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Annual Electricity Ring-fencing Compliance report for the 2024 regulatory year

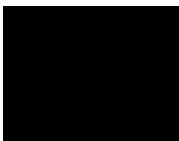
Please find attached the Jemena Electricity Networks (VIC) Ltd (JEN) annual ring-fencing compliance report for the period 1 January 2024 to 31 December 2024 (Reporting Period), submitted in accordance with clause 6.2 of the Ring-fencing Guideline - Electricity Distribution (version 3, November 2021) (Guideline).

In the Reporting Period, JEN has maintained mechanisms to ensure compliance with the Guideline. As part of our annual review process, Jemena management have confirmed there are effective controls in place to ensure compliance and that they are properly equipped to comply with the Guideline in the future.

This annual compliance report has been prepared by JEN with all due care and skill in accordance with the Guideline. We also engaged an independent and qualified authority (KPMG) to conduct a review, as required by the Guideline. KPMG's review advice is included with JEN's report.

If you have any questions in relation to this submission then please contact Catherine Chen at [REDACTED] or [REDACTED]

Regards,



David Gillespie,
Managing Director

Attachment: JEN Annual Electricity Ring-fencing Compliance Report



Jemena Electricity Networks (Vic) Ltd

Ring-fencing - Annual Compliance Report

2024 regulatory year

1 January 2024 to 31 December 2024



An appropriate citation for this paper is:

Ring-fencing - Annual Compliance Report

Contact Person

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1. Overall Compliance Statement

Throughout the 2024 regulatory year, (**the reporting period**), Jemena Electricity Networks (Vic) Ltd. (**JEN or Jemena**) has maintained the compliance controls as described in Section 2 and Appendix A of this Report.

JEN considers it has complied with the Australian Energy Regulators (**AER**) Ring-fencing Guideline Version 3 (Electricity Distribution) – 3 November 2021 (**Guideline**) obligations since there were no breaches in the reporting period.

2. Reporting details

2.1 Maintaining and establishing compliance

Clause 6.1 of the Guideline obligates Distribution Network Service Providers (**DNSPs**) to maintain and establish appropriate internal procedures to ensure they comply with obligations under the Guideline.

JEN's operations are subject to a wide range of legal, regulatory and licence requirements. As such, our business has existing procedures and systems to support JEN to identify, assess, adhere and monitor compliance to its many obligations. Our procedures and systems have been designed in line with AS ISO 19600:2015 Compliance Management Systems. In terms of the Guideline, JEN has incorporated those regulatory requirements into existing policies, procedures and systems where practical. Where necessary, new procedures or controls have been developed and implemented.

A key existing procedure and system paramount in maintaining our compliance is the integration of Guideline obligations within Jemena's compliance and risk system (**Omnia**). This system houses detail about the obligations, such as the description, instrument reference, its risk rating (as per Jemena's risk matrix), obligation review frequency (as per risk rating) and the responsible person within the business for certifying compliance. Certification requires the responsible person to verify that JEN is compliant with the relevant obligation and continues to be equipped to be compliant in the future.

Given the importance JEN places on being compliant with its legislative and regulatory requirements, the Omnia procedure and system is established in a manner that distributes reminders to the responsible persons to review their compliance obligations, in advance of a specified due date. If not completed by the due date, the executive leader who holds ultimate accountability for the relevant obligation, will be notified of the non-response (which equates to non-adherence of the obligation).

This escalation path is critical for Jemena and its staff to reinforce the importance of maintaining, monitoring and acknowledging its compliance with obligations. The system and process assists in maintaining awareness and knowledge of the obligations as it creates a trigger to periodically review, without prompt of an obvious event or trigger such as a complaint, system failure or organisational change which would otherwise suggest or indicate a potential non-compliance risk.

This procedure and process is a critical mechanism for JEN to produce and validate its compliance with the Guideline and to subsequently document this Report.

2.2 Reporting period

Clause 6.2.2 of the Guideline requires DNSPs to submit a compliance report to the AER annually, within four months of the end of each regulatory year.

JEN has complied with this requirement by submitting this Report, based on data from the regulatory year of 1 January 2024 to 31 December 2024, by 30 April 2025. Refer to section 1 for a statement on JEN's overall compliance.

JEN has implemented processes that will require responsible persons within Jemena to complete their compliance responses to allow adequate time for this report to be prepared, validated and assessed by an independent assessor during March and April. This will enable JEN to prepare and submit its Report, with due care and skill, in accordance with the Guideline.

To complete their compliance responses, the responsible persons need to certify:

- that they are currently compliant (and have complied since they last reported) with the requirements of the obligation, and
- there are effective compliance measures in place to ensure future compliance.

2.3 Measures to ensure compliance

Clause 6.2.1(b)(i) of the Guideline requires that the annual compliance report must identify and describe, in respect of the regulatory year, the measures the DNSP has taken to ensure compliance with its obligations under the Guideline.

The SGSP (Australia) Assets Pty Ltd (**SGSPAA**) group has an internal Compliance Policy which affirms the commitment of the group's businesses, including JEN, to compliance with applicable legal and regulatory obligations. This is achieved through structures and management systems supporting group companies to manage and monitor regulatory requirements, create and maintain a compliance culture, and ensure all officers and staff within the SGSPAA group, including contractors, are aware of these obligations and act accordingly.

Appendix A sets out the controls JEN has in place and how these are effective in demonstrating JEN's compliance to its electricity ring-fencing obligations.

As the Guideline's obligations are now embedded in the company-wide compliance program, they are reviewed periodically (via responsible persons and via assurance activities carried out by Jemena compliance functions), as is the case for all obligations in the Omnia system, to ensure continued monitoring and compliance. Obligations in Omnia are assessed by the compliance team to ensure continued accuracy and relevance and where appropriate updated or reassigned.

As a further control, Jemena's Leadership Team (Managing Director and Executive General Managers) receive bi-monthly reports of compliance activities (which includes any reportable breaches), and a status update on compliance with obligations is provided to the Audit and Compliance Committee of the Board of JEN's holding company, SGSPAA (which in turn reports to the full SGSPAA Board annually). As such, non-compliances are reported to the highest level of management and addressed accordingly, including in a Board context.

Throughout the reporting period, JEN has maintained these compliance measures. The 2024 compliance improvement activities are set out in **Appendix B**.

2.4 Reporting details

Clause 6.2.1(b)ii of the Guideline requires DNSPs to report any breaches of the Guideline by the DNSP, or which otherwise relate to the DNSP.

During the reporting period, JEN did not report any breaches to the AER.

Table 2–1: Breaches reported during 2024 regulatory year

Obligation	Materiality as assessed by AER	Date reported	Further details
Nil to report	Not applicable	Not applicable	Not applicable

2.5 Other services provided by JEN

Clause 6.2.1(b)iii of the Guideline requires DNSPs to report all other services provided by the DNSP in accordance with clause 3.1 of the Guideline.

During the reporting period, JEN did not provide any other services.

2.6 Transaction report

Section 6.2.1(b)iv requires DNSPs to report the purpose of all transactions between the DNSP and its affiliated entities.

JEN primarily transacts with Jemena Asset Management Pty Ltd (**JAM**). JAM is the Jemena entity used for procuring and contracting assets and services for Jemena's distribution networks businesses. Transactions between JAM and JEN are captured within projects using Work Breakdown Structures in Jemena's accounting and finance Enterprise Resourcing Platform (**ERP**) system.

Throughout the period 1 January 2024 to 31 December 2024, JEN also had a limited number of transactions with the following affiliated entities: SGSPAA, Jemena Limited, Jemena Gas Networks (NSW) Ltd and ZNX (2) Pty Ltd.

Transactions are categorised within Jemena's systems by cost types as either: Labour; Material; Contractor; Maintenance and Transmission; Administration; Fleet; Network Overheads; Corporate Overheads; Dividend Payments; or Other.

Further details of transactions and balances are summarised in **Appendix C**.

3. Independent assessment of compliance

Clause 6.2.1(c) of the Guideline requires DNSPs to ensure the annual compliance report must be accompanied by an assessment of compliance by a suitably qualified independent authority.

JEN engaged the services of KPMG to undertake a reasonable assurance review of JEN's compliance against the Guideline requirements. KPMG's audit report is provided at **Appendix D** to this Report.

Appendix A

Measures to ensure compliance


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	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
1	Electricity Ring-fencing Compliance Manual	<p>What it is: Detailed manual that describes how Jemena has applied, and implemented practices to ensure JEN adheres to the Guideline.</p> <p>How it demonstrates and supports compliance with obligations: The manual has been written and reviewed by Jemena Regulatory and Legal employees to set out the basis of how the Guideline is applied and interpreted by Jemena/JEN.</p> <p>This demonstrates Jemena establishing internal procedures and knowledge to ensure compliance with obligations under the Guideline. Currency and relevance of this manual is achieved by change events such as breaches, organisational changes, establishment of new businesses, waiver expiries/grants and revisions of the Guideline.</p>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
2	Jemena Code of Conduct	<p>What it is: Jemena's Code of Conduct document explains the standard of behaviour that is required from staff members to act in accordance with our values, comply with all relevant laws and regulations and operate in accordance with our desired culture of good corporate governance</p>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		and compliance. The Code of Conduct relevantly includes a section specifically on ring-fencing. How it demonstrates and supports compliance with obligations: Employment contracts for Jemena staff require compliance with the Code of Conduct.												
3	Compliance Training	What it is: Face to face training for key user groups, complimented by video training to maintain awareness across the broader group. How it demonstrates and supports compliance with obligations: The training program demonstrates our compliance culture of continuous improvement and responsiveness to root cause assessment.				✓	✓	✓	✓		✓	✓		
4	Organisation Framework Design and associated assessment templates	What it is: Provides the business with an overview of the organisational framework at Jemena. It is used to assist decision making in changes to roles and organisational structures. This framework includes reference to how electricity ring-fencing obligations apply to processes and decisions related to the Organisational Structure. Associated templates to assess impact also provide guidance to ensure that JEN designated	✓					✓						

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		roles and functions are identified and treated accordingly to the Guideline. How it demonstrates and supports compliance with obligations: In terms of electricity ring-fencing, it reinforces how organisation changes need to consider functional separation and staff sharing / separation obligations.												
5	Contracting and Procurement Entity Procedure	What it is: This procedure provides guidance on determining the appropriate contracting entity for the procurement of goods and services, revenue agreements and land agreements. How it demonstrates and supports compliance with obligations: In terms of electricity ring-fencing, it provides instructions to use the appropriate legal entity for the procurement of goods and services, revenue agreements and land agreements, as relevant to JEN and / or affiliated entities providing contestable electricity services. It includes guidance on electricity ring-fencing considerations.	✓	✓										

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
6	Time writing business rules and activity list codes	<p>What it is: These documents provide staff with an overview of the rules and instructions relating to time writing for work.</p> <p>How it demonstrates and supports compliance with obligations: It supports adherence to Cost Allocation Methodologies (CAM) which in turn supports JEN in maintaining separate accounts.</p> <p>As part of Jemena’s continuous improvement process, the CAM are periodically reviewed to ensure that costs are appropriately allocated to its Asset Portfolio.</p>		✓	✓									
7	Transaction Report	<p>What it is: Report generated from SAP to identify and list JEN transactions to ensure transactions are raised in line with the CAM and cost allocation principles (CAP).</p> <p>How it demonstrates and supports compliance with obligations: Demonstrates all transactions between JEN and an affiliated entity.</p>		✓	✓									
8	Secondment Procedure and Checklist	<p>What it is: A procedure and checklist regarding how to manage issues relating to secondments (e.g. email, share drive access, cost centre allocations) in instances where personnel transfer from JEN to another role within Jemena (or vice versa) particularly in the cases where the</p>						✓			✓			

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		secondment is to support a Related Electricity Service Provider (RESP) business). How it demonstrates and supports compliance with obligations: In terms of ring-fencing, these documents provide guidance and clarifies responsibilities to ensure confidential electricity information is not inadvertently provided to an RESP as a consequence of staff secondments.												
9	JEN Information Sharing protocol	What it is: Protocol and tools (register, process and request forms) outlining how JEN maintains and manages its obligations regarding <ul style="list-style-type: none">- Sharing Information with RESPs and other contestable electricity service providers; and- Obtaining customer consent to sharing of information. This protocol was merged with the Ring-Fencing Manual in the May 2020 update but remains on Jemena’s website to assist external parties understand JEN’s protocol. How it demonstrates and supports compliance with obligations: This document												

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		demonstrates the establishment of internal knowledge and procedural information to ensure JEN complies with information sharing protocol obligations under the Guideline.												
10	Fleet Asset Class Strategy	<p>What it is: This document provides guidance when procuring, managing and disposing of fleet and plant equipment that is owned, leased and operated by our business.</p> <p>How it demonstrates and supports compliance with obligations: In terms of electricity ring-fencing, it specifies rules to restrict JEN procuring assets on behalf of a RESP.</p>							✓					
11	Asset Management Strategy	<p>What it is: This document provides a consistent, collaborative and integrated approach to the activities undertaken to manage the lifecycle of assets.</p> <p>How it demonstrates and supports compliance with obligations: In terms of Electricity Ring-fencing this document provides for regulated assets to be managed in line with regulatory requirements so that cross promotion and cross subsidy does not occur.</p>			✓	✓			✓					
12	Non Discrimination Principles	<p>What it is: These principles have been documented and embedded in operational guidelines that work to ensure that JEN does not discriminate in the way it supplies (or markets) its direct control services between services supplied</p>				✓		✓						

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		to RESPs and customers of RESPs and services supplied to competitors of those RESPs (and their customers). How it demonstrates and supports compliance with obligations: This demonstrates the establishment of internal knowledge and procedural information to ensure compliance with non-discrimination obligations under the Guideline.												
13	Procurement Policy	What it is: The policy provides a framework to efficiently and effectively procure goods and services; provide guidance on roles and responsibilities of employees undertaking procurement activities; and detail the core principles that underpin those procurement activities. How it demonstrates and supports Jemena’s compliance with its obligations: In terms of Ring-fencing, this policy puts in place procedures to procure goods and services.				✓					✓	✓		
14	Waiver Register	What it is: The Waiver Register published on Jemena’s website (click here) outlines all approved waivers of the Guideline.											✓	

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		The compliance manual (Control 1 in this table) articulates the responsible parties and frequency in which the register must be reviewed. How it demonstrates and supports compliance with obligations: This demonstrates the establishment of internal knowledge and procedural information to ensure compliance with the register obligations under the Guideline.												
15	Staff Registers	What it is: The Staff Register published on. Jemena’s website (click here) identifies staff that may be shared between the provision of direct control services and contestable electricity services. The compliance manual (Control 1 in this table) articulates the responsible parties and frequency in which the register must be reviewed. How it demonstrates and supports compliance with obligations: This demonstrates establishment of internal knowledge and procedural information to ensure compliance with register obligations under the Guideline. Note: During 2023 an evaluation was undertaken of the role that the last remaining RESP employee performed. The evaluation resulted in the employee being re-classified as a Shared Staff member.								✓				

	Control Name	Description	AER Guideline Obligation Clause Reference												
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6	
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement	
16	Office Register	<p>What it is: The Office Register published on Jemena’s website (click here) identifies Jemena premises in which DNSP and RESP Personnel are co-located.</p> <p>The compliance manual (Control 1 in this table) articulates the responsible parties and frequency in which the register must be reviewed.</p> <p>How it demonstrates and supports compliance with obligations: This demonstrates establishment of internal knowledge and procedural information to ensure compliance with register obligations under the Guideline.</p> <p>Note: During 2023 an evaluation was undertaken, and the Office Register updated to reflect nil premises where DNSP and RESP staff are co-located as the sole Shared Staff member who is the administrator of Ovida’s remaining customers does not perform contestable electricity services (CES) work from a JEN office.</p>								✓					
17	SAPS Register	<p>What it is: The SAPS Register published on Jemena’s website (click here) is provides a description of regulated stand-alone power systems used by JEN to provide other services.</p>													✓

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		How it demonstrates and supports compliance with obligations: This demonstrates establishment of internal knowledge and procedural information to ensure compliance with register obligations under the Guideline. Note: The SAPS register contains a “nil” entry as JEN does not have any SAPS.												
18	Physical Separation	What it is: Any personnel involved in provision or marketing of Contestable Electricity Services are not permitted to access office secure areas where JEN dedicated staff work. This is reflected in Jemena’s site manual, access restrictions (security access card) and requests forms (Onboarding checklist). How it demonstrates and supports compliance with obligations: This demonstrates establishment of procedural information and physical controls to ensure compliance with physical separation and information sharing obligations under the Guideline.					✓			✓				
19	Checklist for publishing content on internet and intranet	What it is: A checklist for determining whether information is suitable to be published on the Jemena website or on the intranet. How it demonstrates and supports compliance with obligations: This							✓	✓				

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		demonstrates establishment of, and embedding, procedural information to support information protections and cross promoting obligations. In establishing these checklists, both Jemena’s website and intranet site are reviewed to ensure compliance.												
20	Brand Separation	<p>What it is: The Ovida brand has been established as the brand of Jemena’s RESP. Review of the external website has been conducted to ensure that Ovida is not promoted as part of the Jemena brand (which is associated with the delivery of direct control services). In addition, staff working in contestable electricity services are separated from JEN dedicated staff, and required to contact and communicate with customers via ‘Ovida’ branded emails. This is reinforced in the onboarding checklist.</p> <p>How it demonstrates and supports compliance with obligations: This demonstrates establishment of a separate RESP brand.</p>												
21	Compliance Reporting	<p>What it is: A compliance reporting process has been established, implemented and documented</p>												

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		<p>to facilitate the compilation, assessment and sending of this report to AER each year in line with the Guideline’s requirements.</p> <p>The applicable Guideline obligations are logged in Omnia (obligation register), with the Omnia system periodically alerting responsible persons to assess and confirm compliance.</p> <p>This process is part of the annual certification process which also enables staff to receive assurance they understand and are appropriately managing their regulatory obligations.</p> <p>In addition, responsible persons are to log and manage breaches in Omnia in line with the Jemena breach reporting process.</p> <p>How it demonstrates and supports compliance with obligations: This demonstrates establishment of, and embedding, procedural information to support this business in maintaining and reporting on its compliance.</p>												
22	Financial statement preparation and audit	<p>What it is: Preparation by management and audit (reasonable assurance) by an independent registered company auditor of financial statements of:</p> <ul style="list-style-type: none">the SGSPAA Groupstand-alone financial statements (Audited Base Accounts) for JEN and Jemena Gas Networks (JGN)		✓	✓									

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		<ul style="list-style-type: none">financial and non-financial information disclosures in accordance with Regulatory Information Notices for JEN and JGNDisclosures under Part 10 of the National Gas Rules for certain gas pipeline entities/service providers within the SGSPAA group. <p>How it demonstrates and supports compliance with obligations: This demonstrates establishment and embedding financial control across the SGSPAA group and the entities within, with application of standard cost allocation principles amongst group entities. An annual independent audit is conducted to support management's internal monitoring and compliance framework.</p>												
23	Quality Assurance	<p>What it is: Biannual quality assurance reviews targeting the high risk areas of physical separation, protection of confidential information and provision of contestable electricity services. Reviews are completed by the Regulatory Compliance Manager to ensure ringfencing controls are operating as expected.</p>	✓				✓	✓			✓		✓	

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		How it demonstrates and supports compliance with obligations: In terms of RESP personnel, ensuring there is no unapproved access to JEN's secure office areas or digital repositories. In terms of Affiliate businesses, ensuring no work is undertaken that would be considered contestable electricity services. Note: Quality assurance activities relating to access to site and digital repositories were not conducted in 2024 as there were no RESP staff.												
24	Domain Migration Workflow	What it is: An online form governing internal and intercompany transfers that workflows to the Regulatory Compliance Manager in the first instance for ring fencing assessment and approval. How it demonstrates and supports compliance with obligations: The workflow will not progress until approved by the compliance team. Once approved, tasks are generated to all relevant IT teams to facilitate the IT migration. It also generates email notifications to all relevant parties including the previous and receiving People Leaders and HR business partners.	✓				✓	✓			✓		✓	
25	Identity Management Software	What it is: A ringfencing classification is assigned to each role within the group providing	✓				✓	✓			✓		✓	

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		governance and oversight of all internal staff position changes. How it demonstrates and supports compliance with obligations: The workflow generates tasks to all relevant IT teams to facilitate the required access changes. It also provides ease of oversight to the Regulatory Compliance Manager for managing updates to the staff register under the requirements of version 3 of the Guideline which came into effect 3 February 2022.												
26	Organisational Change Monitoring	What it is: A scheduled review of organisational changes completed by the HR Services Manager 3 times per annum. The review requires a notification to the Regulatory Compliance Manager of any organisational changes that have occurred in the previous 4 months, or which are planned in the upcoming 4 months. How it demonstrates and supports compliance with obligations: The review assists in ensuring the Staff Register is able to be updated and published in a timely manner in addition to providing sufficient lead time to	✔				✔	✔		✔	✔			✔

	Control Name	Description	AER Guideline Obligation Clause Reference											
			3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
			Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
		ensure compliance can be maintained through larger organisational restructures. Note: In 2024, activities relating to organisational change monitoring were ongoing and incorporated into assessments of an affiliate potentially commencing provision of CES, rather than at the defined scheduled intervals noted above.												
27	Asset Management Framework for External Engagement	What it is: A framework which governs the engagement activities of JEN's Asset Management team with external parties, including JEN's related parties who provide contestable electricity services. How it demonstrates and supports compliance with obligations: The framework provides a clear understanding to JEN employees and external parties on how JEN can and will engage to promote efficient and non-discriminatory (intentional or unintentional) engagement with all external parties.			✓	✓		✓			✓			
28	Electricity Markets Guideline – A Compliant Approach to Ring-fencing	What it is: A document which provides the Electricity Markets business with guidance on how JEN's compliance with the AER's Ring Fencing Guideline impacts their business strategy and operations. How it demonstrates and supports compliance with obligations: The document	✓	✓	✓	✓	✓	✓	✓		✓			

Control Name	Description	AER Guideline Obligation Clause Reference											
		3.1a	3.2.1	3.2.2	4.1b	4.2.1a	4.2.2a	4.2.3	4.2.4	4.3	4.4.1	5.7	6
		Legal separation	Seperate accounts	Cost allocation & attribution	Non discrimination	Physical separation	Staff sharing	Branding and cross promotion	Office and staff Registers	Information	Service provider conduct	Waivers	Compliance, reporting & enforcement
	provides guidelines for key ring-fencing questions and early engagement framework with the Regulation and Legal teams so that ring-fencing risks are adequately captured in the strategy for the relevant opportunity or project.												

Appendix B

2024 compliance initiatives

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The following table sets out compliance improvement activities for the reporting period.

Table B1–1: Compliance improvement activities initiated during the reporting period

Obligation	Improvement Activity	Status as at 31 December 2024
All	<p>Training</p> <p>As a result of Jemena's RESP business effectively ceasing operations in May 2022, mandated training was put on hold.</p> <p>Refresher training was provided via video modules to the wider group throughout 2024:</p> <ul style="list-style-type: none"> The general awareness video, covering the Guidelines key obligations was completed by 1127 staff. Tailored RESP and JEN dedicated modules were completed by relevant RESP and JEN staff. <p>During 2024, the Regulatory Compliance team provided a range of advice and proactive face to face interactions to enhance the businesses understanding and awareness of ring-fencing matters. Some examples include:</p> <ul style="list-style-type: none"> Affiliate personnel within the Jemena Network Services area —providing guidance on the establishment of a RESP entity and associated controls required to comply with the Guideline. 	Complete
All	<p>Zinfra status as an affiliate</p> <p>Shortly after commencement of the Guideline, JEN requested that Zinfra (an affiliate) advise JEN should it commence the provision of contestable electricity services itself, or provide services to support the provision of contestable electricity services.</p> <p>To confirm and ensure Zinfra has not commenced bidding for opportunities to provide contestable services, JEN's legal and regulation teams regularly meet with Zinfra's National Manager Commercial and Risk to review opportunities being considered.</p> <p>During 2024, reviews did not identify bids on any contracts that involve the provision of contestable electricity services.</p>	Complete
All	<p>JGN status as an affiliate</p> <p>In July 2020, Jemena Gas Networks (JGN) commenced consultations with the AER regarding the potential need for a waiver to progress JGN's Western Sydney Green Gas Trial. The AER considered the scope of the trial and were of the view that a waiver would not be required, but requested further consultation should the scope change.</p> <p>To ensure the trial remains in line with what was presented to the AER, an annual review of the trial is conducted by the Project Manager and Regulatory Compliance Manager.</p> <p>The review was completed in December 2024 where no deviation of scope was confirmed.</p>	Complete
Staff sharing register	<p>Staff sharing Register</p> <p>During 2024, the staff sharing register was updated and published in January, April, July and October in line with clause 4.2.4 of the Guideline.</p>	Complete.
Waiver Register	<p>Waivers Register</p> <p>During 2024, the waivers register was updated and published in January, April, July and October in line with clause 5.7 of the Guideline.</p>	Complete

Obligation	Improvement Activity	Status as at 31 December 2024
Office Register	Office Register During 2024, the office register was updated and published in January, April, July and October in line with clause 4.2.4 of the Guideline.	Complete
Information Register	Information Register During 2024, the information register was updated and published in January, April, July and October in line with clause 4.3.4 of the Guideline.	Complete
SAPS Register	SAPS Register During 2024, the SAPS register was updated and published in January, April, July and October in line with clause 6.2.3 of the Guideline.	Complete

Appendix C

Transactions Report

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Affiliated Entity	Cost Type	Nature of the Services Provided	Value (\$)	Transaction Description and Purpose
JAM	Labour	All operational, network construction and non-network services, focusing on maintenance and operational network services, non-network, management and corporate support services such as Finance, HR and Legal.	9,254,109	Comprises direct labour time-writing to JEN projects and work activities using Cross Allocation Time Sheets (CATS) in Jemena's SAP system. Direct labour costs includes: Wages; Overtime; Allowances; Superannuation and defined benefit plan costs; Medical charges; Staff training; Welfare expenses; Personnel insurance; Uniforms & clothing; Annual, long service, personal and other types of leave; Payroll tax. Indirect labour costs are recovered as either Network or Corporate Overheads.
JAM	Material	As above	20,783,927	Material comprises costs that are direct: Direct acquisitions; Goods issued; and Other miscellaneous material costs. Indirect material costs are recovered as either Network or Corporate Overheads.
JAM	Contractor	As above	237,115,866	Contractor comprises cost that are direct: Contractor costs; and Consulting costs, in each case where JAM has engaged contractors to perform works or services in relation to JEN's network.
JAM	Maintenance and Transmission	All operational, maintenance for network and non-network services, including the recording of the transmission type costs	104,903,476	Maintenance comprises work including the following: Feed-in Tariff; Transitional Feed-in Tariff; Use of System; Cross boundary charges; Grid Connection charges; Property tax; Maintenance Building & grounds and computer equipment; Security measures; Maintenance fees.

Affiliated Entity	Cost Type	Nature of the Services Provided	Value (\$)	Transaction Description and Purpose
JAM	Administration	Provision of administration type services for the capex and operational activities.	1,993,953	Administration comprises work items of a back office /support nature that are directly attributable to JEN projects and work activities, such as: Office supplies; Utilities; External audit services; External legal services; Other professional fees & expenses; Licence fees (excluding motor vehicle registration fees); Subscriptions & registrations; Telephone, postage and courier service costs; Rental costs; Insurance (other than motor vehicle and personnel); Meter reading fees. In most cases, Administration costs are indirect in nature and recovered as Network or Corporate Overheads.
JAM	Fleet	Provision of fleet type services for the capex and operational activities.	595,139	Fleet costs comprises those that are directly attributable to JEN projects and work activities, such as: Fleet charges; Vehicle and major equipment maintenance; Fuel costs; Lease expense; Registration and third party costs; Unrecovered accident costs; Insurance. In most cases, Fleet costs are indirect in nature and recovered as Network Overheads.

Affiliated Entity	Cost Type	Nature of the Services Provided	Value (\$)	Transaction Description and Purpose
JAM	Other	Provision of miscellaneous type services for the capex and operational activities.	9,480,803	This category comprises work items that are attributable to JEN projects and work items, such as: Tender expenses; Management fees; Marketing services; Travel and Accommodation expenses; Minor equipment. In most cases, other costs are indirect in nature and recovered as Network or Corporate Overheads.
JAM	Network Overheads	Provision of property, engineering and program management support type services for the capex and operational activities.	36,992,792	Network overheads comprise indirect costs that are recovered to capex or opex projects using costing sheets and assessment cycles in SAP. These costs consist of: Direct Support Allocations (DSA) (indirect labour recoveries); Non labour recoveries (such as Indirect materials, Indirect contractor costs, Indirect maintenance other, Administration costs and Other costs) Property recoveries; Store Recoveries; and Fleet costs.
JAM	Corporate Overheads	Provision of administration type services for the capex and operational activities.	1,721	Corporate overheads comprise indirect costs that are recovered to JEN capex or opex projects using costing sheets and assessment cycles in SAP. These costs consist of: Indirect labour recoveries; and Non labour recoveries (such as indirect materials, indirect contractor costs, indirect maintenance other, administration costs).
JAM	Settlement of receivables / payables	n/a	(557,709,640)	Settlement of outstanding receivable / payable balances with related parties through a process of net loan reassignments.
Jemena Ltd	Dividend Payments	Dividend payments to shareholders.	0	Dividend paid during the year.
Jemena Ltd	Settlement of receivables / payables	n/a	633,532,491	Settlement of outstanding receivable / payable balances with related parties through a process of net loan reassignments.

Affiliated Entity	Cost Type	Nature of the Services Provided	Value (\$)	Transaction Description and Purpose
SGSPAA	Settlement of receivables / payables	n/a	(63,789,837)	Settlement of outstanding receivable / payable balances with related parties through a process of net loan reassignments.
Jemena Gas Networks (NSW) Ltd	Labour	All operational, network construction and non-network services, focusing on maintenance and operational network services, non-network, management and corporate support services such as Finance, HR and Legal.	0	Labour costs (see above for detailed description).
Jemena Gas Networks (NSW) Ltd	Settlement of receivables / payables	n/a	6,083,056	Settlement of outstanding receivable / payable balances with related parties through a process of net loan reassignments.
ZNX (2) Pty Ltd	Settlement of receivables / payables	n/a	40,076	Settlement of outstanding receivable / payable balances with related parties through a process of net loan reassignments.
ZNX (2) Pty Ltd	Labour	All operational, network construction and non-network services, focusing on maintenance and operational network services, non-network, management and corporate support services such as Finance, HR and Legal.	(7,656)	Labour costs (see above for detailed description).