

Submission to the Australian Energy Regulator

**In response to the
'Call for Input – Review of the Ring-fencing
guideline (electricity distribution) v4 and
Shared Asset Guideline v2'**

August 2026



Introduction

The National Electrical and Communications Association (NECA) welcomes the opportunity to respond to the Australian Energy Regulator's (AER's) Call for Input on the review of the Ring-fencing Guideline (electricity distribution) v4 and the Shared Asset Guideline v2.

NECA is the peak national body for Australia's electrotechnology industry, representing over 6,500 businesses employing more than 344,000 people and generating over \$82 billion in annual turnover. Many NECA members are active participants in contestable electricity service markets, including connection and infrastructure works, and are therefore directly affected by the operation and effectiveness of the ring-fencing framework.

NECA has consistently raised concerns that the current guideline is not operating as intended. In particular, NECA considers that the framework is failing to prevent DNSPs and their related electricity service providers (RESPs) from leveraging monopoly-derived resources to compete in contestable markets. More significantly, NECA now considers that aspects of the guideline—particularly clause 4.2.2(b) and the associated reporting arrangements—have evolved in practice to **legitimise this behaviour rather than prevent it**.

This submission responds to the AER's questions with a focus on those issues most material to NECA's members and the effective operation of competitive markets.

Response to Question 1

Key changes in distribution networks and the broader system

NECA agrees that the AER has broadly and accurately described the structural changes occurring in the electricity system, including the growth of consumer energy resources, the emergence of new technologies and the increasing interaction between regulated network services and contestable markets.

However, NECA considers that the Call for Input does not sufficiently recognise a critical issue that is already embedded in current market practice. This issue is not prospective or arising from emerging technologies—it is present now and is materially affecting competition.

Specifically, NECA submits that the Ring-fencing Guideline, in its current form, is not simply failing to prevent inappropriate use of DNSP resources. Rather, the combination of clause 4.2.2(b) and existing reporting requirements has created a framework that **permits, normalises and effectively legitimises the use of DNSP staff and resources in contestable markets with appreciable benefits to consumers**.

Clause 4.2.2(a) establishes a clear principle that DNSP staff engaged in regulated activities should not also be involved in contestable services provided by affiliated entities. However, the breadth of the exceptions in clause 4.2.2(b) means that this principle can be routinely set aside. Provisions dealing with staff who have access to electricity information, and those located in regional offices, are sufficiently broad that they allow significant volumes of staff to be shared under what are treated as compliant arrangements.

The practical outcome is that the guideline does not, and has not operated as a constraint. Instead, it operates as a mechanism through which DNSPs can structure and justify large-scale staff sharing arrangements. These arrangements are then disclosed through registers and reports which declare the activity is happening but do not limit it or quantify it.

In this way, the guideline functions less as a ring-fence and more as a **framework for recording and legitimising conduct that undermines competitive neutrality**.

Response to Question 2

Reflection of stakeholder concerns and additional issues

NECA considers that the AER has captured many of the high-level concerns expressed by stakeholders, particularly in relation to functional separation, information asymmetry, waiver reliance and reporting limitations.

However, NECA submits that the Call for Input understates the structural weakness embedded in clause 4.2.2(b) and the way in which it interacts with reporting requirements.

The current drafting of clause 4.2.2(b) does not operate as a narrow or controlled exception to the general rule. In practice, it operates as a broad enabling mechanism that allows DNSPs to justify extensive sharing of staff across regulated and contestable activities. The test applied under these provisions—particularly in relation to access to electricity information—is inherently difficult to verify and, in NECA's view, does not provide a meaningful safeguard against competitive advantage.

This is compounded by the absence of any meaningful constraint on the scale of staff sharing. The guideline does not impose quantitative limits, proportionality tests, or clear thresholds. As a result, some affiliated entities are able to operate with relatively small permanent workforces while drawing heavily on DNSP staff and capabilities as required. This creates a structural imbalance that cannot be replicated by independent providers, who must invest directly in workforce capacity, systems and resources.

The reporting framework further reinforces this outcome. While DNSPs are required to publish staff-sharing registers, these registers do not include sufficient detail to assess the competitive impact of the arrangements. In particular, they do not consistently report hours worked, intensity of engagement, or the proportion of activity performed by shared staff relative to dedicated personnel. DNSPs are

provided with a non-mandatory template (**appendix A**) which leaves the question of quantum very loosely defined and does not address justification for the diversion of technical staff at all.

As a consequence, the reporting framework does not operate as an effective regulatory control. Instead, it serves to formalise the existence of staff sharing without providing the transparency necessary for proper oversight or enforcement.

Taken together, these elements mean that the guideline is not achieving its core objective of preventing DNSPs from leveraging monopoly advantages to distort competition. On the contrary, it is enabling that outcome in a way that is both structured and, importantly, compliant under the current rules.

NECA also considers that the Call for Input understates the extent to which the ring-fencing framework has increasingly become dependent on waivers as a mechanism for expanding DNSP participation in contestable and adjacent markets. While the paper acknowledges stakeholder concerns regarding waiver reliance, it does not fully recognise the scale of concern surrounding the permissive nature of some waiver decisions and the limited scrutiny applied to the supporting rationale. NECA is concerned that significant departures from ring-fencing protections have, in some cases, been approved on the basis of speculative future benefits, assertions of market failure, or claims regarding efficiency and consumer outcomes that are difficult to independently verify. The increasing frequency and breadth of waiver applications raises questions as to whether the current framework is being used to accommodate exceptional circumstances or to progressively redefine the practical boundaries of DNSP activities. The AER's own review notes a substantial increase in waiver activity in recent years, encompassing emerging markets such as batteries, EV charging, training services and other contestable activities.

Further, NECA is concerned that these assessments are undertaken solely by the AER through bilateral regulatory processes that place considerable weight on evidence and submissions provided by the applicant DNSP. While stakeholder consultation occurs, affected competitors, consumers and industry participants have limited ability to test underlying assumptions, challenge forecasts, or scrutinise claimed public benefits. The result is a framework in which material expansions of DNSP or DNSP-affiliated activities can occur without the level of independent market assessment, competition analysis or broader stakeholder oversight that would ordinarily accompany significant changes to competitive market boundaries. NECA therefore considers that the review should explicitly examine whether the waiver framework remains fit for purpose and whether additional governance arrangements, transparency requirements or independent review mechanisms are required to ensure that waivers do not progressively erode ring-fencing protections contrary to the long-term interests of consumers and competitive neutrality objectives.

Response to Question 3

Ring-fencing guideline (electricity distribution)

Functional separation obligations

NECA attend an AER hosted workshop for ‘contestable service providers unrelated to networks, and industry representative bodies’ on the 21st July 2026. In reviewing some of the information presented at the time and contained in the associated slide-pack, NECA considers that it is worth commenting on our own experience with some items in demonstrating why greater clarity is required

In particular, with respect to function separation requirements, on slide 20 of the slidepack provided, three scenarios are presented -

1 SCENARIO 1: BRANDING AND CROSS-PROMOTION

A DNSP can display its branding alongside a RESP on its asset, assets, but must keep them separate.

✓ ACCEPTABLE: Separate branding

DNSP branding and RESP (affiliate) branding are both on the asset, but are clearly separate

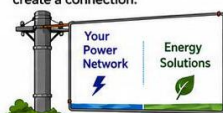


Why this is acceptable

- Branding is visually separate and distinct.
- There is no implication of an association or endorsement.
- The asset is used by the RESP.

✗ NOT ACCEPTABLE: Branding involves cross-advertisement or cross promotion

DNSP branding and RESP branding create a connection.



This includes when it:

- Appears as a joint or combined offering.
- Creates an impression of endorsement or partnership.
- Could influence customers decisions.

i RESP (affiliate) branding may appear on a DNSP asset (e.g. poles, substations, kiosks), but prohibiting branding involves cross advertisement and cross promotion.

NECA have previously raised a case involving multiple installations on a DNSPs assets where DNSP branding on/and above equipment beyond the connection point and were referred to in promoting its RESP activities, obviously creating ‘an impression of endorsement or partnership’. The AER Ring Fencing team took an extremely long time to consider what is a relatively straightforward question but ultimately determined that there was technically no breach of the guideline.

NECA members have also expressed alarm that some RESPs have entered into competition for electrical installation work touting

2 SCENARIO 2: STAFF MAY NOT BE SHARED, EXCEPT IN LIMITED CIRCUMSTANCES

Deployment of staff, and staff access to information, must be carefully managed to ensure functional separation in practice.

i There are restrictions on which staff can be shared. Staff involved in competitive activities, commercial decisions or sensitive information must not be shared.

1 Field work for DNSP

Field officer completes DNSP network work during the day.



2 Return to depot

Officer returns to depot.



3 Change of attire

Officer changes out of DNSP uniform before undertaking affiliate work.



4 Separate timesheets

Officer records time in separate timesheets for DNSP and affiliate work.

DNSP Work		Affiliate Work	
Date	Hours	Date	Hours
12 May	8.0	12 May	5.0

5 Cost allocation

Costs (e.g. salary, vehicles, tools, training) are allocated to DNSP and affiliate activities using a fair and transparent method.




6 Affiliate work

Officer undertakes affiliate activities (e.g. metering installations).



NECA is concerned that the elements of this scenario (as presented) are either not explicitly articulated in AER material or are otherwise substantially misunderstood/misapplied by some DNSPs. In particular,

- Steps 2, 3 – return to depot and change attire**

The reported experience of NECA members is the routine immediate ‘re-branding’ of staff uniforms and plant on/adjacent to site via the use of velcro badges (on attire) and magnetic signage on plant, avoiding the return to a home depot.

In at least one instance a technician has attended site to perform a RESP function and upon perceiving an unrelated compliance problem has walked to his vehicle, changed personal branding and issued paperwork on behalf of the DNSP.

Regardless, such casual intra-day sharing of staff and equipment is inconsistent with an RESP operating as a functionally separate business. The leverage that this affords the RESP from DNSP infrastructure and/or avoided overhead costs cannot be ignored.

- Step 4 – **separate timesheets**

NECA is sceptical about the veracity of the concept of physically separate timesheets. Especially where organisations have implemented electronic/automated timekeeping processes.

- With respect to the ‘**restrictions on which staff can be shared**’

 There are restrictions on which staff can be shared. Staff involved in competitive activities, commercial decisions or sensitive information must not be shared.

NECA refers to evidence in staff sharing registers, and lack declarations/evidence required, to suggest that this aspect is routinely breached.



NECA is concerned that this provision is especially difficult to monitor and enforce for the regulator. NECA members and associated businesses in NSW have indicated awareness of several instances of RESPs obtaining specific knowledge of connection applications and/or leveraging specific electricity information to accelerate responses to prospective clients.

Even if competitors had a facility to obtain access to interrogate the internal communications records of the DNSP, the motivation to do so is tempered by the interest in preserving a working relationship with the DNSP and influential staff members therein such that they can continue to undertake work in that area.

In addition, the opportunities for casual sharing of information between staff that are ‘physically separated’ by a door and/or share site facilities (eg cafes/ parking lots) and/or have substantial personal/familial relationships with staff of the ring-fenced entity and/or staff that are often shared between the entities, mean that physical records/evidence of non-compliance are easily avoided whilst the RESP leverages significant informational and first mover advantages.

Ring-fencing waiver framework and decisions

NECA shares stakeholder concerns about the increasing reliance on waiver processes to enable DNSP or DNSP-aligned participation in emerging and adjacent markets. Waivers should remain exceptional, rather than becoming the mechanism through which material departures from ring-fencing protections are normalised. The PLUS ES trial waiver illustrates this risk. Although the AER stated that the waiver concerned metering requirements rather than authorising EV charger deployment, the decision still enabled up to 1,000 pole-mounted kerbside EV chargers to proceed using a bespoke metering solution by a metering coordinator part-owned by Ausgrid. Stakeholders expressly raised concerns about PLUS ES’ relationship with Ausgrid, facilities access arrangements, preferential access to infrastructure and resources, and the potential for market distortion. The AER nevertheless treated those ring-fencing concerns as outside the trial waiver process, despite recognising that the rollout in Ausgrid’s network was the element giving rise to the compliance risk. In practical terms, the waiver appears to have conferred a first-mover advantage on a DNSP-aligned related party in an emerging kerbside charging market, without a clearly demonstrated need for such advantage.

The Essential Energy training academy waiver raises a related concern. The AER acknowledged that other RTOs already provide relevant training, that stakeholders were concerned the academy may suppress existing or prospective training providers, and that Essential Energy's brand may create an implicit cross-subsidy built on the value of its regulated network business. The AER also recognised that the vocational training market is dynamic, that competition effects may need course-by-course assessment, and that a flexible waiver could limit regulatory oversight. Yet the waiver was granted until 2034 for a broad suite of contestable training services. This demonstrates the limits of expecting the AER, through bilateral waiver processes, to assess complex service markets, future demand, market entry, competitive effects and regional workforce dynamics.

For these reasons, NECA considers significant departures from ring-fencing obligations should not be determined solely through submissions to, and decision by, the AER. NECA recommends a standing stakeholder council comprising consumer representatives, DNSPs, governments, market bodies, contestable providers and peak industry bodies to review material waiver applications, class waivers and streamlined processes before decisions are made. This would improve transparency, reduce regulatory error and ensure affected stakeholders—not only DNSPs and the regulator—shape how ring-fencing protections evolve.

Other evidence and case studies

NECA has previously provided the AER with detailed evidence drawn from staff-sharing registers published by DNSPs. This evidence is central to understanding how the guideline operates in practice and should be considered as part of this review.

NECA refers specifically to staff-sharing data from several DNSP registers and attached to this submission for:

- **Endeavour Energy**

where analysed data indicated that substantial amounts of staff (technical, trade, engineering) are shared consistently with its affiliated entity for each three-month reporting period. Though hours worked, projects worked on are not declared

The register routinely retains line items for many position descriptions that have been superseded and/or for which it reports no sharing for the quarter.

Several NECA members and associated businesses have advised that Endeavour's RESP has obviously competed unfairly for contestable infrastructure works using DNSP engineering and field staff and/or Endeavour Energy itself has failed to treat the RESP in the same manner as competitors when it comes to process or information.

- **Ausgrid**

where numbers/hours are not declared, but personnel providing electrical services are declared to be shared on "Ad-hoc task specific" or even permanently shared basis including staff in positions with obvious opportunities to act contrary to the Guidelines.

This report barely changes from quarter to quarter.

- **Energex, Ergon Energy**

The registers for these entities simply declare large categories of staff classification as being 'permanently shared' with no detail of quantities or hours. The registers from quarter to quarter typically only change the date to satisfy the requirement to publish the register for the last quarter by dates specified in the Guideline.

- **SA Power Networks.**

where numbers/hours are not declared, but personnel in electrical vocational categories are declared to be shared on “Ad-hoc task specific”. The registers from quarter to quarter typically only change the date to satisfy the requirement to publish the register for the last quarter by dates specified in the Guideline.

This DNSP also failed to update their register for almost 5 years until the AER was challenged about this fact.

These datasets indicate patterns of DNSP strategy, in various state jurisdictions, to ‘demonstrate’ paper compliance with the Guideline whilst potentially structuring themselves to share significant numbers of DNSP staff—including lineworkers, engineers, technologists, project managers and other operational personnel—to affiliated entities engaged in contestable electrical service markets.

The importance of this evidence lies not only in the potential magnitude of staff sharing observed, but in the fact that this activity is occurring within the framework of the current guideline and is therefore treated as compliant.

These examples demonstrate three key points.

- First, the business model for several RESPs is not that of a functionally separate business, but rather one that relies on ready access to workers diverted from DNSP activities.
- Second, the existing provisions in clause 4.2.2(b) provide very low threshold pathways for these activities to occur without breaching the guideline, to the detriment of the central principle of clause 4.2.2(a).
- Third, the reporting framework, in particular the requirements for the staff sharing registers do not provide any transparency or sufficient detail to assess the true extent or competitive impact of the arrangements.

In NECA’s view, this evidence supports a clear conclusion:

The current guideline does not merely fail to prevent the use of DNSP staff in contestable markets—it provides a structure through which that use can be justified, nominally disclosed and normalised. DNSPs with a mind to, can and have used the current guideline to effectively arbitrage profit making opportunities using DNSP staff to the detriment of genuine competition and the National Electricity Objective.

To support this commentary of staff sharing rules and reporting and, NECA has included a consolidated historical analysis of staff-sharing data in **Appendix B (B1-B5)**, which illustrates these patterns across several DNSPs identified above and demonstrates the consistency of the issue across jurisdictions and network operators. Also provided in the appendix, is information from the latest version of the staff sharing registers of those DNSP’s.

Response to Question 4

Scope of the review

NECA considers that the proposed scope of the review is broadly appropriate.

However, the effectiveness of the review will depend on whether it directly addresses the structural issues outlined above. In particular, NECA considers that meaningful reform will require:

- revision of clause 4.2.2(b) to significantly narrow the scope of permissible staff sharing and ensure that exemptions cannot be used as a default compliance pathway;
- introduction of measurable constraints on the volume or proportion of DNSP staff that can be allocated to affiliated contestable activities;
- expansion of reporting requirements to include detailed information on staff numbers, hours, roles and the extent of reliance on shared resources; and
- strengthening of waiver assessment processes to ensure that waivers do not further entrench the use of regulated resources in contestable markets without clear and demonstrable public benefit. In particular, the establishment of a standing stakeholder council comprising consumer representatives, DNSPs, governments, market bodies, contestable providers and peak industry bodies to review material waiver applications, class waivers and streamlined processes before decisions are made.

Without reform in these areas, NECA considers that the guideline will continue to operate in a manner that undermines, rather than supports, competitive neutrality and the National Electricity Objective.

Response to Question 5

Stakeholder engagement

NECA supports the AER's proposed engagement approach but considers that additional targeted engagement with unaffiliated service providers is essential.

NECA's previous submission noted concern that earlier amendments proceeded without meaningful engagement with those parties most directly affected by the operation of the guideline.

To address this, NECA recommends that the AER:

- engage directly with industry bodies and independent providers to test how the guideline operates in practice;
- provide mechanisms for confidential submission of evidence where commercial sensitivities exist; and
- ensure that real-world case studies, including staff-sharing data, are used to test the effectiveness of proposed reforms.

endentThese steps will help ensure that the review is informed not only by policy considerations, but by the actual operation of the market.

Conclusion

NECA supports the AER's decision to undertake a comprehensive review of the Ring-fencing Guideline and the Shared Asset Guideline. However, NECA emphasises that the current framework contains fundamental weaknesses that must be addressed as a matter of priority.

In particular, NECA considers that clause 4.2.2(b) and associated reporting requirements have created a regulatory environment in which the use of DNSP staff in contestable markets is not only permitted, but effectively legitimised. This outcome is inconsistent with the intent of ring-fencing and undermines the development of competitive markets.

Unless these provisions are substantively revised, the guideline will continue to operate in a way that allows DNSPs and their affiliates to leverage monopoly-derived advantages to the detriment of independent providers and, ultimately, consumers.

NECA would welcome further engagement with the AER in progressing reforms that restore the integrity of the ring-fencing framework and ensure that it delivers on its intended objectives.

Appendix A – AER Staff Sharing Report Template¹

Staff Sharing Register Template

Date of Update: Click or tap to enter a date.

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 shared staff positions, under cl. 4.2.2 and 4.2.4.

Staff Position Name	Staff Position Description	Term / Duration	Exemption / Waiver	Ring-fencing controls
Please provide the position name.	Please provide a description of roles, functions and duties.	Please provide the expected or actual duration of the sharing arrangement for each staff in the position eg. 3 staff for 2 months, 1 staff for 2 days, 7 staff permanently shared.	Please state the exemption or waiver being used to allow sharing this position eg. 4.2.2(b)i, 4.2.2(b)iii or 4.2.2(d). If using a waiver, please provide a link to the waiver.	Please briefly explain any relevant controls for these positions that reduce the risk of ring-fencing breaches eg. ring-fencing training, information controls, physical separation

¹ <https://www.aer.gov.au/documents/aer-template-staff-and-office-sharing-register-distribution-ring-fencing-guideline-updated-march-2022>

Appendix B

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Appendix B1 – Endeavour Energy

Appendix B2 – Ausgrid

Appendix B3 – Energex

Appendix B4 – Ergon

Appendix B5 – SA Power Networks

Appendix B1 – Endeavour Energy (Ausconnex)

Position Title	Quarter	2023 Q3	2023 Q4	2024 Q1	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2026 Q1	2026 Q2
Technologist		■	■	■	■	■					
Technologist (Protection, Testing)							30				
Technologist (Protection, Testing, substations)								■	■	■	■
Electrical Fitter Mechanic (EFM)		■	■		■	■	■		■	■	■
Leading Hand EFM		9	8			1	1		1	1	2
Electrical Technician Total		57	68	36	17	43	33	32	42	48	28
Design Delivery Coordinator								2	1	1	1
Engineer or Engineering Officer/ Designer		■	■	■	■	■					
Engineer or Engineering Officer/ Designer / Senior							■	■	■	■	■
Automation Engineer		2	4		1	3					
Automation Engineer / Senior Automation Engineer							3	7	2	2	
Integration Engineer							1				
Automation Engineer/Specialist											1
Automation Specialist							1				
Automation / Protection Specialist						2					
Development Specialist - Secondary Systems			2	2	1	1	1	2	1		
Development Engineer / Specialist - Secondary Systems										2	2
Protection Specialist							2	2	2	1	2
Integration Lead Secondary Systems			1	1						1	1
Integration Engineer/ Specialist								2	2	3	2
Communications Field services / Engineer									1	1	6
Engineering Total		15	18	11	13	24	33	39	26	25	41
Lineworker		■	■	■	■	■	■	■	■	■	■
Distribution Powerline Worker (DPW)		■	■	■	■	■	■	■	■	■	■
Overhead Mains Coordinator				1		1	1	1			
Leading Hand Lineworker		■	■	■	■	■					
Live Lineworker (Transmission & Distribution)							■	■	■	■	■
Leading Hand Live Lineworker (Transmission & Distribution)							10	8	4	1	2
Live Lineworker Transmission		20									
Live Lineworker		4									
Lineworker Total		59	70	21	21	36	32	23	21	6	5
Leading Hand DPW					1	1	1			1	
Leading Hand EW Plant Operator			1			1	1				
Plant Operator		9	7	3	2	5	7	1			
Plant Operator (Transmission & Distribution)									3	1	
Electricity Worker (EW) Underground and Overhead		3	5	3	2	2	2	1			
Skilled Labourer Total		■	■	■	■	■	■	■	■	■	■
Leading Hand Cable Jointer/EW Cable Laying		■	■	■	■	■	■	■	■	■	■
Project Officer/ Supervisor/Sub Civil Maintenance Trade and Non-Trade		1	3	3	3	3	1				4
Corporate Communications Manager - Growth						1	1	1	1		1
Technical Support Officer			1						1		
District Operator						1			1		
Project Manager (PM)			1							1	
Corporate Communications Advisor											1
Grand Totals		145	177	79	60	119	113	98	96	83	80

Notes :-

1. Analysis above shows a substantial and continuous contribution of technical and engineering staff to the RESP business
2. The RESP business is explicitly and actively engaged in competition with ASP1, ASP2, and ASP3 businesses (NSW) for the provision of contestable electrical connection services and other infrastructure providers in the marketing and pursuit of 'BOOM'² projects.
3. The data is unable to demonstrate the extent to which the RESP leverages access to electricity information and/or DNSP contacts by shared staff within the DNSP to promote its services in the market and/or act outside of the protocols experienced by competitors.
4. The RESP website³ states

² <https://www.ausconnex.com.au/energy-infrastructure-services/#eboom>

- a. **With the support of the partnership structure**, Ausconnex has the unparalleled ability to plan and deliver large scale energy connections to distribution networks nationwide., and
 - b. ‘...continuing our significant support in the growth of the region by **leveraging our extensive resources and assets**’
5. The extracted information focusses on staff whose substantial vocational classification indicates they involvement in the delivery of direct-control activities for the DSNP.

Staff Sharing Register

Date of update: 09 July 2026

This register is maintained and made publicly available in accordance with clause 4.2.4(b) of the Australian Energy Regulator (AER) Electricity Distribution Ring-fencing Guideline.

The table below sets out those employees who hold positions in Endeavour Energy's Distribution Network Service Provider (DNSP) business who, from time to time, are shared with Endeavour Energy's Related Electricity Service Provider (RESP). These positions have been assessed against the criteria set out in clause 4.2.2(b) of the Guideline and are considered to meet one or more of the exceptions from the obligation not to share employees between the DNSP and the RESP.

This register includes all shared employee roles that are involved in both the provision or marking of direct control services and contestable electricity services, except those that perform services that are not electricity services and only have access to electricity information to the extent necessary to perform those services (such as general administration, accounting, payroll, human resources, legal or regulatory, or information technology support services).

Staff Position Name <i>Please provide the position name</i>	Staff Position Description <i>Please provide a description of roles functions and duties</i>	Term / Duration** <i>Please provide the expected or actual duration of the sharing arrangement for each staff in the position eg. 3 staff for 2 months, 1 staff for 2 days, 7 staff permanently shared.</i>	Exemption / Waiver <i>Please state the exemption or waiver being used to allow sharing this position eg. 4.2.2(b)i, 4.2.2(b)iii or 4.2.2(d). If using a waiver, please provide a link to the waiver.</i>
Technologist (Protection, Testing, substations)	Maintain, construct, test, precommission and commission substations/protection/control equipment.	24 staff shared across 3 months	Employee has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b)).
Electrical Fitter Mechanic (EFM)	Install, maintain and repair electrical equipment; live/de-energised LV and HV overhead mains work.	2 staff shared across 1 month	
Leading Hand EFM	Lead a team of Electrical Fitter Mechanics.	2 staff shared across 1 month	
Design Delivery Coordinator	Manage multidisciplinary design projects from feasibility to construction.	1 staff shared across 3 months	
Engineer or Engineering Officer/ Designer / Senior	Technical advice and direction on network operation/development matters.	26 staff shared across 3 months	
Automation Engineer/Specialist	Design and support SCADA systems to enable network control and monitoring.	1 staff shared across 3 months	
Development Engineer / Specialist - Secondary Systems	Secondary systems engineering, standards, commissioning/maintenance practices and training.	2 staff shared across 3 months	
Protection Specialist	Design protection systems to protect assets and reduce safety risk.	2 staff shared across 3 months	
Integration Lead Secondary Systems	Lead and coordinate integration engineers for secondary systems integration.	1 staff shared across 1 month	
Integration Engineer/ Specialist	Design, implement and test secondary systems integration in HV electrical networks.	2 staff shared across 3 months	
Communications Field services / Engineer	Lead communications solutions supporting network monitoring, protection and control.	6 staff shared across 3 months	
Lineworker	Linework construction, maintenance and emergency restoration.	1 staff shared across 1 month	
Live Lineworker (Transmission & Distribution)	Construct, maintain and repair HV/LV/street lighting overhead systems and transmission live-line works.	2 staff shared across 1 month	
Leading Hand Live Lineworker (Transmission & Distribution)	Lead live-line teams, including construction, maintenance and emergency restoration.	2 staff shared across 2 months	
Project Officer/ Supervisor/Sub Civil Maintenance Trade and Non-Trade	Technical support, design services and estimating for distribution work, field investigations and surveys.	4 staff shared across 2 months	
Corporate Communications Manager - Growth	Lead corporate affairs program for growth strategy and acquisition opportunities.	1 staff shared across 3 months	
Corporate Communications Advisor	Support corporate communications strategy, campaigns and stakeholder/community engagement.	1 staff shared across 3 months	

³ <https://www.ausconnex.com.au/welcome/about-ausconnex/>

Appendix B2 – Ausgrid (Plus ES, Plus GS)

	Quarter	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2
Reported as shared on an 'Ad-hoc task specific' basis no quantities provided									
Shared transmission mains technicians on RESP jobs for maintenance on specialised equipment. Direction of technical issues to staff relating to specific tasks and projects.		*	*	*	*	*	*	*	*
Staff involved in facilitating Distributed Energy Storage services per the granted class waiver.			*	*	*	*	*	*	*
Staff providing support in community batteries services under the Battery Energy Storage System (BESS) program.					*	*	*	*	*
Staff providing support in testing or maintenance of specialised equipment or software (e.g., HV or IR testing).		*	*	*	*	*	*	*	*
Staff supporting BESS program by providing project planning, technical and partnership advice.									*
Staff supporting EVCI projects by providing planning, technical and partnership advice. For example, supporting facilities access agreement entities including RESPs and non-RESP.		*	*	*	*	*	*	*	*
Reported as shared on an 'Permanently shared' basis									
Head of BESS that has dual reporting lines to Ausgrid and RESP and is responsible for planning and executing innovative strategic direction.									*
Head of EVCI and Infrastructure Development that has dual reporting lines to Ausgrid and RESP and is responsible for planning and executing innovative strategic direction.		*	*	*	*	*	*	*	

Notes :-

1. The exemption claimed for each of these roles is that 'Employee has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b)).'
2. The line items highlighted in red contain position descriptions that indicate that they are in a position, or have the opportunity in their substantive role, to discriminate against competitors of the RESP.
3. The extracted information focusses on staff whose substantial vocational classification indicates they involvement in the delivery of direct-control activities for the DSNP. (ie not officers or admin/back office roles)
4. The use of 'Ad-hoc / Task Specific' and 'Permanently shared' in the Term / Duration conceals the extent of the activity.

Staff Sharing Register

Ausgrid maintains this register in accordance with clause 4.2.4(b) of the Australian Energy Regulator (AER) [Ring-fencing Guideline Electricity Distribution Version 4 \(Guideline\)](#).

The table below is in the format requested by the AER in February 2022

It sets out the staff who's positions in Ausgrid's Distribution Network Service Provider (DNSP) business are currently being shared (as at the date of the register) with Ausgrid's Related Electricity Service Provider (RESP).

These positions meet one or more of the below exceptions of the obligation for DNSP and the RESP to separate staff involved in provision or marketing of direct control services:

- s4.2.1(b)i.a - offices for staff who, in the course of their duties do not have access to electricity information;
- s4.2.1(b)i.b - offices for staff who, in the course of their duties have access to electricity information but do not have, in performing the roles, functions or duties of their staff position, any opportunity to use that electricity information to engage in conduct that is contrary to the DNSP's obligations under clause 4.1.
- s4.2.2(d) - member of the staff of a DNSP where the member of staff is an officer both of the DNSP and of a related electricity service provider.

Staff Position Description	Term / Duration	RESP name	Exemption / Waiver	Ring-fencing controls
Staff supporting EVCI projects by providing planning, technical and partnership advice. For example, supporting facilities access agreement entities including RESPs and non-RESP.	Ad-hoc task specific	PLUS ES	4.2.2(b)i.b. - No opportunity to act contrary to Guidelines	- Contractual arrangements - Appropriate cost-allocations - Ring-fencing training - Information Barriers
Staff providing support in testing or maintenance of specialised equipment or software (e.g., HV or IR testing).	Ad-hoc task specific	PLUS ES	4.2.2(b)i.b. - No opportunity to act contrary to Guidelines	- Contractual arrangements - Appropriate cost-allocations - Ring-fencing training - Information barriers - Functional separation
Shared transmission mains technicians on RESP jobs for maintenance on specialised equipment. Direction of technical issues to staff relating to specific tasks and projects.	Ad-hoc task specific	PLUS ES	4.2.2(b)i.b. - No opportunity to act contrary to Guidelines	- Contractual arrangements - Appropriate cost-allocations - Ring-fencing training - Information Barriers - Functional separation
Staff involved in facilitating Distributed Energy Storage services per the granted class waiver.	Ad-hoc task specific	PLUS ES	Exemption under Class Waiver	- Service carried in accordance with granted waiver - Contractual arrangements - Ring-fencing training - Information Barriers
Staff providing support in community batteries services under the Battery Energy Storage System (BESS) program.	Ad-hoc task specific	PLUS ES	4.2.2(b)i.b. - No opportunity to act contrary to Guidelines	- Contractual arrangements - Appropriate cost-allocations - Ring-fencing training - Information Barriers - Functional separation
Staff in positions undertaking general administrative tasks	Permanently Shared	PLUS ES PLUS GS	s4.2.1(b)i.a – No access to EI	- Ring-fencing training - Information Barriers - Functional separation
Staff in positions providing corporate services such as HR, Finance, Legal, Regulation etc	Permanently Shared	PLUS ES PLUS GS	s4.2.1(b)i.b- No opportunity to act contrary to Guidelines	- Ring-fencing training - Information Barriers - Functional separation
Head of BESS that has dual reporting lines to Ausgrid and RESP and is responsible for planning and executing innovative strategic direction.	Permanently Shared	PLUS GS	4.2.2(d) – Officer of Ausgrid and RESP	Ring-fencing training
Staff supporting BESS program by providing project planning, technical and partnership advice.	Ad-hoc task specific	PLUS ES	4.2.2(b)i.b. - No opportunity to act contrary to Guidelines	- Contractual arrangements - Appropriate cost-allocations - Ring-fencing training - Information Barriers

Date of this Register: 15 July 2026

Appendix B3 – Energex (Yurika, Energy Queensland)

Energex Staff Sharing Register History (extract)	Quarter	2024 Q1	2024 Q2	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	Exemption Claimed
<i>All position listed as 'Permanently shared' *</i>											
Designers / Design Officers Support electrical engineers with initial design requirements and production of drawings. Determine and document the type and arrangement of circuits, transformers, circuit-breakers, transmission lines and other equipment.		*	*	*	*	*	*	*	*	*	Clause 4.2(b).i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP.
Engineer / Other Technical Professional Evaluate, estimate, design, develop and maintain electrical control systems and components to required specifications.		*	*	*	*	*	*	*	*	*	
General / Trade Skilled Worker Maintain and construct network infrastructure and components. Install substation secondary control systems and HV equipment. Operate vehicles, plant and equipment. Interpret and understand design drawings. Maintain, test, calibrate and manage tools and equipment to approved standards.		*	*	*	*	*	*	*	*	*	
Supervisor / Team Leader Various supervisory tasks, for example assigning, monitoring and coordinating team members work.		*	*	*	*	*	*	*	*	*	
Technician / Technical Officer Construct, repair and maintain power supply and telecommunications components. Primarily work in the field travelling to different locations to construct, troubleshoot, diagnose and resolve problems. Maintain, test and calibrate equipment to approved standards.		*	*	*	*	*	*	*	*	*	

Notes :-

1. This register effectively declares that all staff are 'Permanently shared' providing no transparency as to the volume of the activity diverting DNSP staff to RESP support or the reliance on sharing for the operation of the RESP business.
2. Energex simply change the date on this register every three months to show compliance with the current Ring Fencing Guidelines

Staff Sharing Register

Ver 24, 14/07/2026



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.

Under the Guideline, Energex must ensure its staff involved in the provision or marketing of direct control services are not also involved in the provision or marketing of contestable electricity services by a related electricity service provider (RESP) unless one of the exemptions in clause 4.2.2 applies.

The following table details the shared staff positions (i.e. they are involved in the provision of both direct control services provided by Energex and contestable electricity services provided by a RESP).

Position	Description of role, functions and duties	Examples	Exemption	Duration	Ring-fencing controls
General / Trade Skilled Worker	Maintain and construct network infrastructure and components. Install substation secondary control systems and HV equipment. Operate vehicles, plant and equipment. Interpret and understand design drawings. Maintain, test, calibrate and manage tools and equipment to approved standards.	Power Worker, Technical Support Officer, Trade Assistant, On Site Assistant, Operator, Stock Controller, Supply Scheduler, Asset Operator, O&M Support Officer	Clause 4.2.2(b)i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP.	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls.
Technician / Technical Officer	Construct, repair and maintain power supply and telecommunications components. Primarily work in the field traveling to different locations to construct, troubleshoot, diagnose, and resolve problems. Maintain, test and calibrate equipment to approved standards.	Metering Technician, Substation Technician, Technical Officer, Work Group Officer, Field Construction Officer, Electric Fitter Mechanic, Cable Joiner, Linesperson, Works Coordinator, Test Paraprofessionals, Technical Service Person Renewables	Clause 4.2.2(b)i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP.	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls.
Designers / Design Officers	Support electrical engineers with initial design requirements, production of drawings. Determine and document the type and arrangement of circuits, transformers, circuit-breakers, transmission lines and other equipment.	Design Paraprofessional (Civil, Telecommunications, Design, Substations and Mechanical)	Clause 4.2.2(b)i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP.	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls.
Engineer / Other Technical Professional	Evaluate, estimate, design, develop and maintain electrical control systems and components to required specifications.	Metering Engineer, Substation Design Engineer, Commissioning Engineer, Civil Design Engineer, Telecommunications Specialist, Field Support Engineer, Production Engineer, Project Manager, Project Coordinator, Project Administration Officer, Construction Manager, Senior DC System Engineer, Senior Asset Engineer, SLA Project Delivery Lead, Works Management, Standards and Systems, Works Program System Support	Clause 4.2.2(b)i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP.	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls.
Supervisor / Team Leader	Various supervisory tasks e.g. assign, monitor and coordinate their team's work.	Manager Customer Operations, Metering Supervisor, Work Group Leader, Work Crew Leader, Manager Fleet, Field Operations Manager, Plant Workshop Manager, Electrical Supervisor, Network Integration Batteries Manager, Work Group Leader – Renewables, Manager Asset & Operations, Team Leader – Power Transformers, Operations & Construction Manager	Clause 4.2.2(b)i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP.	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls.
Officer	Officer of both the DNSP and related electricity service provider.	CEO, EGM Finance, EGM Engineering, EGM Customer, Company Secretary	Clause 4.2.2(d) - Position is an officer for both Energex as well as an officer for a RESP.	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls.

Appendix B4 – Ergon (Yurika, Energy Queensland)

Ergon Staff Sharing Register History (extract)	Quarter	2024 Q2	2024 Q4	2025 Q1	2025 Q2	2025 Q3	2025 Q4	2026 Q1	2026 Q2	Exemption Claimed
<i>All position listed as 'Permanently shared' *</i>		*	*	*	*	*	*	*	*	
Designers / Design Officers Support electrical engineers with initial design requirements and production of drawings. Determine and document the type and arrangement of circuits, transformers, circuit-breakers, transmission lines and other equipment.		*	*	*	*	*	*	*	*	Clause 4.2(b)i.b. Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP. Clause 4.2(b)iii – Some staff are located at a regional office i.e. an office that has less than 25,000 connection points within a 100 kilometre radius of that office.
Engineer / Other Technical Professional Evaluate, estimate, design, develop and maintain electrical control systems and components to required specifications.		*	*	*	*	*	*	*	*	
General / Trade Skilled Worker Maintain and construct network infrastructure and components. Install substation secondary control systems and HV equipment. Operate vehicles, plant and equipment. Interpret and understand design drawings. Maintain, test, calibrate and manage tools and equipment to approved standards.		*	*	*	*	*	*	*	*	
Supervisor / Team Leader Various supervisory tasks, for example assigning, monitoring and coordinating team members work.		*	*	*	*	*	*	*	*	
Technician / Technical Officer Construct, repair and maintain power supply and telecommunications components. Primarily work in the field travelling to different locations to construct, troubleshoot, diagnose and resolve problems. Maintain, test and calibrate equipment to approved standards.		*	*	*	*	*	*	*	*	

Notes :-

1. This register effectively declares that all staff are 'Permanently shared' providing no transparency as to the volume of the activity diverting DNSP staff to RESP support or the reliance on sharing for the operation of the RESP business.
2. Ergon simply change the date on this register every three months to achieve paper compliance with the current Ring-Fencing Guidelines

Staff Sharing Register

Ver 24, 14/07/2026

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.

Under the Guideline, Ergon Energy must ensure its staff involved in the provision or marketing of direct control services are not also involved in the provision or marketing of contestable electricity services by a related electricity service provider (RESP) unless one of the exemptions in clause 4.2.2 applies.

The following table details the shared staff positions (i.e. they are involved in the provision of both direct control services provided by Ergon Energy and contestable electricity services provided by a RESP).

Position	Description of role, functions and duties	Examples	Exemption	Duration	Ring-fencing controls
General / Trade Skilled Worker	Maintain and construct network infrastructure and component. Install substation secondary control systems and HV equipment. Operate vehicles, plant and equipment. Interpret and understand design drawings. Maintain, test, calibrate and manage tools and equipment to approved standards	Power Worker, Technical Support Officer, Trade Assistant, On Site Assistant, Operator, Stock Controller, Supply Scheduler, Asset Operator, O&M Support Officer	Clause 4.2.2(b)i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP. Clause 4.2(b)iii - Some staff are located at a regional office i.e. an office that has less than 25,000 connection points within a 100 kilometre radius of that office. Ergon Energy has been granted a waiver to allow the offices at Mareeba and Charters Towers to be classified as regional offices for the purposes of the Guideline. (https://www.aer.gov.au/networks-pipelines/ring-fencing/ring-fencing-waivers/ergon-energy-ring-fencing-waiver-august-2017)	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls.
Technician / Technical Officer	Construction, repair and maintain power supply and telecommunications components. Primarily work in the field traveling to different locations to construct, troubleshoot, diagnose, and resolve problems.	Metering Technician, Substation Technician, Technical Officer, Work Group Officer, Field Construction Officer, Electric Fitter Mechanic, Cable Joiner, Linesperson, Works Coordinator, Test Paraprofessionals,	Clause 4.2.2(b)i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP. Clause 4.2(b)iii - Some staff are located at a regional office i.e. an office that has less than 25,000 connection points within a 100 kilometre radius of that office. Ergon	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls.
	Maintain, test and calibrate equipment to approved standards	Technical Service Person Renewables	Energy has been granted a waiver to allow the offices at Mareeba and Charters Towers to be classified as regional offices for the purposes of the Guideline. (https://www.aer.gov.au/networks-pipelines/ring-fencing/ring-fencing-waivers/ergon-energy-ring-fencing-waiver-august-2017)		
Designers / Design Officers	Support electrical engineers with initial design requirements, production of drawings. Determine and document the type and arrangement of circuits, transformers, circuit-breakers, transmission lines and other equipment.	Design Paraprofessional (Civil, Telecommunications, Design, Substations and Mechanical)	Clause 4.2.2(b)i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP. Clause 4.2(b)iii - Some staff are located at a regional office i.e. an office that has less than 25,000 connection points within a 100 kilometre radius of that office. Ergon Energy has been granted a waiver to allow the offices at Mareeba and Charters Towers to be classified as regional offices for the purposes of the Guideline. (https://www.aer.gov.au/networks-pipelines/ring-fencing/ring-fencing-waivers/ergon-energy-ring-fencing-waiver-august-2017)	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls.
Engineer / Other Technical Professional	Evaluates, estimates, designs, develops and maintains electrical control systems and components to required specifications.	Metering Engineer, Substation Design Engineer, Commissioning Engineer, Civil Design Engineer, Telecommunications Specialist, Field Support Engineer, Production Engineer, Project Manager, Principal Advis Iso & Remote Energy Mgmt, Project Coordinator, Project Administration Officer, Construction	Clause 4.2.2(b)i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP. Clause 4.2(b)iii - Some staff are located at a regional office i.e. an office that has less than 25,000 connection points within a 100 kilometre radius of that office. Ergon Energy has been granted a waiver to allow the offices at Mareeba and Charters Towers to be classified as regional offices for the purposes of the Guideline. (https://www.aer.gov.au/networks-pipelines/ring-fencing/ring-fencing-waivers/ergon-energy-ring-fencing-waiver-august-2017)	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls.
		Manager, Senior DC System Engineer, Senior Asset Engineer, SLA Project Delivery Lead, Works Management, Standards and Systems, Works Program System Support	pipelines/ring-fencing/ring-fencing-waivers/ergon-energy-ring-fencing-waiver-august-2017		
Supervisor / Team Leader	Various supervisory tasks e.g. assign, monitor and coordinate their team's work.	Manager Customer Operations, Metering Supervisor, Work Group Leader, Work Crew Leader, Manager Fleet, Field Operations Manager, Plant Workshop Manager, Electrical Supervisor, Network Integration Batteries Manager, Work Group Leader - Renewables, Manager Asset & Operations, Team Leader - Power Transformers, Operations & Construction Manager	Clause 4.2.2(b)i.b - Position has access to electricity information but does not have an opportunity to use that information to discriminate in favour of a RESP. Clause 4.2(b)iii - Some staff are located at a regional office i.e. an office that has less than 25,000 connection points within a 100 kilometre radius of that office. Ergon Energy has been granted a waiver to allow the offices at Mareeba and Charters Towers to be classified as regional offices for the purposes of the Guideline. (https://www.aer.gov.au/networks-pipelines/ring-fencing/ring-fencing-waivers/ergon-energy-ring-fencing-waiver-august-2017)	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls
Officer	Officer of both the DNSP and related electricity service provider	CEO, EGM Finance, EGM Engineering, EGM Customer, Company Secretary	Clause 4.2.2(d) - Position is an officer for both Ergon Energy as well as an officer for a RESP.	Permanently shared	Ring-fencing training, ring-fencing guidance materials, specialist ring-fencing advice, IT access controls, branding and signage controls

Appendix B5 – SA Power Networks (Enerven)

	Quarter	2019 Q3	2024 Q4	2025 Q2	2025 Q3	2025 Q4	2026 Q2	
SAPN Staff Sharing Register History (extract)	Sharing Type	Shared; term not specified	Ad-hoc, task specific	Ad-hoc, task specific	Ad-hoc, task specific	Ad-hoc, task specific	Ad-hoc, task specific	Exemption Claimed
<i>Sharing type for all staff listed under quarter label</i>								
Electrical Designers / Design Officers Support electrical engineers with initial design requirements, production of AutoCAD drawings. Determine and document the type and arrangement of circuits, transformers, circuit breakers, transmission lines and other equipment.		*	*	*	*	*	*	All positions (except telco staff) - Guideline 4.2.2(b)(i)(b) staff members have access to confidential electricity information but do not have, in performing the roles, functions or duties of their staff position, any opportunity to use that confidential electricity information. Telco staff - Guideline 4.2.2(b)(i)(a) do not have access to electricity information.
Electrical Technician / Technical Officer Responsible for the construction, repair and maintenance of power supply and telecommunications components. Primarily work in the field travelling to different locations to construct, troubleshoot, diagnose and resolve problems.		*	*	*	*	*	*	
Engineer / Electrical Engineer Evaluates, estimates, designs, develops and maintains electrical control systems and components to required specifications.		*	*	*	*	*	*	
Supervisors / Team Leaders Various supervisory tasks. Responsible for assigning and monitoring of their team's work.		*	*	*	*	*	*	
Trade Skilled Worker / General Skilled Worker Maintaining and constructing network infrastructure and components. Installation of substation secondary control systems and HV equipment. Operate vehicles, plant and equipment. Interpret and understand design drawings.		*	*	*	*	*	*	

Notes :-

1. This register effectively declares that all staff are shared on an 'ad-hoc, task specific' basis providing no transparency as to the volume of the activity diverting DNSP staff to RESP support or the reliance on sharing for the operation of the RESP business.
2. SAPN simply change the date on this register every three months to achieve paper compliance with the current Ring-Fencing Guidelines
3. SAPN failed to update this register for over 5 years (2019-2014) despite the obligation to do so quarterly.

SA Power Networks - Staff Sharing Register

The following are staff positions may be shared in accordance with clause 4.2.2 of the Australian Energy Regulator's Ring-fencing Guideline (**Guideline**).

Staff Position Name	Staff Position Description	Term/Duration	Exemption/Waiver	Ring-fencing controls
Trade Skilled Worker/ General Skilled Worker	Maintaining and constructing network infrastructure and components. Installation of substation secondary control systems and HV equipment. Operate vehicles, plant and equipment. Interpret and understand design drawings.	Ad-hoc, task specific	Guideline 4.2.2(b)(i)(b), staff members have access to confidential electricity information but do not have, in performing the roles, functions or duties of their staff position, any opportunity to use that confidential electricity information.	Ring-fencing training
Electrical Designers/ Design Officers	Support electrical engineers with initial design requirements, production of AutoCad drawings. Determining and documenting the type and arrangement of circuits, transformers, circuit breakers, transmission lines and other equipment.	Ad-hoc, task specific	All positions (except telco designers) - Guideline 4.2.2(b)(i)(b), staff members have access to confidential electricity information but do not have, in performing the roles, functions or duties of their staff position, any opportunity to use that confidential electricity information. Telco designers - Guideline 4.2.2(b)(i)(a) do not have access to electricity information.	Ring-fencing training.
Staff Position Name	Staff Position Description	Term/Duration	Exemption/Waiver	Ring-fencing controls
Electrical Technician/ Technical Officer	Responsible for the construction, repair and maintenance of power supply and telecommunications components. Primarily work in the field traveling to different locations to construct, troubleshoot, diagnose, and resolve problems.	Ad-hoc, task specific	All positions (except fibre technicians and telco field technicians) - Guideline 4.2.2(b)(i)(b), staff members have access to confidential electricity information but do not have, in performing the roles, functions or duties of their staff position, any opportunity to use that confidential electricity information. Fibre technicians and telco field technicians - Guideline 4.2.2(b)(i)(a) do not have access to electricity information.	Ring-fencing training.
Engineer/ Electrical Engineer	Evaluates, estimates, designs, develops and maintains electrical control systems and components to required specifications.	Ad-hoc, task specific	All positions (except telco engineers and transmission protection engineers) - Guideline 4.2.2(b)(i)(b), staff members have access to confidential electricity information but do not have, in performing the roles, functions or duties of their staff position, any opportunity to use that confidential electricity information. Telco engineers and transmission protection engineers - Guideline 4.2.2(b)(i)(a) do not have access to electricity information.	Ring-fencing training. Note telco engineers and transmission protection engineers also have no access to electricity information.
Supervisors / Team Leaders	Various supervisory tasks. Responsible for assigning and monitoring of their team's work.	Ad-hoc, task specific	Guideline 4.2.2(b)(i)(b), staff members have access to confidential electricity information but do not have, in performing the roles, functions or duties of their staff position, any opportunity to use that confidential electricity information.	Ring-fencing training

To arrange a meeting or discuss this proposal further, please contact:

[REDACTED]
Head of Government Relations & Policy
NECA National

T [REDACTED] E [REDACTED] W www.neca.asn.au