



# **United Energy Ring fencing staff and office sharing registers**

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# 1. Introduction

In October 2017, the Australian Energy Regulator (**AER**) released its Ring Fencing Guideline Version 2 (**guideline**). The guideline seeks to prevent distributors from providing their affiliates operating in unregulated markets from having an unfair advantage.<sup>1</sup> The guideline includes provisions in the following three broad areas:

- cross-subsidisation—preventing distributors from using regulated revenues to subsidise activities in unregulated markets
- discrimination—ensuring distributors treat affiliates and third parties equally
- information sharing—providing electricity information to all parties on an equal basis.

To ensure United Energy (**us** and **we**) do not confer an unfair advantage on affiliates, we are required to publish staff sharing and office sharing registers.

In accordance with the guideline, certain staff are allowed to be used, or shared, by us and our affiliates. Staff must be included on the register if they are eligible to be shared for reason that they:

- do not have access to electricity information
- do not have opportunity, in performing their the roles, functions or duties of their position, to use electricity information to engage in discriminatory conduct
- are an officer for us and an affiliate.

The staff sharing register must include a description of the shared staff's positions, roles, functions and duties.

The guideline also allows certain offices to be shared. The office register includes a list of all offices where staff listed on the staff sharing register are located, offices where staff do not have access to electricity information and the location of staff that have access to electricity information but have no opportunity to use that information. Not all staff at the listed locations are shared.

The staff and office sharing registers will be periodically updated.

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<sup>1</sup> 'Affiliates' as used in this register refers to related electricity service providers as defined in the guideline.



## 2. Staff sharing register

The below register contains the positions and a description of the respective roles, functions and duties of shared staff.

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<b>Position</b>	<i>Chief Executive Officer</i>
<b>Description</b>	Manages, directs and is responsible for all company operations to achieve shareholder goals.
<b>Reason</b>	An officer of the business – s 4.2.2(d).

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<b>Position</b>	<i>General Manager Information Technology</i>
<b>Description</b>	Manages the IT programs and projects, service management, technology operations, operational systems, digital products and strategy and IT security functions.
<b>Reason</b>	An officer of the business – s 4.2.2(d).

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<b>Position</b>	<i>General Manager People, Culture &amp; Legal</i>
<b>Description</b>	Develops, delivers and manages policies, procedures and programs to support the delivery of Human Resources, Health and Safety, Knowledge and Process management, Industrial Relations, Learning Management, Payroll, and Remuneration and Benefits activities.
<b>Reason</b>	An officer of the business – s 4.2.2(d).

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<b>Position</b>	<i>General Manager Corporate Affairs</i>
<b>Description</b>	Leads and develops the Corporate Affairs team in the hands-on delivery of outcomes, builds and protects corporate reputation; reactive and proactive external affairs; internal communications and brand strategy, as well as providing strategic counsel to the Executive Management Team.
<b>Reason</b>	An officer of the business – s 4.2.2(d).

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<b>Position</b>	<i>Internal Communication Manager</i>
<b>Description/ distribution services</b>	Ensures effective implementation of internal communication plans and deliverables and provides a suitable communications framework to support the business needs.

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<b>Services to affiliates</b>	Internal communications are consistent across the businesses.
<b>Reason</b>	Internally focused staff cannot access systems with electricity information and could not confer any advantage to affiliates in performing their role. <sup>2</sup>

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<b>Position</b>	<i>Internal Communication Advisor</i>
<b>Description/distribution services</b>	Supports the Internal Communications Manager and the Head of Corporate Affairs in the effective delivery of the internal communications strategy. This role has ownership of the editorial strategy and ensures all communication activities are aligned to the internal communications framework to effectively support business needs.
<b>Services to affiliates</b>	Internal communications are consistent across the businesses.
<b>Reason</b>	Internally focused staff cannot access systems with electricity information and could not confer any advantage to affiliates in performing their role. <sup>3</sup>

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<b>Position</b>	<i>Chief Financial Officer</i>
<b>Description</b>	Directs, controls and administers financial activities, provides the Board of Directors, Chief Executive and Executive Management Team with financial assessments and information which will ensure planning and budgeting activities align with goals.
<b>Reason</b>	An officer of the business. <sup>4</sup>

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<b>Position</b>	<i>General Manager Regulation</i>
<b>Description</b>	Ensures the business interests are protected in government and regulatory areas and develops and leads network pricing reviews.
<b>Reason</b>	An officer of the business. <sup>5</sup>

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<b>Position</b>	<i>General Manager Strategy, Programs and Change</i>
<b>Description</b>	Oversees the successful delivery of a program of work, in accordance with the principles of project management, to achieve the agreed operational goals.

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<sup>2</sup> United Energy, Ring fencing compliance strategy, May 2017, p. 10; AER, Ring fencing guideline, October 2017, 4.2.2(b)(i)(a).

<sup>3</sup> United Energy, Ring fencing compliance strategy, May 2017, p. 10; AER, Ring fencing guideline, October 2017, 4.2.2(b)(i)(a).

<sup>4</sup> AER, Ring fencing guideline, October 2017, 4.2.2(d).

<sup>5</sup> AER, Ring fencing guideline, October 2017, 4.2.2(d).



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**Reason** An officer of the business.<sup>6</sup>

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### 3. Office register

As required by the guideline, table 1 contains a list of offices which may be shared with affiliates. The offices listed are those where the following staff are located:

- staff listed on the staff sharing register
- staff that do not have access to electricity information
- staff who have access to electricity information but do not have in performing their roles, opportunity to use that electricity information

Not all staff within these offices are shared.

**Table 1 Office sharing register**

Office class	Office location
Depot	Burwood
Depot	Mornington
Depot	Keysborough
Head Office	40 Market Street, Melbourne

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<sup>6</sup> AER, Ring fencing guideline, October 2017, 4.2.2(d).