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General Manager, Strategic Policy and Energy Systems Innovation
Australian Energy Regulator
Submitted via email to AERringfencing@aer.gov.au

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Draft electricity distribution Ring-fencing Guideline – Version 3, May 2021

AGL Energy (**AGL**) welcomes the opportunity to comment on the Australian Energy Regulator's (**AER**) Consultation note for further minor changes to the Draft electricity distribution Ring-fencing Guideline – Version 3, May 2021.

AGL supports the two minor changes proposed in the Consultation note, to clarify the information sharing register provision and provide a class waiver mechanism for distribution networks in certain circumstances.

We consider that the proposed clarification to the information sharing register provision will facilitate better outcomes for energy consumers as it will facilitate a more level playing field for the deployment of cost-competitive non-network solutions, by requiring that information shared between networks and their related entities be sufficiently described in the information sharing register. This will provide opportunities for other entities to review the information and put forward more competitive solutions. Energy consumers will benefit with more efficient and innovative solutions that drive more affordable energy outcomes.

As we stated in our response to the Draft electricity distribution Ring-fencing Guideline¹, we believe the Ring-fencing Guideline should be designed to complement the broader economic regulatory framework governing distribution network planning and investment and support the development of markets for DER services, including network services, that reward owners of these assets and broader energy consumers with least cost solutions.

Alongside the development of a structured procurement digital platform, improved information disclosure by distribution networks will be critical to maximising the potential for the most cost competitive solutions.

Should you have any questions in relation to this submission, please contact Kurt Winter, Regulatory Strategy Manager, on 03 8633 7204 or KWinter@agl.com.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Con Hristodoulidis'.

Con Hristodoulidis

Senior Manager, Regulatory Strategy

¹ See further AGL submission in response to AER Draft Updated Ringfencing Guidelines (6 August 2021), Available at <https://thehub.agl.com.au/articles/2021/08/agl-responds-to-aer-draft-updated-ring-fencing-guideline>.