

22 June 2018

Essential Services Commission of Victoria

Level 37, 2 Lonsdale St
MELBOURNE VIC 3000

Via email: paymentdifficulties@esc.vic.gov.au

Re: Payment difficulty framework Amendments to the Compliance and Performance Reporting Guideline, May 2018

To whom it may concern

Australian Gas Infrastructure Group (AGIG) welcomes the opportunity to make a submission to the Essential Services Commission's (the Commission's) Draft Decision "*Payment difficulty framework Amendments to the Compliance and Performance Reporting Guideline*" (the Guideline). We understand that the Commission will review submissions received on the draft decision and publish a final decision in late July 2018, with the revised Guideline applying from 1 January 2019.

AGIG is Australia's largest gas distribution business, delivering natural gas to approximately 2 million customers across Australian. In Victoria, AGIG operates two of the states three gas distribution networks - Australian Gas Networks (AGN) and Multinet Gas Networks (MGN).

We are supportive of the Commission's proposed administrative change of the required compliance reporting signoff. This change includes the Type 1 quarterly and Type 1, Type 2 and Type 3 annual reports from requiring both the Chief Executive Officer (CEO) or equivalent, and Chair of the Board to sign the report, to requiring only the CEO or Managing Director. As highlighted by the Commission we believe there is merit in aligning the signoff requirements with Australian Energy Regulator's reporting requirements for retailers and distributors.

Thank you again for the opportunity to comment on the draft decision. Should you require any additional information please contact Vicky Knighton on [REDACTED]

Yours sincerely

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Craig de Laine
General Manager People and Strategy