



Part of Energy Queensland

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Rebecca Holland  
General Manager (a/g) - Compliance, Enforcement and Surveillance  
Australian Energy Regulator  
[AERexemptions@aer.gov.au](mailto:AERexemptions@aer.gov.au)

Dear Ms Holland,

### **Exemption guidelines review**

Queensland's two distribution network service providers (DNSPs), Ergon Energy Corporation Limited (Ergon Energy Network) and Energex Limited (Energex), thank the Australian Energy Regulator (AER) for the opportunity to provide a submission on its Exemptions guidelines 2026 review (the Consultation paper).

The proposed review of the exemption guidelines is a necessary and timely step to ensure the AER's regulatory framework remains fit-for-purpose in a rapidly evolving energy market. In particular, updating the Network Exemption Guideline to reflect the Australian Energy Market Commission's flexible trading reforms will provide greater regulatory clarity and consistency, helping to facilitate innovation in consumer energy resources (CER) and more efficient use of secondary settlement points.

At the same time, the targeted focus on reducing regulatory burden, especially in relation to commercial embedded network retrofits, demonstrates a pragmatic approach to streamlining processes where risks are lower, while maintaining appropriate consumer protections.

By modernising the guidelines without revisiting their underlying policy intent, the review strikes an appropriate balance between enabling new technologies and business models, improving administrative efficiency, and preserving the integrity of the exemptions framework for consumers and industry participants alike.

With regards to the Consultation paper's questions on the network exemption registration process, we offer the following feedback:

- **Q6. Do stakeholders support removing the requirement for prospective exempt network service providers to obtain AER approval for commercial retrofits and replacing it with a self-certification and registration option?**

We recognise that the current requirement for the AER to assess individual retrofit applications can impose a significant administrative burden. However, we consider it essential that any move to a self-certification and registration model continues to prioritise robust customer protections. In particular, it will be important to ensure that proponents are demonstrably meeting relevant technical and safety standards, and that meaningful, well-informed consultation has occurred with affected customers. Retaining strong assurance mechanisms in these areas will help maintain confidence that streamlined processes do not come at the expense of customer outcomes.

- **Q7. Do stakeholders support the AER developing marketing and consent campaign materials with minimum standardised statements to be used by parties under the self-certification and registration option? If yes, what content and consumer information do stakeholders consider should be prioritised for inclusion. If not, please provide reasons why.**

Yes, we support the development of standardised marketing and consent materials, as this will help ensure a consistent minimum standard of information is provided to affected customers under a self-certification model.

To be effective, these materials should prioritise clear and accessible information on key customer impacts, including transparency of energy costs and pricing structures, requirements for connecting and operating CER, and customers' rights and obligations. They should also set out clear processes for dispute resolution and escalation, as well as procedures for planned outages, including notification timeframes and communication expectations.

Ensuring this information is presented in a simple, consistent and comparable format will support more informed customer decision-making and improve overall confidence in the process.

Should you wish to discuss the above feedback please contact me or Lindsay Chin on [REDACTED]. This letter does not contain confidential information and may be published.

Yours sincerely

[REDACTED]

Mark Simpson  
**A/Manager Regulatory Affairs**

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