



Mr David Young
Director, Energy
Essential Services Commission
Level 37, 2 Lonsdale Street
Melbourne VIC 3000

Via email: energy.submissions@esc.vic.gov.au

25 May 2016

Dear David

Energy Compliance and Enforcement Policy – Draft for Consultation, April 2016

CitiPower Pty Ltd and Powercor Australia Ltd (**the Businesses**) thank the Essential Services Commission (**Commission**) for the opportunity to provide a written submission on the draft *Energy Compliance and Enforcement Policy* (**Policy**) circulated for consultation in April 2016.

The Commission's quarterly Energy Distributor Forum held on 29 April 2016, and the Commission's consultation workshop held on 20 May 2016, provided valuable insights into the Commission's approach to compliance and enforcement.

The Businesses are supportive of the Commission's principles-based approach to compliance and enforcement and consider the guiding principles proposed to be appropriate.

The compliance-enforcement pathway and section 3.2.4 'Investigation and consideration of further action' are helpful in providing the Businesses with both a framework and an approach for how breaches of regulatory obligations will be managed by the Commission. In line with the transparency guiding principle, the Businesses request the Commission clearly states, in all interactions and communications with the Businesses, which stage of the compliance-enforcement pathway any breach-related matter is at.

The Businesses look forward to working with the Commission to finalise the Policy, and its supporting compliance reporting requirements, to ensure a consistent regulatory approach to compliance and enforcement.

If you have any questions, please do not hesitate to contact me on _____ or via email

Yours sincerely

Hannah Williams
Manager Compliance & Projects

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