



15 March 2022

Licencing Division
Essential Services Commission
8/570 Bourke Street
Melbourne VIC 3000

By email: licences@esc.vic.gov.au

Retail Licence Review – Variation of Energy Retail Licences

Alinta Energy Retail Sales Pty Ltd (**Alinta**) welcomes the opportunity to review the proposed "*Standard Electricity Licence Conditions for Electricity Retail*" and the proposed "*Standard Gas Licence Conditions for Gas Retail*".

Alinta Energy understands the adoption of the proposed standard licences will require a variation to Alinta Energy's existing Electricity & Gas Retail licence conditions.

Whilst noting that the proposed variations are purported to be administrative in nature, we would highlight that the following variation would appear to go beyond being only administrative in nature.

3. Ongoing technical capacity

In particular Clause 3.3

Clause 3.3. The Licensee must ensure that all relevant staff are provided with appropriate training in all Victorian specific obligations including the conditions of its Licence and the Energy Retail Code of Practice (if applicable to the activities authorised by this Licence).

Alinta Energy notes this is a new condition, with no similar provision appearing in our current licence conditions. This potentially goes beyond being a variation for administrative purposes.

It is cognisant on retailers to ensure relevant staff are appropriately trained in their obligations, and requirements for operating across the markets in which they are active. As a result, Alinta Energy believe this new clause is an unnecessary inclusion and suggest it can be removed.



Whilst also noting that there are other variations proposed that are generally administrative in nature, any variation to existing licence conditions will need to flow through to Retailers own licence monitoring processes, as such we would seek that a transitional period be provided for the introduction of the new standard electricity and gas licence conditions.

Where these points are appropriately addressed Alinta Energy would see no issue in providing consent to the proposed variations

We would also note that the details in Attachment A – Particulars of the Licence for both Alinta Energy's Electricity & Gas Licences needs to be updated. Likewise details for the Neighbourhood Energy Pty Ltd also require updating.

In particular the "Address for Service" details. Please see below.

Amendments to Attachment A

Address for Service Electricity & Gas Licence	Chief Executive Officer Alinta Energy Retail Sales Pty Ltd Grosvenor Place Level 13, 225 George Street Sydney NSW 2000
Address for Service Electricity Licence	Chief Executive Officer Neighbourhood Energy Pty Ltd Grosvenor Place Level 13, 225 George Street Sydney NSW 2000

Please note: the comments above relate to both the Alinta Energy Retail Sales Pty Ltd & Neighbourhood Energy Pty Ltd retail energy licences.

Should you have any questions or wish to discuss any aspect of our submission I may be contacted on (02) [REDACTED] or via email: [REDACTED]@alintaenergy.com.au

Yours sincerely

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Manager National Retail Regulation