



DRAFT RING-FENCING IMPLEMENTATION PLAN

**DRAFT RING-FENCING IMPLEMENTATION PLAN FOR
CONSULTATION**

April 2017

1.0 Introduction

The Australian Energy Regulator (AER) Ring-Fencing Guideline Electricity Distribution November 2016 (Guideline) is the first consistent cross-jurisdictional ring-fencing guideline. The Guideline has replaced ring-fencing arrangements under the Independent Pricing and Regulatory Tribunal.

The objective of the Guideline is to separate monopoly and contestable electricity services of Distribution Network Service Providers (DNSPs) to promote competition in the provision of electricity services and prevent:

- Cross subsidisation between monopoly services and other services
- Discrimination in favour of affiliated entities providing contestable electricity services.

The AER requires DNSPs to comply with the obligations contained within the Guideline as soon as reasonably practicable, with full compliance required no later than 1 January 2018.

1.1 Purpose

This document provides Endeavour Energy's draft ring-fencing implementation plan prepared in response to the AER's request for information ahead of the formal submission due by 31 July 2017. The draft ring-fencing implementation plan sets out:

- A stocktake of Endeavour Energy's current compliance with the Guideline
- Endeavour Energy's overarching compliance approach, and description of the overall implementation approach required to support this, potential challenges for compliance with the Guideline, and potential waivers that Endeavour Energy is considering seeking from the AER
- A summary of the compliance activities Endeavour Energy has undertaken to date, and activities planned to achieve compliance
- Implementation plan timeline; and
- Whether Endeavour Energy is likely to incur costs that would be the subject of a cost pass through application.

2.0 Stocktake of current compliance

Endeavour Energy has undertaken a review of its current level of compliance with the Guideline for each service classification and guideline obligation. Figure 1, below, provides a snapshot of current compliance with the Guideline. Currently, Endeavour Energy is not fully compliant with the Guideline, however notes that although compliance is required as early as possible, that Endeavour Energy has until 1 January 2018 to comply.

Endeavour Energy's direct control services (DCS) are compliant with the majority of the Guideline, except for the information access and disclosure and service provider obligations. Greater implementation activity is required to achieve compliance for Endeavour Energy's unregulated distribution services, other electricity services and other non-electricity services (shown in Table 1).

Figure 1 – Snapshot of current compliance with ring-fencing obligations by service classification

Obligation	Direct control services	Unregulated distribution services	Other electricity services	Other non-electricity services
Obligation to not discriminate	Compliant	Non-compliant	Non-compliant	Compliant
Legal separation	Compliant	Non-compliant	Non-compliant	Non-compliant
Establish and maintain separate accounts	Compliant	Non-compliant	Non-compliant	Non-compliant
Information access and disclosure	Non-compliant	Non-compliant	Non-compliant	Non-compliant
Physical separation	Compliant	Non-compliant	Non-compliant	Compliant
Staff sharing	Compliant	Non-compliant	Non-compliant	Compliant

Obligation	Direct control services	Unregulated distribution services	Other electricity services	Other non-electricity services
Branding and promotion				
Service providers				

	Service is currently compliant with ring-fencing obligation
	Service is partially compliant with ring-fencing obligation
	Service is currently not compliant with ring-fencing obligation

Table 1 – Endeavour Energy's services by Guideline classifications

Direct Control Services	Unregulated Distribution Services	Other Services	
		Other Electricity Services	Other Non-Electricity Services
<p>Common distribution services (formerly 'network services') including:</p> <ul style="list-style-type: none"> Emergency Recoverable Works Other network support Temporary supply to embedded networks and off-grid networks <p>Ancillary network services</p> <ul style="list-style-type: none"> Design related services Contestable network commissioning and decommissioning (DNSP funded component) Access permits and oversight Notices of arrangement Property services Site establishment services Network safety services Customer vegetation defect works Network tariff change request Recovery of debt collection costs (dishonoured transactions) Services provided in relation to a ROLR event Planned interruption – customer requested Attendance at customers' premises to perform a statutory right where access is prevented Inspection services - private electrical installations and ASPs Authorisation of ASPs and associated admin services <p>Metering Services:</p> <ul style="list-style-type: none"> Meter reading and testing Type 5–6 metering provision (pre 1 July 2015) Types 5–6 meter reading, maintenance and data services Meter recovery - type 5–6 current transformer metering Emergency maintenance of failed metering equipment not owned by DNSP Type 7 metering services Distributor arranged outage for purposes of replacing metering Correction of metering and market billing data NMI extinction fee Site alteration service Meter bypass issue <p>Connection Services:</p> <ul style="list-style-type: none"> Premises connection assets (uncontestable) Extensions undertaken by DNSP Augmentations undertaken by DNSP Registered participant support services Site inspection Facilitation of generator connection and operation of the network Reconnections/Disconnections <p>Public Lighting</p>	<p>Field services contracting (FSC) including:</p> <ul style="list-style-type: none"> Premises connection assets (contestable) Extensions undertaken by Accredited Service Provider (ASP) Augmentation undertaken by customer Contestable metering support roles (e.g. Metering coordinator, meter data provider, metering provider) <p>Nightwatch lights</p> <p>Distribution asset rental</p>	<p>Transformer Workshop</p> <p>Embedded network services (including Microgrid)</p>	<p>Technical training</p>

3.0 Approach to compliance

3.1 Overall approach to compliance

Endeavour Energy has developed its approach to compliance and implementation plan with a focus on achieving the objective of the Guideline by separating Endeavour Energy's monopoly and contestable electricity services. Endeavour Energy's starting point was a top-down approach, to understand which of Endeavour Energy's services would need to be separated from Endeavour Energy's core DCS.

Endeavour Energy undertook a gap analysis for each service classification to determine the scope of compliance activity required for each ring-fencing obligation. The outcomes of this gap analysis informed the development of the compliance approach. The gap analysis identified the core focus of the compliance approach would be to separate unregulated distribution services and other services from Endeavour Energy's DCS.

Endeavour Energy used a bottom up approach to develop the compliance approach, addressing each obligation individually across all impacted services. The compliance approach identifies the activities Endeavour Energy will undertake to implement the required changes to become compliant with the Guideline.

3.2 Implementation approach

Endeavour Energy's overarching approach to implementing the Guideline is to separate all unregulated distribution services and other services it provides into a new affiliated legal entity (AE), which will have a separate brand. The AE will be considered a related electricity service provider (RESP) with respect to the contestable electricity services (CES) it provides.

In connection with the provision of direct control services, Endeavour Energy will treat the AE on an arms-length basis, on similar terms to competitors and potential competitors. It will review, update and communicate policies and procedures prohibiting discrimination and enhance system and information access controls to prevent discrimination between a RESP and its competitors. These will build on existing policies and procedures in place to support the contestable works market in NSW and IPART ring-fencing requirements.

Endeavour Energy will continue to provide corporate and other permitted functions to the AE, however these functions will be provided on arm's length terms, to be documented through a mechanism such as a Memorandum of Understanding. Endeavour Energy will also seek to share staff, property and offices used for the provision and marketing of direct control services and other services, where the Guideline allows staff, property and offices to be shared.

To achieve compliance with the Guideline for provision of equal access to information for all market participants, Endeavour Energy will:

- provide the AE with information and access arrangements as used currently by Accredited Service Providers (ASPs) in NSW with no further confidential or electricity information being made available to the AE, and treat the AE on an arms-length basis.

Table 2 below provides a summary of Endeavour Energy's implementation approach for each of the guideline obligations.

Table 2 – Summary of Endeavour Energy's implementation approach key guideline obligations

OBLIGATION	IMPLEMENTATION APPROACH
Discrimination	<ul style="list-style-type: none">• For the provision of DCS, Endeavour Energy will treat its AE on an arms-length basis, on similar terms to competitors and potential competitors in connection with the provision of direct control services by Endeavour Energy.• Endeavour Energy will continue to provide corporate and other permitted functions to its AE, however these functions will be provided on arm's length terms to be documented through a mechanism such as a Memorandum of Understanding.

OBLIGATION	IMPLEMENTATION APPROACH
Legal / Accounting separation	<ul style="list-style-type: none"> • Endeavour Energy will create a new affiliated entity (AE) to provide the following services: <ul style="list-style-type: none"> ○ Unregulated distribution services ○ Other electricity services ○ Other non-electricity services. • Endeavour Energy will seek waivers for: <ul style="list-style-type: none"> ○ Emergency recoverable works ○ Technical training. • Endeavour Energy will document and provide its internal accounting procedures for separately handling the accounting systems for DCS and its unregulated activities to the AER; and report on transactions between Endeavour Energy and its AE. • Endeavour Energy will establish and maintain separate accounts for Endeavour Energy and the AE and any transactions between Endeavour Energy and the new affiliated entity will be captured in the accounting procedures. • Endeavour Energy will allocate costs to DCS and other services in a manner that is consistent with its approved CAM.
Information access and disclosure	<ul style="list-style-type: none"> • The overarching approach is to improve access to information for all market participants in the longer term. In the short-term, Endeavour Energy will provide the AE with access to information and access arrangements currently provided to ASPs for Confidential Information as defined in the Guideline. • Endeavour Energy will analyse the information it holds to identify what specifically constitutes Confidential Information, and will put in place systems and procedural controls to ensure Confidential Information is not disclosed to a RESP, or any other person, other than in accordance with the Guideline. • Targeted communications will accompany any systems or procedures changes to ensure that impacted staff understand their obligations. • Endeavour Energy will develop an agreement that includes terms and conditions requiring the AE, and competitor parties such as ASPs to whom Confidential Information is made available, to keep Confidential Information confidential, and prohibiting it from disclosing that information in the absence of exemptions set out under the Guideline. The AE and its competitors will need to sign the agreement before Endeavour Energy discloses Confidential Information. • Endeavour Energy will establish, maintain and keep an information register of all legal entities who request access to Confidential Information and will make the register publicly available on its website.
Physical separation	<ul style="list-style-type: none"> • Endeavour Energy will move staff that are dedicated to the AE and are not shared with Endeavour Energy to Parramatta or Hoxton Park (Transformer workshop) with separation being achieved through electronic securing of areas to ensure that only the correct staff have access. • Parramatta depot is currently ring-fenced from offices of DNSP staff who cannot be shared and has the capacity to accommodate the dedicated AE staff. Hoxton Park is a shared site between DNSP employees and AE staff. All employees dedicated to AE services at Hoxton Park are housed in a separate building which is intended to have electronic access security put in place to ring-fence AE staff from the remaining operations at the site. There are no shared office spaces that are expected to complicate access arrangements. • Where staff are able to be shared between DCS and the AE's activities, they will remain co-located. Endeavour Energy will apply any exemptions allowed for staff who do not have access to electricity information or the opportunity to use that information in contravention of the Guideline.
Staff sharing	<ul style="list-style-type: none"> • Endeavour Energy's approach is to share staff across the provision and marketing of DCS and CES, where the Guideline allows staff to be shared. • Endeavour Energy will apply any exceptions allowed for staff who do not have access to electricity information or the opportunity to use that information in contravention of the Guideline. • Where staff cannot be shared, Endeavour Energy will:

OBLIGATION	IMPLEMENTATION APPROACH
	<ul style="list-style-type: none"> ○ Review roles and job descriptions to consolidate the provision of DCS and CES into separate roles ○ Discontinue certain activities for some roles ○ Duplicate roles if necessary. • Endeavour Energy will use its staff sharing tool to identify whether staff can be shared across the provision and marketing of DCS and CES. This tool will be applied to staff roles across the business to identify whether the role can be shared, or if that staff role is required to be amended to be able to be shared.
Branding & Promotion (Marketing & CRM)	<ul style="list-style-type: none"> • Endeavour Energy's new AE will have its own brand, AusConnex. • Endeavour Energy will analyse its website, call centre scripts and procedures, advertisements, external communications to identify circumstances where DCS and CES are advertised together and amend these. • Endeavour Energy will implement a low cost rebranding solution for field staff. It is proposed that vests will be provided to RESP staff to cover Endeavour Energy branded uniforms and magnetic stickers for fleet. • Policies and procedures will be amended to ensure that Endeavour Energy does not promote its DCS and CES together, and these amendments will be supported by targeted communications to impacted staff members.
Reporting & Governance	<ul style="list-style-type: none"> • Endeavour Energy's operational changes brought about by the ring-fencing implementation program will be underpinned by supporting policies and procedures. Existing policies and procedures will be leveraged and updated where appropriate, and new policies and procedures developed otherwise. • Endeavour Energy will commence collecting information, and setting up systems and procedures, necessary to ensure it can prepare an annual ring-fencing report for the 2017-18 regulatory year, and will submit its first report in October 2018. • Endeavour Energy's systems will be modified to ensure that it is able to report on breaches of the Guideline as they are identified. This will leverage procedures in place for reporting breaches of the NER. • Endeavour Energy will engage an independent authority to assess its compliance in relation to the annual compliance report.
Waivers	<ul style="list-style-type: none"> • Endeavour Energy is currently considering waivers for: <ul style="list-style-type: none"> ○ the treatment of services subject to reclassification between Regulatory Control Periods ○ Technical training – external service – waiver from the legal separation and functional obligations. • Upon receiving a final waiver decision from the AER, Endeavour Energy will establish a register of all successful waiver applications and maintain this on an ongoing basis.
Service providers	<ul style="list-style-type: none"> • In establishing new contracts, or as contracts come up for renewal, new clauses requiring service providers to comply with non-discrimination, locational and staffing separation, and information protection obligations under the Guideline will be included. • Communications targeting relevant staff, such as procurement staff, will assist staff in understanding their obligations and incorporating obligations when new or amended contracts with service providers are triggered. • Endeavour Energy will review service provider arrangements to ensure that these do not include arrangements where a service provider is incentivised to contravene Endeavour Energy's ring-fencing obligations.

3.3 Potential compliance challenges

Endeavour Energy expects to be fully compliant with the Guideline within the allowed transition period. To date, no material risks to achieving compliance by 31 December 2017 have been identified.

3.3.1 Impacts of the Endeavour Energy lease transaction on ring-fencing compliance

The NSW Government is intending to enter into a long term lease for the majority share of Endeavour Energy. As a result of the lease transaction, Endeavour Energy will have a new operator and to facilitate this process a number of structural changes will necessarily occur. Endeavour Energy has no reason to believe that the lease transaction will compromise its compliance with the Guideline.

However, there are some specifics of the implementation plan that will not be able to be finalised until after the lease transaction has been completed: for instance the set-up of a separate legal entity cannot be undertaken until after the new ownership structure is in place. This creates the potential for delays in providing the AER with the level of detail that may be expected at some stages of the compliance process. Endeavour Energy will provide the AER with as much notice as practical in the event that any delays in provision of information within the transition period arise.

3.4 Potential waivers being considered

Endeavour Energy is considering seeking waivers in two areas:

1. Some services identified in the AER's Preliminary Framework & Approach Paper for NSW electricity distributors 2019-24 will change classifications between the current regulatory control period and the next regulatory control period. Endeavour Energy is considering seeking waivers for the services that will change classification to direct control services to be exempt from the co-location, staffing and branding and promotion obligations.
2. A waiver from the legal separation and functional obligations for the technical training – external service, which Endeavour Energy considers to be an Other Service.

4.0 Compliance snapshot

Progress made to date by Endeavour Energy in implementing its compliance approach and key activities required to achieve Guideline compliance are outlined in the table below. Activities that Endeavour Energy considers it is able to achieve in advance of the end of the transition period have been identified as 'quick wins'.

The compliance snapshot is presented according to the key compliance areas in the Guideline, as activities to achieve compliance do not vary significantly between services.

Table 3 – Compliance Snapshot

OBLIGATION	PROGRESS TO DATE	ACTIVITIES TO ACHIEVE COMPLIANCE	EXPECTED COMPLIANCE DATE
Discrimination	<ul style="list-style-type: none"> Commenced review and update of Contestable Works Policy (including governance, oversight and auditing). <ul style="list-style-type: none"> Administering the ASP application process Granting / refusing access to Endeavour Energy Network Setting and collecting ASP fees / conditions Communicating network information to ASPs Developing workplace instructions etc. to monitor ASP performance Commenced review and update of associated contestable service provider policies for issues impact compliance with anti-discrimination obligations Reviewed membership and industry association activities for contestable staff to identify potential conflicts of interest and control requirements Confirmed existing contract database (PMWeb) appropriately restricts access to information at an individual branch level Identified areas of potential information sharing compliance risk regarding sharing by DNSP of competitor information with RESP Implemented short term compliance protocols and communications regarding risk of sharing by DNSP of competitor information with RESP (confidentiality of ASP information in shared used facilities and print rooms) Guideline obligations and key change requirements communicated to impacted functions 	<p>Quick wins (by 1 September)</p> <ul style="list-style-type: none"> Implement workplace instructions covering process for disclosure of network information to third parties Update Endeavour Energy's conflict of interest register to align with Guideline sharing of information obligations Implement policies and design physical separation arrangements preventing sharing of competitor information by DNSP with RESP Design arrangement by which corporate and other permitted functions will be provided by Endeavour Energy to the RESP, e.g. MoU. <p>Longer lead items</p> <ul style="list-style-type: none"> Establish monitoring and reporting approach to track alignment of work activities according to revised policies and procedures Enhance internal systems governance and control procedures to ensure ongoing compliance with system and information access restrictions Design and implement enhanced access to information controls within Endeavour Energy's Procurement team to ensure segregation of DNSP and contestable business information Implement physical separation arrangements preventing sharing of competitor information by DNSP with RESP 	September 2017

OBLIGATION	PROGRESS TO DATE	ACTIVITIES TO ACHIEVE COMPLIANCE	EXPECTED COMPLIANCE DATE
Legal / Account separation	<ul style="list-style-type: none"> Service scope of AE and approach to allocation and sharing of assets determined Corporate service requirements for RESP defined Timetable for creation of new legal entity planned for September 2017 following completion of the lease transaction In principle accounting approach confirmed Endeavour Energy's existing CAM confirmed as compatible with Guideline Confirmed that Endeavour Energy's existing ERP (Ellipse), project management tools and time-and-attendance systems (ESS) can be used by the AE 	<p>Quick wins (by 1 September)</p> <ul style="list-style-type: none"> Execute IR and communication requirements regarding staff transfers / secondments Decision on employees to transfer / second to AE based on final staff sharing position Define contractual arrangements with RESP regarding corporate services and asset sharing Confirmation of new accounting structure <p>Longer lead items</p> <ul style="list-style-type: none"> Timing of these activities is dependent on the finalisation of the transaction Establish new legal entity Create new accounting district and accounting processes and records Implement RESP employee transfer / secondment arrangements Execute contractual arrangements with RESP regarding corporate services and asset sharing 	31 December 2017
Information & Disclosure	<ul style="list-style-type: none"> Approach to information compliance defined Scoped current information compliance risk areas (staff, processes, systems, data sets), including identification of confidential information and access arrangements Implemented short term compliance protocols and communications regarding access to confidential information by RESP (prohibition of informal contact between DNSP and RESP staff, formal meeting booking process, lodgement of enquiries to cwttech or via phone similar to external ASPs) 	<p>Quick wins (by 1 September)</p> <ul style="list-style-type: none"> Define policy & procedures update requirements regarding compliance with RESP information and access arrangements Define process and system change requirements Establish and publish information sharing protocol, including terms and conditions for the RESP and RESP competitors to access confidential information <p>Longer lead items</p> <ul style="list-style-type: none"> Implement policy & procedures compliance requirements Implement process and system change requirements Communicate systems and procedure changes to ensure impacted staff understand their obligations Establish and publish information register and associated processes 	1 December 2017

OBLIGATION	PROGRESS TO DATE	ACTIVITIES TO ACHIEVE COMPLIANCE	EXPECTED COMPLIANCE DATE
Physical separation	<ul style="list-style-type: none"> Location of separate physical offices for RESP staff identified (existing Parramatta depot for FSC and Hoxton Park for Transformer Workshop) Limited physical access control requirements identified No exemption requirements regarding regional offices identified 	<p>Quick wins (by 1 September)</p> <ul style="list-style-type: none"> Design physical access control restrictions at RESP locations (including electronic securing of areas) Establish procedures governing ongoing control of physical location of RESP staff, including change of roles and secondments <p>Longer lead items</p> <ul style="list-style-type: none"> Physical relocation of RESP staff to separate facilities Implement physical access control restrictions at RESP locations 	1 December 2017
Staff sharing	<ul style="list-style-type: none"> Staff sharing compliance assessment tool developed Role descriptions for key staff sharing positions tested Preferred position regarding sharing of staff defined No exemption requirements regarding staff located at regional offices identified Remuneration, incentives & benefits compliance assessment performed (4.2.2(c)) – no change requirements identified Officer sharing requirements defined 	<p>Quick wins (by 1 September)</p> <ul style="list-style-type: none"> Finalise role-by-role assessment of staff sharing eligibility using staff sharing tool Consider ability to redefine role descriptions to achieve optimum balance of operational efficiency and compliance Develop supporting analysis for staff sharing position (process and information flows, role objectives and activity descriptions, information and system access, etc) Finalise staff sharing position and develop staff sharing register Identify recruitment requirements for the RESP <p>Longer lead items</p> <ul style="list-style-type: none"> Design and implement compliant organisational structures and reporting lines Communication of staff sharing arrangements Finalise and publish staff sharing register and implement ongoing compliance control procedures Recruitment of new RESP hires (hiring entity to be determined) 	1 December 2017

OBLIGATION	PROGRESS TO DATE	ACTIVITIES TO ACHIEVE COMPLIANCE	EXPECTED COMPLIANCE DATE
Branding (Marketing and CRM)	<ul style="list-style-type: none"> • Separate brand for RESP under development • Conducted options analysis regarding branding of shared use field staff and field assets 	<p>Quick wins (by 1 September)</p> <ul style="list-style-type: none"> • Confirm strategy regarding branding of shared field staff and field assets • Develop strategy & design concepts for external RESP brand requirements (website, marketing material, customer documentation etc.) • Analyse website, call centre scripts and procedures, advertisements, external communications to identify circumstances where DCS and CES are advertised together and amend these. • Establish policies and procedures regarding separate advertising and promotion of RESP services <p>Longer lead items</p> <ul style="list-style-type: none"> • Implement change requirements regarding branding of shared field staff and field assets, including targeted communications to impacted staff members • Build external RESP brand related requirements 	1 December 2017
Reporting & Governance	<ul style="list-style-type: none"> • Ongoing compliance and monitoring framework established 	<p>Quick wins (by 1 September)</p> <ul style="list-style-type: none"> • Design ongoing compliance and monitoring policies and procedures (responsibilities, processes, data collection requirements, review and reporting arrangements, etc.) • Develop Guideline compliance training (for DNSP and RESP staff) <p>Longer lead items</p> <ul style="list-style-type: none"> • Implement ongoing compliance and monitoring policies and procedures • Implement Guideline compliance training • Develop process and timeline to undertake annual compliance reporting, including engaging an independent authority to assess compliance. 	1 December 2017

OBLIGATION	PROGRESS TO DATE	ACTIVITIES TO ACHIEVE COMPLIANCE	EXPECTED COMPLIANCE DATE
Waivers	<ul style="list-style-type: none"> Preferred position regarding waivers defined - Endeavour Energy is currently considering waivers for: <ul style="list-style-type: none"> the treatment of services subject to reclassification between Regulatory Control Periods Technical training – external service – waiver from the legal separation and functional obligations. Endeavour Energy may also seek a time limited waiver to extend the transitional period, should delays from external processes (e.g. transaction process) result in implementation not being achievable by 31 December. 	<ul style="list-style-type: none"> Define final position regarding waivers Establish a register of all successful waiver applications 	1 July 2017
Service Providers		<ul style="list-style-type: none"> Review existing service provider arrangements to ensure these do not include arrangements where a service provider is incentivised to contravene Endeavour Energy's ring-fencing obligations Establish service provider Guideline compliance protocols (4.4.1) Communication to relevant staff, such as procurement staff, to assist staff in understanding their obligations and incorporating obligations when new or amended contracts with service providers are triggered. 	1 December 2017

5.0 Implementation plan timeline

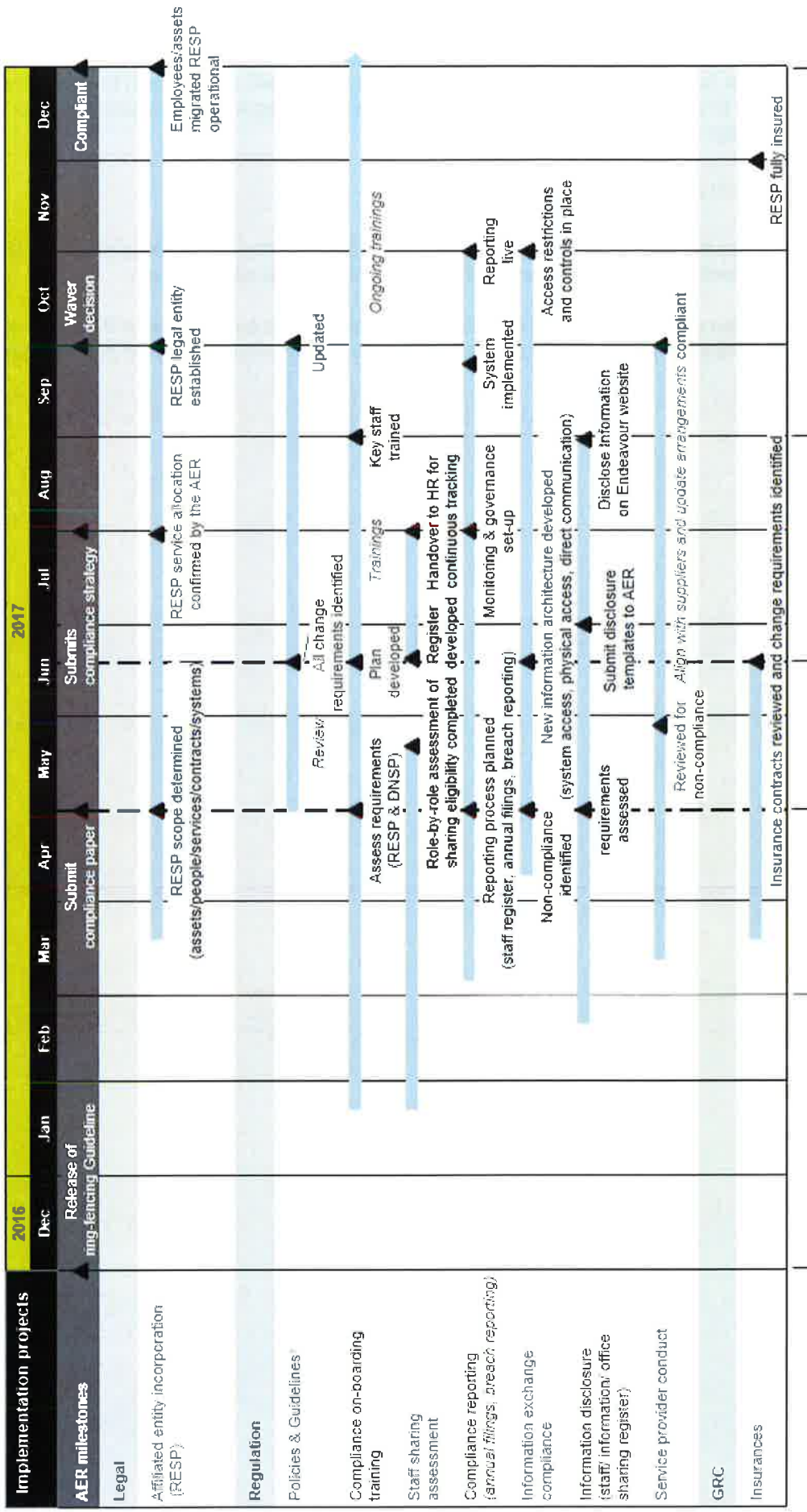
The implementation timeline allocates the compliance activities and actions identified in the previous section to the relevant business area within Endeavour Energy that will be required to undertake the activities. Endeavour Energy will use this timeline to track progress against the implementation plan. A detailed implementation plan is shown in Appendix A.

6.0 Cost considerations

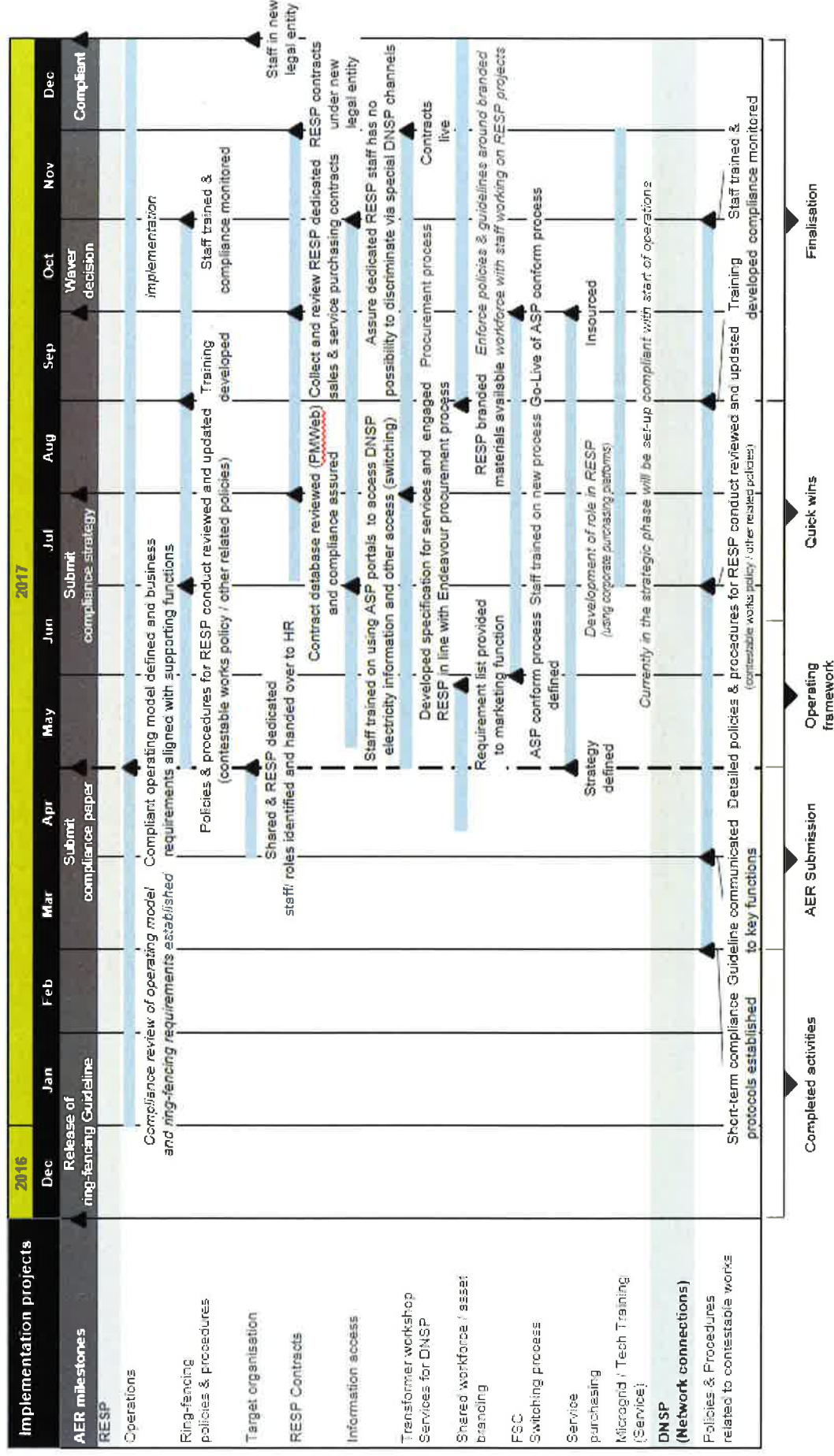
Based on the activities outlined in the draft implementation plan, Endeavour Energy does not expect that the estimated implementation costs will exceed the threshold for cost pass through.

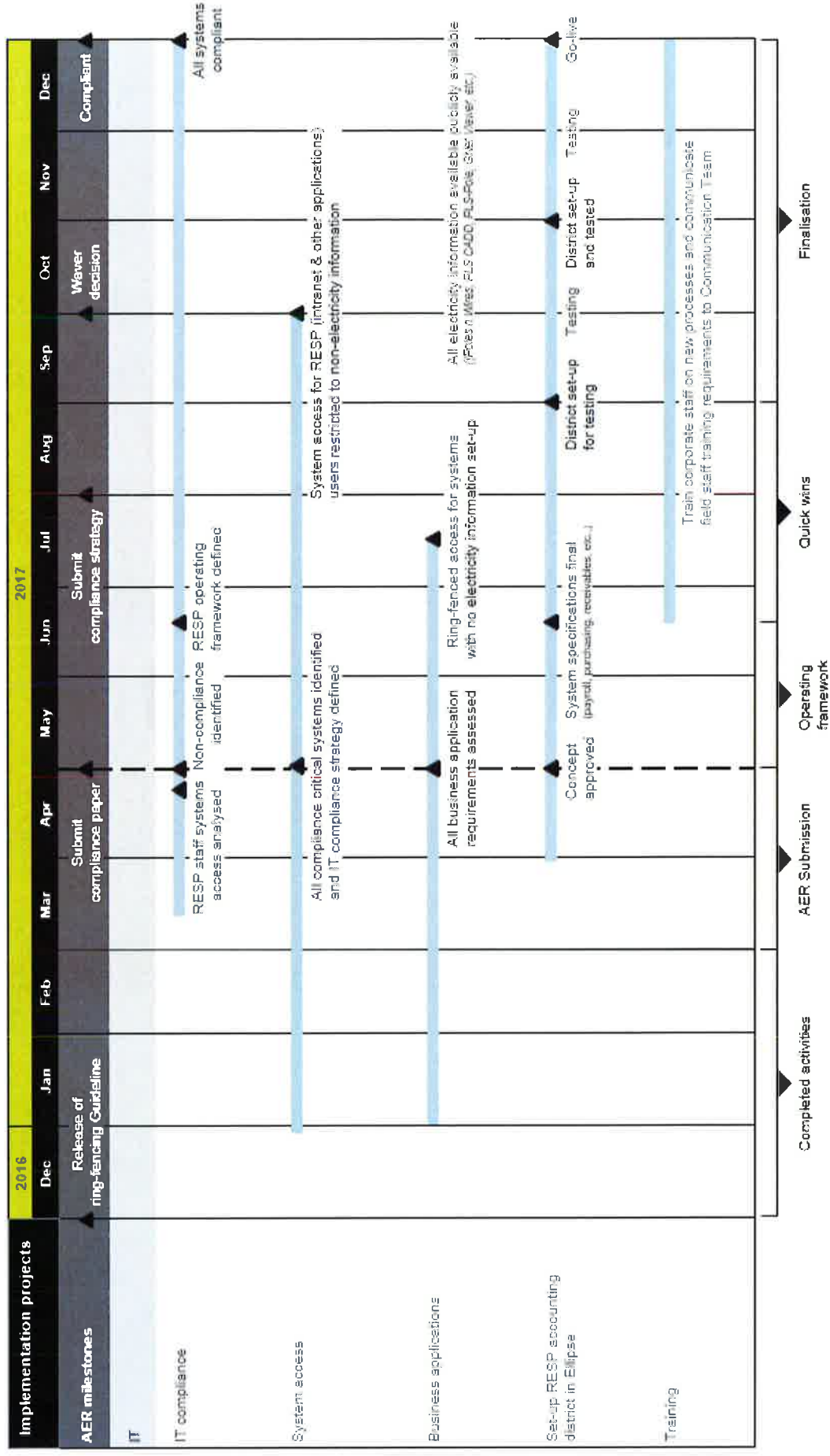
Endeavour Energy also does not expect there to be material impacts on Endeavour Energy's or the RESP's ongoing operational costs, based on the implementation approach outlined in this paper.

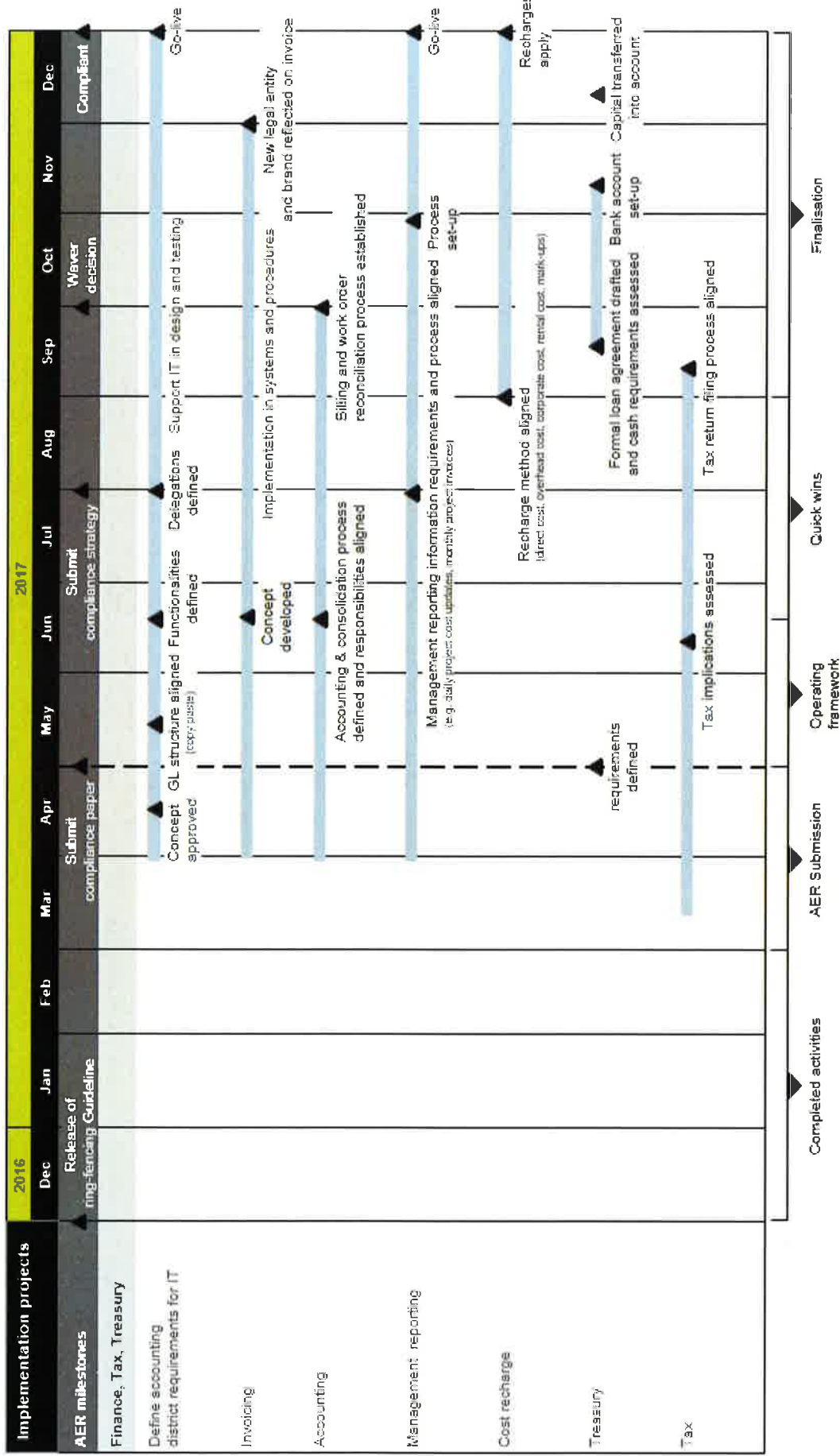
Appendix A – Implementation Plan

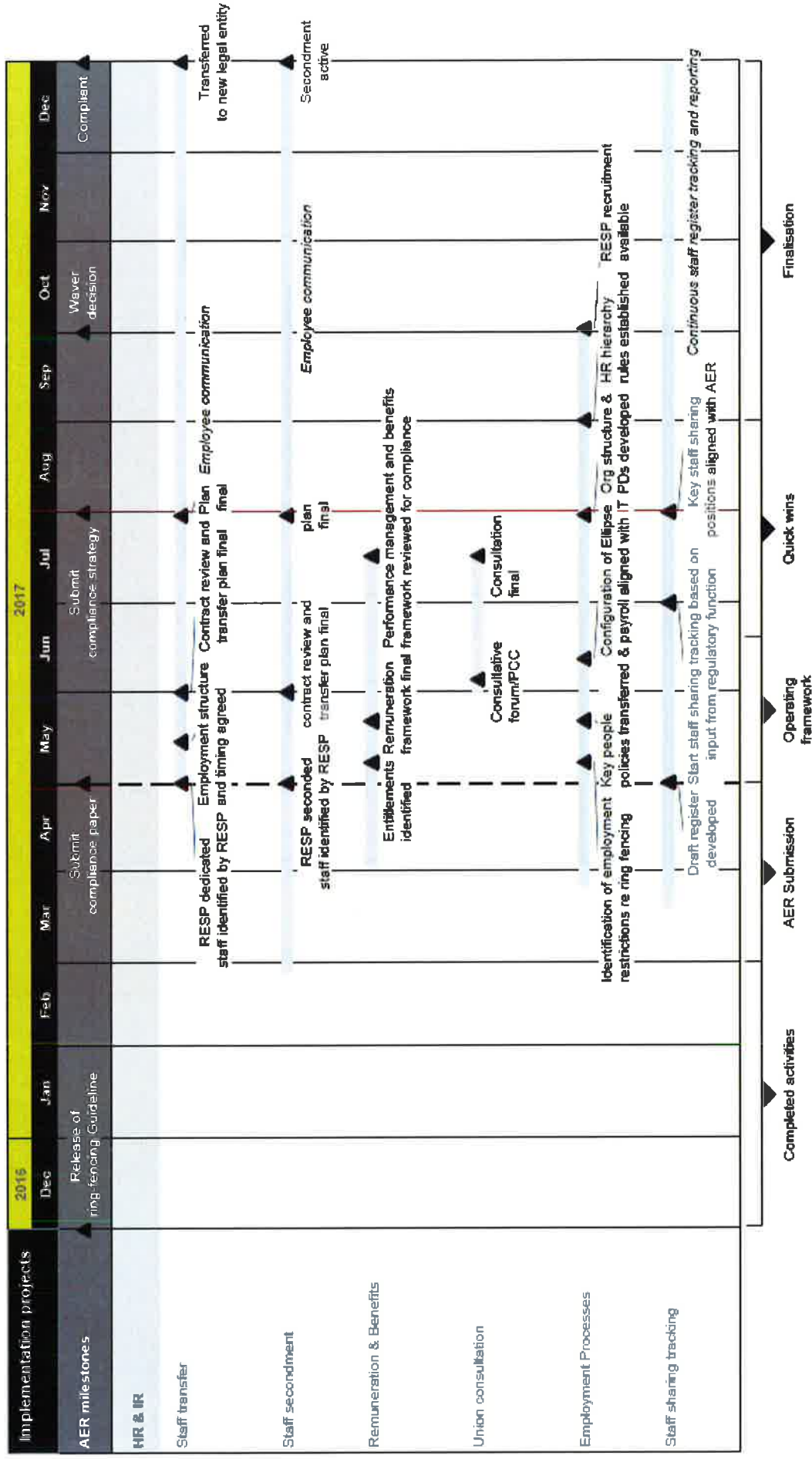


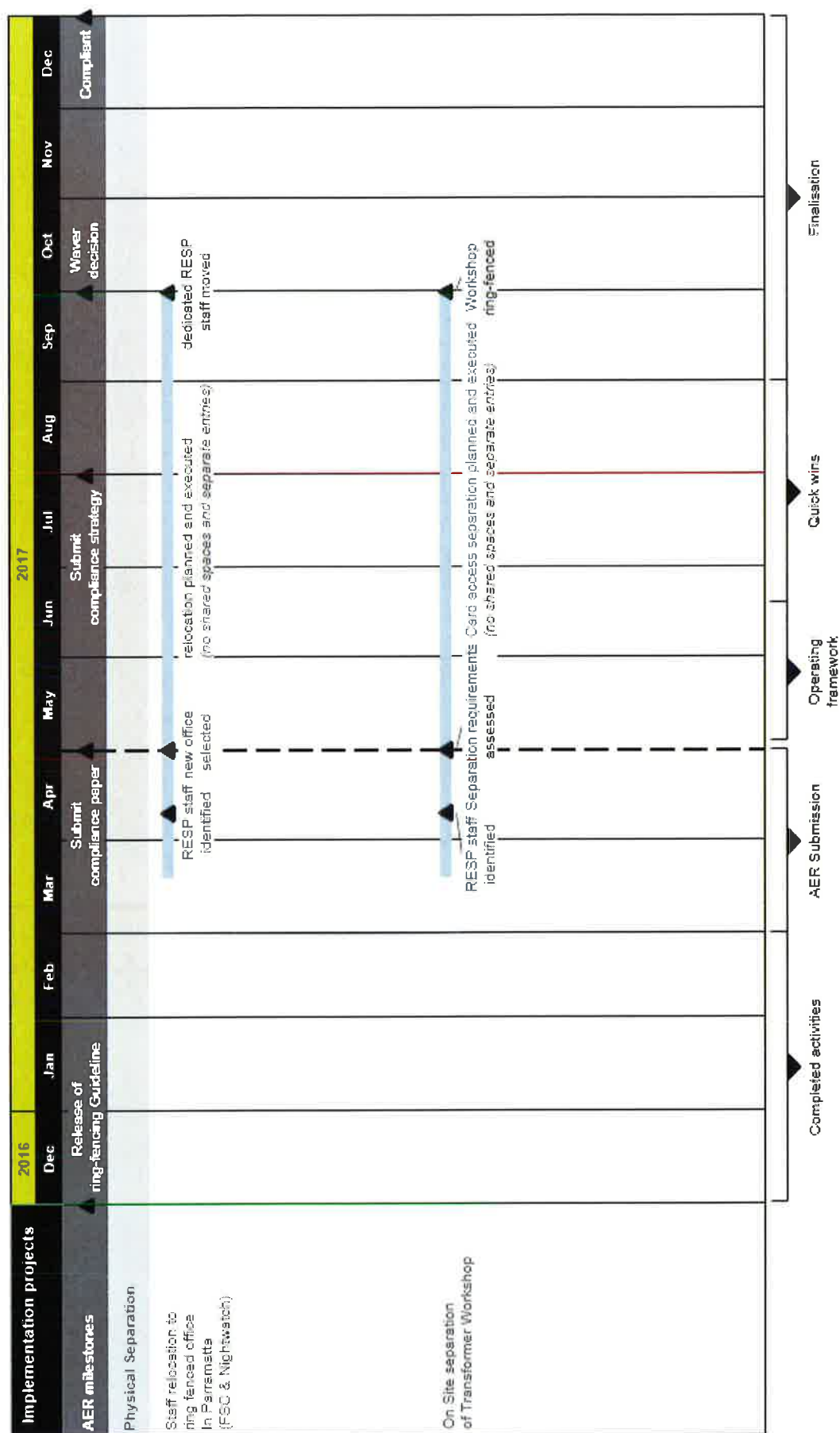
¹Review and amend policies to positively assure Endeavour Energy DNSP will not discriminate between its affiliated entity and its competitors or ASPs











Endeavour Energy - Staff Sharing Register

Implementation overview by function

Purpose This register is made publicly available in accordance with clause 4.2.4(b) of the AER Ring Fencing Guideline Electricity Distribution, November 2016.

The table below sets out those staff who hold positions in Endeavour Energy's Distribution Network Service Provider (DNSP) business who, from time to time, are shared with Endeavour Energy's Contestable Service Provider business. These positions have been assessed against the criteria set out in clause 4.2.4(b) of the Guideline and are considered to meet the relevant staff-sharing exemption to enable the position to be shared between the two businesses.

This register includes all shared staff roles that are involved in the provision or marketing of direct control services and contestable electricity services, except those that perform services that are not electricity services (such as general administration, accounting, payroll, human resources, legal or information technology support services).

ID	Function (Branch)	Position Title (PDS in function)	Description of role (e.g. purpose)	Nature of position (roles, functions, duties)	Provide Services to	Information Access (e.g. category of information)	Staff sharing considerations		Other considerations
							Do any of the exceptions apply?	Explanation as to why the exceptions apply	
1	Network Services Regions	Project Assistant	Role is to ensure work site safety and WH&S compliance on high risk construction projects	Duties include: monitoring the implementation of site safety management plans, work site hazard and risk assessments site inductions. Assists the project team in reporting on project delivery performance. Ensure consistent application and utilization of business processes and systems.			Staff member has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b))		
2	Network Services Regions	Electricity Worker		Duties include: Installation/repair/maintenance of equipment. Provide field support services to the work crew. Use basic hand tools and equipment. Identify hardware and associate equipment. Stock levels for vehicles and work site. Operate support plant and equipment. Lay underground cables. Erecting, assembly or maintenance of public lighting systems/ poles and associated hardware. Stringing and maintenance of overhead conductors and cables. Installation of underground enclosures. Notification to customers of system outages and interruptions on the network. Read geographic maps.			Staff member has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b))		
3	Network Services Regions	Plant Operator		Refer Electricity Worker. In addition, duties include: Appointment to operate heavy plant.			Staff member has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b))		
4	Network Services Regions	Line Worker		Duties include: Stock levels for vehicles and work site. Assist in erecting and maintaining poles and associated hardware. Prepare site for support installation and operate support plant and equipment. Notification to customers of system outages and interruptions on the network. Inspect overhead structures and electrical apparatus. Conduct low voltage switching operations. Provide basic customer service in the field to visitors. Install/repair/maintenance of equipment in hazardous conditions. Tree trimming functions near live low voltage conductors. Read and interpret project construction drawings/ schematics. Install and maintain low voltage overhead conductors and cables. Undertake commissioning procedures of low voltage apparatus and associated basic circuits. Install and maintain electrical equipment			Staff member has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b))		
5	Network Services Regions	Leading Hand Lineworker		Refer Line Worker duties. In addition, duties include: Demonstrate and promote Endeavour Energy's values within the work team. Communicate effectively and appropriately. Implement effective change management within their work team. Inspire and motivate their work team to achieve set work tasks and goals. Take accountability for the results of their work team. Focus on broader business / branch objectives in the performance of their day to day duties.			Staff member has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b))		
6	Network Services Regions	Cable Joiner		Duties include: Traffic control – stop/go. Notification to customers of system outages and interruptions on the network. Conduct low voltage switching operations. Interpretation of project construction drawings; schematics. Joining and terminating of high voltage underground cables. Install and maintain electrical equipment and associate hardware, including identification of faults and return to service. Notification to customers of system outages and interruptions on the network. Undertake commissioning procedures of apparatus and associated basic circuits. Installation of underground enclosures. Maintenance of underground cables, including diagnosis of faults and commissioning. Diagnose faults in power cables.			Staff member has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b))		
7	Network Services Regions	Leading Hand Cable Joiner		Refer Cable Joiner duties. In addition, duties include: Demonstrate and promote Endeavour Energy's values within the work team. Communicate effectively and appropriately. Implement effective change management within their work team. Inspire and motivate their work team to achieve set work tasks and goals. Take accountability for the results of their work team. Focus on broader business / branch objectives in the performance of their day to day duties.			Staff member has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b))		
8	Network Services Regions	Distribution Powerline Worker		Refer Line Worker and Cable Joiner duties. Position can be a combination of lineworker and cable joiner duties depending on the area they are working in.			Staff member has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b))		
9	Network Services Regions	Supernumerary Distribution Powerline Worker		Refer Distribution Powerline Worker.			Staff member has access to electricity information but no opportunity to discriminate by using the electricity information (4.2.2(b)(i)(b))		

Endeavour Energy - Information Register

Purpose

This register is made publicly available in accordance with clause 4.3.5(a) of the AER Ring Fencing Guideline Electricity Distribution, November 2016.

The table below lists the legal entities that have requested access to information identified in clause 4.3.4(a), that is, confidential information that a DNSP shares with a related electricity service provider, and a description of the kind of information requested.

ID	Legal entity	Category of information requested	Description of information*
1			
2			
3			
4			
5			
6			
7			

* The description of information must be in sufficient detail to enable other legal entities to make an informed decision about whether to request that kind of information from the DNSP.

Endeavour Energy - Office Sharing Register

Purpose This register is made publicly available in accordance with clause 4.2.4(a) of the AER Ring Fencing Guideline Electricity Distribution, November 2016.

The table below lists the offices which Endeavour has applied the exceptions to the physical separation obligation and provides details of the services and functions being provided from the shared offices, and access restrictions that are applied.

ID	Office	Description	Staff/services utilising the office	Exception applied	
				Offices for staff who, in the course of their duties, do not have access to electricity information, have access but do not have an opportunity to discriminate or only have access to the extent necessary to perform non-electricity services (4.2.1(b)(i))	Regional office (4.2.1(b)(iii))
1	Parramatta	Parramatta depot is currently ring-fenced from offices of DNSP staff who cannot be shared and has the capacity to accommodate the dedicated RESP staff.	RESP staff working in the area of Field Service Contracting and Nightwatch as well as Endeavour shared operational staff with no access to confidential electricity information or opportunities to discriminate.	Yes	No
2	Hoxton Park	Hoxton Park is a shared site between DNSP employees and AE staff. All employees dedicated to AE services are housed in a separate building which can be ring-fenced from the remaining operations at the site. There are no shared office spaces that are expected to complicate access arrangements.	RESP staff working in the Transformer Workshop	Yes	No
3					
4					
5					
6					
7					

