

Ms Naomi Menon
Director
Competition Exemptions
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

30 April 2025

Dear Ms Menan

Energy Networks Association Limited and others revised application for authorisation (AA100688-1)

The Australian Energy Council ('AEC') welcomes the opportunity to make a submission in response to the revised application, submitted by Energy Networks Association Limited (ENA), Synergy and others ('the Applicants'), for authorisation of certain conduct required to establish, and give effect to, national energy Public Key Infrastructure (PKI) for the management of Consumer Energy Resources ('the Proposed Authorisation').

The AEC is the peak industry body for electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. AEC members generate and sell energy to over 10 million homes and businesses and are major investors in renewable energy generation which is a part of the transition currently occurring in the industry. The AEC supports reaching net-zero by 2050 as well as a 55 per cent emissions reduction target by 2035 and is committed to delivering the energy transition for the benefit of consumers. The AEC and its members are strong supporters of protections that provide appropriate support for all customers and the need to ensure regulation is fit for purpose in the evolving energy market.

The AEC is supportive of the need to establish an entity for the procurement of PKI services and the supply of PKI services to support the integration of consumer energy resources (CER). We acknowledge the importance of a national approach to PKI for CSIP-Aus to support the implementation of emergency backstops, to reduce the need for bespoke solutions by individual networks, and for cyber security.

The AEC acknowledges the need for industry engagement and collaboration in support of this policy priority. The AEC supports the revised governance arrangements for the proposed not for profit company (NEPKI) and intends to nominate for a NEPKI Board Director position. We believe this would ensure that Market Participants, via AEC, can play a direct role in shaping this critical national infrastructure from the outset. The AEC is supportive of the Applicants' intent to provide for an open membership that will enable wide participation of industry and government at the membership level. We support the applicants' proposal to adopt a voting class distribution similar to AEMO's governance model.

Any questions about this submission should be addressed to Jo De Silva, General Manager Retail Policy by email to jo.desilva@energycouncil.com.au or by telephone on 03 9205 3100.

Yours sincerely,

Jo De Silva

Jo De Silva
General Manager Retail Policy