

18 April 2019

Angela Bourke
A/g General Manager, Consumers and Markets
Australian Energy Regulator



Dear Ms Bourke,

Proposed delay to the review of the transmission ring-fencing guideline

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in New South Wales. Established in 1982, PIAC tackles systemic issues that have a significant impact upon people who are marginalised and facing disadvantage. We ensure basic rights are enjoyed across the community through litigation, public policy development, communication and training. The Energy + Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

PIAC welcomes the opportunity to respond to the Australian Energy Regulator's (AER) letter.

We support the proposal to delay the AER's review of the transmission ring-fencing guideline.

As outlined in the letter from Energy Networks Australia, there are a number of substantial reform processes currently underway which may affect the extent of a Transmission Network Service Provider's roles and responsibilities. We agree that it would be beneficial to defer reviewing the ring-fencing guideline until after the direction of these broader reforms is better established.

We also consider the deferral would provide the AER, TNSPs and stakeholders with additional time to develop a better understanding of any implementation issues coming from the recent contestable connections framework as well as lessons from the implementation of the distribution ring-fencing guideline.

We do not consider there are pressing concerns with the current guideline which outweigh the benefits outlined above and in the letter from Energy Networks Australia.

Continued engagement

PIAC would welcome the opportunity to meet with the AER and other stakeholders to discuss these issues in more depth.

Yours sincerely,

Miyuru Ediriweera

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Public Interest Advocacy Centre

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