

5 March 2021

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Sarah Sheppard
Executive Director (acting)
Energy Sector Reform
Department of Environment, Land, Water and Planning Organisation]
Nicholson Street Melbourne

Dear Sarah

Re: Regulating electricity connections for new housing developments Consultation paper

Thank you for the opportunity to comment on the Regulating Electricity Connections for New Housing Developments Consultation paper.

The VPA is supportive of effective and streamlined measures to improve the timeliness of electricity connections in Greenfield development areas and in doing so, contributing to swifter development approvals and delivery of housing and jobs.

The VPA does not have a particular view on whether the Minister for Energy, Environment and Climate Change should exercise her Powers to regulate timeframes for these connections under the Energy Legislation Amendment (Licence Conditions) Bill 2020.

We do, however, have a small number of suggestions and observations (see table 1 over page) and trust that these may assist with your deliberations.

For further information or to discuss any aspect of our submission, please contact Paul Cassidy, Director Streamlining on 0414 015 916 or paul.cassidy@vpa.vic.gov.au

Yours sincerely



RACHEL DAPIRAN
EXECUTIVE DIRECTOR INFRASTRUCTURE, STRATEGY AND PLANNING

CC Cheree Marchant - Policy Officer | Energy Institutions and Regulations

TABLE 1 – SPECIFIC VPA FEEDBACK

| Page / Section | Issue | Suggestion / Recommendation |
|--------------------------------------|--|---|
| Pg 2 / para 2 | States that the negotiated connection stages include stages 1-6 which is at odds with the following table which correctly excludes stage 1 (Precinct Structure Planning) | Revise text to stage 'stages 2-6' |
| Pg 5 / para 1 (following dot points) | Different proposed regulated timeframes | If regulation is to occur, it is suggested that it should be a common standard for the particular class of development (i.e. greenfields) across all distribution businesses. (therefore, if CitiPower were ever to be involved in a Greenfield development they would be captured, but they would not be if they are not involved) this approach would ensure that the regulation is setting based and not entity based. |
| Pg 7 / para 1 | CitiPower does not have greenfield residential sites | See above |
| Pg 7 / para 3 | Regulated timeframe based on maximum no. of days to complete a stage rather than an average. | As a suggested alternative, timeframes could potentially be designed to set a maximum no. of business days for distribution businesses with annual housing volumes below a certain level and an average for those with volumes above a certain level. |
| Pg 9 / para | Exceptions for delays caused by a developer's contractor failing to meet certain standards. | This could be a valid consideration however it is suggested that it would need to be carefully drafted to ensure that it doesn't become an easy 'stop the clock'. |