



United Energy

Ring fencing staff and office sharing registers

15 January 2026



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1. Introduction

On 3 November 2021, the AER published the Ring-fencing Guideline Version 3 (**guideline**) and accompanying explanatory statement. United Energy must comply with this version from 3 February 2022. The guideline seeks to prevent distributors from providing their affiliates operating in unregulated markets from having an unfair advantage.¹ 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 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 comprises of a description of the shared staff's positions and the services they provide, the term of the sharing arrangement and the reason they may be shared.

We have also published a register showing which shared staff have moved to a new position within the business in the past 12 months and where their access to electricity information has changed.

The ring-fencing compliance strategy published on our website describes the access to, and way in which, shared staff use electricity information in performing their roles in more detail.

The guideline also allows certain offices to be shared. The office sharing register includes a list of all offices where staff listed on the staff sharing register may be located, or the location of staff that only have access to electricity information for the purpose of providing corporate services.² Not all staff at the listed locations are shared.

The staff and office sharing registers must be updated quarterly (by 15 January, 15 April, 15 July and 15 October of each year).

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

² AER, Ring fencing guideline version 3, November 2021, clause 4.2.4(a).



2. Staff sharing register

As required by the guideline, table 1 contains a list of offices which may be shared with affiliates.

The shared staff listed are those staff that:

- in the course of their duties: do not have access to electricity information
- have access to electricity information but do not have, in performing the roles, functions or duties of their staff position, any opportunity to use that electricity information to engage in conduct that is contrary to our obligations
- are located at a regional office.
- are an officer of both ourselves and an affiliate.

Table 1 Staff sharing register

| Staff Position Name | Staff Position Description | Term / Duration | Exemption / Waiver | Ring-fencing controls |
|--|--|--------------------------|-----------------------|---|
| Chief Executive Officer | | | | |
| Chief Financial Officer | | | | |
| Chief Information Officer | | | | |
| General Manager People Culture and Legal | | | | |
| General Manager Corporate Affairs | Officers of both ourselves and an affiliate. | Staff permanently shared | Clause 4.2.2(d) | Ring fencing training, information controls |
| General Manager Regulation | | | | |
| General Manager Electricity Networks | | | | |
| General Manager, Strategy and Customer Group | | | | |
| General Manager Energy Solutions | | | | |
| General Manager Service Delivery | | | | |
| Group Workplace Services Manager | Responsible for corporate and depot sites. | | | |
| Receptionist | Day to day running of these sites in regard to office space, refurbishments, general repairs, maintenance at the site, engagement with all business units, mail room, car parking, reception, cleaning, stock, security at site. | Staff permanently shared | Clause 4.2.2(b)(i)(a) | Ring fencing training, information controls |



As required by the guideline clause 4.2.4(a)iii, table 2 contains a list of staff members that have moved from a position referred to in the above table, to a new position within the past 12 months and where their access to electricity information has changed.

Table 2 Staff position change register

| Former position | New Position | Date commenced new position | Date to be removed from register |
|------------------------|---------------------|------------------------------------|---|
| NA | NA | NA | NA |



3. Office sharing register

As required by the guideline, table 3 contains a list of offices which may be shared with affiliates. The offices listed are those offices which may be shared because the staff:

- do not have access to electricity information
- have access to electricity information but do not have, in performing the roles, functions or duties of their staff position, any opportunity to use that electricity information to engage in conduct that is contrary to our obligations
- only have access to electricity information to the extent necessary to perform services that are not electricity services (such as general administration, accounting, payroll, human resources, legal or regulatory, or information technology support services); or
- are located in an office that is in a regional location.

Not all staff within these offices are shared.

| Office Location | DNSP Staff | RESP Staff | Ring-fencing controls | Exemption / Waiver |
|-----------------|---|-------------------------------------|---|--------------------|
| Melbourne | Finance IT Network Services People Culture and Legal Corporate Affairs Regulation Electricity Networks Strategy and Customer Group Service Delivery | Construction & Maintenance Services | Ring-fencing training, information controls and physical separation | 4.2.1(b)(i) |