.7 of the Ring-fencing Guideline for Electricity Distribution (Version 3).					
ID	Date	Decision Date	Description of Conduct	Terms & Conditions	Comments
	<i>Please provide the date of the application of the waiver.</i>	<i>Please provide the date the waiver was granted by the AER.</i>	<i>Please provide a description of the conduct to which the waiver applies (as set out in the AER's written decision).</i>	<i>Please outline the terms and conditions of the waiver (as set out in the AER's written decision).</i>	<i>Please include any additional comment relevant to the waiver or decision.</i>
Evoenergy Gas Network Businesses	31 July 2017	18 December 2017	The AER grants a waiver of Evoenergy's obligation to comply with clause 3.1 (b) of the Guideline from 18 December 2017 until 30 June 2024 to allow Evoenergy to continue to own and operate its: - natural gas distribution pipelines located in the ACT and the Queanbeyan-Palerang council area east of Canberra (ACT Gas Network); and - natural gas distribution pipelines located in the Nowra network in the Shoalhaven local government area on the NSW south coast (Nowra Gas network).	This waiver is granted on the condition that Evoenergy will submit to the AER a cost allocation methodology updated to: - reflect the requirements of the Guideline; and - explicitly account for the ACT Gas Network, the Nowra Gas Network and the CNG Refuelling Facility, and any changes to Evoenergy's organisational structure arising from the creation of separate legal entities. This updated cost allocation methodology must be submitted to the AER by 1 July 2018.	
Evoenergy Gas Network Businesses	17 August 2023	3 November 2023	The AER has decided to grant a waiver of Evoenergy's obligation to comply with clause 3.1 (b) of the Guideline from 1 July 2024 until 30 June 2029 to allow Evoenergy to continue to own and operate its natural gas distribution pipelines located in the ACT and the Queanbeyan-Palerang council area east of Canberra (ACT Gas Network); and its natural gas distribution pipelines located in the Nowra network in the Shoalhaven local government area on the NSW south coast (Nowra Gas Network).	The AER expects Evoenergy to comply with the Guideline in all other circumstances and in all other respects. Evoenergy is required by clause 5.7 of the Guideline to include this waiver on its waiver register, which must be publicly available on Evoenergy's website.	
Evoenergy Electricity Network Businesses	30 August 2023	22 May 2024	The AER has decided to grant a waiver of Evoenergy's obligation to comply with clause 3.1(b) of the Electricity Distribution Ringfencing Guidelines in relation to the provision of 'other services'. This Waiver allows Evoenergy to continue providing the Services to the Customer for a <u>two year</u> period, until 22 May 2026, while Evoenergy re-designs systems to separate assets on the Evoenergy and the Customer's side of the network boundary.	The AER expects Evoenergy to comply with the Guideline in all other circumstances and in all other respects. Evoenergy has been granted the waiver subject to meeting the requirements of an enforceable undertaking on terms agreed with the AER. Evoenergy is required by clause 5.7 of the Guideline to include this waiver on its waiver register, which must be publicly available on Evoenergy's website.	
ActewAGL House 40 Bunda Street Canberra ACT 2601   GPO Box 365 Canberra ACT 2601   t 13 23 88   <a href="http://evoenergy.com.au">evoenergy.com.au</a> Jonera Networks (ACT) Pty Ltd (ABN 24 068 522 062) and son Distribution businesses Limited (ABN 63 073 025 204) Was Evoenergy (ABN 75 670 593 668)					



## 7. AAD TRANSACTIONS WITH RELATED ENTITIES

Table 2 sets out the transactions for services provided by affiliates to AAD and Table 3 set out transactions for services provided by AAD to its affiliates.

TABLE 2 – SERVICES PROVIDED BY AFFILIATES TO AAD

Affiliate	Overview of service provided by Affiliate	Comment
ActewAGL Retail, a partnership of AGL ACT Retail Investments Pty Ltd and Icon Retail Investments Limited	Electricity and gas retail services to Evoenergy	No comment
Icon Water Limited	Water and sewerage services to Evoenergy	Icon Water is the regulated monopoly provider of water and sewerage services in ACT and therefore is not subject to the procurement process
Icon Water Limited	Provision of employee who are seconded AAD.	No comment
Zinfra Pty Ltd	Construction services to AAD's electricity distribution network business	No comment
Jemena Limited	Jemena undertakes works on behalf of external parties on AAD's gas network, and gift these to Evoenergy. These are recorded at fair value by Evoenergy and there is no exchange of cash.	AAD's gas network business provides an "other service" for which a waiver to comply with the Guidelines has been granted by the AER. The gas network business is subject to separate Ring-fencing requirements under the <i>National Gas (South Australia) Act 2008</i> (SA). This transaction has been included for completeness.
Jemena Limited	Jemena provides various management services to Evoenergy, including asset management, general management and construction management, for both routine and non-routine activities within the gas business.	AAD's gas network business provides an "other service" for which a waiver to comply with the Guidelines has been granted by the AER. The gas network business is subject to separate Ring-fencing requirements under the <i>National Gas (South Australia) Act 2008</i> (SA). This transaction has been included for completeness.

TABLE 3 – SERVICES PROVIDED BY AAD TO AFFILIATES

Affiliate	Overview of service provided by AAD	Comment
ActewAGL Retail, a partnership of AGL ACT Retail Investments Pty Ltd and Icon Retail Investments Limited	Regulated electricity and gas services	Regulated service
ActewAGL Retail, a partnership of AGL ACT Retail Investments Pty Ltd and Icon Retail Investments Limited	Warehousing services	Warehousing costs are allocated according to floor space occupied for inventory belonging to each division in accordance with Evoenergy's AER approved cost allocation method
Icon Water Limited	Evoenergy provide dial before you dig and call center services to Icon Water	No comment
Icon Water Limited	AAD charges a fee to Icon Water for use of shared IT systems	IT costs are allocated based on time spent on specific divisions' requirements or usage of infrastructure in accordance with Evoenergy's AER approved cost allocation method



## APPENDIX A – AAD KEY RING-FENCING DOCUMENTS

ID	Document Name	Purpose/ Description	Relevant obligations
GENERAL			
G.1	Ring-fencing Staff Information and Compliance Manual	To provide all staff with resources for Ring-fencing protocols and compliance requirements under the Guideline, where Ring-fencing protocols can be stored and accessed, and breaches can be reported.	All
G.2	Ring-fencing Fact Sheet for Eveenergy	To provide a ring-fence compliance fact sheet that stipulates the requirements for staff to comply with the guidelines.	All
G.3	Corporate Procedure Ring-fencing	To set out AAD's requirements to comply with the Guideline.	All
LEGAL SEPARATION			
L.1	Classification of Services Flowchart	To set out how AAD services are classified as either regulated distribution services, unregulated distribution services or other services.	3.1
L.2	Legal Entity Structure	Sets out the ActewAGL legal entity structure.	3.1
SEPARATE ACCOUNTS			
A.1	Intercompany and Related Accounting Policy	To provide the intercompany and related accounting policy that sets out, the internal accounting procedures, report on transactions between the DNSP and its affiliated entities and any additional information to demonstrate the extent and nature of transactions between the DNSP and its affiliated entities.	3.2.1
A.2	AER Decision – ActewAGL Distribution (Evoenergy) Cost Allocation Method	To set out how AAD allocates its costs between the different services that it provides. Includes information on how AAD allocates costs for services that it provides to RESPs and other affiliated entities.	3.2.2
OBLIGATION TO NOT DISCRIMINATE			
D.1	Procurement Management Manual - Phase 2 Sourcing and Selection	To provide guidance on the Sourcing and Selection phase of the procurement process. Includes the requirement that at least one quote must be sourced from a non-affiliated entity in order to meet the minimum market approach requirements.	4.1, 4.4.1
D.2	Obligation not to Discriminate Flowchart	To set out the obligations for AAD staff when interacting with RESPs and other contestable energy service providers.	4.1
OFFICES, STAFF BRANDING AND PROMOTIONS			
O.1	Security Pass and ID Card Procedure	To ensure all persons are clearly identified as being an employee of AAD or a contractor working for AAD and are provided identity cards and electronic access as appropriate to complete their duties. Sets out how the corporate team is to oversee access.	4.2.1, 4.2.2
O.2	Physical Separation and Staff Sharing- flowchart	To capture the physical separation and staff-sharing requirements that stipulates the requirements for staff to comply with the Guideline.	4.2.1, 4.2.2
O.3	Staff Register	To provide Evoenergy's staff register via a publicly available website, identifying the nature of positions (including description of the roles, functions and duties) of its members of staff, to which staff involved in the provision or marketing of direct control services are involved in the provision or marketing of contestable electricity services by a related	4.2.2, 4.2.4

ID	Document Name	Purpose/ Description	Relevant obligations
O.4	Branding and Cross-Promotion Flowchart	electricity service provider by reason of clauses 4.2.2(b)i. a, 4.2.2(b)i.b, 4.2.2(b)ii. Or 4.2.2(d) of the Guideline.  To capture the branding and cross-promotion requirements for Evoenergy's direct control services separately to that used by a RESP for contestable electricity services, without promoting contestable electricity services provided by a related electricity service provider other than the DNSP itself, including any exceptions as per the Guideline.	4.2.3
O.5	Office Register	To provide Evoenergy's office register via a publicly available website, identifying the classes of offices to which physical separation or co-location requirements have not been applied by reason of clauses 4.2.1(b)i, or 4.2.1(b)iii.	4.2.1, 4.2.4
<b>INFORMATION ACCESS AND DISCLOSURE</b>			
I.1	Confidential Information Flowchart	To provide assistance in identifying electricity information and confidential information.	4.3.1, 4.3.2, 4.3.3, 4.3.4
I.2	Information Sharing Protocol	To provide the information sharing protocol via a publicly available website, that sets out how and when it will make confidential information available to RESPs and other legal entities on an equal basis.	4.3.2, 4.3.3, 4.3.4, 4.3.5
I.3	Information Register	To provide the information register via a publicly available website, that publishes all valid requests for access to confidential information (including the kind of information requested and their description) made by RESPs and other legal entities who provide contestable electricity services.	4.3.3, 4.3.4
I.4	Listed Legal Entities	To provide the record of listed legal entities via a publicly available website, involving all requests for being included on the register, the date added to the list and information types requested.	4.3.3, 4.3.4
I.5	Information Request Form	To provide a form for legal entities seeking to apply for access to information identified on the information register, such that they can be assessed by Evoenergy for disclosure of information and responded to with; a confirmation of whether the information request is complete and valid under the Guideline, and the timeframe and communication mechanism for the provision of information.	4.3.3, 4.3.4, 4.3.5
I.6	Register Inclusion Form	To provide a form that legal entities can use to request to be included on the information register with respect to all or specific kinds of information.	4.3.4, 4.3.5
I.7	Privacy Policy	To provide a privacy policy that sets out that confidential information is kept confidential, and that confidential information is only used for the purpose for which it was acquired or generated.	4.3.2
<b>SERVICE PROVIDERS</b>			
P.1	Ring-fencing Fact Sheet for Evoenergy	To provide guidance to Evoenergy staff including information about service providers/contractors.	4.4.1
P.2	Conduct of Service Providers- Flowchart	To capture the obligations for conduct of service providers under any new or varied agreements involve, complying with clauses 4.1, 4.2.1, 4.2.2, 4.2.3 and 4.3.2 of the Guideline, and not encouraging or incentivising a service provider to engage in conduct that would go against the DNSP's obligations under clause 4 of the Guideline.	4.4.1
<b>WAIVERS</b>			
W.1	Waiver Register	To provide the waiver register via a publicly available website, that records waivers that have been successfully submitted to the AER, the description of the waiver, the terms and conditions of the waiver and its expiration date.	5.7
<b>COMPLIANCE AND ENFORCEMENT</b>			



<b>ID</b>	<b>Document Name</b>	<b>Purpose/ Description</b>	<b>Relevant obligations</b>
C.1	Compliance and Risk Management System (ARIA)	To document the end-to-end process for capturing new and amended legislation relevant to ActewAGL's operations within the ActewAGL compliance and risk management database (ARIA) including the required monitoring of operational compliance against obligations. This system is relevant to compliance controls already in place to address compliance with existing legal obligations.	6.1, 6.2, 6.3
C.2	Compliance Management Manual	To provide business with tools and knowledge of practices and systems to support legislative compliance.	6.1, 6.3, 6.4
C.3	Incident Management Manual	Documents the process for all incident management within ActewAGL and Evoenergy	6.3
C.4	SAP's Register	Provided on Evoenergy's public accessible website; identifies each regulated stand-alone power system used by the DNSP to provide other services:	6.2.3

