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Dear Mark,

Consultation note for further minor change to Electricity Distribution Ring Fencing Guideline

AusNet Services thanks the Australian Energy Regulator (**AER**) for the opportunity to comment on the further minor changes proposed to the draft Electricity Distribution Ring Fencing Guidelines (**Guideline**).

AusNet Services supports the submission made by Energy Networks Australia supporting the further minor changes.

In addition, AusNet invites the AER to re-consider the wording of the proposed amendments to clause 4.3.4 to clarify that a reference to a legal entity includes a related electricity service provider (**RESP**). Using the conjunction 'or' suggests a RESP is distinguishable from a legal entity. This risks creating confusion in other clauses of the Guideline which only reference a legal entity, as it raises the possibility that a RESP is not captured by unless it is specifically identified. Therefore, we propose that each reference to "legal entity or related electricity service provider" in clause 4.3.4 be amended to read "legal entity (including a related electricity service provider)".

We consider this change will achieve the AER's stated purpose and avoid possible difficulties in interpreting other clauses in the Guideline.

Yours sincerely



Tom Hallam
General Manager, Network Regulation
AusNet Services

