

20 February 2020



Mr Owen Pascoe
Director
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Mr Pascoe

EPR0079 Draft Rules to Implement Regulatory Sandbox Arrangements

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Commission (AEMC), on its consultation on the *Draft Rules to Implement Regulatory Sandbox Arrangements*. This submission is provided by Energy Queensland, on behalf of its related entities Energex Limited, Ergon Energy Corporation Limited, Ergon Energy Queensland Limited and Yurika Pty Ltd.

Energy Queensland agrees with the drafting of the proposed changes to the National Electricity Rules (NER), National Energy Retail Rules (NERR) and National Gas Rules (NGR) give effect to the Regulatory Sandbox toolkit outlined in the AEMC's Final Report on Regulatory Sandbox Arrangements to Support Proof-of-Concept Trials (Final Report) as endorsed by the Council of Australian Government Energy Council.

We note that Appendix A of the Final Report provides drafting instructions for amendments to the National Electricity Law (NEL), National Energy Retail Law (NERL) and National Gas Law (NGL) to confer additional functions on the Australian Energy Regulator (AER), empower the AER to grant trial waivers, and empower the AEMC to make trial Rules. It is understood that these amendments will be the subject of a separate consultation, which has not yet commenced.

We understand that the proposed changes to the NEL, NERL and NGL are required before the changes to the NER, NERR and NGR will be fully operational. As such, it would be prudent to commence consultation on the proposed changes to the national energy laws in a timely manner to ensure there is no delay in the commencement of the changes to the national energy rules.

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact myself or Barbara Neil on (07) 4432 8464.

Yours sincerely



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Manager Policy and Regulatory Reform

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