

21/06/2019

Ms Linda South
Director Corporate Services
Essential Services Commission of South Australia
GPO Box 2605
Adelaide SA 5001

Dear Ms South

Charter of Consultation and Regulatory Practice - Review

Mondo appreciates the opportunity to provide feedback on the Essential Services Commission of South Australia's (the Commission) revised Charter of Consultation and Regulatory Practice (Charter), issued on 24 May 2019.

Mondo owns and maintains a variety of contracted transmission and distribution services, including grid connections for new generators and battery energy storage systems. Mondo also provides metering and platform-based distributed energy resource (DER) services, aggregating DER within community minigrids to provide broader market and network services. Mondo strongly supports a renewable energy future and initiatives that enable the National Electricity Market to better integrate with renewable energy.

Mondo supports the Commission's decision to take a principles-based approach to stakeholder engagement. This approach will provide greater flexibility to the Commission and help ensure all engagement is fit-for-purpose, which will ultimately result in better regulatory practice.

While Mondo supports the revised Charter, there are a few areas we feel it could be strengthened.

Getting involved

While we understand the importance of a flexible approach – including the ways in which stakeholders can become involved – removing all information about 'getting involved', as was provided in the previous Charter, may lessen the confidence of stakeholders in their ability to provide input.

Reintroducing some basic information in the Charter about the variety of ways to get involved, or how to find information about current consultations would serve to empower stakeholders.

Indicative timeframes

Indicative timeframes for both formal, regulatory decision-making processes and inquiries or other advisory work have been provided in section *5.2 Timeframes for consultation*.

We suggest the second and third paragraph should be removed from section 5.2 and instead be included as a new column in *Table 2: Commission's types of consultation and approaches*. This would provide stakeholders with an understanding of the indicative timeframes associated with each of the different types of consultation approaches.

Mondo hopes the comments contained in this submission are of assistance to the Commission as it implements its new Charter. If you have any queries in relation to this submission, please contact Taree Lamplugh, Stakeholder Consultation and Community Engagement Lead via email taree.lamplugh@mondo.com.au or via telephone 03 9695 6390.

Yours sincerely

Margarida Pimentel

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Manager Policy and Insights