

**CitiPower and Powercor
Ring-fencing staff and office
sharing registers
15 April 2024**

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1 Introduction

On 3 November 2021, the AER published the Ring-fencing Guideline Version 3 (**guideline**) and accompanying explanatory statement. CitiPower and Powercor 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 CitiPower and Powercor (**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 staff 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 to 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 Network Services				
General Manager People Culture and Legal	Officers to both ourselves and an affiliate	Staff permanently shared	Clause 4.2.2(d)	Ring-fencing training, information controls and physical separation
General Manager Corporate Affairs				
General Manager Regulation				
General Manager Energy Solutions				
General Manager Electricity Networks				
General Manager, Strategy and Customer Group				
Group Manager Protective Security Facilities Specialist	Responsible for corporate and depot sites.			
Facilities Coordinator	Day to day running of these sites in regard to office space, refurbishments, general repairs, maintenance, engagement with all business units, mail room, car parking, reception, cleaning, stock, security.	Staff permanently shared	Clause 4.2.2(b)(i)(a)	Ring-fencing training, information controls and physical separation
Facilities Technician				
Mail and Records Management Coordinator				
Security Guard				

Staff Position Name	Staff Position Description	Term / Duration	Exemption / Waiver	Ring-fencing controls
Contact Centre Manager Team Leader Contact Centre Call and resource analyst Customer Service Advisor Learning and Development Co-ordinator	Responsible for providing a 24/7 phone service for faults and emergencies reports, whilst also assisting customers with a wide range of general enquiries.	Staff permanently shared	Clause 4.2.2(b)(i)(b)	Ring-fencing training, information controls and physical separation

Source: CitiPower and Powercor

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 business in 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
General Manager, Strategy and Customer Group	General Manager, Corporate Affairs, Customer & Strategy Group	Q3 FY2023/24	End Q2 FY2024/25
Call and resource analyst	Team Leader Contact Centre	Q1 FY2024/25	End Q4 FY2024/25
Customer Service Advisor (several)	Document Controller, Maintenance Officer, Team Leader Contact Centre, Graduate - Corporate and Customer	Q1 FY2024/25	End Q4 FY2024/25

Source: CitiPower and Powercor

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 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 at 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
Ardeer	Finance Electricity Networks Strategy and Customer Group Network Services	Construction & Maintenance Services	Ring-fencing training and information controls	4.2.1(b)(iii)
Ballarat	People Culture & Legal Electricity Networks Finance Network Services Electricity Networks Strategy and Customer Group	Construction & Maintenance Services	Ring-fencing training and information controls	4.2.1(b)(iii)
Bendigo	People Culture & Legal Electricity Networks Network Services Electricity Networks	Construction & Maintenance Services	Ring-fencing training and information controls	4.2.1(b)(iii)

Office location	DNBP Staff	RESP Staff	Ring-fencing controls	Exemption / Waiver
	Strategy and Customer Group			
Geelong	Network Services Electricity Networks Finance People Culture & Legal Strategy and Customer Group Information Technology Regulation	Construction & Maintenance Services	Ring-fencing training and information controls	4.2.1(b)(i)
Kyneton	Network Services	Construction & Maintenance Services	Ring-fencing training, and information controls	4.2.1(b)(iii)
Melbourne	Chief Executive Officer Finance IT Network Services People Culture and Legal Corporate Affairs Regulation Electricity Networks Strategy and Customer Group	Construction & Maintenance Services	Ring-fencing training, information controls and physical separation	4.2.1(b)(i)
Mildura	Network services	Construction & Maintenance Services	Ring-fencing training and information controls	4.2.1(b)(iii)
Shepparton	Strategy and Customer Group Network Services	Construction & Maintenance Services	Ring-fencing training and information controls	4.2.1(b)(iii)

Office location	DNSP Staff	RESP Staff	Ring-fencing controls	Exemption / Waiver
	People Culture & Legal			

Source: CitiPower and Powercor