

24th May 2016
Attn: Alex Kroon
Markets & Regulation, Public Utilities Office
Department of Finance
Level 1, Albert Facey House,
469 Wellington Street,
Perth WA 6000

Dear Alex,

Further to our review of the Consultation Paper prepared by the Department of Finance, relating to Electricity Industry Exemption Order 2005 and Energy Coordination Exemption Order 2009 and the anticipated Amendments to electricity and gas on-selling licence exemptions, Psaros Group welcome this important initiative and wish to strongly endorse all amendments as summarised on page 10 of the Consultation paper.

More specifically, we agree to the following summarized amendments:

1. Clause 4 of the Electricity Exemption Order and clause 5 of the Gas Exemption Order are amended to exempt a third party providing electricity or gas supply services on behalf of a commercial on-seller from the requirement to hold a transmission/distribution/retail licence (electricity), or distribution licence (gas).
2. Clause 5 of the Electricity Exemption Order and clause 4 of the Gas Exemption Order are amended to exempt a third party providing electricity or gas supply services respectively on behalf of a residential on-seller from the requirement to hold a transmission/distribution/retail licence (electricity), or distribution/trading licence (gas).
3. The definition of 'commercial premises' in the Electricity Exemption Order and Gas Exemption Order is amended to include premises used for business or general purposes.
4. A new gas trading licence exemption is granted to allow a person to on-sell gas on commercial premises that it has control or management of (it will also allow a third party to operate under this licence exemption on behalf of the on-seller).
5. All existing electricity and gas on-selling licence exemptions (and the proposed new gas licence exemption in recommendation 4) include a condition that the on-seller must provide its customer with billing information, which must include information that clearly sets out the quantity and price of electricity/gas supplied to the customer and the fees and charges payable by the customer for the provision of electricity/gas services.

Following the submission period closing and the Public Utilities Office considering submissions received, we look forward to a positive recommendation to the Minister for the request for amendments to the electricity and gas on-selling licence exemptions and that these recommendations will be expeditiously submitted for granting by the Governor.

Regards

George Ventouras
Director of Development
Psaros Project Management Pty Ltd