
Addendum – Ausgrid’s Climate Resilience Business Case

Submission to the Australian Energy Regulator *Issues Paper: Ausgrid Electricity
Distribution Determination 1 July 2024 to 30 June 2029*

Consumer Challenge Panel
Sub-panel 26

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1. Executive Summary

Ausgrid's Climate Resilience Business Case (Business Case) has been shaped by an ambitious and novel customer engagement program.

Many aspects of Ausgrid's engagement activities have been exemplary. This includes Ausgrid's genuine desire to listen to its customers and empower them, its continuing constructive relationship with the Reset Customer Panel (RCP), the granular and local focus of its engagement and its transparent and accountable approach to engagement. The deliberative model adopted by Ausgrid has also enabled constructive and rich community insights to emerge, particularly where the material was easily accessible and relatable.

The three proposed Local Government Area (LGA) resilience expenditure packages (Central Coast LGA: \$68.7m; Lake Macquarie \$40.4m; Port Stephens LGA: \$19.7m) received super-majority support (>80%) from each LGA forum. Ausgrid adopted these LGA packages in their entirety in its Business Case.

The RCP has indicated its broad support for the proposed LGA expenditure on the basis of Ausgrid's deep engagement with local communities, although it has also flagged that it believes there is scope for Ausgrid to improve the efficiency of the proposed community resilience solutions.¹ The RCP has indicated its support for the Whole of Network (WON) resilience expenditure package (\$47.7m), although it has identified some concerns about the proposed Spreader Bar and Vegetation Management programs.²

The Voice of Community (VOC) 2023 did not endorse the proposed LGA or Whole of Network (WON) resilience expenditure in its totality, although there is clearly strong support for some resilience expenditure, with a slight preference towards funding WON solutions. A range of views were expressed about the willingness of the community to fund the proposed resilience expenditure.

There are, nevertheless, aspects of the engagement program that concern the Consumer Challenge Panel Sub-panel 26 (CCP26), including:

- The significant over-representation of people with lived experience of extreme weather events in the LGA engagement which was likely to have affected engagement outcomes.
- The lack of the right, and sufficient, information to participants about proposed resilience solutions, including details of the planned activity and the specific customer resilience outcomes associated with each proposed solution.
- The relatively late introduction of the concept of the 'risk of paying twice', as well as the adequacy of the traffic light rating to communicate the weather-related risks of ex-ante network resilience investment.
- The appearance that other resilience actors were not involved in the development of the proposed resilience expenditure.

¹ RCP Report, p5

² RCP Report, p5

We note that Ausgrid applied three models which provided inputs to the engagement process. If these models were to be materially changed, the validity of the engagement outcomes could be called into question. We also note that the LGA engagement and VOC 2023 did not specifically consider whether proposed expenditure items may in fact be addressed through existing reliability obligations or BAU expenditure programs.

2. Background

Ausgrid undertook a range of resilience-related engagement activities to inform its Business Case, which was submitted to the AER on 14 July 2023. The CCP26 observed a sample of the LGA and VOC 2023 workshops³ (see annexure 1), a sample of the pre-lodgement engagement (see CCP26 Submission) and one meeting between Ausgrid and the RCP on 31 March 2023. We have reviewed the material submitted to the AER in support of the Business Case. Ausgrid's Business Case identifies engagement with commercial and industrial customers but, as the CCP26 did not have any exposure to this work, it is not considered in this advice.

This *addendum* to our May 2023 submission provides the CCP26's advice on the effectiveness of Ausgrid's resilience-related engagement activities and how consumer preferences are reflected in the Business Case. We have considered the engagement expectations set out in the AER's *Better Resets Handbook* and the engagement expectations of the AER's *Network Resilience Guidance Note* (Guidance Note).

3. Effectiveness of the LGA engagement

Ausgrid's LGA engagement involved a series of three workshops with 30 community members in each of the Port Stephens, Lake Macquarie and Central Coast LGAs. BD infrastructure states that:

"[Each group] was tasked with developing a package of resilience responses that were right for the area, and which they felt was fair for all customers to pay"⁴.

The CCP26 formed the view that Ausgrid was genuine in its desire to consult with local communities. The series of three workshops included 2 all-day in-person workshops located in each of the LGAs, and one online workshop. The workshops were well attended by Ausgrid staff and members of the RCP. It was clear to the CCP26 that Ausgrid and its engagement partners had thought deeply about how to craft an engagement program that allowed community members to explore their needs before considering how to best meet them. We observed some community members who were initially sceptical or suspicious develop trust in the process over the course of the three workshops.

Ausgrid used a deliberative engagement model. BD infrastructure explains that deliberative processes "have been found to broaden participation, enable a more informed conversation, produce more sensible recommendations (including on tough issues) and lead to greater

³ BD Infrastructure was Ausgrid's engagement provider for these processes

⁴ BD Infrastructure, p9

public trust in an organisation’s decision”. The CCP26 observed that the most robust deliberations occurred during the in-person workshops, and when the material was easily relatable to the participants. On these occasions we observed a diversity of views expressed and respectfully considered by participants. The online LGA workshops, on the other hand, used some technology and framing devices that were difficult for some participants to use and comprehend.

There is also evidence that the RCP continued to partner closely with Ausgrid in the LGA engagement. We observed some RCP members involved directly in the LGA workshops, for example presenting to participants, interacting with participants during group discussions and helping to navigate potential roadblocks. The RCP report confirms that it was involved in the engagement design process with representatives on the Engagement Stakeholder Working Group and that Ausgrid was willing to seek advice from the RCP.⁵ The RCP concludes that it was “satisfied that the proposed engagement methodology was sufficiently robust when engagement began in February 2023 and that suitable adjustments were made during the engagement process to continue our confidence in the engagement”⁶.

Ausgrid is also to be commended for the transparency and accountability of its LGA engagement. Over the course of the three workshops, participants were provided with opportunities to review the outputs of their previous workshops and there was plenty of time allocated to allow participants to ask questions and discuss the material. BD Infrastructure’s engagement report provides an objective and robust account of the engagement that took place. All of the LGA engagement materials have been made available to the CCP26.

a. Concerns about the effectiveness of the LGA engagement

The CCP26 has a range of concerns about the effectiveness of Ausgrid’s LGA engagement which are explored below.

Was the sample sufficiently representative?

The community participants included a good mix of gender and age, although younger people were underrepresented.⁷ However, between 85% to 95% of the community members in the LGA processes had lived experience of extreme weather events, despite the target sitting at 50%.⁸ Many of these participants were still dealing with trauma arising from their experience of extreme weather events.⁹

People with lived experience of extreme weather have an important perspective on the costs and benefits of resilience related expenditure. It is important that this perspective is included in any resilience-related engagement as part of a balanced, representative sample of the community.

⁵ RCP Report, p21

⁶ RCP Report, p21

⁷ BD Infrastructure Report, p11

⁸ BD Infrastructure Report, p11

⁹ See BD Infrastructure p5 and RCP Report p14

The over-representation of people with lived experience of extreme weather events is not addressed in the Business Case or its supporting materials.

The CCP26 considers that the over-representation of people with lived experience of extreme weather events in Ausgrid's LGA engagement is likely to have affected the engagement outcomes.

Were participants equipped with the right, and sufficient, information?

The CCP26 queries whether participants were equipped with sufficiently detailed and robust information about expenditure items as they constructed their LGA packages in workshop 3.

To be clear, we do not suggest that meaningful deliberations between participants did not occur. Participants were involved in deliberations that rejected some items, and altered others, while some items, particularly those that were easily relatable, were discussed at length.

Our concerns include:

- Participants had minimal information about the likely specific customer outcomes of the proposed item. For example, the benefits associated with each item were limited to a descriptor such as “helps during an outage”, the number of customers who would benefit and which of the LGA's 3 goals it would meet. For example, the Central Coast network solution to reduce outage time and frequency was described as benefiting 58,000 people but did not provide any more specific information on the nature of that benefit (see Box 1 below).
- The effectiveness rating of the LGA resilience solutions was not included in workshop 3, when the final package was determined. (This information was provided in workshop 2.)
- The proposed network items lacked substantive detail. For example, the proposed network solution for Port Stephens was described in terms of its constituent elements i.e. the number of kilometres of line to be undergrounded, the number of sectionalisers included, the length of covered conductor to be installed and the approximate number of critical services served by the proposed infrastructure, rather than the detail of where and when the items would be deployed. Several maps showing examples of possible network solutions were provided “for demonstration purposes only”.
- Some of the proposed non-network items did not appear to be well-developed. For example, in the Central Coast workshop, the “Local safety and outage messaging” item proposed to fund new text message services, some of which already existed (which was subsequently clarified during the deliberation).
- Some network solutions, including very costly solutions, were not subject to meaningful debate and deliberation (see Box 1 below).
- The absence of experts, independent of Ausgrid, who participants could readily turn to for independent advice.

Box 1 – Central Coast Network solution

The “Network solutions to reduce outage time and frequency for the most customers”, is the highest cost item (\$37.64m) in the Business Case. When the Central Coast LGA participants deliberated on this item they were provided with the following pieces of information about the proposed expenditure:

- it would provide benefit to about 58,000 customers
- Outcome: “Most customers” (benefit most customers with solutions that impact everyone)
- a red rating for the risk you could pay twice
- indicative areas (mapped) for resilience network expenditure
- A statement that Ausgrid’s modelling indicated that a mixture of reclosers and covered conductor are the most effective solutions for Central Coast. Ausgrid will continue to review and add additional solutions if required.
- An indicative example mapped

There was no substantive discussion of the proposed solution and the participants immediately voted, with the solution achieving a super-majority (>80%) support.

The CCP considers that, at a minimum, Ausgrid ought to have provided modelling about the nature of the benefit flowing to customers i.e., what reduction in outage time and frequency should those 58,000 customers expect to see?

Were other resilience actors meaningfully involved in areas of shared responsibility?

NSPs are expected to work collaboratively with other responsible entities involved in disaster management to understand what the communities’ genuine needs are to plan and prepare for, as well as recover from, a natural disaster. The AER is also interested in the degree of input these stakeholders have had in developing the proposed resilience-related expenditure.¹⁰

Ausgrid has outlined its alignment with other resilience actors in Appendix B of its Business Case and summarises its engagement with them as follows:

Ausgrid invited other resilience actors to contribute to and participate in our LGA workshops (Councils, NBN, Telstra, Optus, Hunter Water, NSW Reconstruction Authority). We are actively working towards strengthening our partnerships with these entities by agreeing to memorandum of understandings.¹¹

The RCP notes that Local Council involvement in the LGA workshops varied across the three LGAs, with only Port Stephens Council willing and able to have staff observe the forums.¹² The RCP also notes that resilience actor representatives were invited to attend as observers and only contributed at the facilitator’s request.¹³ There were very few other resilience actors who took up Ausgrid’s invitation to observe its LGA engagement.¹⁴ We observed the small number of resilience stakeholders attending the LGA workshops make contributions when requested.

¹⁰ Guidance Note

¹¹ Ausgrid Business Case, p10

¹² RCP report, p27

¹³ RCP report, p28

¹⁴ See RCP Report, p28 and Business Case, p71

Overall, the CCP26 formed the view that Ausgrid is still establishing its collaboration with other resilience actors in the three LGAs. It does not appear that other resilience actors were involved in the development of the proposed resilience expenditure.

Do the proposed solutions reflect Ausgrid's role?

LGA workshop participants appeared to have a good sense about Ausgrid's role in disaster preparedness and recovery. BD Infrastructure explains that:

To help participants understand what Ausgrid should do vs what others (including community) are responsible for, we presented the LGA groups with diagrams of what about resilience Ausgrid could influence compared to other players in the system.¹⁵

However, we also observed that workshop participants didn't feel constrained by this and, in specific situations, were willing to support Ausgrid taking a more expansive role where there was a clear community need (see Box 2 – Community Resilience Plan in the Central Coast LGA).

Box 2 – Community Resilience Plan in the Central Coast LGA

Last year the Central Coast council was dismissed, and an administrator was appointed following a report into financial management. The participants in the Central Coast LGA workshop expressed their frustration with their Local Council. The Business Case notes that Central Coast Council staff had reservations about attending the workshops in part because of "community tensions resulting from Central Coast Council's recent challenges and status in administration"¹⁶ although it goes on to note that council staff were willing to engage with Ausgrid.

The CCP26 observed a prevailing view in the LGA Workshop 3 that the council hadn't progressed as it ought to have on resilience-related issues. Participants felt that council should have done this work but hadn't.

While the Central Coast LGA participants were well informed about the respective roles of Ausgrid and council in the development of a Community Resilience Plan, they nevertheless expressed a strong preference for Ausgrid to take on this piece of work.

The RCP has stated that Ausgrid needs to take a supporting role in the development of this plan as it is not the best placed entity to drive the development of an integrated community resilience plan.¹⁷

This is a relatively new engagement expectation and as such, the CCP26 offers the following insights:

¹⁵ BD Infrastructure Report, p21

¹⁶ Ausgrid Business Case p 71

¹⁷ RCP Report p54

- Without strong collaboration with other resilience actors, there is a real risk of the community paying twice for resilience-related solutions across areas of shared responsibility. For example, the community may end up paying for a solution once as an electricity customer and again as a ratepayer. We see this as a particular risk for activities aimed at helping communities prepare for extreme weather events.
- Where resilience obligations are shared with other actors, the community should be able to express its preferences for resilience-related solutions that sit outside a DNSP's remit. In these instances, the best role for a DNSP may be limited to advocating for other resilience actors to fulfil their roles in order to best meet community needs.
- Non-network resilience expenditure should be able to demonstrate its integration with Local Emergency Management Plans, including through collaboration with the Local Emergency Management Committee, and any other relevant disaster management protocols, particularly for activities that aim to support the community's recovery from a natural disaster.

Were the weather risks adequately explored?

NSPs are expected to:

engage with their consumers on how its ex-ante funding proposal will ensure any risks to manage extreme weather events are allocated efficiently between consumers and businesses. Businesses should also demonstrate that the proposed project/program does not make consumers worse off by bearing the risk to manage weather uncertainties twice. It would not be in consumers' interest to be funding a business's recovery of actual costs from an unpredictable event (i.e. through a cost pass through) as well as funding the same risk up-front in a business's revenue proposal)¹⁸

Ausgrid state that they have "been clear with all customers that the risk of paying twice exists and have provided them with a high-level indication of the degree of risk for each solution discussed"¹⁹.

In Workshop 3, Ausgrid introduced, and took time to explain, its traffic light rating for the risk of paying twice. This simple signal appeared to be understood by some participants and featured in some of the participant deliberations that we observed. Early workshops, including those which discussed the costs, benefits and effectiveness of ex-ante network solutions, did not feature this risk-rating system and did not communicate the risks associated with managing weather uncertainties in any other way.

The CCP26 is not satisfied that the traffic light rating tool conveys the full magnitude of the risk trade-off articulated in the Guidance Note. The risk of managing weather uncertainties with ex-ante network investment extends beyond the risk of customers' paying a second time in the event of a cost-pass through event. It also includes the risk of paying for assets

¹⁸ AER Guidance Note, p12-13

¹⁹ Ausgrid Business Case p10

that do not deliver the promised benefits to customers if weather events do not strike as anticipated. We consider that the uncertainty associated with benefits, as well as the uncertainty associated with cost, should form part of an informed conversation with customers about ex-ante network resilience investment.

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4. Effectiveness of the VOC 2023 (resilience-related) engagement

The VOC 2023 met initially online, then in two full-day in-person workshops (in April and June 2023) in each of the two locations (Sydney and Newcastle). The resilience-related matters dealt with by the VOC 2023 included:

- Exploring and providing feedback on resilience spend, in particular the whole of network solutions and
- providing views on the community's willingness to pay for proposed resilience expenditure on LGA packages and whole of network (WON) solutions.²¹

Ausgrid selected 101 people for the VOC23, and 86 people attended the sessions.²² The diversity of Ausgrid's customer base was well-represented in the people selected for the VOC 2023, with a good mix of gender, age and geography. The geographic mix also reflected the range of exposure to climate risk, as well as the potential to directly benefit from the LGA specific expenditure.²³ The participants included a fair mix of people continuing from the VOC 2022 and new participants.

Developing the WON package

After a session on resilience needs, the VOC 2023 participants were presented with a range of WON resilience solutions, including network and non-network solutions. Participants had a strong sense of what resilience activities they did not see as Ausgrid's role. They were

²⁰ Ausgrid Business Case, p72

²¹ BD Infrastructure Report, p15

²² BD Infrastructure Report, p13

²³ Ausgrid Business Case, p127

quick to rule out items that they felt were outside Ausgrid's role and that Ausgrid should be "sticking to the knitting".

As with the LGA engagement, the information provided to participants about the proposed solutions was very high level, with little information about the tangible customer outcomes of the expenditure. The only information that participants received about the impact of each proposed solution was an indication of one or more of: "fewer outages", "shorter outages" and/or "welfare support". The cost of the proposed solution was generally an indication of one of: "Higher", "Lower" or "to be decided".

Participants were asked to identify their two highest priority and two lowest priority solutions. The top ranked items were included in the WON package, with Ausgrid adding two additional "non-negotiable" items. Some top rated 'high priority' solutions also received votes as the lowest priority solution. For example, despite receiving an equal number of 'high priority' and 'low priority' votes, "Strategic vegetation management" was included in the WON package.

Unlike the LGA engagement process, items did not have to meet a supermajority of 80% support to be included in the WON package. This was a very simple process that didn't incorporate any trade-off discussions. Nor did the process give participants the opportunity to remove items from the package.

There were no resilience partners observing or participating in the VOC 2023 workshops. We did not see any evidence that other responsible entities involved in disaster management had helped to establish the WON community needs or scope the development of the WON solutions.

Ausgrid introduced its traffic light rating for the risk of paying twice in workshop 2, when the focus shifted to customers' willingness to pay for the WON package and the LGA packages. Prior to this, the risks associated with ex-ante network investment to manage extreme weather risks had not been explored with the group.

Assessing customers' willingness to pay

The engagement was well structured to facilitate constructive and diverse deliberation between participants. We observed participants' having difficult conversations and bringing their perspectives to the process. BD infrastructure described the robustness of the VOC 2023 workshop 2 deliberations as follows:

This rich quantitative and qualitative feedback provides highly nuanced views from a diverse range of customers who have clearly wrestled with the benefits/cost trade-off.²⁴

The willingness to pay activities in workshop 2 were strongly situated within an affordability context. Participants were encouraged to consider the needs of the wider community in

²⁴ BD Infrastructure Report, p24

their deliberations. In Sydney, the discussion was also foregrounded by a session to help participants reflect on what life was like for other people.

The VOC 2023 willingness to pay resulted in a wide range of views being expressed and the CCP26 considers that the exercise enabled the breadth and depth of these complex considerations to be fully explored.

Ausgrid note that the most common response provided by VOC2023 participants when asked ‘How much of the proposed investment are you willing to pay for?’ was 100%. Ausgrid states:

The VOC Panel expressed a high level of comfort with our proposal in their voting for the packages (quantitative data) and in verbatim comments (qualitative data)²⁵

BD Infrastructure consider that the overall level of comfort with the proposal is reflected in the average level of spend from the participant ‘willingness to pay vote’ as follows²⁶:

Lake Macquarie LGA package	Central Coast LGA package	Port Stephens LGA package	WON solutions package
70%	73%	73%	83%

The RCP notes that Ausgrid’s approach to evaluate willingness to pay is nuanced and believes the results will be much more useful to the AER when it is seeking to understand what is important to Ausgrid’s customers around resilience, what they value and how they reached their conclusions.²⁷

A range of views were expressed about the willingness of the community to fund the proposed resilience expenditure. The VOC 2023 did not endorse the proposed LGA or Whole of Network (WON) resilience expenditure in its totality, although there is clearly strong support for some expenditure, with a slight preference towards funding WON solutions.

5. Effectiveness of the Pre-lodgement resilience-related engagement

There were two key outcomes of Ausgrid’s pre-lodgement engagement activities that have shaped the Business Case:

- The ‘customer-nominated’ cap of \$204m, with a mix of capex and opex solutions
- The criteria for targeting local resilience expenditure²⁸

The CCP26’s earlier submission raised a range of concerns about the validity of some of Ausgrid’s pre-lodgement engagement. For example, we noted that just 15 people (one third of the VOC 2022 participants) were involved in the October workshop that established the

²⁵ Ausgrid Business Case, p42

²⁶ BD Infrastructure Report, p8

²⁷ RCP report, p16

²⁸ Ausgrid Business Case, p39

criteria for targeting local resilience expenditure and provided feedback on the expenditure cap.

While we agree that the pre-lodgement engagement did settle on \$204m as a figure that the community was prepared to support for resilience-related expenditure, the CCP26 is not comfortable with Ausgrid's characterisation of this as a 'customer-nominated' cap. We understand that the \$ figure was developed by Ausgrid, who then sought customer views on its appropriateness through its VOC recall and Townhall engagement.

The Guidance Note engagement requirements did not feature during the pre-lodgement engagement. As such, community members consulted as part of those processes did not consider the risks associated with ex-ante network resilience expenditure. Specifically, the concept of a 'risk of paying twice' was not introduced during the 2022 engagement.

6. The incorporation of consumers preferences in the Business Case

The LGA and VOC 2023 engagement processes have played a central role in shaping Ausgrid's Business Case.

BD Infrastructure has described the engagement as occurring at the "collaborate" level of the IAP2 spectrum²⁹. The RCP has congratulated Ausgrid for deciding to "empower its customers to shape its whole resilience investment program (other than the \$500k for climate modelling)"³⁰. Operating at the upper end of the IAP2 spectrum puts a great deal of trust in public participation.

The LGA packages were almost entirely determined by the community representatives. Ausgrid did directly influence some aspects of the package (e.g. the Ausgrid liaison officer was requested to be included by Ausgrid in order to enact other aspects of the package). The VOC 2023 played a more constrained role in designing the WON package and two "non-negotiable" items were included by Ausgrid.

It is less clear that the willingness to pay preferences expressed by the VOC 2023 have been incorporated into the Business Case. The VOC 2023 did not deliver resounding support, for example in the form of a super majority, to proceed with the full package. No changes were made to the LGA or WON packages in response to the results of the VOC 2023 willingness to pay engagement.

7. Other factors to consider

A. Ausgrid's Business Case was informed by Risk Frontier's Climate impact assessment, KPMG's Climate resilience CBA model and Ausgrid's Local Network Solutions Model. The outputs of these processes also provided critical inputs into the LGA engagement and VOC 2023. A material change to the outputs of any of these models as they apply to

²⁹ BD Infrastructure Report, p20

³⁰ RCP Report, p37

either the LGA or WON engagement may challenge the validity of the engagement outcomes.

- B. The LGA and VOC 2023 engagement processes did not examine whether, or to what extent, the resilience solutions proposed by Ausgrid may in fact be addressed through existing reliability obligations or BAU expenditure programs. For example, the Build Back Better Program and the Local Safety Outage Messaging solutions both appear to be extensions of programs of work that are already underway. It may be that some of the activities for which the community expressed strong support may be undertaken by Ausgrid out of BAU funding.
- C. The objective of the Business Case is to “maintain overall climate risk to 2050 in line with existing levels”³¹. Ausgrid has not tested what level of climate risk the community is willing to bear, nor considered how those preferences may change over time. Australian communities will face difficult choices in the future about how to best manage the impacts of climate change beyond electricity network infrastructure.

³¹ Ausgrid Business Case, p3

Annexure 1

Ausgrid Resilience Engagement activity	Date	Location	CCP observer
LGA workshop 1	Sat 25 February 9am - 5pm	Lake Macquarie	-
	Sun 5 March 9am - 5pm	Port Stephens	-
	Sat 4 March 9am - 5pm	Central Coast	Elissa Freeman
Voice of Community (VOC) Meet & Greet	Wed 22 March 6pm - 9pm	Online	-
LGA workshop 2	Thurs 23 March 5pm - 9pm	Port Stephens - online	Robyn Robinson
	Wed 29 March 5pm - 9pm	Central Coast - online	Elissa Freeman
	Thurs 30 March 5pm - 9pm	Lake Macquarie - online	Mark Henley
LGA workshop 3	Sat 20 May 9am - 5pm	Port Stephens	Robyn Robinson
	Sat 27 May 9am - 5pm	Central Coast	Elissa Freeman
	Sun 28 May 9am - 5pm	Lake Macquarie	-
VOC Regional Forum – Day 1	Sat 1 April 9am - 4pm	Hunter Valley + Central Coast	Elissa Freeman
	Sat 29 April 9am – 4pm	Sydney	Elissa Freeman
VOC Regional Forum – Day 2	Sat 17 June 9am - 4pm	Hunter Valley + Central Coast	-
	Sat 24 June 9am - 4pm	Sydney	Mark Henley