

17 November 2016

Mr Chris Pattas
General Manager Networks
Australian Energy Regulator
Level 35, 360 Elizabeth Street Melbourne 3000
Email: chris.pattas@aer.gov.au

Electricity distribution ring-fencing guideline – Exposure draft

Dear Mr Pattas,

Energy Networks Australia welcomes the opportunity to review an exposure draft of the Australian Energy Regulator's Ring-Fencing Guideline.

Energy Networks Australia and its members have developed the attached mark ups. We believe that consideration of these would be beneficial in relation to the clarity, and fitness for purpose, of the final ring-fencing guideline. The changes are provided in marked up form, with brief explanatory notes setting out the reasons for the change. In some areas, we have opted to provide drafting comments rather than specific marked up changes.

As requested, Energy Networks Australia has focused its comments on issues relating to technical workability and clarity. However, we continue to support the changes outlined in our previous correspondence of 3 November 2016.

Energy Networks Australia notes that it is critical that network service providers are able to achieve compliance with the ring-fencing guideline. Individual businesses will provide their views on the appropriate transition in their submissions.

If further information is sought on this matter, please contact Garth Crawford, Executive Director, Economic Regulation, on 02 6272 1507.

Yours sincerely,



John Bradley
Chief Executive Officer

As of 10 November 2016, the Energy Networks Association commenced trading as Energy Networks Australia. Our website and email has changed to energynetworks.com.au. Please update your records accordingly.