

Network Regulation Branch
Australian Energy Regulator
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NORTHERN
ALLIANCE FOR
GREENHOUSE
ACTION

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Draft Consumer Engagement Guideline for Network Service providers

Thank you for the opportunity to provide a submission on the Draft Consumer Engagement Guideline for Network Service Providers, developed by AER as part of the Better Regulation program of work.

The Northern Alliance for Greenhouse Action (NAGA) is an alliance of nine councils in the northern metropolitan region of Melbourne and Moreland Energy Foundation (NAGA's members are listed in the footer). NAGA formed in 2002 as a network that shares information, coordinates emission reduction activities and cooperates on the research and development of innovative projects. NAGA's goal is to achieve significant emissions abatement by delivering effective programs and leveraging local government, community and business action. NAGA and its members have demonstrated significant emission reduction innovation at the local government and regional level. NAGA's 'Towards Zero Net Emissions' regional plan (TZNE), endorsed by its members and launched in April 2010, outlines a series of initiatives which focus on energy efficiency across the industrial, commercial and residential sectors.

NAGA has participated in meetings with AER on the development and release of the Draft Guideline and would like to make the following comments:

- The Guideline, with its emphasis on best practice, is appropriate and well-designed.
- NAGA supports an emphasis on consumer engagement as part of sound and necessary business practice, and not just compliance-driven.
- Based on NAGA's experience with distribution network service providers, we would like to see active and ongoing attention paid to matters concerning distributed energy, new technologies and practices which are of significance to local government and their communities, worked through in a pro-active manner wherever possible (with a reliance on regulation as the last resort).
- NAGA suggests that AER conducts a review, engaging both the distribution businesses and consumers, to report on progress within 2 years. This review should report on sound practices and identification of areas that consumers see as requiring further attention.

NAGA and its members would be pleased to provide additional information, based on our direct experience of working with both distribution businesses and with local governments and consumers to assist the process. Please contact me if you would like any further information or clarification on the issues raised in this submission.

Yours sincerely

Judy Bush
Executive Officer

MEMBER ORGANISATIONS

BANYULE CITY COUNCIL, DAREBIN CITY COUNCIL, HUME CITY COUNCIL, MANNINGHAM CITY COUNCIL, CITY OF MELBOURNE, MORELAND CITY COUNCIL, MORELAND ENERGY FOUNDATION LIMITED, NILLUMBIK SHIRE COUNCIL, CITY OF WHITTLESEA, CITY OF YARRA

The views represented in this submission do not necessarily represent the views of all NAGA members individually.