

**CitiPower and Powercor
Ring Fencing Compliance
Strategy
May 2017**

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Table of Contents

- 1 OVERVIEW 4
 - 1.1 Background.....4
 - 1.2 Overview and purpose4
 - 1.3 Corporate overview4
- 2 IMPLEMENTATION STRATEGY 6
 - 2.1 Compliance approach.....6
 - 2.2 Compliance toolkit.....6
 - 2.3 Our understanding of the guideline's operation7
 - 2.4 Key potential risk points8
- 3 WAIVER APPLICATIONS AND NO ACTION REQUESTS 15
 - 3.1 Waiver approach 15
- 4 PASS THROUGH APPLICATIONS..... 16
 - 4.1 Approach 16
 - 4.2 Projected costs 16

1 Overview

1.1 Background

On 30 November 2016, the Australian Energy Regulator (**AER**) released its final Ring Fencing Guideline (**guideline**). The guideline seeks to prevent distributors from providing their affiliates operating in unregulated markets from having an unfair advantage. The guideline includes provisions in the following three broad areas:

- cross-subsidisation—preventing distributors from using regulated revenues to subsidise activities in unregulated markets;
- discrimination—ensuring distributors treat affiliates and third parties equally; and
- information sharing—providing electricity information to all parties on an equal basis.

The guideline allows distributors to apply for waivers from ring fencing obligations in certain circumstances.

1.2 Overview and purpose

On 17 February 2017 the AER requested CitiPower and Powercor (**us** and **we**) to provide a draft compliance strategy by the end of April 2017 and a final compliance strategy, waiver applications and details of contemplated pass through applications by the end of July 2017. The AER has outlined these responses will be treated as confidential.¹

We understand this compliance strategy is not the Annual Compliance Report contemplated in the guideline. Our first Annual Compliance Report is not required until 30 April 2018.²

The purpose of this compliance strategy is to broadly outline how we intend to incorporate guideline compliance into our business activities. We will be subject to external compliance audits once all our compliance actions are in place.

More specifically, this strategy outlines:

- our interpretation of the guideline and how it applies to us;
- the types of activities we will undertake to comply with the guideline;
- the key potential risk areas where we will focus compliance activities;
- activities for which we have identified the need for waivers and 'No Action' letters; and
- high level cost drivers from complying with the guideline. The need for a pass-through application is likely to depend on the outcome of our waiver applications.

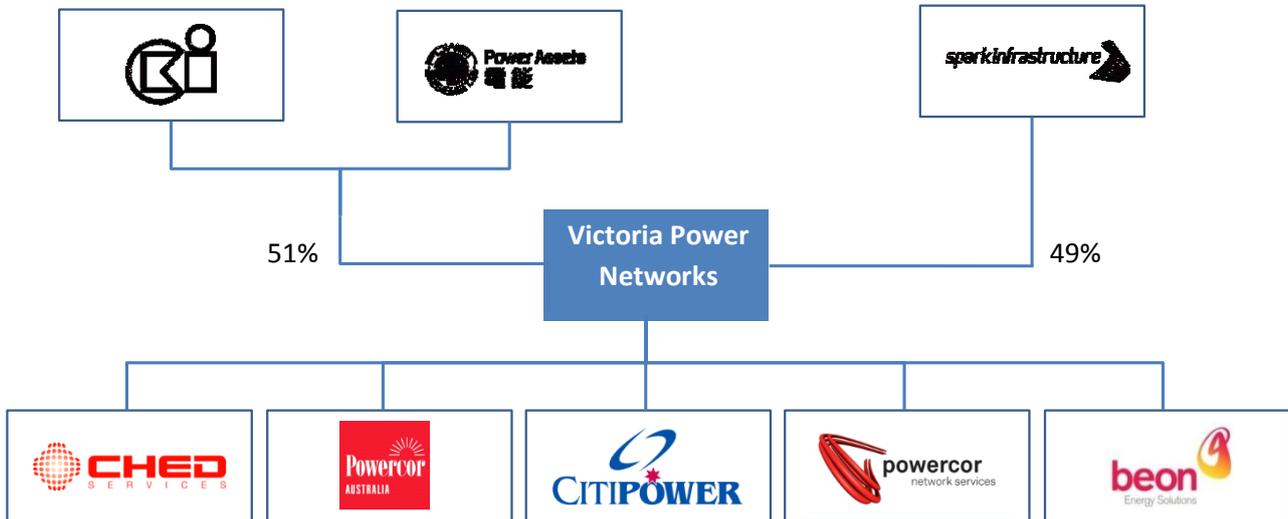
This document is our final compliance strategy, which should be read together with our accompanying waiver application.

1.3 Corporate overview

The figure below presents our corporate structure.

¹ AER, letter to Mr Rourke from Ms Groves, 17 February 2017.

² AER, Ring Fencing Guideline, November 2016, 6.2.2.



Energy Solutions Pty Ltd, trading as beon Energy Solutions (**contestable service provider**), provides contestable energy services. We understand the relationship between the contestable service provider and us is the primary focus of ring fencing.

Other affiliated entities within our corporate structure include:

- CHED Services—provides corporate services to us such as Finance, Legal, Information Technology (IT) Human Resources and Procurement. It also provides corporate services to affiliates; and
- Powercor Network Services—provides design and field services to us, affiliates and third parties.

The contestable service provider, CHED Services and Powercor Network Services are direct affiliates to us.

The AER's guideline is drafted to capture a broad range of affiliates and so indirect affiliates such as SA Power Networks may also be captured by the guideline. Indirect affiliates do not appear in our corporate structure because they have other distinct parent ownership (or ownership shareholdings), or operate networks in distinct locations and with different management. We believe the relationship between these businesses and us is less likely to create economic or customer harms and are therefore not the primary focus of ring fencing—although several ring fencing provisions will still be relevant. Our understanding of the guideline's applicability to all affiliates is discussed in section 2.4.

2 Implementation strategy

2.1 Compliance approach

We have developed a 5 step approach to ensure guideline compliance as illustrated below.



In January 2017 we established a core team to implement the guideline. The team conducted extensive interviews with representatives from across our business to identify the risk of non-compliance based on each business unit's functions. The team then reviewed business documentation to identify additional potential issues, which included reviewing:

- accounts and accounting procedures;
- business procedures and protocols;
- IT system access approvals;
- staff position descriptions;
- website material; and
- Contact Centre scripts.

From these reviews, the team developed a draft implementation approach consisting of actions to mitigate the risk of non-compliance. The team then re-consulted with each business unit around the feasibility of the proposed actions. These actions will now be implemented throughout the business by 2018 (refer to Appendix A).

Importantly, the meetings conducted within the business also promoted ring fencing compliance. During the meetings, the team has explained and clarified the ring fencing obligations to each business unit and promoted general guideline awareness. From this, our business units are already contacting the team to discuss whether activities comply with ring fencing and to bring additional areas of potential concern to its attention.

2.2 Compliance toolkit

We will use a broad range of tools to achieve guideline compliance, including:

- changing business activities;
- changing employees' role description and function;
- developing new business protocols;
- changing IT access controls; and
- delivering awareness training.

We are selecting the most efficient tools that will result in robust compliance. Based on this approach we expect to not seek a pass-through application should our waiver application be successful.

2.2.1 Awareness training details

Training can take different forms, which affects its effectiveness. In this section we expand on our training approach.

The training sessions discussed in this paper will be half day workshops consisting of general training on ring fencing obligations and worked examples targeted to the team's specific function. To inform the targeted training, the implementation team has requested team managers to collate questions and scenarios on the application of ring fencing that their team have faced.

The training materials will include guidance for staff on the process to follow when they have ring fencing queries. This includes seeking guidance from managers and sending queries to an internal ring fencing inbox, to be answered by the implementation team.

Staff will also complete online refresher (and induction) training annually.

After the training has been completed we expect that staff will understand and comply with ring fencing requirements. The implementation team will investigate any breaches and will address issues via discussions with staff and their managers.

2.3 Compliance assessment approach

We will engage independent assessors to conduct a compliance assessment of our Annual Compliance Report that will be submitted to the AER in April 2018. We understand the AER expects the independent assessor to:

- assess whether implementing the actions outlined in the Annual Compliance Report will lead to guideline compliance; and
- assess whether the actions in the Annual Compliance Report have been undertaken;

The compliance assessment will consider both inputs (actions we undertake to comply) and outputs (whether we comply). For example, inputs can include reviewing training material to ensure it is consistent with the guideline and was delivered to the relevant staff. Outputs can include reviewing transactions between us and our affiliates to ensure we did not cross subsidise their activities. We note this approach may change as the AER provides additional guidance.

Should the independent compliance assessment reveal areas of non-compliance, we will assemble a working group to address the issue with high priority. We will also report our corrective actions to the AER.

2.4 Our understanding of the guideline's operation

The guideline's application depends on distributors' corporate structure and activities. In this section we provide our general understanding of how the guideline applies to us. We have applied our understanding of the guideline consistently when identifying the steps to comply with the guideline.

We understand that:

1. only services provided in connection with our own network are distribution services—work on, or for, other networks must therefore be undertaken by our affiliates;
2. where an affiliate works on our behalf we must ensure it complies with ring fencing. However, where an affiliate is undertaking work for a different party, ring fencing does not apply to the affiliate; except to the extent the affiliates' provision of services to the other party affects its relationship with us.

By way of example—when Powercor Network Services provides quotes to customers for regulated connections work, it must price the connections on an equal basis because it is working on our behalf. When Powercor Network Services is quoting for unregulated wind farm reticulation to other parties, it can charge as it chooses. However, we cannot use regulated revenue to cross subsidise Powercor Network Services' wind farm quote. Furthermore, if Powercor Network Services uses our fleet to conduct its unregulated work, this must not materially prejudice the regulated work it undertakes for us.

3. staff providing distribution services may also provide non-distribution services under staff sharing arrangements (provided they do not have an opportunity to use electricity information for discriminatory purposes). This is consistent with the guideline's legal separation provision because the distributor is not providing a service (i.e. to customers) but rather staff are providing an input into another entity's (being an affiliate or third party) service. This is also consistent with the ring fencing Explanatory Statement case study 3; and
4. through discussions with our business units, we have identified that electricity information does not provide staff who work for us with an advantage when undertaking work for greenfield sites or when our affiliates provide services in or for other networks.

We note the guideline makes exceptions from various provisions for regional offices. None of our offices or depots meet the AER's regional office definition and so this is not considered further.

Where relevant, the applicability of our understanding will be outlined below.

2.5 Key potential risk points

Through our review of the business we identified key potential risk points where there may be a higher risk of non-compliance due to the nature of the work and involvement with an affiliate. In general we have found the areas of higher potential risk are where:

- we engage directly with customers—this brings the cross promotion and discrimination provisions into focus;
- a customer requires a direct control service and a contestable service (which could be provided by an affiliate)—this brings information disclosure, discrimination and staff sharing provisions into focus; and
- where staff and assets are shared with affiliates—this brings cost allocation, information disclosure, discrimination and staff and location sharing provisions into focus.

In the sections that follow, we outline the key potential risk activities by guideline provision, and the actions we propose to implement to ensure compliance. These actions will be subject to independent assessment.

2.5.1 Legal separation

Legal separation obligations ensure we only undertake distribution services and assist in ensuring we do not use regulated funding to subsidise affiliates (discussed in section 2.5.2).

The services we provide

Through our review we have identified that we only provide distribution services. For clarity, Powercor Network Services and CHED Services assist us with the provision of distribution services. They also provide non-distribution services, but we have no involvement in these services. For example:

- CHED Services provides Contact Centre services to us and SA Power Networks—where this is provided to us, it forms part of a distribution service that we provide to our customers. Where the service is provided to SA Power Networks, this is not a distribution service because it does not relate to our network. Nevertheless, CHED Services may continue to provide this non-distribution service because we have no involvement in it (i.e. it is not a service provided to us or by us to our customers) and so we do not need to ensure CHED Services' service provision to SA Power Networks complies with ring fencing obligations (although we note SA Power Networks may need to ensure this); and
- Powercor Network Services provides regulated design and field services to us and unregulated work to third parties. Where the service is provided to us, it forms part of a distribution service that we provide to our customers. Where the service is provided to third parties, this is not a distribution service because the

services relate to greenfield sites or other networks. Powercor Network Services may continue to provide non-distribution services because we have no involvement in them (i.e. it is not a service provided to us or by us to our customers) and so ring fencing does not apply to Powercor Network Services' provision of these services.

This is consistent with points 1 and 2 in section 2.4. We therefore only provide distribution services and comply with legal separation provisions. This will be subject to independent assessment.

2.5.2 Separate accounts and cost allocation

Consistent with the guideline, we maintain accounts for our business that are separate to our affiliates' accounts. Our accounts are audited, and we provide to the AER our internal accounting procedures and report on transactions between us and affiliates through our Regulatory Information Notice responses.

We must also ensure we allocate costs to distribution services in accordance with the Cost Allocation Principles. The intent of this obligation is that we do not cross subsidise unregulated activities with regulated revenues.

We have service agreements in place with CHED Services and Powercor Network Services. These agreements are negotiated using strict governance principles ensuring commercial contract terms. The CHED Services corporate service agreement is based on a fixed charge, indexed annually for inflation. The network services agreement with Powercor Network Services is based on a mix of fixed price quotes, unit rates and labour rates. Under these agreements, we are only required to pay for the services we actually receive.

We are not cross subsidising affiliates because these service agreements are negotiated at arms-length and we only pay for the services we receive. This will be subject to independent assessment.

2.5.3 Obligation to not discriminate

In accordance with clause 4.1 of the guideline we, and CHED Services and Powercor Network Services when undertaking work for us, must not discriminate in favour of our affiliates or affiliates' customers. This is a general obligation around non-discrimination. The guideline also contains other specific obligations which we discuss in later sections.

Procurement

On limited occasions we have engaged the contestable service provider to assist us in the provision of distribution services.

Consistent with the fundamental basis of incentive based regulation, our business practice is to select service providers on the basis of efficient service provision, or 'best value for money'. The regulatory framework requires and incentivises this via, for example:

- the Efficiency Benefit Sharing Scheme and the Capital Expenditure Sharing Scheme provide incentives for minimising capital and operating expenditure;
- the regulatory investment test for distributors requires us to consider most efficient solutions to investments; and
- during regulatory determinations we face AER and stakeholder scrutiny around the basis of proposed regulatory costs, which includes; the alternatives considered, whether competitive tendering was undertaken, the process and terms under which related parties agreements were made, and how expenditure benchmarks against other distributors. As a result we only receive revenue to undertake activities efficiently.

Nevertheless, to further ensure we treat all service providers equally, we will conduct training with staff that procure works from third parties to re-affirm their obligation to treat all potential suppliers equally in like circumstances. Not discriminating between affiliates and third parties also ensures cross subsidies are not present if we engage the contestable service provider, by ensuring it is engaged on commercial terms.

Our compliance with non-discrimination provisions will be subject to independent assessment.

Connections

When undertaking connections work, we will potentially need to transact with our affiliates and their customers, meaning it is a key potential risk area for discrimination. For example, connection works may incorporate regulated components and unregulated components undertaken by affiliates.

There are two key ways in which discrimination could occur—the price and timeliness of regulated connections. We need to ensure customers are treated equally in like circumstances.

In respect to price, the majority of routine connection works are quoted via a software tool that does not discriminate between the contestable service provider and third parties; a minority require manual intervention. For major connections, more manual intervention is required. To mitigate the risk of non-compliance, for the minority of connections where manual intervention is required, we will develop and provide training to relevant staff to ensure no price discrimination.

The entry point into our business for the vast majority of connections is our 'eConnect' system developed in 2016. This enables parties to directly input regulated connection requests.³ eConnect then schedules the works thereby assisting to ensure equal treatment for all connections in terms of timeliness.

For some major regulated connections, the request may be raised directly with our Customer Development Managers. The request is then sent to Network Planning and the Design team. To further ensure equal treatment, we will:

- develop and provide training to relevant staff to ensure design work is scheduled in a fair manner; and
- develop procedures for equally treating connections where the proponent contacts us seeking to escalate the connection from the schedule.

2.5.4 Physical separation/co-location

The ring fencing guideline places obligations on us rather than affiliates. Nevertheless, the contestable service provider and indirect affiliates have agreed to move to a separate corporate office location from us. Our approach will promote guideline compliance without having to incur significant costs paid for by customers under the regulatory framework.

CHED Services' and Powercor Network Services' staff are co-located with us and are involved in the provision or marketing of direct control services and contestable electricity services. The guideline allows for this under certain circumstances. The circumstances under which this is allowed are the same under which staff may be shared. We consider these circumstances in the following section.

2.5.5 Staff sharing

Staff may be involved in the provision or marketing of a both direct control and contestable electricity services if they:

³ See <<https://www.powercor.com.au/our-services/electricity-connections/econnect/>>

- do not have access to electricity information;
- have access to electricity information but cannot use the information to engage in discriminatory conduct in performing their role; and
- only use electricity information to provide corporate services.

Regardless of whether staff are employed directly by us (in-house) or through an affiliate or third party (contractor arrangement), staff sharing obligations apply. This is because the obligations attach to the staff role.

Staff that provide direct control services and negotiated or unclassified services (as per the AER's 2016-2020 final determination) are considered in our waiver application. Below we discuss which staff may be shared across direct control services and services that are not classified:

- **Customer Development Managers**—these staff are the point of contact for major customers such as real estate developers. They have electricity information about customers and could potentially use it to advantage the contestable service provider. Therefore these staff cannot be shared and we do not seek a waiver from this obligation;
- **Design**—these staff perform regulated and unregulated design work. Unregulated design work consists of new housing estate reticulation and customer side design for wind and solar plants in greenfield sites. Design staff have no ability to use electricity information to discriminate in favour of affiliates meaning they can be shared, as described below.

When undertaking regulated design work, Design use variants of the AutoCAD design program. Within this program, Design has developed templates to efficiently ensure technical standards are met. Neither the design program nor templates contain information about our network or customers. Further, the templates were not developed from electricity information—third parties using AutoCAD could similarly develop templates to meet technical standards. The design team also access a Geographic Information System (**GIS**), which contains the location of network assets.

When undertaking unregulated work, the AutoCAD program and templates are used. As it contains no electricity information, use of this program does not restrict Design staff from being shared. GIS which contains electricity information is not used because there are no existing network assets in greenfield sites. This is consistent with our general finding outlined in section 2.4, point 4.

- **Field Services**—these staff undertake regulated field work for us and unregulated field work for the contestable service provider and third parties. When working for us, they have access to limited electricity information and no opportunity to use the information to advantage affiliates, as described below. These staff may therefore be shared.

At the beginning of each day, work orders and schedules are sent to Field Services' staff in one of two way. For routine maintenance, faults and metering services it is sent to their handheld devices via our 'Click' scheduling program. For more complex works, a paper based system is used whereby staff collect the work order from the depot.

Work orders contain limited electricity information. Information about the network consists of a drawing, description and location of the assets to which the work pertains. The Construction Project Leaders (i.e. the supervisors) also receive the name and telephone number of affected customers. Field Services only have access to this information for the day; they do not have ongoing access to systems such as CIS-OV and GIS that contain comprehensive customer and network information.

The work orders and schedules do not include network information that could be used to discriminate in favour of affiliates such as asset loading or asset / site technical characteristics (e.g. frequency stability,

voltage stability, power factor and harmonic levels), which could be used to target embedded generation or storage services for grid support. Similarly, the customer information provided to Construction Project Leaders does not include consumption profiles or tariff assignments that could potentially be used to target solar PV sales or load reduction equipment.

Furthermore, there is no opportunity for Field Services to provide the limited electricity information to which they have access, to the contestable service provider. When working on wind and solar farm reticulation for the contestable service provider, Field Services are allocated to these sites for entire days (unless there is a network emergency). On these days they therefore do not receive work orders or schedules for distribution services, meaning they do not have access to any electricity information when working with affiliates.

Field Services do not have the opportunity to use the limited electricity information that they receive to discriminate in favour of affiliates, and can therefore be shared.

- **Network Planning**—these staff plan the distribution network. They possess information about the distribution network for planning purposes. Consistent with the guideline, Network Planning staff are not shared with affiliates or third parties and we do not seek a waiver for this;
- **Corporate Affairs**—staff are split into providing internal communication and external communication and advertising services. Internally focussed staff cannot access systems with electricity information and could not confer any advantage to affiliates in performing their role. These staff may therefore be shared. Staff with an external focus have access to electricity information and could use this to advantage affiliates. Therefore these staff cannot be shared with affiliates, and we do not seek a waiver from this;
- **Contact Centre**—these staff provide contact centre services to us and affiliates. When providing services to SA Power Networks, our network and customer information can provide no advantage because of the different network locations consistent with point 4 in section 2.4. Therefore this would not preclude staff from being shared; and
- **Control Centre**—these staff operate the control centre for the distribution network and provide limited control centre services for contestable transmission assets. These staff cannot provide an advantage from electricity information because of the different network locations consistent with point 4 in section 2.4. Therefore these staff may be shared.

The following groups consist of corporate staff and can be shared with affiliates:

- Finance;
- Procurement;
- Information Technology support;
- Regulation;
- Legal Services;
- Human Resources and Payroll; and
- Officers.

For staff that are to be shared, we will place a description of their role on a register published on our website.

As discussed, staff that can be shared with affiliates may also be co-located with us.

2.5.6 Branding and cross-promotion

The guideline requires distributors to:

- have separate branding from affiliates;⁴ and
- not advertise or promote (or cross advertise or promote) the services of affiliates.

Branding

All our affiliates have a distinct brand from us except Powercor Network Services. This is discussed in section 3 on waivers.

Staff training

We will develop and provide training on the cross promotion obligations. This training will be provided to new and existing staff that have a customer facing role and work for either us and / or work for an affiliate that provides services to us.

Under this criteria, we will provide training to staff from the Contact Centre, Corporate Affairs, Customer Projects (who manage connection processes), Customer Development Managers and Field Services. We will also ensure there are no references that advantage affiliated entities in the scripts used by Contact Centre staff.

For other staff, we will send periodic communiques outlining their obligations to not promote the services of affiliates. This is appropriate because non-customer facing staff have few opportunities to promote the services of affiliates.

Website

In accordance with our current business practice, information for the website must be approved by Corporate Affairs prior to publication. Our training to Corporate Affairs will ensure these staff are aware of their obligations to not promote affiliates or their services on the website.

We believe references to the contestable service provider have already been removed from our website but we will continue to review this. We will also review and remove material discussing other affiliates.

Materials and equipment

To date we have not identified printed material cross promoting us and affiliates. We will continue to review this.

Powercor Network Services uses equipment and uniforms that possess the CitiPower and Powercor brands. The materials and uniforms are used when undertaking work for us and unregulated work for other affiliates and third parties. This is discussed in section 3 on waivers.

2.5.7 Information access and disclosure

We must only disclose confidential information when we have obtained the explicit consent of the customer, is required by law, is necessary to provide distribution services or on condition information provided to affiliates is placed on an information register. We must also develop an information sharing protocol outlining how and when we will share information with third parties when that information is shared with affiliates.

⁴ Separate branding is also required for non-direct control services, but we are seeking a waiver from this obligation for the non-direct control services we provide.

System access

We are reviewing IT system access registers to ensure staff of the contestable service provider and the indirect affiliates cannot directly access confidential electricity information.

CHED Services' and Powercor Network Services' access to information will not be removed as it is needed to provide distribution and other services in accordance with clause 4.3.3(c) of the guideline. These affiliates, however, must comply with the information sharing restrictions in the same way we must:

- we renegotiated our service agreement with these affiliates this year, the terms of which required them to only disclose our confidential information in accordance with the guideline and information sharing protocol (i.e. on the same basis we may disclose confidential information);
- staff sharing/co-location restrictions will apply to these affiliates' staff that could use the information to engage in discriminatory conduct as discussed in section 2.5.5; and
- the training discussed in the next section will include these affiliates' staff.

That is, these affiliates and staff will be subject to the same information sharing restrictions as CitiPower and Powercor and their staff.

Training

Training will be provided to our staff, and affiliates' staff that undertake work for us, which can also access confidential information. The training will help ensure staff understand the circumstances under which they may provide confidential electricity information to affiliates. This training will be directed to staff from Network Planning, Design, Regulation, Contact Centre, Corporate Affairs, Customer Projects and Customer Development Managers. For lower risk staff without direct access to confidential information, we will send periodic communiques reminding them of their obligations.

Unlike other staff, officers may be shared between us and affiliates, and receive confidential electricity information which could provide affiliates with an advantage. We have therefore identified joint officer arrangements as a potential risk area of non-compliance with non-discrimination and information sharing provisions. In addition to receiving training on their obligations as per the abovementioned staff, joint officers will need to annually declare they have acted in accordance with the guideline.

Information sharing register

The information sharing register must list the entities that request access to confidential information that we share with our affiliates. For each entity that requests access to this information, the register must describe the kind of information the entity requests.

We will establish a register as required by the guideline.

2.5.8 Conduct of service providers

Legal will ensure that the standard terms and conditions used in our new and varied contracts are consistent with ring fencing obligations. If not, these will be changed.

New and varied contracts that do not use standard terms and conditions will be reviewed by Legal for compliance.

3 Waiver applications and No Action requests

3.1 Waiver approach

We will seek waivers where the cost of complying with the guideline is likely to outweigh the benefits. Our waiver approach is outlined in more detail in our draft waiver application which accompanies this compliance strategy.

We are seeking three waivers and one No Action Letter in respect to:

- the provision of negotiated and unclassified services;
- use of the Powercor Network Services brand (which includes the term 'Powercor') when undertaking unregulated services for large commercial and industrial customers;
- use of the CitiPower and Powercor brand when undertaking unregulated field services for large commercial and industrial customers; and
- adopting a single business operating model for CitiPower and Powercor.

The number of waivers, however, could increase if the AER does not agree with our interpretation of the guideline's applicability to us.

4 Pass through applications

4.1 Approach

We have sought waivers to minimise the cost to our customers of complying with the ring fencing guideline. Should our waivers and No Action Letter request be successful, we will not submit a pass through application.

4.2 Projected costs

The costs we will incur from complying with ring fencing arise from the following activities:

- identifying risk areas—time spent identifying potential risk areas;
- implementing compliance—developing and implementing training, IT access changes, changing documentation templates and developing new business procedures; and
- reviewing compliance—establishing a compliance framework to monitor and report on compliance, including engaging auditors to review compliance.

We will not seek a pass through for these costs if they are the only costs incurred.

If our waiver applications and No Action Letter request are unsuccessful, we will potentially incur additional costs for the following activities:

- re-branding—including approximately 916 vehicles and uniforms and safety equipment for 660 Field Service staff; and changing email domain, website, and legal and consumer documentation;
- developing separate websites and implementing necessary business changes to apply ring fencing between CitiPower and Powercor; and
- establishing new business processes and potential need for additional staff and depots to continue to undertake negotiated and unclassified services.

If these costs arise they may be material.

A Appendix – Compliance actions

Issue	Ring fencing obligation	To be addressed via
We may not use CitiPower/Powercor branding for negotiated and unclassified services (including public lighting, reserve feeders, emergency recoverable works)	Branding	Seek waiver
Powercor Network Services brand includes Powercor in its name	Branding / Cross promotion	Seek waiver
Field work is carried out by Powercor Network Services for the contestable service provider using CitiPower and Powercor branding	Branding / Cross promotion	Seek waiver
Ensure no cross subsidies between us and affiliates	Cross subsidies	Appropriate accounting practices already in place. Strengthen with training to Finance
In providing services: <ul style="list-style-type: none"> prioritisation / escalation of work must be fair confidential information and customer leads cannot be shared with related parties except in accordance with the information sharing protocol we must deal with and engage the contestable service provider and other affiliates on the same basis as a non-associated entity we must price regulated work consistently between affiliates and other parties (and their customers), e.g connections 	No discrimination Protect confidential information	Software tools already in place. To be strengthened with training and procedures
Ensure corporate websites comply with ring fencing obligations – Corporate Affairs to review and remove cross promotion of affiliates on our websites	Cross promotion	Training and procedures
Contact centre must not cross promote the contestable service provider or other affiliate services	Cross promotion	Training, procedures (include scripts)
Ensure officers do not share confidential electricity information between regulated and non-regulated business	No discrimination	Training and declarations
Ensure staff only share information in accordance with the information sharing protocol (being developed)	Protect confidential information	Training and declarations
Ensure contestable service provider's systems and staff cannot access confidential customer information in our IT systems	Protect confidential information	System review/change
Ensure staff of affiliates that do not provide services on behalf of CitiPower and Powercor (e.g. the contestable service provider) cannot send emails from 'Powercor' domain	Cross promotion	System review/change
Ensure marketing roles (with access to customer contact details) are not shared with the contestable service provider	Staff sharing	Business practice review/change
Review standard contracts for consistency with ring fencing obligations	Conduct of service providers	Business practice review/change

Issue	Ring fencing obligation	To be addressed via
Develop and publish a staff register as required by the guideline	Staff sharing	Business practice review/change
Develop and publish an information register as required by the guideline	No discrimination	Business practice review/change
Develop a waiver register as required by guideline	Waiver	Business practice review/change
Restrict contestable service providers' access to Market Street office	Protect confidential information	Building access change