



2 November 2017

Christine Allen
Compliance and Enforcement Policy
IPART
PO Box K35, NSW 1240

Dear Ms Allen

RE: Draft Compliance and Enforcement Policy

APA appreciates the opportunity to comment on the Draft Compliance and Enforcement Policy released by IPART. APA is generally supportive of the new policy and understands IPART's desire to provide consistency in relation to its regulatory compliance functions. APA notes that this new policy will replace the 'Energy and Water licence compliance policy, July 2013'.

APA seeks further clarification on some sections of the policy as noted below.

1) Documented historical, current and emerging risks

APA seeks further clarification in regards to this register, specifically:

- will this be a publicly available register?
- will items on the register be shared with the relevant organisation in terms of emerging or current risks?

2) Publishing enforcement decisions

This section of the draft policy provides that IPART will '*consult with the regulated entity of the proposed media release*'. However, Section 3.5 of the Energy and Water licence compliance policy, July 2013 provided that '*IPART will endeavour to provide the authorisation holder concerned with one working days prior notification of media release, except in special circumstances or where warranted by the damage caused by a contravention*'.

APA believes the provision to endeavour to provide one working days prior notice should be maintained in the new policy.

If you require further information or wish to discuss this submission please contact Naomi Donohue at [REDACTED] or [REDACTED].

Sincerely

Naomi Donohue
Market & Regulatory Specialist, Power Assets
APA Group