



26 April 2013

Energy and Water Licence Compliance Policy
Independent Pricing and Regulatory Tribunal
PO Box Q290
QVB Post Office NSW 1230

ENERGY AND WATER LICENCE COMPLAINE POLICY

Alinta Energy Retail Sales Pty Ltd (**Alinta Energy**) welcomes the opportunity to comment on IPART's draft *"Energy and Water Licence Compliance Policy"*.

Alinta Energy is both a generator and retailer of electricity and gas in Western Australia and the Eastern States energy markets. It has over 2500MW of generation facilities and in excess of 700,000 retail customers, including around 100,000 customers in Victoria and South Australia. As an incumbent retailer in WA and a new entrant retailer in the National Energy Market, Alinta Energy is well placed to comment on the draft policy.

Alinta Energy supports the introduction of the National Energy Consumer Framework (**NECF**) in NSW and the attempts to harmonise licensing and compliance obligations in those jurisdictions yet to adopt the NECF. Until NSW adopts NECF, Alinta Energy believes every attempt should be made to ensure that licensing obligations and regulatory regimes (including compliance policies) reflect those contained in the NECF.

Uniform regulatory and compliance regimes allow retailers to recognise regulatory and compliance efficiencies, effectively manage risk and participate in markets with certainty, keeping costs down. Regulatory and compliance derogations should be avoided, as what may be considered to be a minor derogation can in fact result in significant costs to retailers to ensure systems and processes can meet differing obligations and requirements across jurisdictions. Costs that are ultimately passed on the consumers.

Should you have any questions or wish to discuss our submission further, I may be contacted on (02) 9372 2653, or via email: shaun.ruddy@alintaenergy.com.au

Yours sincerely

Shaun Ruddy
Manager National Retail Regulation