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**From:** [Redacted]  
**Sent:** Monday, 19 June 2017 5:11 PM  
**To:** [Redacted]  
**Subject:** Issues Paper - Review of the REES Code - EA comments

Thanks for the opportunity to comment on the Review of the REES Code. Our responses to the questions in the Issues paper are set out in turn below.

Question	EnergyAustralia response
Are there any suggested improvements to the consumer protection requirements outlined in the Code?	No, EnergyAustralia considers that the current consumer protection obligations in the REES code and broader obligations under the Australian Consumer law (in the Competition and Consumer Act 2010) are fit for purpose and provide sufficient protections for consumers.
What improvements could be made to the annual compliance plan process?	None at this time, EnergyAustralia considers the annual compliance plan process is operating effectively.
Is there a need to expand or further refine the training requirements for REES installers (general or	EnergyAustralia does not consider that further requirements need to be specified. The current arrangements are operating effectively. It also considers that expanding regulatory requirements should only occur when there is evidence of an

<p>activity specific)? And how could these requirements be improved?</p>	<p>issue or concern that needs to be resolved.</p>
<p>Should training requirements for mandatory safety training be further specified?</p>	
<p>How should the REES Code address REES installations where a sub-contractor is engaged?          – Should training requirements for sub-contractors be further defined in the Code?          – What improvements could be made to ensure that the Scheme information provided to customers is adequate?</p>	<p>EnergyAustralia considers the current approach in the REES Code is appropriate.</p>
<p>Is it beneficial to require obliged retailers to ensure its contractors and/or agents hold a nominated level of liability insurance? What requirement(s) could be applied?</p>	<p>EnergyAustralia does not consider that specified requirements are necessary however should the Code be amended to include these requirements, it submits that insured amounts should be set at proportionate levels and be set so that they are consistent with other regulatory regimes i.e. the ACT Energy Efficiency Improvement Scheme.          We note that YESS, EnergyAustralia’s contractor, has a number of liability insurances in place, including public liability and professional indemnity insurance, and that these currently comply with ACT requirements.</p>
<p>Are the quarterly assessments of achievement provided to obliged retailers beneficial, or does the REES Retailer Reporting System (REES-R) provide sufficient information for obliged retailers to monitor their achievement?</p>	<p>We consider the REES –R portal provides sufficient information for EnergyAustralia to monitor our achievements and track our level of activities against our targets.</p>
<p>Does the current REES Code present any issues or challenges to obliged retailers in complying with their obligations?</p>	<p>No comment at this time.</p>
<p>Are there any other matters, or emerging REES related issues, that the</p>	

Commission should consider or take into account?	
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Should you have any questions about this submission, please feel free to contact me.

Kind regards,

[Redacted signature block]

**EnergyAustralia**

Level 33, 385 Bourke Street, Melbourne, Victoria 3000

[energyaustralia.com.au](http://energyaustralia.com.au)

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