

Ms Rowena Park  
General Manager  
AER Compliance and Enforcement Branch

By email: [AERexemptions@aer.gov.au](mailto:AERexemptions@aer.gov.au)

Dear Rowena

**Re: Draft – Network Exemptions Guideline (Version 7)**

Thank you for an opportunity to provide feedback into the Draft Network Exemptions Guideline.

The ACAT has considered the proposed changes to the Guideline and makes the following observations.

Primary Registrant

As you would be aware, the ACAT does not operate as an Ombudsman Scheme in the same manner as other jurisdictions. A key difference is that retailers in the ACT cannot join the ACAT as members. Rather, retailers come under the jurisdiction of the ACAT through the operative provisions of the *Utilities Act 2000*.

To the extent that it would operate on exempt networks in the ACT, this proposed change has no impact on the ACAT.

Small Generation Aggregator Scheme

The ACAT has no comment to offer.

Embedded Network Manager requirements

The ACAT has no comment to offer.

Explicit Informed Consent

The ACAT supports the requirement for a proposed embedded network service provider to give standardised information to customers about their rights to purchase electricity from a retailer of their choice.

The ACAT also supports the requirement to keep informed consent records for at least 7 years.

**ENERGY AND WATER**

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Disconnection Protections for Energy Only Customers

The ACAT strongly supports any measure that allows customers within an embedded network to have same protection against disconnection as customers outside these networks.

Additional Amendments

The ACAT has no comment to offer.

Again, the ACAT appreciates the opportunity to provide a response on the Draft Network Exemptions Guideline

Yours Sincerely,



Graeme Neate AM  
President  
9 December 2022

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