



27 April 2023

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Mr Jim Betts  
Secretary  
Department of Infrastructure, Transport, Regional Development,  
Communications and the Arts  
GPO Box 594  
Canberra ACT 2601  
Attention: Director, Postal Policy—Communications Services and  
Consumer Division

Submitted via email to: [postalconsultation@infrastructure.gov.au](mailto:postalconsultation@infrastructure.gov.au)

Dear Mr Betts

### **Postal Services Modernisation Consultation**

This submission is made jointly by the five electricity businesses licensed to distribute electricity in Victoria: AusNet Electricity Services (**AusNet**), Jemena Electricity Networks (**Jemena**), and CitiPower, Powercor and United Energy (**CPPCUE**) (together, the **Electricity Distributors**).

The Electricity Distributors appreciate the vital postal services provided by Australia Post to our customers across the state, especially to regional areas where customers rely more heavily on mail services. The Electricity Distributors are responsible for delivering energy to more than 3.1 million Victorian households and businesses. Our crews are continually undertaking repairs, replacements and augmentations to our respective electricity distribution networks to maintain a reliable electricity supply to our customers.

To perform these works, the Electricity Distributors are required to interrupt customers' electricity supply from time to time, called a 'planned outage'. Every year, the Electricity Distributors undertake over 25,000 planned outages across Victoria affecting approximately a million customers. Before we can interrupt supply, the Victorian regulatory framework requires us to give our customers at least 4 business days' written notice of the planned interruption. In many cases, the only way we can do this is by using a hard copy letter sent by post. If the timeline is not met, we must cancel the planned outage. Cancellations are expensive and delay important network maintenance and repairs.

Timely delivery of the notifications we send by post is a critical part of the process. Australia Post's existing 4 business day delivery timeframe means we have to allow a notification lead time of up to 8 business days. Any increase in Australia Post's guaranteed delivery timeframes beyond 4 business days will make it more difficult for us to plan works, especially planning outages around inclement and severe weather events that are typically more time sensitive.

The regulatory obligations that apply to us require the customer to provide their explicit informed consent (**EIC**) to opt-in to electronic, written communications (e.g., email and SMS). Efforts to date to have customers opt-in to electronic notifications have resulted in very low take-up rates. We therefore depend heavily on Australia Post to meet these obligations.

We expect there are other businesses in other sectors that are similarly affected by longer guaranteed mail delivery timeframes, and we urge Australia Post to consider the impact of its proposed changes on these businesses and the sectors more generally.

If you have any queries in relation to this submission, please do not hesitate to contact [REDACTED], Manager Compliance (Acting) from AusNet at [REDACTED]

Yours sincerely

[REDACTED]

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