

Dear Mark, Rachel and team

Thank you for the opportunity to provide feedback on the AER's proposed following changes to the Electricity Distribution Ring-Fencing Guideline (the Guideline):

- Clarification of the information sharing register provision, and
- Insertion of a new provision to allow the AER to grant 'Class Waivers',

as outlined in the **attached** AER Consultation Note.

ENA supports the AER's proposal (via amendments to clause 4.3.4 of the Guideline) to clarify that information a DNSP shares with a Related Electricity Service Provider (RESP) must be identified on the information sharing register. i.e., it is not only information requested by another third party legal entity that must be identified but information requested by the RESP must be identified as well.

In addition, ENA supports the AER's proposal to introduce a new provision (via a proposed new clause 5.3A) to allow the AER to grant class waivers. This new provision will give the AER the option to begin the process for a class waiver, and may be a simpler, more efficient solution in certain circumstances. We would also strongly encourage the AER to consider updating the current drafting of clause 5.2 to also allow for multiple non-affiliated DNSPs to submit waivers together, which also may be a simpler, more efficient solution in some circumstances.

We look forward to continuing to work with the AER in designing an updated Guideline that supports the uptake of technologies such as stand-alone power systems and community batteries.

Kind regards

Lucy

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Head of Regulation



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