

[REDACTED] (ESC)

**From:** [REDACTED]@tasgas.com.au>  
**Sent:** Thursday, 26 May 2022 3:34 PM  
**To:** Licence Query Info (ESC)  
**Cc:** [REDACTED]  
**Subject:** RE: ESC – Energy retail licence review – Tas Gas Retail [SEC=OFFICIAL]

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** [REDACTED]

Dear ESC Licensing team

Thank you for your letter dated 27 April 2022 and the opportunity to review and consent to the revised licence variation proposal. Apologies for the delay in providing our response. We have the following comments to make:

1. Notice for change of Control (clause 6.2)  
The requirement to notify the Commission “in any case not later than 3 Business Days after the Licensee becomes aware of the event or circumstances or makes the decision” is very short and not in line with the 10 Business Days timeline set out in Gas Networks Victoria’s Distribution Licence or in licences held by Tas Gas Holdings in other jurisdictions (for example WA where it is also 10 Business Days). Given the confidential nature of a change of control, and the necessary delay in communication that may occur, we ask that the notification requirement in the new retail licence is also amended to 10 Business Days.
2. Tas Gas Retail would like confirmation that the below clause will be included into their licence when it is issued in the new format (noting that Brookfield Regional Networks Pty Ltd (BRN) should now read Gas Networks Victoria Pty Ltd (GNV) and reference to “BRN” be updated to “GNV”) :

**28. Exemption from requirement to register with AEMO**

- 28.1. In respect of the activities conducted under this Licence, the Licensee is exempt from the requirement to register with AEMO and to comply with the RMPs. The exemption does not apply if:
- a. any of the pipelines in Victoria used by Brookfield Regional Networks Pty Ltd (BRN) to provide gas distribution services become ‘covered’ under the *National Gas Law*, or
  - b. any of the pipelines used by BRN to provide gas distribution services become part of the Victorian ‘declared distribution system’ under the *National Gas (Victoria) Act 2008 (Vic)*.
- 28.2. If the Licensee is not obliged to comply with the RMPs, the Licensee must comply with the Customer Transfer and Reconciliation Code (CTR Code) published by BRN. The CTR Code is subject to the approval of the Commission, and may be amended by the Commission at its discretion.

We would be grateful if you could give the above your consideration and advise us accordingly following which we will be happy to provide our consent.

Regards

[Redacted]  
GM Retail

m: [Redacted]  
p: [Redacted]  
e: [Redacted]@tasgas.com.au

95 Albert Rd  
Moonah, 7009

[www.tasgas.com.au](http://www.tasgas.com.au)



This email and any attachments are confidential and may be legally privileged in which case neither is intended to be waived. The contents of this email, including any attachments, are intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient, you are not permitted to distribute or use this message or any of its attachments in any way. If you have received this message in error, please notify us and remove it from your system. Any views expressed in this email or the attachments are those of the individual sender, except where the sender expressly, and with authority, states otherwise. It is your responsibility to check any attachments for viruses and defects before opening or sending them on. None of the sender or any of its related entities accepts any liability for any consequential damage resulting from this email containing any computer viruses.

---

[Redacted]

[Redacted]

\*\*\*\*\*  
The information in this email is confidential and intended only for the use of the named recipient. If you have received this email in error please delete it immediately from your system and inform us by return email. If you are not the intended recipient, any dissemination, copying or use of the information is strictly prohibited. This email and any attachments are also subject to copyright. No part of the email or attachments may be reproduced or transmitted without the written permission of the copyright owner.