

9 May 2023

Arek Gulbenkoglu
General Manager, Network Expenditure
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

By email to: AERgasreform@aer.gov.au

Dear Mr Gulbenkoglu

Re: Pipeline information disclosure guidelines

Evoenergy welcomes the opportunity to provide a submission to the Australian Energy Regulator's (AER) Issues Paper on Pipeline Information Disclosure Guidelines ('guidelines').

Evoenergy owns and operates the electricity distribution network in the Australian Capital Territory (ACT) and gas distribution networks in the ACT and the Queanbeyan–Palerang Regional Council and Shoalhaven City Council local government areas of New South Wales.

Evoenergy notes the guidelines are required under the new prescribed transparency information requirements that apply to all gas pipelines under Part 10 of the National Gas Rules, which came into effect in March 2023. Evoenergy is committed to being open and transparent with our gas customers by providing information that is easy to access and understand.

Information provision and regulatory burden

Evoenergy currently provides a comprehensive suite of information for the ACT's gas distribution network every five years to the AER to support our Access Arrangement, and on a monthly and annual basis to fulfil reporting requirements.¹ Other information, including the number of customers, gas volumes and disconnections data is provided on a monthly basis to the ACT Government under the draft gas transition regulations.

Evoenergy's gas network is relatively small and we forecast decline in customer numbers over coming years as the ACT pursues electrification. Within this context, Evoenergy considers the cost of additional reporting requirements should be carefully weighed against the benefits that ~~may be received if additional~~ information is available. Regulatory reporting costs can be

¹ Technical and other information required by Evoenergy's network licence under the Utilities Act 2000 (ACT) is provided to the ACT Independent Competition and Regulatory Commission (annually) and to the ACT Utilities Technical Regulator (monthly and annually). Evoenergy reports a range of metrics to the AER annually to comply with Regulatory Information Notice (RIN) reporting requirements.

significant, particularly when there is duplication between national and jurisdictional reporting requirements.

Accordingly, Evoenergy supports the new prescribed transparency information requirements, so long as their development carefully considers the costs and benefits of the additional regulatory burden imposed on network businesses.

Should you wish to further discuss matters raised in this submission, please contact Andrew Ponsonby, at [REDACTED]

Yours sincerely

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David Wilkinson
General Manager Evoenergy (Acting)