



Our Ref: 18786054  
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30 November 2018

Economic Regulation Authority  
PO Box 8469  
PERTH BC WA 6849

Dear sir or madam

### **INQUIRY INTO REFORM OF BUSINESS LICENSING IN WESTERN AUSTRALIA**

Synergy welcomes the opportunity given by the Economic Regulation Authority (**ERA**) to participate in the above inquiry. As Western Australia's largest licensed generator and energy retailer Synergy has a strong interest in licensing frameworks and arrangements.

Synergy provided its submission to the ERA detailing opportunities for license improvement on 3 April 2018.

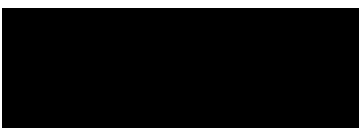
In relation to the ERA's recent request for feedback on its recommended licensing scheme reforms Synergy is supportive of the six proposals for change.

Synergy also advocates the ERA address the following:

1. When the state government introduces new or modifies existing licensing legislation it should also include within the relevant legislation licensing objectives that can be measured and assessed. This is critical to determine whether a particular licensing regime is effective or not.
2. Wherever possible energy licensing should be outcome based and not prescriptive.
3. Where state government agencies are responsible for administering licensing frameworks they should have a statutory obligation to ensure licensing costs are efficient.
4. In the event the state government adopts the ERA's licensing recommendations then the ERA should also be subject to those recommendation in terms of implementing recommendations 1, 2 and 4 and be subject of coverage under recommendation 6.

Please contact me should you wish to discuss the above matters further.

Yours sincerely,



**SIMON THACKRAY**  
**MANAGER REGULATION AND COMPLIANCE**