

United Energy Ring-fencing Staff and Office Sharing Registers

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1 Introduction

On 27 February 2025, the AER published the Ring-fencing Guideline Version 4 (guideline) and accompanying explanatory statement. The guideline seeks to prevent distributors from providing their affiliates operating in unregulated markets from having an unfair advantage¹. 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 services². 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 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 4, February 2025, 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. 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
Receptionist				

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.

Table 3 Office sharing register

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)