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Dr. Paul Grimes

Secretariat, Review of Victoria's Electricity Safety Network

Department of Environment, Land, Water and Planning

By email: delwp.secretariat@delwp.vic.gov.au

16 June 2017

Dear Dr Grimes,

Review of Victoria's Electricity and Gas Network Safety Framework

AGL welcomes the opportunity to comment on the Victorian Department of Environment, Land, Water and Planning's (DELWP) Review of Victoria's Electricity and Gas Network Safety Framework Supplementary Issues Paper (Paper). AGL notes that the Paper specifically deals with gas transmission and distribution network safety.

AGL is one of Australia's leading integrated energy companies and largest ASX listed owner, operator and developer of renewable generation. Our diverse power generation portfolio includes base, peaking and intermediate generation plants, spread across traditional generation fuel sources as well as renewable sources. AGL is also a significant energy retailer, providing energy solutions to over 3.7 million customers throughout eastern Australia.

The paper asked for feedback on the efficiency and effectiveness of the gas network safety framework (framework) and whether there should be a change in the degree of prescription provided.

AGL considers that the reporting framework largely works well and AGL has had no significant issues with regards to its reporting obligations.

AGL considers that the framework's requirements for gas retailers would potentially benefit from a more principles-based approach that gave industry additional flexibility in choosing the best safety framework in the context of their business activities. It is ideal for legislative and regulatory arrangements to reflect best industry practices and minimum safety standards without employing unnecessary prescriptive requirements. AGL considers that there would be efficiency and effectiveness gains by employing a less prescriptive approach to the current framework requirements.

AGL will continue to constructively engage with ESV to ensure that together we continue to achieve the best safety outcomes cohesively.



If you have any queries about this submission, or require further information, please contact Brigid Richmond at brichmond@agl.com.au or on 03 8633 6631.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Simon Camroux'.

Simon Camroux

Senior Manager, Wholesale Markets Regulation