

19 December 2017

Ms Sarah Proudfoot  
General Manager – Retail Markets Branch  
Australian Energy Regulator  
GPO Box 520  
Melbourne VIC 3001

Via email: [AERExemptions@aer.gov.au](mailto:AERExemptions@aer.gov.au)

## AER (Retail) Exempt Selling Guideline Version 5

Dear Ms Proudfoot,

Energy Networks Australia welcomes this opportunity to make a submission to the latest version of the Australian Energy Regulator's (AER's) *(Retail) Exempt Selling Guideline*.

Our Association represents Australia's energy grid supporting all Australian customers with over 900,000 km of electricity transmission and distribution lines and almost 90,000 km of gas distribution mains.

Energy Networks Australia favours a regulatory approach that provides exempt customers with appropriate protections. We support the AER's amendments to the Guideline, which would require exempt sellers with residential customers to:

- » be members of, or subject to, energy ombudsman schemes where the scheme enables them to be;
- » if subject to an ombudsman scheme, to inform the exempt customer of the ombudsman's contact details in the event of a dispute and comply with requirements of that scheme; and
- » have in place appropriate complaints and dispute handling processes.

Energy Networks Australia notes that jurisdictional energy ombudsman schemes may need to amend their charters, constitutions or constituting legislation in order to allow exempt sellers to be participants in their schemes. These schemes' fee structure will also require amendment to include exempt sellers.

Our members also support the AER's other minor proposed amendments to the Guideline.

To discuss this matter further please contact Kate Healey, Director Regulation on (02) 6272 1516 or [khealey@energynetworks.com.au](mailto:khealey@energynetworks.com.au).

Yours sincerely,



ANDREW DILLON  
Chief Executive Officer