

# **Annual Ring-fencing Compliance Report for 2018/19 SA Power Networks October 2019**

## 1. Introduction

The Australian Energy Regulator (**AER**) released a new draft Ringfencing Guideline in November 2016, and the current Ringfencing Guideline (**Guideline**) in October 2017. In 2017, SA Power Networks (also **we, us**) undertook a significant ring-fencing implementation program, overseen by an Executive Steering Committee, to:

- Interpret Guideline requirements;
- Assess areas of the business impacted by the new obligations;
- Develop/modify policies and procedures to ensure compliance;
- Train staff on the new requirements; and
- Implement other necessary changes.

The Guideline required us to comply with the obligations by no later than January 2018. We implemented significant changes to comply within the required timeframes, and have undertaken work to ensure we comply with the Guideline with the lowest cost to our customers and minimum impact to service delivery. We have continued to embed and improve our controls to ensure ongoing ringfencing compliance. Some controls have been strengthened as a result of our independent assessment for the regulatory year end June 2018, and through established controls such as company directives, training, and our quarterly compliance questionnaire, we ensure compliance remains a priority.

One of the first steps we took towards compliance prior to 1 January 2018 was to establish a new affiliate, Enerven to continue to provide 'non distribution' or 'other services'. The term 'affiliate' and Enerven are used interchangeably throughout our Ring-fencing Annual Compliance Report (**Report**).

This Report provides details of the actions that we have undertaken to ensure compliance with the Guideline. We describe the exceptions and related recommendations provided by Deloitte in their 2018 and 2019 SA Power Networks Ring-Fencing Guideline Compliance Reports (**Independent Assessment/s**), and the rectification actions we have undertaken. The period for which this Report relates is 1 July 2018 to 30 June 2019.

Throughout this Report, there are references to documents that have been created or already existed prior to 1 January 2018, that support ring-fencing compliance. The references align with those in Appendix A, which appear as '[alphabetic reference].[document number]'. Appendix A provides a brief description for each document referred to.

### 1.1 Key Interpretations

Some key interpretations were outlined in our Ring-fencing Implementation Plan in August 2017, and in our 2018 Ring-fencing Annual Compliance Report, and these interpretations have remained consistent since our implementation process.

Compliance implementation was guided by our general interpretations of the guideline, as follows:

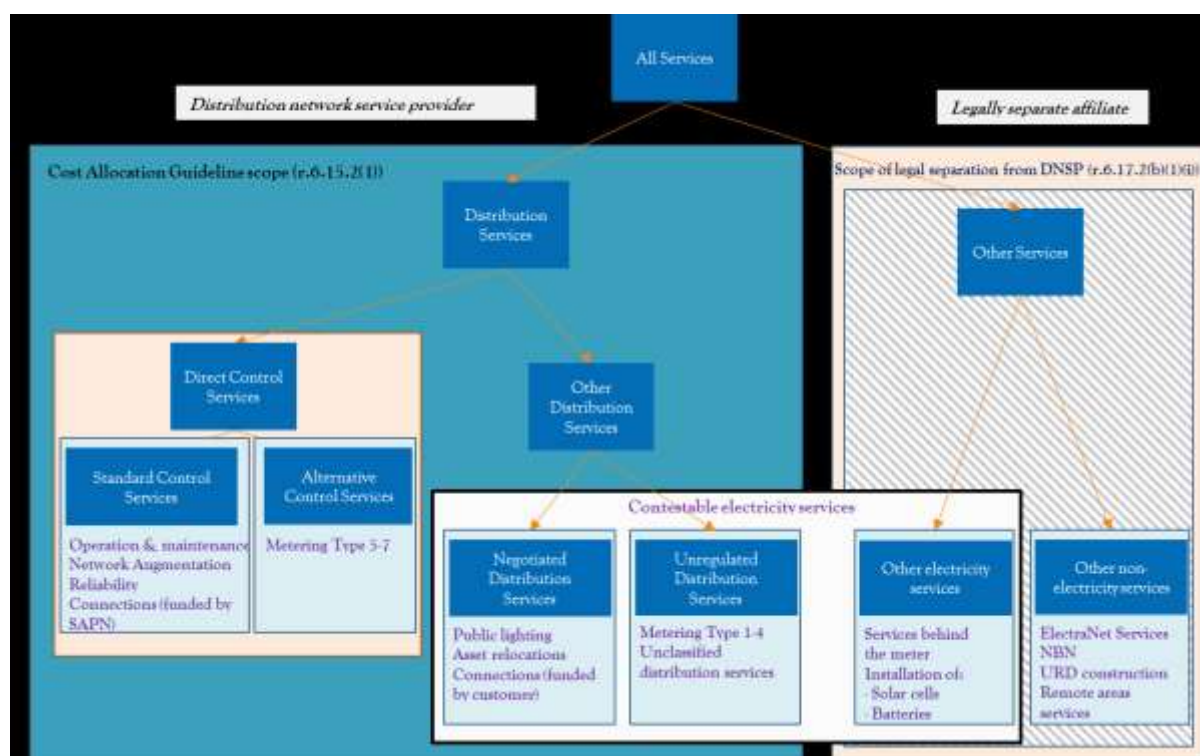
1. Only services provided in connection with our own distribution network are distribution services—work on, or for, other networks must therefore be undertaken by our affiliates (except where an exemption applies under the Guideline).
2. If an affiliate provides services on our behalf we must ensure it complies with ring-fencing obligations just as any service provider must. However, where an affiliate undertakes work for a

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different party, ring-fencing does not apply to the affiliate; this is except to the extent that the affiliates' provision of services to the other party affects its relationship with us.<sup>1</sup>

3. Staff involved in providing our direct control services may also be involved in the provision of services by our affiliate, subject to meeting certain conditions:
  - The roles and activities of any shared staff must accord with one of the exclusions listed in the Guideline; or
  - The services in question are 'other non-electricity services'<sup>2</sup>, typically construction, maintenance and metering infrastructure services provided to customers that are not connected to our distribution network and include property developers and other electricity and telecommunications utilities. For the avoidance of doubt, where any of our affiliate's customers provide electricity services, our affiliate is providing an input to these services and is not providing services direct to their customers—that is, our affiliate is not providing electricity services in these circumstances. Figure 1 overlays a non-exhaustive list of these and other services that we provide, onto the diagram from the AER's Explanatory Statement.

Figure 1: Mapping ring-fencing to distribution services



<sup>1</sup> If our affiliate provides services to a party other than SA Power Networks, we must ensure our affiliate is not using SA Power Networks' regulated funds to cross-subsidise its activities.

<sup>2</sup> AER, *Electricity distribution ring-fencing guideline – Explanatory statement*, November 2016, Figure 1, page 14.

## 2. 2018 Independent Assessment exceptions (breaches)

Deloitte's 2018 "SA Power Networks Ring-Fencing Guideline Compliance Report" (**2018 Independent Assessment**) identified three exceptions, one in relation to legal separation; and two relating to protection of confidential information. As a result, we have been working towards improved controls, or, as set out below, provided the AER with an action plan (in relation to SAP access). These exceptions are reported in the 2019 Independent Assessment and this Annual Report, as while they were identified in the 2018 Independent Assessment, they did carry over into the 2018/19 regulatory year.

### 2.1 Legal separation

Through SA Power Networks' self-reporting, Deloitte identified a breach of the legal separation obligation for five SA Power Networks' contracts for 'other services'. These five contracts were not covered by an AER-approved waiver from the obligation to comply with clause 3.1 (legal separation) of the Guideline. Enerven identified the contracts not included in the initial AER-approved waiver and SA Power Networks disclosed this as part of the Independent Assessment. The contracts were reported to the AER and included in the waiver extension application for Other Services contracts, which was subsequently approved by the AER on 28 September 2018. The breach was reported on the material breach reporting template to the AER at their request. While this breach was identified, and action undertaken to rectify it, prior to the 2018/19 period commencement, Enerven has continued to embed further controls which are described below.

#### Actions to rectify

The Enerven commercial team now manages and maintains a central contracts register for all Enerven contracts, which includes the waived Other Services contracts. They will ensure that any proposed amendments to the waived contracts are first discussed with the appropriate internal team (Regulation branch) who will advise the AER of any proposed amendment as required by the AER waiver notice.

There are processes to manage and monitor new and ongoing Enerven contracts, to ensure that no new contracts are executed in SA Power Networks name. This has included, for example, a detailed analysis of all Enerven purchase orders in SAP and a check on the contracts to which they relate.

This is a continued area of focus for the Enerven commercial team.

### 2.2 Protection of confidential information

Deloitte identified and reported two exceptions in relation to the protection of confidential information, both in the context of Enerven access to IT systems containing confidential information:

- Application of the correct Guideline definition of confidential information in the IT systems access process; and
- Inadequate HR processes to ensure staff secondments from SAPN to Enerven are appropriately managed, tracked, and removal of access is actioned.

#### IT systems access process

##### Background

The SA Power Networks Risk branch undertook a ringfencing audit (health check) prior to the commencement of Deloitte's 2018 Independent Assessment. Deloitte determined through visibility of and their initial assessment of the health check, that the definition of confidential information

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initially applied in the IT process was limited to customer information. Network and service information was not included in the definition of confidential information against which IT systems were assessed for controlled/restricted access.

### **Rectification actions**

Following initial consultation with Deloitte, the IT Department undertook a detailed review in September 2018 of IT systems that contain confidential information, based on the Guideline definition (ie including network information not available publicly). A comprehensive review of all IT applications was undertaken and these systems are now maintained on a 'critical application' list, which is included in the IT system access process.

Part of the IT review included removal of any Enerven staff access to these systems (critical applications) not allowed by a Guideline exemption. Deloitte's assessment did not identify any inappropriate access to this confidential information.

An IT system access process and a quick reference guide developed for ringfencing compliance, provide clear direction for IT staff to manage Enerven staff system access requests. There are also regular access checks by IT applications team leaders to ensure the process is being followed and no Enerven access is provided, unless a Guideline exemption applies.

The IT system access process includes a specific approval requirement for any Enerven access request to a 'critical application'. Approval or denial of an access request is provided by a system owner (business application owner) who has been specifically trained in ringfencing obligations and the IT system access process. Any access request must contain clear justification, so the system owner can make an informed decision as to whether access falls within a Guideline exemption (ie required only for distribution work).

### **SAP access**

#### **Background**

SAP was implemented in 1997 and at that time the Construction and Maintenance Services (**CAMS**) Department, now known as Enerven, was set up together with joint procurement and financial operations as common services. Currently, SA Power Networks and Enerven are a single entity within SAP. The work to establish a separate company code in SAP for Enerven is highly complex and will require involvement of several business units across SA Power Networks and Enerven. It will include the review and modification of every SAP business process for Enerven (and several of SA Power Networks'), which is made more challenging by the current customisations in SAP that were created to suit SA Power Networks, and significant other IT projects currently underway. For these reasons, which are elaborated on below, it is not possible to commence implementation of a new SAP company code until after July 2020.

#### **Action Plan**

As is highlighted in our Regulatory Proposal for the 2020-25 Regulatory Control Period (RCP) Supporting Business Case "Ringfencing Compliance: Information Technology solution", the manual controls we have for SAP access are a risk-area. The business case driver for this IT project is the need to ensure ongoing ringfencing compliance by implementing improved compliance controls in the most efficient way (for regulated customers), being that Enerven continue to utilise SAPN's systems and is allocated its share of IT costs rather than Enerven have its own separate system(s) and regulated customers pay 100% of the costs. To minimise any ring-fencing non-compliance risk this project will implement stronger ex ante automated system controls, including the set up of a new company code in SAP to separate the regulated and unregulated entities, and also to implement more robust system-based information access controls for all applications that contain

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confidential information. Creation of a new company code in SAP will enable restricted access at transaction level between SA Power Networks information and Enerven information.

We have reviewed options for interim controls and found that the only solution that will completely resolve the issue is implementation of a new company code in SAP as described above. An option we investigated was to use a separate SAP Purchasing Group for Enerven to restrict certain procurement information access between SA Power Networks and Enerven. The intention of this interim solution was that Enerven would have a separate Purchase Group (high level) code and would not be able to directly access or view SA Power Networks' purchase orders (low level), purchase requisitions and invoices. However, detailed user testing found that Enerven could still access the same information via other financial transactions, which could not be restricted using a Purchasing Group.

Our proposed actions are therefore to reinforce existing controls (training, company-wide Directives and Policies, Quarterly Compliance Questionnaires, Audits, etc) and we are seeking funding in SA Power Networks' Regulatory Proposal for the 2020-2025 Regulatory period, for the IT Ring-fencing Project to create a separate company code for Enerven in SAP.

### **Human relations (HR) branch activities**

Deloitte identified in their 2018 Independent Assessment that our HR branch were not monitoring completion of induction checklists for new staff or seconded staff from SAPN to Enerven. The induction checklist includes a requirement for the hiring manager to ensure that staff access to critical applications is restricted. Without adequate monitoring, there is a risk that staff transferred or seconded to Enerven would retain access to IT critical applications.

The SA Power Networks HR branch is developing a new digital 'new starter checklist' and secondment process which have become part of a project with a more significant scope than initially anticipated. This process will be completed in 2019.

In the interim, HR are monitoring movements from SA Power Networks to Enerven (and return) to ensure access to systems are reviewed as part of movement.

Information regarding further improvements to HR process is set out in Section 3 below.

## **3. 2019 independent assessment exception (immaterial breach)**

### **3.1 Protection of confidential information**

#### **HR secondment process (access to confidential information)**

The 2019 Independent Assessment identified that our controls and related processes for protection of confidential information require strengthening. This was found as a result of audit testing, where two affiliate staff had access to systems containing confidential information following commencement of their secondments on an affiliate project. While explicit customer consent to access the customer's information did exist, elements of the process were not followed to ensure ring-fencing compliance at the commencement of their secondments. The finding highlighted HR process compliance issues ie access checks were not completed prior to commencement of these secondments.

There have been a number of process improvements undertaken as a result, provided below.

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### **HR process improvement activities**

A communication has been issued to all Enerven staff confirming the HR secondment and transfer process and reiterated the requirement for any staff secondment to involve the Enerven HR Talent Manager prior to commencement. The Talent Manager will ensure the correct HR secondment checklist is completed, and access restrictions are imposed prior to the commencement of any secondment.

HR has implemented new digital checklists that have replaced the paper-based checklists with a new digital form. The checklists will be launched by a HR Officer at the earliest possible point in each recruitment process and will workflow to and between leaders and staff via emails, with instructions and links directly to the checklist.

The 'Transferring Employee' induction checklist (which is now initiated by HR for all employee moves between business units – for secondments, permanent internal appointments, redeployment opportunities and realignment of roles and / or functions), contains a specific ringfencing section in the 'pre-commencement' leader tasks section. If ringfencing compliance actions apply to the employee move, both HR and the leader will ensure that all ring-fencing related tasks outlined in the checklist are completed prior to the employee commencing in their new position.

All secondments and transfers will be actioned through the HR branch and recorded in SAP.

HR will monitor progress of the checklists weekly to ensure pre-commencement obligations are met.

## **4. Compliance measures**

Key documents related to our ongoing compliance are summarised at the end of this Report in Appendix A alongside each Guideline obligation.

Information provided in this Report is not exhaustive, but provides some detail on ongoing key compliance controls, in addition to those already provided above.

### **4.1 Additional information on compliance measures**

#### **4.1.1 Training and awareness activities**

A ring-fencing training module (Appendix A, **G.1**) is mandatory for all new SA Power Networks Group staff (including Enerven). As at June 2019, 97 per cent of staff are recorded as having completed it. (The staff who had not completed the training were on extended leave or had only commenced with SA Power Networks a short time prior to the report extraction.) The training highlights the Guideline obligations, includes a high-level overview of each section, and provides some examples and case studies.

Several 'Quick Reference Guides' that remind all staff of their obligations in respect to specific areas, such as staff and office sharing restrictions, branding and cross promotion obligations, and breach reporting requirements, are available to all staff on the central company knowledge library.

A ringfencing refresher presentation was provided to senior managers across the business in April 2019, and an annual refresher of key ringfencing principles was sent out company-wide in May 2019. An online refresher module for all staff is being developed for future years to make it a more automated process.

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### 4.1.2 Internal compliance reports

An internal compliance questionnaire (**C.2**) is issued to managers in all SA Power Networks departments on a quarterly basis. This was undertaken for each quarter of 2018-19. The questionnaire lists the obligations assigned to individual managers, along with reference documentation and explanatory notes where appropriate. The managers must review and complete the questionnaire, declaring they are 'compliant' (or otherwise) against each obligation. They are also asked to state their mechanism/s for compliance, and any other relevant comments including actions to address any non-compliances.

The quarterly questionnaire serves as a mechanism to regularly remind managers of their ring-fencing obligations, and to identify areas of potential concern including risk areas; requirements for follow up conversations; and training requirements, and to highlight implemented controls.

## 4.2 Legal Separation

### 4.2.1 Considerations

The legal separation obligations in the Guideline require that SA Power Networks only undertake distribution services, and prevent SA Power Networks from using regulated funds to subsidise affiliates. The obligations do not prevent affiliates from providing non-distribution services.

### 4.2.2 Compliance actions

In 2017, the SA Power Networks Board agreed to establish new legal entities (known as 'Enerven') to provide non-distribution services. The corporate structure became effective 1 January 2018 and is set out in Figure 2.

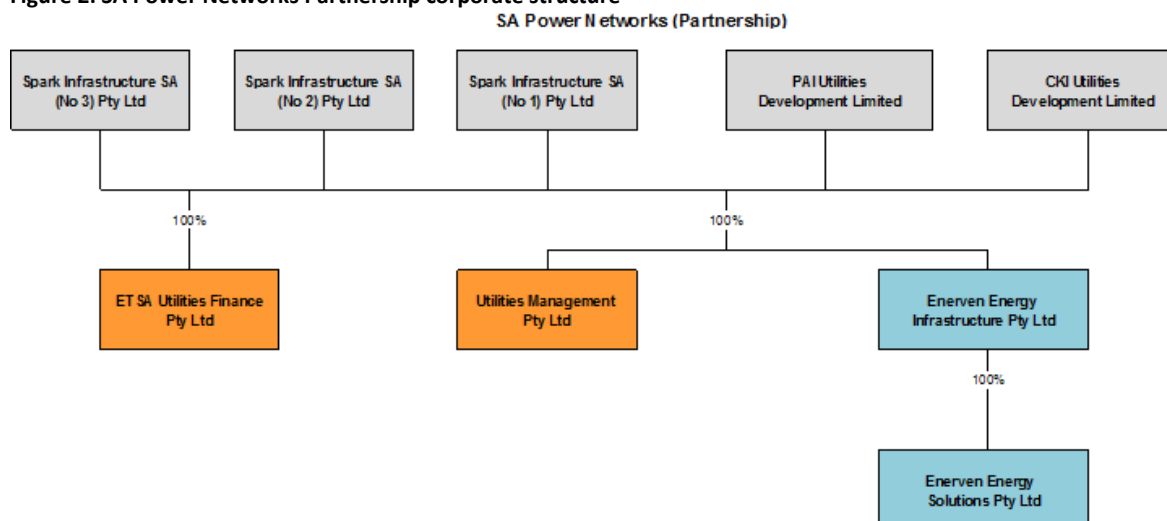
SA Power Networks is a partnership comprising five corporate entities. The Guideline defines legal entity to include a partnership. The SA Power Networks partnership is the Registered DNSP (**L.1**). All staff are employed by Utilities Management Pty Ltd (**UMPL**).

From 1 January 2018, and subject to waivers granted by the AER, 'other services' are no longer provided by SA Power Networks, but by Enerven.



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Figure 2: SA Power Networks Partnership corporate structure



### 4.3 Establish and maintain accounts

#### 4.3.1 Considerations

We must establish and maintain appropriate internal accounting procedures to ensure that we can demonstrate the extent and nature of transactions with our affiliates. Further, we must allocate or attribute costs in accordance with our AER-approved Cost Allocation Method (**CAM**).

Prior to the Guideline implementation, we already accounted for and reported most of our unregulated business activities in a separate business unit. These activities were therefore already effectively ring-fenced from an accounting perspective from our distribution services. Costs are attributed or allocated to regulated and unregulated activities in accordance with the CAM, which also identified how corporate costs are allocated between each function.

Separate financial accounts are established for our affiliate entities.

To facilitate compliance with the Guideline, a review of financial processes was undertaken and actions to comply with the Guideline are identified and documented in a 'Consolidated Finance Blueprint' (**F.1**).

#### 4.3.2 Compliance actions

To comply with the Guideline, the following activities were completed prior to 1 January 2018:

- Reviewed costing procedures to verify no cross-subsidisation exists between us and our affiliates;
- Developed processes, protocols and guidelines for transactions between us and affiliates, including service-level agreements where appropriate;
- Created inter-company general ledger accounts to identify transactions between us and our affiliates;
- Reviewed labour costing to ensure appropriate distribution of employee costs from Utilities Management Pty Ltd to distribution and non-distribution services, including transparent identification of inter-company transactions (**F.3**);
- Created inter-company transactions for corporate costs allocated in accordance with the CAM;

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- Identified and implemented IT changes to facilitate any revision to accounting procedures in the most efficient manner;
- Updated documentation and trained key personnel in accounting processes and protocols between us and our affiliates; and
- Reviewed and updated the CAM (**F.2**) to incorporate structural organisation changes arising from legal separation, and cost allocation changes that were required to comply with the Guideline.

Additionally, for the regulatory year ending 30 June 2019 the following activities were also undertaken, and will continue as compliance activities for future years:

- Reports generated out of SAP to capture the extent and nature of affiliate transactions by functional area. These reports are provided to key finance personnel on a quarterly basis for review, to follow up any concerns with operational staff and to post any required corrections in SAP. The annual version of these SAP reports are used to generate our final Affiliate Transaction Report (refer Attachment 1).
- Half-yearly workbooks are maintained that show the direct attribution or allocation of corporate overheads between distribution and non-distribution services in accordance with SA Power Networks' CAM. Compliance is assessed by an independent external audit of the information contained in SAPN's Regulatory Accounts and associated AER Regulatory Information Notices (**RINs**).

## 4.4 Obligation to not discriminate

### 4.4.1 Considerations

We must not discriminate in favour of affiliates or the customers of affiliates. This obligation applies generally, but also with specific reference to the terms and conditions, timeliness, and quality of services that we offer and provide to other parties.

### 4.4.2 Compliance actions

#### **Contracting and partnering with Enerven**

The corporate Procurement Directive (**D.2**), Procure to Pay Guideline and Strategic Sourcing Framework (**D.3**) provide business-wide direction on procurement activities, which includes engaging with any third party including Enerven.

The Shared Services Engaging Enerven Guideline (**D.1**) provides information and advice on how to engage with Enerven when procuring goods and/or services on behalf of SA Power Networks' regulated business.

The governance framework in the guideline requires multiple steps to ensure no discrimination occurs. This includes an Engagement Matrix that includes the entire procurement context, including value, market assessment, and complexity assessment.

Service Agreements (**F.7**) continue to operate to provide the basis on which certain services (including corporate services) are provided.

## 4.5 Physical separation/co-location and Staff sharing

### 4.5.1 Considerations

Restrictions on staff sharing and co-location first require consideration of the service in question. Our direct control services staff are disallowed from being shared and co-located with the staff of affiliates where the affiliates are providing 'contestable electricity services'. Staff providing 'other non-electricity services' may be shared.

The second consideration is in relation to the nature of the staff role in question. Some of our direct control services staff can still be co-located with staff of our affiliates in circumstances where our affiliates are providing contestable electricity services, if these staff:

- Do not have access to electricity information;
- Have access to electricity information but cannot use that information to engage in discriminatory conduct in performing their role;
- Only use electricity information to provide corporate services;
- Are located in a regional office; or
- Are providing assistance to another network service provider in response to an emergency or uncontrollable event.

### 4.5.2 Compliance actions

#### Physical separation

Location sharing analysis is conducted quarterly by the Finance and Regulation teams. The process involves using organisational data from our HR system which details all staff roles and their locations, and using a tool that assists with analysis. The 2017 initial analysis exercise highlighted locations where both regulated and contestable services were provided. Further detailed analysis then assessed the duties of each staff member in shared locations and whether an exemption under the Guideline applied. These shared locations and the exemptions applicable are listed in our Office Sharing Register (**R.2**). There have been no additional locations added to the Office Sharing Register as a result of quarterly analysis.

An Office Sharing Guideline (**O.1**) and Office Sharing Quick Reference Guide (**O.2**) are maintained within the internal Quality Management System Knowledge Library, and details are provided to all staff via the training module and a corporate communication bulletin (respectively). These documents provide guidance and practical examples for staff on where they can and cannot co-locate.

Deloitte, in their 2018 Independent Assessment, commented on general building access for all employees to SA Power Networks Head Office.

The Keswick Head Office (**Head Office**) houses a number of departments. Many are corporate services, including People and Culture (eg Human Relations, Learning and Development, Change Management), Regulation, Finance, and Legal. As permitted by the Guideline (and outlined in the Explanatory Statement) certain corporate services are shared between SA Power Networks and its affiliate.

Head Office is also the location of our Customer Relations and Network Management departments, and some of our Field Services personnel. These departments plan, operate, and control the distribution network.

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The corporate services areas have access to information required for administration and management of the SA Power Networks Group. While much of this information is commercially confidential or confidential under privacy legislation (eg personnel data, financial records), it is not confidential electricity information as defined by the Guideline<sup>3</sup>. Noting, all information considered confidential under privacy and other law is strictly treated accordingly by all staff.

Customer Relations, Network Management and Field Services departments do (generally) have access to confidential electricity information that is required to complete distribution work. This includes customer and network information. However, customer and network information not in the public domain is not available to Enerven or any other visitors to head office.

The risk of discrimination occurring due to these arrangements is low. Head Office does not permanently house any affiliate (Enerven) staff. It does enable Enerven access to the building for corporate services functions, including meetings, but no Enerven teams are housed alongside distribution staff within Head Office.

Each department within Head Office (and any SA Power Networks Group department) operates under clear company-wide Directives and Policies. As specified in our Compliance Report, these include the Ringfencing Corporate Compliance Directive, Code of Conduct, Information Security Directive, and Information Classification and Handling Directive. There are also broader privacy considerations within the Privacy Act, which all staff must legally adhere to. For example, confidential information cannot be used or disclosed for any other purpose other than the reason for which it is collected (Australian Privacy Principle 6).

Head Office is a shared office space due to the nature of corporate services functioning across the whole SA Power Networks Group. Enerven staff must engage with and work with these areas, and costs are appropriately allocated in accordance with the Cost Allocation Method (**CAM**).

There is limited opportunity to engage in conduct that is contrary to obligations under 4.1 of the Guideline, primarily because affiliate staff are not housed within Head Office. As with any other contractor in the building, there is potential for staff to 'do the wrong thing' however this would be in breach of corporate Directives and Policies and privacy legislation, as described in our Compliance Report. We have endeavoured to minimise this risk through various training activities and implementing detective controls.

### **Staff sharing**

Staff sharing analysis is also conducted quarterly. The process involved using organisational data from our HR system which detailed all staff and their positions, and building a tool that assisted with analysis. As part of the 2017 initial analysis exercise, a service description was assigned to each member of staff, which involved liaison with all areas of the business. Analysis was conducted at the role level. Further detailed analysis then looked at the duties of each role and whether an exemption under the Guideline could be applied. These shared staff positions are listed in our Staff Sharing Register (**R.1**). There have been no additional positions added to the Staff Sharing Register as a result of quarterly analysis.

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<sup>3</sup> Corporate services staff generally do not have access to electricity information however if they do, they only have access to the extent necessary to perform services that are not electricity services. Under Guideline section 4.2.1(b), 4.2.1(a) does not apply in respect of offices for staff who, in the course of their duties:

- (a) do not have access to electricity information;
- (b) have access to electricity information but do not have, in performing the roles, functions or duties of their staff position, any opportunity to use that electricity information to engage in conduct that is contrary to the DNSP's obligations under clause 4.1; or
- (c) only have access to electricity information to the extent necessary to perform services that are not electricity services.

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A Staff Sharing Guideline (**S.2**) and Staff Sharing Quick Reference Guide (**S.3**) were developed and provided to all staff via the training module and a corporate communication bulletin (respectively). These documents provide guidance and practical examples for staff on where they can and cannot be shared between the regulated business and Enerven. A Staff Movement Directive (**S.1**) was also developed to ensure the obligations are appropriately considered and adhered to by all staff.

### Area of special consideration

#### Procurement staff

We have provided the AER further information at their request, in relation to sharing of procurement staff. AER staff have provided feedback that they believe sharing of Procurement staff to be in breach of the Guideline due to the nature of the services they provide. AER staff consider that involvement in sourcing activities constitutes 'electricity services' and therefore Procurement staff cannot be shared between our regulated distribution business, and the contestable affiliate business.

We do not agree that Procurement staff should be treated differently than other shared corporate services functions, and do not believe sharing these staff is in breach of the Guideline, specifically clauses 4.2.2<sup>4</sup> and 4.1<sup>5</sup> (and therefore no breach of clause 4.3).

#### Role of Procurement staff

The SA Power Networks Group Shared Services (Procurement) branch forms part of the Finance Department, which provides a corporate shared service. To the best of our knowledge, procurement operates as a 'shared service' within the structure of other DNSPs.

At SA Power Networks and Enerven, the services performed by procurement staff are not electricity services. Procurement staff perform an administrative support function, an 'input' to other parts of our business that do provide electricity services (e.g. Network Management Department).

Procurement staff gather supplier information, consolidate it, present that information to those other parts of the business for decision making and actioning. Procurement staff in the performance of their role do not:

- Make decisions about contestable electricity services. These staff do not make decisions in relation to the pricing of supplies, which supplier to engage or on what terms. Those decisions are made by key functional (service delivery) areas;
- Put together upstream tenders for work for Enerven. Enerven business development staff are responsible for tenders in which Enerven participates;
- Have visibility of who Enerven's competitors are;

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<sup>4</sup> (b) Clause 4.2.2(a) does not apply in respect of:

i) a member of staff who, in the course of their duties:

a) does not have access to electricity information;

b) has access to electricity information but does not have, in performing the roles, functions or duties of their staff position, any opportunity to use that electricity information to engage in conduct that is contrary to the DNSP's obligations under 4.1; or

c) only has access to electricity information to the extent necessary to perform services that are not electricity services (such as general administration, accounting, payroll, human resources, legal or regulatory, or information technology support services)

<sup>5</sup> (b) A DNSP must not discriminate (either directly or indirectly) between a related electricity service provider and a competitor (or potential competitor) of a related electricity service provider in connection with the provision of:

i. direct control services by the DNSP...; and/or

ii. contestable electricity services by any other legal entity.

(c) Without limiting its scope, clause 4.1(b) requires a DNSP to...

iv. ... not disclose to a related electricity service provider information the DNSP has obtained through its dealings with a competitor (or potential competitor) of the related electricity service provider where the disclosure would, or would be likely to, provide an advantage to the related electricity service provider.

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- Have access to project or tender information for which Enerven is competing and the usefulness or otherwise of any information that SA Power Networks holds in order to be able to identify SA Power Networks information that competitively advantages Enerven;
- Perform electricity services; or
- Provide Enerven staff with supplier information in relation to SA Power Networks procurement activities.

Therefore procurement staff cannot in performance of their roles, functions or duties, engage in discriminatory conduct contrary to 4.1 of the Guideline.

### **Metering**

An area that has required more focus since ring-fencing implementation is metering. This area is considered higher risk of ringfencing compliance due to the nature of the work performed by the metering team. Due to feedback provided by the Australian Energy Market Operator (**AEMO**) in late 2018, there have been some (interim) changes to services delivered by the Enerven metering team.

With the introduction of metering contestability from December 2017, SA Power Networks was required to cease providing new metering services.

In December 2018 AEMO clarified that Enerven could not share the UMPL accreditation for the provision of metering services. Enerven will only provide contestable metering services when they have the appropriate AEMO accreditation.

SA Power Networks' provision of services for non-contestable meters remains unchanged from last year, and a summary is provided below.

#### **Provision of services for non-contestable meters:**

- All staff involved are UMPL employees that work for SA Power Networks.
- SA Power Networks holds AEMO metering coordinator registration for type 5-7 meters.
- UMPL holds AEMO meter data agent accreditation for type 5-7 meters.
- UMPL holds AEMO metering provider accreditation for type 5-6 meters. [Note, there is no metering provider accreditation for Type 7 meters as these are unmetered metering installations.]
- Metering technicians are shared staff. They provide meter type testing on type 5-6 meters. They also provide contestable meter services under the Enerven brand. Controls are in place to ensure they do not access electricity information (i.e. SA Power Networks' metering and other network databases) for these contestable meter services.

## **4.6 Branding and cross-promotion**

### **4.6.1 Considerations**

We must have independent and separate branding from our affiliates, and not advertise or promote (or cross-advertise or promote) the services of affiliates.

Where affiliates are providing 'other non-electricity services', it is permissible (and efficient) for our staff in question to use uniforms and vehicles that are branded with our logo (rather than that of our affiliate).

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### 4.6.2 Compliance actions

The new and distinct Enerven brand was developed to ensure it does not resemble the SA Power Networks brand. This ensures that it will not be inferred, by a reasonable person, that SA Power Networks and Enerven are related.

#### Logos

Enerven have two logos available to use.

The Standard logo does not reference Enerven's relationship to SA Power Networks. This logo only contains the Enerven design, and is used for branding associated with the delivery of Other Electricity Services (**OES**).



The Endorsed logo below factually references Enerven's relationship to SA Power Networks. This logo is used for branding associated with the delivery of Other Non-Electricity Services (**ONES**).



An internal Branding Guideline (**BC.1**) and Branding Quick Reference Guide (**BC.2**) were developed and issued to all staff in a corporate communication bulletin, to remind them of their obligations and provide examples of what is and is not allowed. Specific controls are discussed below.

#### Documentation

Internal documentation including operational forms and corporate directives, policies and procedures are co-branded as they are not marketing material. Any external marketing documentation including tender documents will not be co-branded, unless a supplier is bidding to supply to both SA Power Networks and Enerven in a joint tender. Corporate Services documentation such as Work, Health and Safety policies and procedures may remain SA Power Networks branded.

#### Call Centre Scripts

Occasionally, our Customer Relations call centre receives customer enquiries for contestable services. New scripts (**BC.3**) for the call centre were developed through workshops and vetted by the Ring-fencing Steering Committee prior to implementation. The scripts ensure that call centre staff who may receive queries about contestable services do not discriminate in favour of Enerven. Initially, the call centre script included a reference to Enerven as a 'sister company'. Following our 2017/18 Independent Assessment and subsequent AER feedback, we have removed any reference to Enerven in our call centre script. No calls were received during the 2017/18 period that warranted use of the script.

#### Website and social media

A new website was created for Enerven in 2017, and is managed wholly by the Enerven Commercial Team. The SA Power Networks Customer Engagement branch ensures the SA Power Networks website makes no mention of Enerven in an advertising or promotional manner. The Website Governance Procedure (**BC.4**) implemented and managed by the Customer and Community Department ensures that approved publishers identify content suitability prior to publication on the website. This has worked successfully over the past regulatory year.

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SA Power Networks has social media pages on Facebook, Twitter and LinkedIn. Any social media posts by SA Power Networks are managed by the Customer Engagement branch. There is an approvals process in place for any external communications, to ensure that no promotional material for Enerven is posted by SA Power Networks on our social media pages. This process has ensured ringfencing compliance on SA Power Networks social media platforms.

### **Other Branding Controls**

There are several branding controls that are used at times where UMPL employees are shared between the regulated business and Enerven projects (where allowed under our staff sharing provisions). These include the following:

- Separate Enerven email addresses for individuals, teams or projects. The implementation best suited to the business context is chosen.
- Enerven branded Personal Protective Equipment (PPE) and clothing.
- Enerven branded vehicle magnets are used in two separate scenarios:
  - Where a SA Power Networks vehicle is used (as a shared asset) on an Enerven project; or
  - An Enerven vehicle with the endorsed branding is used (as a shared asset) on a contestable project.
- Where artefacts require a branded stamp and signature to denote acceptance, an Enerven stamp will be used for Enerven projects.

## **4.7 Office and staff registers**

### **4.7.1 Considerations**

We must establish, maintain and keep a register available on our website that identifies the classes of offices to which we have not applied physical separation/co-location obligations; and the nature of the positions (including a description of the roles, functions and duties) of our staff to which we have not applied staff sharing obligations.

### **4.7.2 Compliance actions**

The process to determine appropriate office and staff sharing is described in section 2.5 above.

The registers (**R.1 & R.2**) are published on our website, and are reviewed on a quarterly basis and updated in accordance with internal procedures.

## **4.8 Protection of confidential information**

### **4.8.1 Considerations**

We must keep confidential information confidential, and only use it for the purpose for which it was acquired or generated.

### **4.8.2 Compliance actions**

Confidential information, as defined in the Guideline, is protected by SA Power Networks controlling access to IT applications that contain it. Analysis was performed which involved a review of IT applications, and whether they contain confidential information. A list of applications was developed, and for each of those applications, a review of all staff that have access was conducted.



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This was done with an initial view of high-risk staff, based on the nature of their role within Enerven and the opportunity they have to use confidential information for commercial benefit.

The IT Department has an Application Access Work Instruction (**I.6**) for management of any new access requests to systems with confidential information. This Work Instruction requires approval from the application owner before access will be provided. All business application owners are aware of ring-fencing obligations, specifically in relation to protection of confidential information.

A quarterly review of access to each application containing confidential information has been conducted and verified by IT Management, to ensure the process and controls are being adhered to.

Further procedures are discussed in the following sections, which strengthen controls around protection of confidential information.

### **IT Quarterly system access review process**

A quarterly system access review process was implemented from September 2018 to ensure no inappropriate access to IT systems containing confidential information. The requirement was communicated by email and verbally to all IT Applications Team Leaders, however the process was not formally documented, including reporting format requirements. In their 2019 Independent Assessment, Deloitte has identified some process improvement opportunities in relation to these regular system access reviews and as a result, the following activities have been undertaken in October 2019:

- The process has now been documented by the Applications Team Leader, and approved by the Applications Support Services Manager, Manager SAP Services, and Manager Digital and Mobile Solutions. The process includes:
  - o Reporting frequency and due dates
  - o Applicable systems for reporting (and team leader responsible)
  - o Reporting format
  - o Level 3 Manager review and approval (with approval records maintained) of all quarterly system access review reports all recorded in central repository for future reference
- The process has been provided and clearly communicated to all applicable team leaders and Level 4 managers.

### **Enerven staff IT system access approvals**

Deloitte have also identified an improvement opportunity in their 2019 Independent assessment in relation to recording of IT system access approvals. While the approvals process and appropriate record of those approvals is detailed in the IT Application Access Work Instruction, there were instances identified in Deloitte's assessment where approvals had not been recorded.

IT Teams have been reminded of the critical importance by IT Management of adhering to the Application Access Work Instruction (which includes the requirement to record all system access approvals including reasons). The approval for any Enerven staff requesting access to critical systems will be automated in the IT service request management tool to remove opportunity for human error. The automated approval will incorporate the detailed ringfencing specific approval templates, and will stop the subsequent access provision process if appropriate approval is not granted via the IT service request management tool.

An IT Ringfencing Compliance Group has been established and meetings are now held monthly with key staff representing all IT teams, to ensure all new staff understand the IT Application Access Work Instruction and Quarterly system access review process requirements, and all IT staff are continually

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reminded of the importance of the process. Team-specific meetings (ie Service Desk and Applications teams) will also include ringfencing as a standing Agenda item. The IT induction process for any new or transferring staff within IT now includes (in addition to the online ringfencing training activity) a review of the IT Application Access Work Instruction and Quarterly system access review process.

### 4.9 Disclosure of information

#### 4.9.1 Considerations

We must not disclose confidential information to any person including Enerven, unless an exemption applies.

#### 4.9.2 Compliance actions

General controls including staff training and Code of Conduct applicable to all staff, ensure staff are aware of their obligation not to disclose any confidential information to a third party, including Enerven. Specific ring-fencing comments have been added to our Code of Conduct eLearning training module (**G.3**). Additional high-level controls include the Information Classification, Handling and Management Directive (**I.1**). The Information Classification and Handling Directive ensures that we have a process for classifying information to ensure it is produced, stored, distributed and destroyed in accordance with the risks related to that information. It also defines how information can be shared with external organisations, and what levels of permission need to be obtained prior to disclosing information to an external organisation. In some cases, the type of information shared may need to be included on an information register, published on the SA Power Networks website in accordance with the AER's ring-fencing guideline.

The Ring-fencing Requests for Information Procedure (**I.3**) provides specific direction where third-party requests for confidential information are received. The Information Sharing Guideline (**I.4**) and Information Sharing Quick Reference Guide (**I.5**) provide staff with an overview of obligations and the process that must be followed when requests for information are received from a third party, including Enerven.

Certain exemptions apply to disclosure of information. Those most relevant to us are discussed briefly below. These activities are 'business as usual' and existed prior to release of the Guideline. Confidential information is always treated in accordance with privacy obligations, however we now also consider Enerven as a third party, and treat their requests for confidential information like any other third party.

#### **Customer consent**

Our Customer Relations Department receives requests for confidential information, most commonly from the customers themselves. Customer consent is recorded. This often relates to connection of embedded generation systems, or other connections.

#### **Distribution services**

Staff who provide distribution services access confidential information to provide these services. The information is used solely to enable the provision of those distribution services.

## 4.10 Sharing of information

### 4.10.1 Considerations

Where we share confidential information with Enerven, or where we disclose confidential information to a legal entity solely for the purposes of research which is then disclosed to Enerven, we must provide access to that information (including the derived information) to other legal entities on an equal basis.

We are only required to provide information to a legal entity if they have requested to be on our information register for that information; and where they are competing or seeking to compete with Enerven in relation to contestable electricity services. Sharing obligations do not apply if we disclose information where an exemption applies.<sup>6</sup>

We must establish and make available on our website an information sharing protocol, and where we disclose information we must do so on terms and conditions that require the other legal entity to comply with 'protection of confidential information' and 'disclosure of information' obligations.

### 4.10.2 Compliance actions

As provided above, we do not share information with any legal entity, including Enerven, unless a valid exemption applies.

We have established and published an Information Sharing Protocol (**Protocol**) (**I.8**) which sets out the process for legal entities to follow in respect of being added to our Information Register. The Protocol includes the circumstances required for a valid request, and a link to our information register request web form (**I.9**). The Information Protocol and information register request web form are located on our website, on the Corporate Information page.

We have developed a specific non-disclosure agreement (**I.10**) which we will provide to any third party when we are required to provide confidential information. The agreement includes ring-fencing obligations they must adhere to as part of the disclosure. Confidential information will not be provided without these terms being officially agreed.

## 4.11 Information register

### 4.11.1 Considerations

We must establish, maintain and keep a register of all legal entities (including Enerven) who provide contestable electricity services, who request access to confidential information, and must make the register publicly available on our website.

### 4.11.2 Compliance actions

We have developed an Information Sharing Register (**I.7**) which is published on our website. Our internal Information Sharing Procedure (**I.3**) specifies when and what details we must add information to the register. The process includes regular (daily) checking of our mailbox to ensure information requests are captured.

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<sup>6</sup> AER Ring-fencing Guideline 4.3.3 lists the circumstances where we can disclose information without the need to provide it equally to other legal entities.

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To date, we have received no requests from third parties to be added to our Information Register.

### 4.12 Conduct of service providers

#### 4.12.1 Considerations

We must ensure that any new or varied agreement between us and a service provider requires the service provider to not act contrary to the Guideline's requirements. We must also not directly or indirectly encourage or incentivise a service provider to engage in conduct contrary to the Guideline.

#### 4.12.2 Compliance actions

Formal contract amendments were issued to suppliers in 2017 which included additional clauses required by the 'conduct of other service providers' Guideline provisions<sup>7</sup>. Purchase orders were transferred to Enerven where required, and suppliers were notified of this via a letter (SP.3).

New supply agreement templates (terms and conditions) are in place for any new or amended contractual arrangements. The new templates include the obligations required by the Guideline for other service providers. For example, our standard agreement for the supply of services to SA Power Networks (SP.1) includes a new section 29 'Ring-fencing compliance'.<sup>8</sup>

A letter (SP.4) was issued to all suppliers in early 2018 providing information on our obligations under the Guideline and the role of the Procurement branch as a shared corporate service function to all parts of the SA Power Networks group, including Enerven.

### 4.13 Waiver register

#### 4.13.1 Considerations

The Guideline allows us to apply for waivers in respect of the legal and functional separation obligations. We must also establish and maintain a register of all waivers that are granted.

We will only apply for waivers in very limited circumstances where the cost of complying with the Guideline is likely to outweigh the benefits.

We have been granted three waivers in respect of the following:

- A temporary generation project we are undertaking on behalf of the South Australian Government.
- Our current Negotiated Distribution Services, all of which will be reclassified as Direct Control Services from 1 July 2020.
- Existing construction and maintenance contracts which if transferred to Enerven could incur significant tax liabilities.

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<sup>7</sup> AER Ringfencing Guideline 4.4.1, A DNSP must ensure that any new or varied agreement between the DNSP and a service provider, for the provision of services to the DNSP that enable or assist the DNSP to supply direct control services, requires the service provider to comply, in providing those services, with: clauses 4.1, 4.2.1, 4.2.2 and 4.3.2 of this Guideline; and clause 4.2.3 of this Guideline in relation to the brands of the DNSP; as if the service provider was the DNSP.

<sup>8</sup> (a) To the extent that the Ring-Fencing Guideline applies to the provision of any Services or Goods under this Agreement, the Supplier will comply with clauses 4.4, 4.2.1, 4.2.2, 4.3.3 and, in relation to the Supplier's branding, clause 4.2.3 of the Ring-Fencing Guideline as if the reference in such clauses to "DNSP" was a reference to the Supplier.

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### 4.13.2 Compliance actions

We have developed a register to list waivers granted by the AER, which is published on our website (**W.1**). The register details the Guideline obligations to which the waiver applies, and the terms and conditions of the waiver.

Our Ringfencing Compliance Procedure (**C.1**) lists our current waivers and expiry dates. Part of this Procedure is to review any waiver three months from expiration, and action accordingly. Our existing waivers are also set out below.

#### Temporary Generation Waiver

In April 2017 we applied for a waiver from legal and functional separation, to enable us, on behalf of the SA Government to design, construct, commission and operate a temporary generation project. The AER approved our waiver application, and the conditional waiver is not expected to be required beyond the end date of 1 June 2020, as the requirements under the contract with the SA Government conclude by that time.

#### Negotiated Distribution Services Waiver

In August 2017 we applied for a waiver for our negotiated distribution services (**NDS**) from functional separation obligations, until 30 June 2020. The AER approved our waiver application, as set out in their Decision<sup>9</sup> in December 2017.

The AER Framework and Approach for SA Power Networks 2015-2020 regulatory period sets out the classification of our current NDS. These services will be reclassified as Direct Control Services for the 2020-2025 regulatory period, from 1 July 2020. Any non-distribution services will not be provided by SA Power Networks beyond the waiver end date. The new Framework and Approach classifications are effective from 1 July 2020. This waiver will not require an extension, and it is intended that Guideline obligations in relation to these services will be complied with from 1 July 2020.

#### Existing Construction and Maintenance Contracts Waiver

In October 2017 we applied for a waiver for 'other services' (maintenance and construction contracts) from legal separation. This waiver applied to 20 contracts which were not novated from SA Power Networks to Enerven. The waiver was due to expire on 30 September 2018. On 3 September 2018, we lodged a waiver extension application in relation to 21 existing maintenance and construction contracts for which we were unable to obtain a Private Binding Ruling from the Australian Taxation Office. The AER approved the waiver extension on 28 September 2018, on the condition that we notify the AER 30 days prior to entering into an extension of any of the relevant contracts. The Waiver Register is updated on the SA Power Networks website.

## 4.14 Compliance and enforcement

### 4.14.1 Considerations

To ensure ongoing compliance with the Guideline, we must

- Establish and maintain appropriate internal procedures, noting that the AER may require us to demonstrate the adequacy of these procedures upon reasonable notice;
- Provide annual compliance reports by 31 October each year, accompanied by an independent compliance assessment; and

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<sup>9</sup> AER Decision 'DNSP applications for waivers from the Electricity Distribution Ring-fencing Guideline' December 2017.

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- Report material compliance breaches within five business days of becoming aware of a breach.

### 4.14.2 Compliance actions

Several internal procedures and other documents are maintained to support ring-fencing compliance. These documents are identified and referenced throughout this report, and summarised in Appendix A.

The Ring-fencing Compliance Procedure (**C.1**) provides our internal process for preparing the Annual Compliance Report, and the independent compliance assessment (**C.3**). It includes a timeline for engaging with the independent assessor, through to report completion and submission. This process is managed by the Regulation branch.

Our Breach Management Governance Framework (**B.1**) ensures that breaches reported to Regulation Branch are appropriately considered and managed. Staff must report any potential breach of the Guideline as soon as they become aware. The Breach Reporting Quick Reference Guide (**B.2**) provides all staff with guidance including what they must do and specific contact details for Regulation staff who can advise further action as required. Material breaches will be reported to the AER within the required timeframe, and all breaches are reported in the Annual Compliance Report.

## 5. Breaches of the Guideline

### 5.1 Additional information on breaches

Sections 2 and 3 of this report provide breach information and rectification activities.

## 6. Other services provided by the DNSP

SA Power Networks is not permitted to provide 'other services', as defined by the Guideline.

The AER-approved waiver (and subsequent AER approved waiver extension of 28 September 2018) for other services contracts allows SA Power Networks to legally provide 21 'other services' contracts.

## 7. Transactions between the DNSP and affiliated entities

For the period 1 July 2018 to 30 June 2019, SA Power Networks has contracted one of its affiliated entities, Enerven Energy Infrastructure Pty Ltd (Enerven), to perform various capital and operating works for its distribution network business. Services have been completed either in accordance with applicable works or service agreements between SA Power Networks and Enerven.

Transactions between Enerven and SA Power Networks are captured against individual capital and operating job/work orders in SAP, SA Power Networks' integrated business management system. These job/work orders capture costs for distinct items of work which, for example, may be job specific or program specific.

Job/work orders are assigned an SA Power Networks' functional area when created in SAP. They are assigned to one functional area only. Functional areas are the link to identify regulatory costs as

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they measure the costs of different lines of business for each of SA Power Networks' distribution service types.

Specific General Ledger accounts in SAP enable the reporting of individual job/work orders (transactions) generated and charged by Enerven Energy Infrastructure Pty Ltd to SA Power Networks grouped by functional area. The table at confidential Appendix 1 summarises the outputs of this report.

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## **8. Attachments**

Attachment 1: CONFID Transactions between the DNSP and affiliated entities

Attachment 2a: CONFID Deloitte Independent Assessment Report

Attachment 2b: PUBLIC Deloitte Independent Assessment Report

Attachment 3: Confidentiality Claim



## 9. Appendix A – Key SA Power Networks Ring-fencing compliance documents

Document Reference	Document Name (these are all internal SAPN documents, unless otherwise stated)	Purpose/Description
<b>GENERAL</b>		
G.1	Ringfencing Training Module (eLearn), including Depot visits	Provides all staff (SAPN and Enerven) with an overview of ringfencing and associated obligations. The training is mandatory for existing and new staff. (Across all staff the eLearn module is 99.7% complete.)
G.2	Other training activities (Leaders presentations; Bulletin releases (QRGs); specific guidance to individual areas to address concerns / questions)	Provides further guidance to staff and managers.
G.3	Code of Conduct (and Code of Conduct eLearn training)	Provides all staff with examples of the standards of behaviour expected of them. Includes a section on confidentiality and the proper handling of information.
G.4	Ringfencing Compliance Directive	Contains information relating to the responsibilities of all staff and contractors to appropriately adhere to the AER Ringfencing Guideline.
<b>LEGAL SEPARATION</b>		
L.1	Registration and Licensing of SA Power Networks	SA Power Networks is licensed as a Distribution Network Service Provider. The license can be viewed on the ESCoSA <a href="#">website</a> .
<b>ESTABLISH AND MAINTAIN ACCOUNTS</b>		
F.1	Consolidated Finance Blueprint	Documents financial processes incorporating changes required to comply with the Ringfencing Guideline.
F.2	Cost Allocation Method (CAM)	Sets out the Cost Allocation Method adopted in SA Power Networks Regulatory reporting. The CAM was updated to incorporate changes required by ringfencing and published on the SAPN website.
F.3	Provision of Inter-Company Labour Services	Defines the accounting treatment for labour services provided between SA Power Networks' entities, including those provided to Enerven by employees that normally undertake regulated work.

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Document Reference	Document Name (these are all internal SAPN documents, unless otherwise stated)	Purpose/Description
F.4	Work Order Quick Reference Guide	Provides guidance to staff on how to accurately allocate their time in a range of scenarios.
F.5	INTENTIONALLY LEFT BLANK	
F.6	AER Shared Asset Guideline	Provides the rules and mechanism for shared assets.
F.7	SAPN – Enerven/Enerven - SAPN Service Agreements	Formal service agreements for supply of services between SAPN and Enerven/Enerven and SAPN.
F.8	Shared Assets Quick Reference Guide	Provides staff with scenarios where sharing of assets is allowed under ringfencing (and the Shared Asset Guideline).
<b>OBLIGATION TO NOT DISCRIMINATE</b>		
D.1	Shared Services Engaging Enerven Guideline	Provides information and advice on how to engage with Enerven when procuring goods and/or services on behalf of SA Power Networks' regulated business.
D.2	Procurement Directive	Promotes procurement practices that (among other things) maintain ethical conduct with consideration to probity and accountability.
D.3	Strategic Sourcing Framework	Provides guidance and structure for undertaking sourcing activities.
<b>PHYSICAL SEPARATION/CO-LOCATION</b>		
O.1	Office Sharing Guideline	General guideline to assist staff to understand their responsibilities regarding the sharing of locations/offices between SA Power Networks and Enerven.
O.2	Office Sharing Quick Reference Guide	A quick reference guide to assist staff to understand their responsibilities regarding the sharing of office locations between SA Power Networks and Enerven.
O.3/S.5	Office/Location Sharing Analysis	Data extracted from enterprise system SAP to determine and analyse locations and where they are shared.

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Document Reference	Document Name (these are all internal SAPN documents, unless otherwise stated)	Purpose/Description
<b>STAFF SHARING</b>		
S.2	Staff Sharing Guideline	General guideline to assist staff to understand their responsibilities regarding the sharing of staff between SA Power Networks and Enerven.
S.3	Staff Sharing Quick Reference Guide	A quick reference guide to assist staff to understand their responsibilities regarding the sharing of staff between SA Power Networks and Enerven.
S.4	HR Secondment Checklist	
O.3/S.5	Staff Sharing Analysis	Data extracted from enterprise system SAP to determine and analyse staff positions and where they are shared.
S.6	Network Innovation Centre (NIC) Quick Reference Guide	
<b>BRANDING AND CROSS-PROMOTION</b>		
BC.1	Branding Guideline	General guideline to assist staff to understand obligations in relation to branding, advertising, and promotion/ cross-promotion.
BC.2	Branding Quick Reference Guide	A reference for staff which provides examples and case studies in relation to branding, advertising and promotion/cross-promotion.
BC.3	Customer Relations Call Centre Scripts (Updated)	Provides call centre staff with standard scripts for two scenarios: <ol style="list-style-type: none"> <li>1. When the call centre provide an overflow function for Enerven; and</li> <li>2. When customers call to enquire about contestable services.</li> </ol>
BC.4	Website Governance procedure	
<b>OFFICE AND STAFF REGISTERS</b>		
R.1	Staff Sharing Register	Provides the nature of the positions (including a description of the roles, functions and duties) of our staff to which we have not applied staff sharing obligations due to a valid exemption.

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Document Reference	Document Name (these are all internal SAPN documents, unless otherwise stated)	Purpose/Description
R.2	Office Sharing Register	Provides the classes of offices to which we have not applied physical separation/co-location obligations due to a valid exemption.
<b>INFORMATION ACCESS &amp; DISCLOSURE</b>		
I.1	Information Classification, Handling and Management Directive (Updated)	The purpose of this directive is to ensure that we have a process for classifying information to ensure it is produced, stored, distributed and destroyed in accordance with the risks related to that information. It also defines how information can be shared with external organisations, and what levels of permission need to be obtained prior to disclosing information to an external organisation. In some cases, the type of information shared may need to be included on an information register, published on the SA Power Networks website in accordance with the AER's ring-fencing guideline.
I.3	Requests for Information Procedure	To guide SA Power Networks Group personnel employed by Utilities Management and working in the regulated business, including contractors, in the provision of confidential electricity information to requestors external to SA Power Networks. This includes requests from affiliates (ie Enerven).
I.4	Information Sharing Guideline	General guidelines to assist staff in understanding responsibilities regarding the sharing of information between SA Power Networks and other entities, including our affiliate (ie Enerven).
I.5	Information Sharing Quick Reference Guide	A quick reference guide for all staff to assist in identifying information sharing obligations, exemptions, and process requirements.
I.6	IT Application Access Work Instruction	Provides IT Service Desk staff and application owners the process to follow where staff working primarily for Enerven request access to a system containing confidential information.
I.7	Information Sharing Register	The register is currently blank, but will be used to record requests to be added to the register as required.

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Document Reference	Document Name (these are all internal SAPN documents, unless otherwise stated)	Purpose/Description
I.8	Information Sharing Protocol	The protocol outlines the circumstances under which an entity can request to be added to the Information Sharing Register, and the process for submitting a request.
I.9	Information Sharing Web form	A form to enable third parties to submit a request to be added to our Information Register. The form is available on our <a href="#">website</a> .
I.10	Information Sharing Terms and Conditions (Confidentiality agreement)	A specific confidentiality agreement for ring-fencing. Where we share confidential information with a third party, they must agree to these terms prior to the information being provided.
<b>SERVICE PROVIDERS</b>		
SP.1	Standard Terms and Conditions (Updated)	The terms and conditions issued for varied or new agreements now include the ringfencing provisions that service providers must comply with.
SP.2	Supplier Contract Amendment Letter	Provides existing suppliers with information about ringfencing and their obligations, along with resultant amendments to their contract.
SP.3	PO Transfer Notification Letter	Provides existing suppliers with information about ringfencing and their obligations, along with resultant amendments to their purchase order/s.
SP.4	SA Power Networks' Relationship to Enerven communication	Provided suppliers information on our requirements under the Ring-fencing Guideline, and the role of the Procurement team as a shared service function to all parts of the SA Power Networks group (including Enerven).
<b>WAIVERS</b>		
W.1	Waiver Register	A register of waivers approved by the AER which is published on the SAPN website.
<b>COMPLIANCE AND ENFORCEMENT</b>		
C.1	Regulation Ringfencing Compliance Procedure	Provides the ringfencing procedures managed by the Regulation branch, including breach reporting, annual compliance reporting, updating of registers, and internal quarterly reporting.

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Document Reference	Document Name (these are all internal SAPN documents, unless otherwise stated)	Purpose/Description
C.2	Regulation Ringfencing Quarterly Internal Compliance Questionnaire	Confirms obligations with General Managers and Level 3 Managers and checks for compliance and appropriate controls.
C.3	Annual Compliance Report and Independent Assessment	As required by Guideline section 6.2.
B.1	Breach Management Governance Framework	Provides the framework for breach reporting, including treatment of material breaches and the involvement of the Breach Management Committee.
B.2	Breach Reporting Quick Reference Guide	Guides staff on the breach reporting process and highlights the importance of reporting any potential breach.