Final Decision

Ausgrid Electricity Distribution Determination 2024 to 2029 (1 July 2024 to 30 June 2029)

Attachment 12
Customer Service Incentive Scheme

April 2024



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1	30 April 2024	18

List of attachments

This attachment forms part of the AER's final decision on the distribution determination that will apply to Ausgrid for the 2024–29 period. It should be read with all other parts of the final decision.

As a number of issues were settled at the draft decision stage or required only minor updates, we have not prepared all attachments. The final decision attachments have been numbered consistently with the equivalent attachments to our draft decision. In these circumstances, our draft decision reasons form part of this final decision.

The final decision includes the following documents:

Overview

Attachment 1 – Annual revenue requirement

Attachment 2 - Regulatory asset base

Attachment 4 – Regulatory depreciation

Attachment 5 - Capital expenditure

Attachment 6 - Operating expenditure

Attachment 7 – Corporate income tax

Attachment 12 – Customer service incentive scheme

Attachment 13 - Classification of services

Attachment 14 – Control mechanisms

Attachment 15 – Pass through events

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12 Customer Service Incentive Scheme

The Customer Service Incentive Scheme (CSIS) is designed to encourage electricity Distribution Network Service Providers (DNSPs or distributors) to engage with their customers and provide customer service in accordance with their preferences. The CSIS allows us to set targets for DNSP customer service performance and require DNSPs to report on performance against those targets. Under the CSIS DNSPs may be financially rewarded or penalised depending on how they perform against their customer service targets.

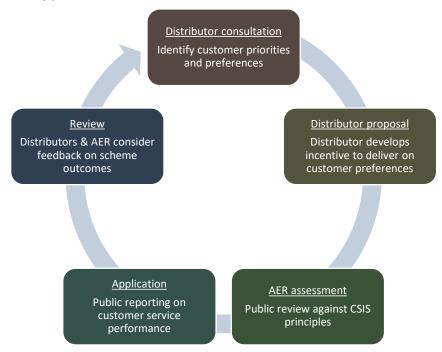
DNSPs are 'natural' monopolies, which means that they do not face competition from other networks. In the absence of economic regulation, distributors do not face the same incentives to deliver price and quality of service outcomes that customers prefer. The CSIS creates an incentive for distributors to maintain and improve customer services not covered by the Service Target Performance Incentive Scheme (STPIS), or other mechanisms, when desired by customers.

The CSIS is a flexible 'principles based' scheme that can be tailored to the specific preferences and priorities of a DNSP's customers. This flexibility will allow for customer engagement to evolve and adapt to the introduction of new technologies. The principles of the scheme target customer preferences and provide safeguards to ensure rewards/penalties under the scheme are commensurate with improvements/detriments to customer service. Figure 12.1 illustrates how the CSIS works in practice.

¹ AER, Customer service incentive scheme, July 2020, clause 3.1(d).

Under the regulatory framework Clause (NER 6.6.2(a)) the AER must, in accordance with the distribution consultation procedures, develop and publish an incentive scheme or schemes (service target performance incentive scheme) to provide incentives (which may include targets) for Distribution Network Service Providers to maintain and improve performance.

Figure 12.1 Application of the CSIS



Source: AER, Explanatory Statement Customer Service Incentive Scheme, July 2020, p. 4.

The CSIS has principles targeted at improving customer experience that must be met by distributors for the scheme to be applied. Distributors can identify, in consultation with their customers, incentive designs that would meet those principles. This allows us to apply different parameters to different distributors. Importantly, we will not apply an incentive design unless a DNSP can demonstrate that its customers support the incentive design through genuine engagement.

12.1 Final decision

We consider that Ausgrid's incentive design sets out and satisfies each of the elements (performance parameters, measurement methodology, assessment approach and financial component) outlined in clause 3.2 of the scheme.

We are also satisfied that Ausgrid's incentive design meets the considerations in clause 2.1 of the CSIS.³

These performance parameters are an aspect of the customer experience component of the DNSP standard control services that Ausgrid's customers have indicated that they value and want improved. The measurement methodology complies with scheme requirements and the assessment approach baselines Ausgrid's performance using historical data. The performance targets proposed incentivise genuine improvement in customer services.

We accept Ausgrid's proposal to amend the connection project timeframe parameter based on audit advice. We also accept Ausgrid's proposal to apply exclusions for delays to the

³ AER, *customer service incentive scheme*, July 2020, clause 2.1.

connection project timeframe due to safety grounds and the suspension of the accredited service provider.

To comply with this determination, Ausgrid must submit to us the annual CSIS compliance model used to calculate the annual revenue adjustment for the CSIS (H-factor). Robust data oversight is a vital component of the CSIS. The data used to populate the annual CSIS compliance model must be audited in accordance with the assurance requirements of our regulatory information order.

We note that Ausgrid is committed to providing its Customer Consultant Committee with audited CSIS data in the next regulatory control period.

Table 1 presents our final decision on the applicable CSIS performance targets, revenue at risk and incentive rates that will apply to Ausgrid for the 2024–29 period.⁴

Table 1 Final decision — CSIS targets and incentive rates for Ausgrid for the 2024-29 period

Category	Sub-category	Baseline	Deadband	Revenue at risk	Incentive	rate range
Core	Planned outage service ease (urban)	64.4%		0.083%	0.0010000	0.0078333
services	Planned outage service ease (regional)	69.1%		0.083%	0.0010000	0.0078333
Customer care	Website satisfaction	44.1%	5.9%	0.167%	0.0010000	0.0161667
Enabling services	Connection project timeframe days	215		0.167%	0.0005000	0.0080833

Source: AER analysis. Ausgrid, 2024-29 Revised Proposal, Attachment 7.1: Proposed 2024-29 CSIS, 30 November 2023.

12.2Ausgrid's revised proposal

Ausgrid amended its proposed CSIS in the revised proposal to address our draft decision⁵, to reflect customer feedback, and an opinion from its auditor when they reviewed the CSIS data. While retaining all metrics set out in its initial proposal, Ausgrid:

- updated the starting milestone and source of data used for the connections project timeframe metric
- proposed certain exclusions for connection delays that are beyond its control,
- updated its approach to split its revenue at risk equally across the three focus areas, and
- amended its approach to setting incentive rates in line with customers' feedback.6

⁴ NER, clause 6.12.1(9).

AER, Draft decision Ausgrid electricity distribution determination 2024 to 2029 (1 July 2024 to 30 June 2029), Attachment 12 customer service incentive scheme, September 2023, p. 2.

Ausgrid, 2024-29 Revised proposal, Attachment 7.1: proposed 2024-29 CSIS, 30 November 2023.

In its revised proposal, Ausgrid indicated that its customers were supportive of including all four of its proposed CSIS metrics. This is reflected in the Reset Customer Panel's submission, which identified support with some qualification.⁷

Ausgrid's customer engagement submissions

In a submission the Public Interest Advocacy Centre (PIAC) stated:8

... Ausgrid indicated the VoCP could influence certain elements of CSIS design but that others would be non-negotiable.

...The VoCP was not permitted to modify the amount of revenue at risk or alter the shape of the scheme or provided with an explanation of this decision.

Ausgrid chose to discount legitimate concerns that the proposed revenue component is too large.

....PIAC was concerned that Ausgrid's response to consumer concerns around revenue at risk may have misrepresented the costs of the scheme.

It is not clear the VoCP would have supported introducing a CSIS had this choice been given to them. While the VoCP expressed support for the new metrics and shaped some aspects of the scheme, it is not possible to conclude the proposed CSIS represents the preference of the VoCP.

These points were also raised by Ausgrid's reset customer panel (RCP) in its letter to Ausgrid on 10 August 2023 endorsing Ausgrid's CSIS.⁹

AER response to submission from PIAC

In our framework and approach paper for NSW, we stated that we will apply the STPIS customer service parameter to Ausgrid unless the distributor proposed a CSIS in accordance with the existing regulatory framework¹⁰.

Ausgrid has proposed to apply a CSIS in lieu of the STPIS telephone answering parameter in 2024–29.

The purpose of this CSIS is to provide incentives for Ausgrid to provide customer service that aligns with their customers' preferences. Our role in approving the CSIS is to assess whether Ausgrid's CSIS is supported by its customers as demonstrated through genuine

Ausgrid, 2024-29 revised proposal, Attachment 7.1: Proposed 2024-29 CS/S, 30 November 2023. Reset Customer Panel, Submission on Ausgrid's revised proposal and draft decision 2024-29, January 2024, p. 2.

Public Interest Advocacy Centre, *Draft decision 2024-29 revenue determinations: Ausgrid, Endeavour, and Essential Energy, 19 February 2024*, pp.19–20.

Reset Customer Panel, Letter to Ausgrid, Re: RCP Position re proposed CSIS, 10 August 2023, p. 2.

Under NER clause 6.6.2(a) the AER must provide incentives for Ausgrid to maintain and improve performance via our service target performance incentive scheme. A component of the STPIS is the customer service telephone answering parameter to incentivised Ausgrid to answer customers' calls within 30 seconds.

engagement. Therefore, we sought a response from Ausgrid on the question of the efficacy of its customer engagement. Ausgrid's responded that:¹¹

The process to develop Ausgrid's CSIS began with an analysis of over 40,000 customer survey verbatims to identify service improvement areas, which was shared with the Reset Customer Panel (RCP). Commencing in 2020, we engaged with various customer types, including businesses, to gather further insights on service improvement.

Working closely with the RCP we designed the proposed CSIS, benefiting from their expertise in incentive schemes and previous experience of co-designing CSIS. During this time, we actively responded to RCP and Voice of the Customer Panel (VoCP) feedback, refining the scheme based on their input.

For example:

Telephone answering was removed from the scheme based on residential customers' feedback, although we committed to maintaining focus on this area;¹²

A specific regional focus was introduced based on input from our Newcastle VoCP members;¹³ and

A deadband was established for the website metric, reflecting the views of RCP that performance under 50% was too low.¹⁴

Throughout the process up to the Initial Proposal, the RCP and the VoCP were supportive of our CSIS proposal.

Ausgrid started consulting on its CSIS in 2020 (as outlined in 12.4.1). It has obtained RCP approval, large customers' approval and partial VoCP approval in 2023.

Specifically:

 Ausgrid extensively consulted with its customers on its CSIS as acknowledged by submissions from the RCP and PIAC.

- Ausgrid's CSIS was approved by the RCP (throughout the consultation process), large customers on 28 April 2023 and partially by the VoCP on 10 August 2023.¹⁵
- Ausgrid has acknowledged that there were 'non negotiables' in its engagement with the VoCP but emphasised that:

Ausgrid, email to AER re: Ausgrid – information request AGD IR#0074 – [CSIS] – 20240328 – [PUBLIC] Customer Service Incentive Scheme consultation (RCP and PIAC's submissions, 6 March 2024.

Ausgrid, Regulatory Proposal - Att. 3.3.a - Customer engagement materials - 31 Jan 2023 – Public – Townhall customer pre read materials, 15 October 2022.

Ausgrid, Regulatory Proposal Attachment 3.3.a - Customer engagement materials - 31 Jan 2023 VoC Panel, 4 June 2022

¹⁴ Reset Customer Panel, independent report on Ausgrid 2024-29 revenue proposal, January 2023, p. 43.

Reset Customer Panel, *letter to AER re: Response to AER Issues Paper on Ausgrid's 2024-29 regulatory Proposal*, pp. 2–4.

".... Like other DNSPs, our primary engagement on the CSIS was with the RCP, which possesses expertise in the incentive framework and scheme mechanisms. Customers were primarily involved in decision-making processes related to selecting metrics and determining how rewards and penalties should be split.

... we did not ask customers to shape all aspects of the CSIS and focused instead on areas where their input could have the most significant impact and align with their priorities.

We made best endeavours to address the confusion of some new customers and believe we have gone further than other DNSPs with the breadth of our CSIS engagement, resulting in a scheme that is supported by customers."

We acknowledge PIAC's submission.

We consider that Ausgrid has met the scheme design in genuinely and comprehensively consulting with its customers to form its CSIS incentive design. While not universal, we consider that Ausgrid has strong support from its customers. In doing so, Ausgrid had to balance competing customer interest and no consumer groups were excluded in proposing its CSIS design.

On PIAC's revenue at risk comment, we consider that a revenue at risk at 0.5% is sufficient to incentivise Ausgrid to invest more in customer service without resulting in a significant bill impact to customers. Ausgrid's 0.5% cap is consistent with other CSIS proposals and PIAC's submission on revenue at risk. 16

Furthermore, as Ausgrid is a 'natural monopoly,' in the absence of economic regulation it would not face the same incentives to deliver quality of service outcomes that customers prefer.¹⁷

The sections below set out our final decision on Ausgrid's CSIS.

12.3Assessment approach

The assessment approach principles cover how performance is evaluated and then translated into an expression of improvement or deterioration which can be used to determine a reward or penalty. The incentive design should express the result of the assessment of measured performance against each performance target as a single value. These principles establish a baseline or neutral level of performance against which performance is assessed.¹⁸

Across all parameters, Ausgrid has proposed historical performance (around 3 years) as a baseline target and a dead band to (website satisfaction parameter only) measure rewards or penalties. This will ensure Ausgrid is only rewarded when more than half of the customers surveyed about their website usage experience report satisfaction.¹⁹

¹⁶ Public Interest Advocacy Centre, AER customer service incentive schemes, 29 Aug 2019.

¹⁷ AER, explanatory statement customer service incentive scheme, July 2020, p. 5.

AER, customer service incentive scheme, July 2020, clause 3.2(4).

Reset customer panel, *independent report on Ausgrid's 2024*–29 revenue proposal, January 2023, p. 43.

Ausgrid's incentive design establishes a direct relationship between identified parameters and its performance. This ensures that Ausgrid is correctly rewarded or penalised. The performance targets set by Ausgrid incentivise genuine improvement and the targets refer to baseline performance.

12.4Reasons for final decision

Ausgrid's CSIS is an improvement to the current telephone answering parameter under the STPIS as it covers more customer service elements. Ausgrid's CSIS creates incentives to:

- incrementally improve its communication to its customers
- improve on key performance indicators for effectiveness of service delivery/response times, and
- improve on key performance indicators related to customers' experience during planned outages, including ease of access to information.²⁰

We consider that Ausgrid genuinely engaged with its customers in the development of the scheme with the aim of targeting customer experience. Ausgrid's incentive scheme design is also consistent with the CSIS objectives.²¹

12.4.1 Ausgrid's proposed customer service incentive scheme

Consultation

Genuine engagement with, and support from a distributor's customers is required for the AER to apply the CSIS.

We consider that in developing its proposed incentive design, Ausgrid engaged in genuine and lengthy consultation to identify customer service priority areas and respond to them accordingly.

Ausgrid's consultation process can be summarised as follows:

- preliminary research: Ausgrid's sought customers' feedback via several channels to gauge key customer service issues over 2020–2022
- discussion: Ausgrid held several forums with its reset customer panel (RCP), large customers, and voice of customer panel (VoCP)
- workshops on CSIS design: Ausgrid's customers were presented with the proposed incentive design and were also given the opportunity to provide feedback
- stakeholder feedback: input was sought from the RCP, Large customers, and the VoCP.
 Following the draft decision, Ausgrid further consulted with the RCP and the VoCP, who supported its final CSIS
- Ausgrid's customers were provided with more than one opportunity to provide input on the performance parameters of the proposed CSIS. Their preferences have been

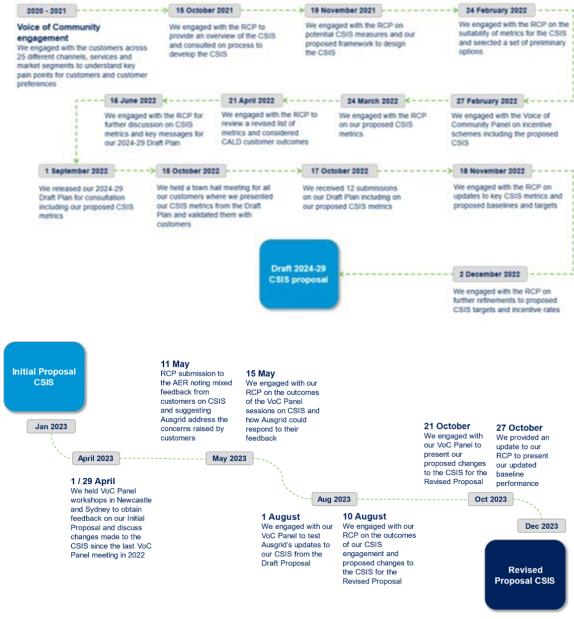
²⁰ Ausgrid customer panel, *voice of customer panel report*, June 2022, p. 11.

AER, customer service incentive scheme, July 2020, clauses 1.4(1) and 1.4(2).

reflected through Ausgrid's proposed incentive design, to improve customer service in the following identified performance parameters:

- Planned outage service ease (urban)
- Planned outage service ease (regional)
- Website satisfaction
- Connection project timeframe days.
- VoCP support for Ausgrid's proposed CSIS was expressed in a meeting on 1 August 2023
- Ausgrid's views about its CSIS were presented to the VoCP, RCP and Consumer Challenge Panel after the draft decision (please see figure 2). The RCP supported the expanded CSIS because it recognised, as did other customers, that the telephone answering parameter under the STPIS did not fulfil their expectations.

Figure 1: Ausgrid's CSIS engagement



Source: Ausgrid

12.4.2 Incentive Design Criteria

Section 3.1 (b) of the CSIS requires that the incentive design must set out each of the following scheme elements:

- Performance Parameters, consisting of the metrics of customer service performance subject to the incentive design,
- Measurement Methodology, consisting of a description of how performance against the performance parameters will be measured and the assurance arrangements that will apply to the measurement,
- Assessment Approach, consisting of a performance target and a method for evaluating measured performance against performance targets, and
- Financial Component, consisting of an overall revenue at risk, an amount of revenue at risk for each performance parameter, and a means of setting the incentive rate for each performance parameter.

Performance parameters assessment

The CSIS require:²²

- the relevant principles for performance parameters are that each performance parameter must be an aspect of the customer experience component of the DNSP's standard control services
- that the customers of the DNSP particularly value and want improved, as evidenced by genuine engagement with, and support from, the DNSP's customers
 - that is within the control of the DNSP, and
 - for which the DNSP does not already have an incentive under another incentive scheme or jurisdictional arrangement.

We consider that Ausgrid's performance parameters comply with these criteria, as:

- they have been developed with genuine engagement with and support of Ausgrid's customers. Ausgrid's proposal demonstrates extensive engagement with a broad range of customers over the consultation period, including vulnerable household customers, small businesses, and commercial and industrial businesses. It consulted with the RCP, large customers and VoCP, all of whom had more than one opportunity to provide input and expressed support for the proposed parameters²³
- they relate directly to the services it provides and controls. Under its proposed CSIS,
 Ausgrid is not rewarded or penalised for outcomes beyond its control
- there are no duplicate incentive schemes or jurisdictional arrangement covering these parameters.

²² AER, customer service incentive scheme, July 2020, clauses 1.4(1) and 1.4(2).

Reset customer panel, report on Ausgrid's draft plan for 2024–29, January 2023, pp. 41–43; Reset customer panel, independent report on Ausgrid's 2024–29 revenue proposal (CONFIDENTIAL), January 2023, pp. 43–46; Ausgrid, email to the AER: re: CSIS customer consultation outcome, 2 August 2023; Reset customer panel, submission on Ausgrid's revised proposal and draft decision 2024-29, January 2024, p. 1.

Measurement methodology assessment

The measurement methodology principles govern how performance under the scheme is measured. We consider that Ausgrid's measurement methodology principles align with the criteria set out in 3.2 (3) of the CSIS.

Section 3.2(3) of the Customer Service Incentive Scheme, 2020 is as follows:3) The relevant principles for measurement methodology are that for each performance parameter, the proposed measurement;

- a) accurately measures the features of the performance parameter identified in clause 3.2(1)(a),
- b) is sufficiently independent, in that it is either conducted by an independent third party or based upon an independently developed methodology,
- c) is compiled in an objective and reliable manner with data retained in a secure and logically indexed database, and
- d) produces results that could be audited by an independent third party.

AER assessment - Ausgrid's compliance against 3.2(3)(a) and (b)

Ausgrid's proposed approach accurately measures the features of the identified performance parameters and is sufficiently independent, for the following reasons:

- for planned service outage ease (urban and regional)²⁴, Ausgrid intends to collect survey data of the level of ease in the service experience associated with the outage. These surveys are sent to Ausgrid's customers via SMS after a planned outage occurs. Responses are measured separately for Urban and Regional customers. Performance is measured by the Service Ease Score (the percentage of customers that answer 'Strongly Agree' or 'Somewhat Agree' to the survey question 'Dealing with Ausgrid for this service was easy'). Ausgrid's current targets are made up of 33,726 surveys response collected between 1 January 2021 and 31 October 2023.
- for its connection project timeframe, Ausgrid proposed to use the median energisation time for connection projects (the median timeframe within which all connections projects in each financial year are energised), between:
 - the 'connection offer accepted' field being triggered by a customer in Ausgrid's Customer Relationship Management (CRM) portal; and
 - the energisation date in SAP Enterprise Resource Planning (ERP) program.

Ausgrid also proposed to exclude projects where there has been a:

- suspension of an ASP 1 company, suspension of ASP 1 staff and/or suspension of a work site for a safety breach or breaches; or
- change in an appointed ASP 1 by the connecting customer or their representative;
 or

To assess customers' experience in dealing with Ausgrid during an outage.

delay in a project due to safety.

Ausgrid's target is the median energisation timeframe of 2,302 customer projects connected between 1 July 2020 and 31 October 2023.

For the website satisfaction rate, customers visiting Ausgrid's website will be asked, via a pop-up survey, whether they consider if Ausgrid's website met their needs. The survey data is captured and reported in the cloud based Qualtrics platform. Ausgrid's current target is based on its survey performance between 1 January 2021 and 31 October 2023.

AER assessment - Ausgrid's compliance against 3.2(3)(c) and (d)

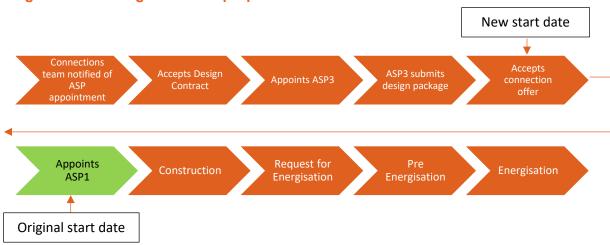
Ausgrid retains the data in a secure and logically indexed database, which can be audited.²⁵

As the proposed methodology is quantified and external audits can be implemented to verify outcomes, we consider that the measurement methodology principles have been met.²⁶

Changes to connection project timeframe parameter in the revised revenue proposal

In its revised proposal on the CSIS (Figure 2below), Ausgrid proposed to amend the timeframe for connection measurement from when an ASP is appointed to when the connecting applicant accepts the connection offer—changing its targets from 177 days (or 195 days on a like for like basis) to 215 days.

Figure 2 Ausgrid revised proposal on CSIS



We accept Ausgrid's proposal to amend the connection project timeframe parameter. This amendment will incentivise Ausgrid to engage with its customers to appoint an ASP expeditiously to undertake the connections work.

We consider it reasonable to exclude events for decisions that reset the number of days of connection project timeframe.

Ausgrid, email to AER re: Ausgrid – information request AGD IR#0074 – [CSIS] – 20240328 – [PUBLIC] customer service incentive scheme consultation (RCP and PIAC's submissions, 6 March 2024, p. 5.

Ausgrid, email to AER re: Ausgrid – information request AGD IR#0074 – [CSIS] – 20240328 – [PUBLIC] customer service incentive scheme consultation (RCP and PIAC's submissions, 6 March 2024, p. 5.

Financial component assessment

The financial component covers how an incentive design delivers penalties or rewards for a given level of performance. That is, penalties and rewards under the CSIS are commensurate with customer benefits and do not provide an incentive for distributors to over-invest in customer service.²⁷

We consider that Ausgrid's financial component complies with the requirements set out in 3.2 (5) of the CSIS. Our assessment is set out in the table below.

Table 2 Compliance with CSIS requirements

Requirement set out in section 3.2(5) of the CSIS	AER Assessment
The relevant principles for the financial component are that the incentive design provides rewards or penalties that;	
a) Will increase relative to the degree of outperformance or underperformance, commensurate with the identified value of the service improvement to customers of the <i>DNSP</i> ,	Ausgrid's rewards or penalties are financially proportionate to its performance, as calculated by the identified value of the service improvement. The value was established using a reasonable process that is transparent and involved genuine customer consultation.
b) Are commensurate with the service improvements or degradations observed in respect of the DNSP's distribution system	Ausgrid collaborated with the members of the RCP, large customers and VoCP on an appropriate range of improvements over the course of the 2024–29 period compared to the baseline performance. ²⁸
c) Are not likely to exceed the value that customers attribute to the level of service improvement observed	As outlined in Table 1, Ausgrid's CSIS includes caps on the parameter's performance and an overall cap to the total reward/penalty that Ausgrid can earn.

²⁷ AER, CSIS explanatory statement, July 2020, p. 10.

Reset customer panel, *report on Ausgrid's draft plan for 2024*–29, January 2023, pp. 41–43; Reset customer panel, *independent report on Ausgrid's 2024*–29 *revenue proposal*, January 2023, pp. 43–46; Ausgrid, *email to the AER: re: CSIS customer consultation outcome*, 2 August 2023; Reset customer panel, RCP, *submission on Ausgrid's revised proposal and draft decision 2024-29, January 2024*, p. 1.

Requirement CSIS	set out in section 3.2(5) of the	AER Assessment
aggregate DNSP for incentives result in th DNSP rela	ely to, when considered in with all incentives applied to the customer service, (including external to the incentive design), e incentives available to the sting to customer service the value customers attribute to onent of service,	As outlined in Table 1, Ausgrid's CSIS includes overall revenue at risk, an amount of revenue at risk for each performance parameter, and a means of setting the incentive rate for each performance parameter
3.2(4)(a) a attribute to degradation reasonable that custon service imposerved, o Is tranolively	ing the requirements of clause and (c), the value that customers is service improvements or one is established using a service process that identifies the value mers attribute to the level of provement or degradation in that the process: asparent, and see genuine consultations with the process; and	Please see 12.4.1.
between t	de in circumstances agreed ne distributor and its customers, ct to principles 4)a) to 4)e)	Please see 12.4.1.

Shortened forms

Term	Definition
AASB	Australian Accounting Standards Board
AER	Australian Energy Regulator
capex	capital expenditure
CSIS	customer service incentive scheme
DMIAM	demand management innovation allowance mechanism
EBSS	efficiency benefit sharing scheme
NER	national electricity rules
opex	operating expenditure
STPIS	service target performance incentive scheme