

# Ring-fencing Guideline Electricity Transmission Issues Paper

## Attachment 1 Stakeholder feedback template

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the Ring-fencing Guideline Electricity Transmission Issues Paper and any other issues that they would like to provide feedback on. The AER encourages stakeholders to use this template and to provide reasons for stakeholders' views to assist the AER in considering the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the issues paper.

### Submitter details

**ORGANISATION:** Northern Beaches Council

**CONTACT NAME:** Yianni Mentis

**EMAIL:** Yianni.Mentis@northernbeaches.nsw.gov.au

**PHONE:** 02 8495 6441

### Section 2.1 – Preventing cross-subsidies – Activities versus services

AER Question	Stakeholder feedback
1. What are the potential harms and benefits of the guideline referring to services, rather than activities?	None

### Section 2.2.2 – Legal separation – Scope of services

AER Question	Stakeholder feedback
2. What are the potential harms and benefits for consumers, the market and TNSPs of requiring TNSPs to legally separate transmission and non-transmission services?	None
3. How would the definitions for transmission services set out in Chapter 10 of the NER cover these new and emerging electricity services?	None
4. What is the appropriate range of services TNSPs should be able to	None

<p>provide without legal separation? For example:</p> <ul style="list-style-type: none"> <li>a) Distribution services;</li> <li>b) Contestable electricity services; and</li> <li>c) Non-electricity services.</li> </ul> <p>What are the possible harms and benefits to consumers and the market from TNSPs offering these services?</p>	
<p>5. In the case of TNSP-owned batteries, should TNSPs be able to lease excess capacity to third parties? What are the potential harms and benefits to consumers, the market and TNSPs of this?</p>	<p>Northern Beaches Council is proud to be the first council in NSW to host a network provided community battery as part of a two year trial.</p> <p>Northern Beaches Council supports the Ausgrid community batteries program and our residents want more installed in the area.</p> <p>The Northern Beaches has approximately 57,900 kW of rooftop solar installed across more than 13,000 residential dwellings. We believe that with access to a storage option that is cheaper than purchasing individual batteries, our solar penetration will increase. This inturn will help us deliver against local, state and federal net zero targets, with increased solar uptake identified as a key measure to reduce our community's emissions.</p> <p>The battery trial provides connected customers greater value for their rooftop-solar, earning them up to an additional \$200 each year. The trial also demonstrates the ability of community batteries to reduce network costs, leading to lower bills for everyone, and supporting solar uptake.</p> <p>Council supports increased access to community batteries and supports the role out of community batteries by network operators in a manner that is fair, equitable and facilitates healthy competition where appropriate.</p>

#### Section 2.2.4 – Legal separation – Exceptions to legal separation

AER Question	Stakeholder feedback
<p>6. In relation to non-transmission services, what would be the harms and benefits to consumers, the market and TNSPs of moving to a waiver approach rather than a revenue cap?</p>	<p>None</p>
<p>7. If a revenue cap approach was maintained, what would be the appropriate form and magnitude of that cap?</p>	<p>None</p>

### Section 2.2.5 – Legal separation – Grandfathering arrangements

AER Question	Stakeholder feedback
8. If legal separation is applied, how should existing services be treated?	None

### Section 3.1 – Preventing discrimination – Obligation not to discriminate

AER Question	Stakeholder feedback
9. What are the key potential harms and risks that an obligation not to discriminate should target?	None
10. What are the potential harms and benefits to consumers, the market and TNSPs of strengthening the obligation not to discriminate?	None

### Section 3.2 – Preventing discrimination – Functional separation

AER Question	Stakeholder feedback
11. What are the potential harms and benefits to consumers, the market and TNSPs of introducing additional functional separation obligations for: <ul style="list-style-type: none"> <li>a) staff sharing;</li> <li>b) office sharing; and</li> <li>c) branding and cross-promotion?</li> </ul>	None
12. Should any new functional separation obligations apply to all contestable services? Should any exceptions apply, and if so, why?	None

### Section 3.3 – Preventing discrimination – Information access and disclosure

AER Question	Stakeholder feedback
13. What are the potential harms and benefits to consumers, the market and TNSPs of aligning the transmission and <a href="#">distribution guidelines</a> in relation to information access and disclosure?	None
14. Are there any potential inconsistencies with the <a href="#">Transmission Connections and Planning Arrangements</a> rule change we need to consider?	None

### Section 3.4 – Preventing discrimination – Requirement for service providers to comply

AER Question	Stakeholder feedback
15. What are the potential harms and benefits to consumers, the market and TNSPs of aligning the transmission and distribution guidelines in relation to obligations on third party service providers that support the provision of prescribed transmission services?	None

### Section 4 – Compliance

AER Question	Stakeholder feedback
16. What are the potential harms and benefits to consumers, the market and TNSPs of expanding the scope of compliance reporting?	None
17. Should the timeframe for reporting all breaches be extended to 15 days?	None

### Section 5.1 – Other issues - Waivers

AER Question	Stakeholder feedback
18. Would there be benefit in the AER providing more clarity on the application and assessment process for waivers?	None.
19. Do you agree with the AER's initial views that certain clauses should not be subject to waivers (e.g. the obligation not to discriminate and information access and sharing)? Please explain your reasons.	
20. Which elements of the assessment criteria used to assess waiver applications by DNSPs would be appropriate for transmission?	None
21. What factors should we take into account in considering the duration of waivers?	None
22. Are there any circumstances where class waivers may be appropriate for transmission?	None

### Section 5.3 – Other issues – Additional ring-fencing obligations

AER Question	Stakeholder feedback
23. What are the potential harms and benefits to consumers, the market	None

and TNSPs of removing the ability of the AER to impose additional obligations on a TNSP (clauses 9 and 10 of the guideline)?	
24. Are there any other issues in relation to this review that you would like the AER to consider?	No.