12 August 2011

General Manager
Network Operations and Development Branch
Australian Energy Regulator
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Thank you for the opportunity to comment on the AER approach to electricity network service provider exemptions June 2011 and the Electricity Network Service Provider Registration Exemption Guideline June 2011.

The Energy & Water Ombudsman NSW investigates and resolves complaints from customers of electricity and gas providers in NSW, and some water providers.

EWON believes that approach undertaken in these documents to align classes of exemptions between exempt networks and sellers is a sensible one which will have the potential to deliver greater consumer protection. EWON also believes that the general conditions proposed for exempt networks are appropriate.

In particular EWON believes that the conditions requiring meters to comply with the requirements of the National Measurement Institute in both pattern approval and accuracy classes will considerably improve consumer protection.

EWON also endorses the strong emphasis on exempt network registration requiring that safety standards be met. For many small exempt networks such as residential parks the process of registering will provide an opportunity for the owner to ensure that the network meets the proper safety standard.

If you would like to discuss this matter further, please contact me or Chris Dodds Senior Policy Officer on 82185262.

Yours sincerely

Clare Petre
Energy & Water Ombudsman NSW