

25 October 2021

[REDACTED]
Essential Services Commission
Level 8, 570 Bourke Street
Melbourne Victoria 3000

Locked Bag 14051
Melbourne City Mail Centre
Victoria 8001 Australia
T: 1300 360 795
www.ausnetservices.com.au

Lodged via the Engage Victoria website

Dear [REDACTED]

Updating the Compliance and Performance Reporting Guideline 2021

AusNet appreciates the opportunity to comment on the draft decision proposing updates to the Compliance & Performance Reporting Guidelines (**draft Guidelines**) required by the Essential Services Commission (Compliance and Enforcement Powers) Bill and reflect changes identified in Essential Services Commission's (**ESC**) recent reviews of regulatory instruments.

Increased number of Type 1 and Type 2 obligations

We support the ESC in ensuring that customers rights are protected but note the large increase in the number of obligations which are classified as either Type 1 or Type 2 breaches. The rationale for the increase is the focus on classifying compliance obligation types based on customer impacts.

AusNet was the first Australian utility business to trial a customer forum process, that could represent the perspective of our customers, for our FY22-26 expenditure plans and we are committed ensuring that customers are at the heart of everything we do and we work hard to understand their needs. Our goal is to create a seamless customer experience, build trust and do what's right for our local communities.

Type 2 breach reporting

We note the draft Guideline introduces reporting timeframes for type 2 obligations of 30 calendar days from when a breach is detected. The ESC's intention is to provide Distributors with time to undertake breach investigations prior to submitting the breach report, with each breach receiving the same time duration which would not occur if Type 2 breaches were reported on a calendar month or by a set date. The change to the 30 calendar days may be initially challenging, however we appreciate the positive impact of having time to investigate a breach and to implement remediation activities. We will work with the ESC to ensure this new reporting process is effective and efficient.

Annual report

Table 1.2 Distributor reporting obligations on page 11 is missing the Annual Report.

Below is what is included in Table 1.1 Retailer reporting obligations.

Annual report	Annually	For the period 1 July to 30 June – on or before 31 August.
---------------	----------	--

The requirement for the report is the sign off by the CEO or Managing Director is included on page 12.

If you have any queries on our submission, please do not hesitate to contact

Yours sincerely