

Australian Competition & Consumer Commission

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4 July 2001

Authorisation of Amendments to Victoria's Derogations

On 19 March 2001, the Australian Competition and Consumer Commission (Commission) received applications for authorisation (Nos A90786, A90787, and A90788) of amendments to Victoria's derogations to the National Electricity Code. The applications were lodged by the National Electricity Code Administrator on behalf of the Victorian Government.

Enclosed is a copy of the Commission's draft determination in respect of these applications for authorisation. The Commission's draft determination outlines its analysis and views on the amendments to Victoria's derogations. The Commission proposes to grant authorisation, conditional upon two amendments to the derogations being made. These two conditions are outlined in chapter 5 of the draft determination.

The Commission invites the applicant and other interested persons, to notify it within 14 days from 4 July 2001 whether they wish the Commission to hold a conference in relation to this draft determination. If the applicant or an interested party notify the Commission in writing that they want the Commission to hold a conference, the conference is scheduled to be held in Canberra on 20 July 2001. Details of the location of the conference will be determined at a later date, should a conference be called.

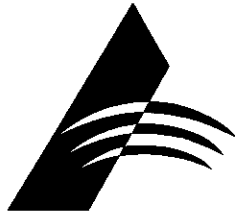
The applicant, interested parties who receive a copy of the draft determination, and any other interested parties whose presence the Commission considers appropriate are entitled to participate in any such conference. Following the conference, the Commission will take into account issues raised at the conference, and any related submissions, and will issue a final determination. If no pre-determination conference is called then this draft determination will become the final determination. A person dissatisfied with the final determination may apply to the Australian Competition Tribunal for its review.

If you have any queries or require further information please contact me on (02) 6243 1249 or Gabrielle Ford on (02) 6243 1238.

Yours sincerely

Michael Rawstron
General Manager
Regulatory Affairs - Electricity





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4 July 2001

Mr Stephen Kelly
Managing Director
National Electricity Code Administrator
Level 4
41 Currie St
ADELAIDE SA 5000

Dear Stephen

Authorisation of Amendments to Victoria's Derogations

On 19 March 2001, the Australian Competition and Consumer Commission (Commission) received applications for authorisation (Nos A90786, A90787, and A90788) of amendments to Victoria's derogations to the National Electricity Code. The applications were lodged by your company on behalf of the Victorian Government.

Pursuant to subsection 91(2) of the *Trade Practices Act* (TPA), the Commission hereby grants interim authorisation to the derogations subject to the conditions set out in chapter 5 of the draft determination. These applications relate to the metering arrangements of chapter 7 of the code.

These interim authorisations take effect from Wednesday 4 July 2001 and will lapse when the Commission reaches a final determination in regard to each application.

Please note that under subsection 91(2) of the TPA, the Commission may revoke an interim authorisation at any time.

Please also find enclosed a copy of the Commission's draft determination in respect of these applications for authorisation. The Commission's draft determination outlines its analysis and views on the amendments to Victoria's derogations. The Commission proposes to grant authorisation, conditional upon two amendments to the derogations being made. These two conditions are outlined in chapter 5 of the draft determination.

The Commission invites you, and other interested persons, to notify it within 14 days from 4 July 2001 whether you wish the Commission to hold a conference in relation to this draft determination. If you, or an interested party notifies the Commission in writing that they



want the Commission to hold a conference, the conference is scheduled to be held in Canberra on 20 July 2001. Details of the location of the conference will be determined at a later date should a conference be called.

A representative from your company, interested parties who receive a copy of the draft determination, and any other interested parties whose presence the Commission considers appropriate are entitled to participate in any such conference. Following the conference, the Commission will take into account issues raised at the conference, and any related submissions, and will issue a final determination. If no pre-determination conference is called then this draft determination will become the final determination.

A person dissatisfied with the final determination may apply to the Australian Competition Tribunal for its review.

The Commission has also written to The Hon. Candy Broad, M.P., informing her of the Commission's draft determination.

If you have any queries or require further information please contact me on (02) 6243 1249 or Gabrielle Ford (02) 6243 1238.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Rawstron', with a long, sweeping horizontal stroke extending to the right.

Michael Rawstron
General Manager
Regulatory Affairs- Electricity



**Australian
Competition &
Consumer
Commission**

Draft Determination

Applications for Authorisation

Amendments to the National Electricity Code

Victorian Full Retail Competition Derogations

Date: 4 July 2001

Authorisation Nos:

A90786
A90787
A90788

File No:
C2001/442

Commissioners

Fels
Shogren
Cousins
Jones

Contents

Contents	I
Glossary	II
1. Introduction	1
2. Statutory test	2
3. Public consultation process	4
4. Victorian full retail competition derogations	5
5. Determination	11
Appendix A — Submissions	12

Glossary

AES	Australian Energy Services
Code	National Electricity Code
Commission	Australian Competition and Consumer Commission
EPD	Energy Policy Division, Victorian Department of Natural Resources and Environment
FRC	Full Retail Competition
FRMP	Financially Responsible Market Participant
LNSP	Local Network Service Provider
NECA	National Electricity Code Administrator
NEM	National Electricity Market
NEMMCO	National Electricity Market Management Company
NSP	Network Service Provider
ORG	Office of the Regulator General (Victoria)
TPA	<i>Trade Practices Act 1974</i>
Victorian DBs	Victorian Distribution Businesses

1. Introduction

On 19 March 2001, the Australian Competition and Consumer Commission (Commission) received applications for authorisation (Nos A90786, A90787 and A90788) of amendments to the derogations contained in chapter 9 of the National Electricity Code (code). The applications were submitted by the National Electricity Code Administrator (NECA), on behalf of the Energy Policy Division of the Victorian Department of Natural Resources and Environment (EPD), under Part VII of the *Trade Practices Act 1974* (the TPA). The proposed derogations relate to the metering arrangements of chapter 7 of the code.

The EPD is seeking to amend the derogations contained in chapter 9 of the code, in conjunction with the introduction of full retail competition (FRC) in Victoria. The proposed changes to the Victorian derogations:

- introduce transitional arrangements for metering services in the wholesale electricity market; and
- provide the Local Network Service Providers (LNSPs) with a monopoly for the provision of metering services.

Authorisation under Part VII of the TPA provides immunity from court action for certain types of market arrangements or conduct that would otherwise be in breach of Part IV of the TPA, where the Commission concludes that the public benefits of the arrangements or conduct would outweigh the anti-competitive detriment of such arrangements or conduct.

The Commission has prepared this draft determination outlining its analysis and views on the applications for authorisation of the amendments to the Victorian derogations contained in chapter 9 of the code.

Chapter 2 of this draft determination sets out the statutory test that the Commission must apply when assessing an application for authorisation. Chapter 3 contains an outline of the Commission's public consultation process. The Commission's analysis of the proposed derogation is set out in chapter 4 and the Commission's draft determination is in chapter 5.

2. Statutory test

The applications were made under sub-sections 88(1) and 88(8) of the TPA.

Applications made under sub-section 88(1) of the TPA are for authorisation to make a contract or arrangement, or arrive at an understanding, a provision of which would have the purpose, or would or might have the effect, of substantially lessening competition within the meaning of section 45 of the TPA; and to give effect to a provision of a contract, arrangement or understanding where the provision is, or may be, an exclusionary provision within the meaning of section 45 of the TPA. Further sub-section 88(6) provides that an authorisation made under sub-section 88(1) has effect as if it were also an authorisation in the same terms to every other person named or referred to in the application.

Applications made under sub-section 88(8) of the TPA are for authorisation to engage in conduct that constitutes, or may constitute, the practice of exclusive dealing in accordance with the provisions of section 47 of the TPA. Further, sub-section 88(8AA) provides that where authorisation has been granted under sub-section 88(8) and this particular conduct is expressly required or permitted under a code of practice, the authorisation applies in the same terms to all other persons named or referred to as a party or proposed party to the code. Authorisations may also apply to any corporation who becomes a party in the future.

The TPA provides that the Commission shall only grant authorisation if the applicant satisfies the relevant tests in sub-sections 90(6) and 90(8) of the TPA. While sub-section 90(6) and sub-section 90(8) relate to different types of anti-competitive behaviour, the tests are essentially the same.

Sub-section 90(6) provides that the Commission shall grant authorisation only if it is satisfied in all the circumstances that:

- the provisions of the proposed contract, arrangement or conduct would result, or be likely to result, in a benefit to the public; and
- that benefit would outweigh the detriment to the public constituted by any lessening of competition that would, or would be likely to result from the proposed contract, arrangements or conduct.

Sub-section 90(8) provides that the Commission shall grant authorisation only if it is satisfied in all the circumstances that the proposed provision or conduct would result, or be likely to result, in such a benefit to the public that the proposed contract, arrangement, understanding or conduct should be allowed.

The detriment to be considered is limited to detriment caused by a lessening of competition. However, consideration of public benefits is less restricted and public benefits recognised in the past include:

- fostering business efficiency;
- industry rationalisation;
- promotion of industry cost savings;
- promotion of competition in industry;
- promotion of equitable dealings in the market;
- expansion of employment;
- development of import replacements;
- growth in export markets; and
- arrangements which facilitate the smooth transition to deregulation.

In considering whether or not to grant authorisation the Commission must consider what the position is likely to be in the future if authorisation is granted and what the future is likely to be if authorisation is not granted.

If the Commission determines that the public benefits do not outweigh the detriment to the public constituted by any lessening of competition, the Commission may refuse authorisation or grant authorisation subject to conditions.

The value of authorisation for the applicant is that it provides protection from action by the Commission or any other party for potential breaches of certain restrictive trade provisions of the TPA. It should be noted, however, that authorisation only provides exemption for the particular conduct applied for and does not provide blanket exemption from all provisions of the TPA. Further, authorisation is not available for misuse of market power (section 46).

A more expansive discussion about the Commission's authorisation process and the statutory test that the Commission applies can be found in: *Guide to authorisations and notifications*, Australian Competition and Consumer Commission, November 1995.

3. Public consultation process

The Commission has a statutory obligation under the TPA to follow a public process when assessing an application for authorisation.

The Commission received the application for authorisation of the changes to the derogations on 19 March 2001. Notification of the application and a request for submissions was advertised in the *Australian Financial Review* on 6 April 2001 and placed on the Commission's web site. Interested parties were asked to make submissions to the Commission regarding their views on the issues of public benefit and anti-competitive detriment arising from implementation of the proposed changes.

Four interested parties provided submissions (see Appendix A). All submissions have been placed on the Commission's public register.

The Commission has produced this draft determination outlining its analysis and views on the derogations according to the statutory assessment criteria set out in chapter 2. The Commission invites the applicant and other interested persons to notify whether the applicant or other interested persons wish the Commission to hold a conference in relation to this draft determination.¹

If the applicant or an interested party notifies the Commission in writing within 14 days of 4 July 2001 that it wants the Commission to hold a conference, the Commission will hold a conference on 20 July 2001, at a time and place to be notified. The applicant, interested parties who receive a copy of the draft determination and any other interested parties whose presence the Commission considers appropriate are entitled to participate in the conference.

Following the conference, the Commission will take into account issues raised at the conference, and any related submissions, and will issue a final determination. If no pre-determination conference is called then this draft determination will become the final determination.

A person dissatisfied with the final determination may apply to the Australian Competition Tribunal for its review.

¹ For the purposes of the conference, an interested person is a person who has notified the Commission in writing that the person, or a specified unincorporated association of which the person is a member, claims to have an interest in the applications and the Commission is of the opinion that the interest is real and substantial.

4. Victorian Full Retail Competition Derogations

On 1 January 2001 the final tranche of electricity retail contestability commenced in Victoria. The timetable outlined by the Victorian EPD is:

- Customers consuming between 160 MWh and 40 MWh per year are currently contestable;
- From 1 August 2001 public lighting customers will become contestable; and
- From 1 January 2002 all customers will become contestable.

The Commission has granted interim authorisation to code changes that facilitate the introduction of full retail competition (FRC code changes).² The FRC code changes introduced a new role into the code, that of the metrology coordinator. The metrology coordinator is responsible for developing a metrology procedure for metering installation types 5-7.³

The metrology procedures will contain information on the devices and processes that measure the flow of electricity and will establish the rules, processes, algorithms and procedures necessary to facilitate the conversion of metering data into a format suitable for wholesale market settlement.

In Victoria, the EPD is the metrology coordinator, and is currently in the process of developing its metrology procedures, which provide the LNSP with exclusivity over meter provision, ownership and reading for a transitional period. The proposed derogations relate to chapter 7 of the code, which deals with metering arrangements for the wholesale electricity market.

The derogations amend:

- the definition of an LNSP;
- the role of the responsible person;
- the arrangements for the payment for metering; and
- the provisions for the metering provider.

The geographical area allocated to a Network Service Provider (NSP) is called a 'local area'. Chapter 10 of the code defines the LNSP as 'Within a local area, a Network Service Provider to which that geographical area has been allocated by the Jurisdictional Regulator'.

² The ACCC granted interim authorisation of the FRC code changes on 20 September 2000 and revoked and re-granted the interim authorisation on 27 October 2000. The Commission released a draft determination on the FRC code changes on 11 April 2001.

³ Type 5 - manually read interval meters; type 6 - method of estimating electricity consumption from basic accumulation meters; and type 7 - estimation of unmetered supplies (eg streetlights, telephone boxes).

In Victoria there has been one instance in which the same geographic area has been allocated to more than one NSP. The proposed derogations clarify the definition of the LNSP in circumstances where there is more than one LNSP, so that the metering obligations are imposed on the NSP to whose network the connection point/metering installation is connected.

Clauses 7.2.2 and 7.2.3 of the FRC code changes specify that unless otherwise elected by the financially responsible market participant (FRMP), the LNSP is the responsible person for metering installations in the LNSPs' local area.⁴ The derogations provide that the LNSP automatically becomes the responsible person for metering installation types 5, 6 and 7 for a transitional period of three years, commencing from the date at which the metrology procedures come into effect.

Clause 7.3.6 of the FRC code changes states that the FRMP for a connection point is responsible for the payment of all costs associated with the provision, installation, maintenance, routine testing and inspection of the metering installation for that connection point. The proposed derogations provide that during the three year transitional period, the costs of the LNSP will be recovered in accordance with the distribution businesses' licence conditions and the price determination made by the Office of the Regulator General (ORG).

Clause 7.4.2 of the code requires a person to be accredited by and registered with NEMMCO to be a metering provider. The code also specifies that the responsible person must engage a metering provider to carry out the metering installation activities, unless that responsible person is the LNSP and a registered metering provider. The derogations provide that each LNSP will be deemed to be an accredited and registered metering provider for these metering types. This is to be effective from the introduction of the metrology procedure for the relevant type of metering installation. However, this will expire one year after the metrology procedures become effective. Therefore, the LNSPs will have to register as a metering provider within that year.

Issues for the Commission

The arrangements that provide LNSPs with exclusivity for the role of the responsible person for metering installations types 5-7 in the LNSPs' local area may be taken to be:

- an exclusionary provision, as the arrangements have the effect of restricting the supply of meters to electricity retailers by providers other than the LNSP for a particular connection point;
- provisions substantially lessening competition, as the derogations may create a barrier to competition for the provision of meters and metering data services; and
- exclusive dealing, as the derogation requires electricity retailers to procure meters and metering data services from the LNSP for each connection point only.

⁴ Chapter 10 of the code defines the financially responsible market participant as a market participant who has 'classified the connection point as one of its market loads; or classified the generating unit connected at that connection point as a market generating unit.' The responsible person is defined as 'the person who has responsibility for the provision of a metering installation.'

What the applicant says

The EPD states that it would be desirable to delay the introduction of competition for metering services for a transitional period of three years commencing from the release of the metrology procedures, to facilitate a smooth transition to FRC. It argues that making the LNSP the responsible person for metering installation types 5-7 for a transitional period will provide simplicity and clarity of obligations relating to meter provision and metering data services. The EPD argues that the introduction of a large number of new systems could impede FRC, as there is a greater risk of failure of one of those systems. It argues that an ineffective transfer process would damage consumer confidence in FRC and deter consumers from choosing to switch suppliers, thus limiting the development of competition.

While the EPD recognises the importance of maximising contestability in provision of settlement-ready data, it contends that metering competition is not necessary for the benefits of FRC to be realised by customers. It argues that introducing metering competition will add an extra layer of complexity to the introduction of FRC, and that this would hinder the development of core competition, particularly in terms of customers choosing to switch retailers.

The EPD states that the introduction of systems and processes necessary for competition in metering and data services is feasible, but that at this stage, the net benefits of introducing them have not been determined.

The EPD contends that as LNSPs are currently responsible for most of the tasks relating to meter provision and metering data services, they are in the best position to assume the role of the responsible person. It argues that as the responsible persons, LNSPs can best facilitate the development of the new systems and processes required by the introduction of metering installation types 5-7.

The EPD argues that having the LNSPs act as the exclusive responsible person will reduce the time and work relating to metering provision for metering installation types 5, 6 and 7. It contends that these arrangements will allow the relevant industry participants to benefit from the experience of identifying the optimal systems and processes required to provide maximum benefits to consumers. It also claims that this will facilitate cost effective and technically efficient solutions, and create opportunities for innovation in the market.

The EPD states that the economies of scale currently enjoyed by the LNSPs place them in the best position to supply metering services for the initial stages of FRC. It argues that new retailers can only achieve economies of scale through technological innovation, which is not likely in the short term.

The EPD claims that competitive benefits are already being realised in meter provision and metering data services. Some LNSPs employ metering providers based on competitive tenders. The EPD claims that this provides some competitive benefits. It contends that having the FRMP act as the responsible person for metering installation types 1 to 4 for customers consuming greater than 160MWh per annum has not reduced the costs of providing those services. It further states that reduced costs are less likely to occur for consumption levels less than 160MWh per annum.

The EPD advised that metering cost recovery by the Victorian LNSPs will be the subject of review by the ORG during its next regulatory reset for the period 2006-2010.

What the interested parties say

Generally, the Victorian Distribution Businesses (the Victorian DBs), Integral and the New South Wales Government support the proposals, agreeing that they will minimise the complexity of the arrangements. The New South Wales Government has signalled that it is also considering submitting a derogation to the Commission.

The Victorian DBs also argue that the proposed derogation will ensure that FRC commences as soon as possible with a cost structure that promotes customer choice.

United Energy contends that the proposals will provide public benefits by enhancing the interpretation of the code, maximising metering system integrity that is also cost effective, and will enhance the overall transition process to FRC.

Integral argues that passing the responsibility of metering small customers to the FRMP would allow them to create a barrier to entry. It states that by refusing to allow subsequent retailers to use the metering assets, or by pricing their use higher than their amortised cost, the FRMP creates a barrier to transfer that is equal to the cost of installing new metering. It further contends that allowing the FRMP to be the responsible person for metering presents a conflict of interest as the FRMP is in competition with the host retailer and this would impact on service quality. Integral also argues that there will be significant costs associated with transferring metering responsibility to the FRMP.

Australian Energy Services (AES) opposes the proposed derogations, questioning the ability of Victorian LNSPs to deliver metering services with service quality and prices comparable to those of independent service providers. AES argues that an experienced independent service provider looking to increase market share is likely to offer and maintain a competitive pricing structure. It submits that the current ringfencing of LNSPs from incumbent retailers in Victoria is inadequate and contends that metering and retail charges should be subject to competition for the benefits of FRC to be fully realised, because allowing retailers to choose their metering service provider will empower customers to select the best and most cost-effective electricity solutions.

Commission's considerations

The Commission considers that it is important to have in place an operating environment that is conducive to customer churn, for the full benefits of FRC to be realised. The Commission agrees with the EPD's view that allowing LNSPs to have temporary exclusivity in meter provision would simplify the process for customers who choose to switch retailers, and will minimise disruption to the metering data systems.

The AES submission argues that allowing the LNSP to have exclusive ownership of meters is a barrier to competition. However, in its draft determination on the FRC code changes, the Commission expressed concern that introducing contestability into meter ownership could potentially act as a barrier to competition. In the above 160MWh market, the cost savings that are derived from lower electricity prices readily outweigh the cost of the meter. However, in the below 160MWh market, these cost savings may be outweighed by the cost of the meter. The Commission believes that it is unlikely

that a retailer will bear the cost of a meter when the risk of a customer switching could leave a large portion of the metering cost stranded. This could mean that retailers may charge customers up front for the cost of the meter, and there is a potential risk that this may deter customers from switching retailers. The Commission also notes Integral's concerns that contestability in metering could lead to barriers to customer switching.

However, the Commission considers that under contestability, arrangements could potentially be developed to overcome such barriers. For example, second tier retailers might lease meters from first tier retailers. In this sense, allowing the retailer to own meters may not necessarily be a barrier to competition.

Given the infancy of retail contestability, the Commission considers it inappropriate for it to determine whether metering contestability is required at this stage. In its draft determination on the FRC code changes, the Commission imposed a condition that requires the jurisdictional regulators to conduct a review, by 31 December 2003, that includes consideration of whether meter ownership acts as a barrier to customer switching. Therefore, the Commission considers it appropriate to grant authorisation to the derogations pending the outcome of the review of meter ownership.

The Commission considers that the ringfencing issues raised by AES ought to be referred to the Victorian ORG. However, the submission does highlight an area of concern to the Commission. The Commission considers that the public benefit derived from these derogations will be significantly lessened if the ringfencing guidelines are not administered appropriately.

In its draft determination on the FRC code changes the Commission expressed its concern regarding the current ringfencing arrangements between the distribution businesses, retail businesses and the metering businesses. Condition C7 of that draft determination requires that the jurisdictional regulators must review the effectiveness of their ringfencing guidelines and develop new guidelines where the current arrangements are deemed to be ineffective.

The Commission notes that the ORG is finalising a position paper on enhanced ringfencing guidelines to be implemented as part of the Victorian DBs' licence conditions, supported by a monitoring regime. The guidelines are expected to come into effect by 1 January 2002.

The effect of clause 9.9A.2 (e) is that the derogations relating to the responsible person and the cost allocation of metering will be in place for a transitional period of three years from the effective date of the metrology procedures for type 6 metering installations. The EPD has informed the Commission that the effective date of the type 5 metering installations will be 12 July 2001. However, the commencement of the type 6 metrology procedures is likely to be January 2002.

The Commission is concerned that the cessation date of the derogation is expressed relative to the effective date of the metrology procedure for type 6 metering installations. This would mean exclusivity is effectively granted for longer than three years for type 5 metering installations, and may continue for an unknown period of time if the commencement of the type 6 metrology procedure is delayed.

Therefore, the Commission authorises the derogation, subject to the condition that clause 9.9A.2 (e) of the derogation must end on 1 July 2004. This will prevent the period of exclusivity from extending beyond the three years requested by the EPD.

The implication of this decision is that all metering services, including meter ownership and installation, meter reading, and metering data agency will become contestable at the end of the derogation, unless the jurisdictional review determines otherwise for meter ownership.

Clause 9.9A.4 of the application enables LNSPs to have automatic accreditation and registration with NEMMCO to be a metering provider for metering types 5-7 for one year, effective from the introduction of the metrology procedure for the relevant type of metering installation. As these metering installation types will be implemented incrementally from 12 July 2001, the Commission is concerned that this derogation may also extend beyond one year. Therefore in approving the derogation, the Commission has imposed a condition that limits the LNSPs' deemed registration and accreditation to 1 July 2002.

5. Determination

This draft determination is made on 4 July 2001. The Commission considers that the proposed arrangements and conduct set out in the Victorian derogations in relation to the transition to full retail competition:

- 1) are likely to result in a benefit to the public which outweighs the potential detriment from any lessening of competition that would result if the proposed conduct or arrangements were made, or engaged in; and
- 2) are likely to result in such a benefit to the public that the proposed conduct or arrangements should be allowed to take place or be arrived at.

For reasons outlined in chapter 4 of this determination, the Commission proposes, subject to any pre-determination conference requested pursuant to s.90A of the TPA, to authorise the amendments to the code contained in application numbers A90786, 90787, and 90788, subject to the conditions below.

C1 Clause 9.9A.2 (e) must be amended to state that it ceases to apply on 1 July 2004; and

C2 Clause 9.9A.4 (c) must be amended to state that it ceases to apply on 1 July 2002.

The Commission grants interim authorisation of the derogations effective from 4 July 2001. The interim authorisation will apply until the final authorisation of the derogations takes effect, being the date of gazettal in the South Australian Government Gazette.

Appendix A — Submissions

Australian Energy Services

Integral

Joint submission from the Victorian Distribution Businesses – AGL, Citipower, Powercor, TXU Australia, and United Energy

United Energy

New South Wales Government