
Ring Fencing Guideline

Staff and Site Register

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Contact

This document is the responsibility of AusNet Services.

Please contact the indicated owner of the document with any inquiries.

AusNet Services

Level 31, 2 Southbank Boulevard

Melbourne Victoria 3006

Ph: (03) 9695 6000

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1 Ring Fencing Guideline

The AER released its Ring-fencing Guideline (Guideline) for Electricity Distribution in November 2016. The Guideline requires that all electricity Distribution Network Service Providers (DNSPs) must be fully compliant as soon as reasonably practical and no later than 1 January 2018.

Ring-fencing separates the regulated and contestable parts of a DNSP's network business via legal separation and functional separation obligations. Ring-fencing aims to provide a level playing field for third party providers in new and existing markets for contestable services.

Clause 4.2.4 of the Guideline states that, AusNet Services must establish, maintain and keep a register that identifies:

- Offices where the DNSP uses the same offices as a related electricity service provider uses to provide contestable electricity services. This sharing is permitted where the staff have no electricity information, or no opportunity to use that electricity information to engage in conduct that is contrary to the ring-fencing guideline.
- Staff that are involved in the provision or marketing of direct control services, who are also involved in the provision or marketing of contestable electricity services by a related electricity service provider. This is permitted where the staff have no electricity information, or no opportunity to use that electricity information to engage in conduct that is contrary to the ring-fencing guideline.

1.1 Site Register

Table 1 AusNet Services Site Sharing Register

None to date

1.2 Staff Register

Table 2 AusNet Services Staff Sharing Register

<p>Project Delivery Roles Project Mangers, Construction Manager, Commissioning Engineer, Projects Director Project Engineer, Project Administrative Support / Project Controller</p>	<p>Functions: These roles are involved in the planning and delivery of existing electricity service projects.</p> <p>Duties:</p> <ul style="list-style-type: none"> • <i>Manage, track and report on the progress of assigned projects from handover through to commissioning/completion including data entry into appropriate systems.</i> • <i>Development of project execution plans including timelines, costs, risk assessments, commissioning, and closeout.</i> • <i>Management of contracts, requisitions, orders and invoices associated with projects.</i> <p>Nature of sharing:</p> <ul style="list-style-type: none"> • Projects may fall into the definition of 'other electricity services'. However, the projects have already been won or committed by the affiliated entity when the participation of these shared staff is required. Hence there is no opportunity for staff sharing for the build phase to breach cross-subsidisation obligations. Appropriate cost
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	<p>allocation applies in these cases.</p> <ul style="list-style-type: none"> The only 'electricity information' brought to the work is the technical expertise of the shared employee and specification for the project provided (owned& managed) by affiliated entities. There is no dependency on 'electricity information' to be provided by the DNSP staff. <p>The member of staff has access to electricity information, but does not have, in performing the roles, functions or duties of their staff position, any opportunity to use that electricity information to engage in conduct that is contrary to the DNSPs obligations under clause 4.1.</p>
<p>Field Delivery Roles Lineworker, Apprentice Lineworker, Worksite Leader, Glove and Barrier Lineworker, Crew Leader</p>	<p>Functions: Field services staff are used for affiliated entities activities for installation of devices / infrastructure to provide services that affiliated entities have won in agreement with a customer.</p> <p>Duties</p> <ul style="list-style-type: none"> <i>Construction & maintenance of the overhead & underground electrical distribution network up to & including 66kv to relevant standards including metering and servicing, public lighting, fault finding and rectification, field operating HV and LV as required and authorised.</i> <i>Install, commission and maintain distribution and sub-transmission lines</i> <i>Prepare work records and reports as required, including input into databases and work hours/daily work records</i> <i>Allocate tasks for the work group</i> <i>Complete on-site hazard and risk assessments with relevant discussion and input from the work crew</i> <i>Ensure compliance with safe work practices and technical specifications</i> <i>Lead and supervise the workgroup</i> <p>Nature of sharing:</p> <ul style="list-style-type: none"> Projects may fall into the definition of 'other electricity services' However, the projects have already been won or committed by the affiliated entity when the participation of these shared staff is required. Hence there is no opportunity for staff sharing for the build phase to breach cross-subsidisation obligations. Appropriate cost allocation applies in these cases. The only 'electricity information' brought to the work is the technical expertise of the shared employee and specification for the project provided (owned& managed) by affiliated entities. There is no dependency on 'electricity information' to be provided by the DNSP staff . <p>It is noted that field delivery staff have no involvement in the planning, marketing or promotion of contestable electricity services. Sharing of staff to provide these roles does not compromise the ring-fencing obligations.</p> <p>The member of staff has access to electricity information, but does not</p>

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	<p>have, in performing the roles, functions or duties of their staff position, any opportunity to use that electricity information to engage in conduct that is contrary to the DNSPs obligations under clause 4.1.</p>
<p>Network Engineering Roles Distributed Energy Engineer, Network Intelligence Engineer, Graduate Engineer Senior Networks Planning Engineer</p>	<p>Function: Network Engineering staff are used for affiliated entities for technical expertise to support and design activities outside of the DNSP network area.</p> <p>Duties</p> <ul style="list-style-type: none"> • <i>Provide engineering support services for the installation, maintenance and operation of complex works for distribution, sub-transmission and transmission electricity networks ensuring the safety, efficiency and integrity of the network in accordance with requirements;</i> <p>Nature of sharing: Various engineering roles can be shared, including network design engineers, network planners, and innovation and new technology designers in a number of ways</p> <ul style="list-style-type: none"> • Development of commercial proposals (broad range of engineering roles involved) –staff are shared on the basis that the work is for services to be strictly limited to locations outside of the DNSPs network area. • Implementation (broad range of engineering roles involved) – similar to above apply, but particularly in relation to network planning. The planner’s role should continue to be strictly limited to work in locations outside of the DNSPs network area.