



AER consultation on Draft Ring-fencing Guidelines Version 3, May 2021

The ASP Assist Group provides a range of services solely to the NSW Electricity Supply Industry. These services include but are not limited to the provision of vocational education and the sales of goods and services to NSW Accredited Service Providers.

This submission was formed by discussions with our customers i.e., the NSW Accredited Service Providers who are competing for work in the NSW Electricity Distribution market against the NSW DSPN and their affiliates. It is the ASP Assist Group's observation that:

Despite consultation on the guidelines being critical, most of the NSW Accredited Service Providers were not aware that these guidelines were open to consultation. This represents a failing in ensuring that true and valid consultation has occurred as many of the stakeholders who are disadvantaged by monopolisation were not consulted. Greater efforts in reaching out to these stakeholders may have provided a better picture of the actual situation.

Anecdotal evidence exists that suggests that alleged breaches may be a failing to be reported and investigated due to potential failings in breach reporting protocols. This is due to the fact that many NSW Accredited Service Providers are unaware of the fact that they can report alleged breaches and the means of making such a report.

Although support in the principles and objectives of the Australian Energy Regulator's Electricity Distribution Ring Fencing Guidelines exists; confidence is low in the effectiveness of those very principles and objectives as many NSW Accredited Service Providers are skeptical that any real implementation has occurred.

I trust that this submission was helpful, and I am happy to contribute further should you require.

Doug Cavanough

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