

5 April 2013

Natasha Cheshire
Manager, Compliance
Essential Services Commission of South Australia
GPO Box 2605
Adelaide SA 5001



By email: escosa@escosa.sa.gov.au

Dear Natasha,

Post-NECF (National Energy Customer Framework) Review of Regulatory Instruments

Thank you for the opportunity to review ESCOSA's regulatory instruments following implementation of the National Energy Customer Framework ("NECF") in South Australia. Envestra supports the Commission's efforts to harmonise regulation where possible.

Envestra understands that a 'condensed NECF-related review of limited codes' took place in January of this year, for which it provided submissions, and given commencement of the NECF in South Australia, the Commission is now conducting a more widespread review of the regulatory instruments.

The regulatory instruments which form part of this subsequent review and which relate to Envestra comprise:

Codes

- Gas Distribution Code

Licences

- Envestra Limited Gas Distribution Licence

Guidelines

- Gas Guideline No. 1 - Regulatory Information Requirements Distribution System
- Energy Guideline No. 4 Compliance Systems and Reporting

Policies

- Enforcement Policy

January 2013 Submissions

As mentioned above, Envestra participated in the limited review of codes in January. The Commission would however be aware that Envestra's proposed amendments incorporated all of the gas-related regulatory instruments which were under the authority of the Commission at that time, with the exception of the Enforcement Policy.

As such, Envestra's response to this subsequent review is mostly a duplicate of the response Envestra provided in January but with additional comments for the Enforcement Policy.

Envestra notes however that this review does not include the Gas Metering Code. Envestra understands that this code was part of the limited review in January, however many of Envestra's proposed changes were not incorporated. This being the case Envestra would like to take this opportunity to reinforce its proposed changes as the code is mostly a duplicate of the South Australian Retail Market Procedures.

Table of Changes

Similar to Envestra's response in January, attached to this letter is a Table of Changes which sets out Envestra's comments on the instruments listed above.

Further questions or comments

Envestra trusts that these documents are of assistance to the Commission however if you have any questions or comments please contact myself or Joanne Parry on 8159 1633.

Yours sincerely,

Ralph Mignone
Manager Engineering and Technical Regulation