

# Reset Reference Group (RRG) Engagement Report for the 2025-2030 Energex Regulatory Proposal

## Table of contents

1. Executive summary.....	3
Objectives of the report. ....	3
Overall Assessment .....	4
The Energy Queensland Reset Reference Group.....	6
2. Queensland Context .....	8
Immediate Challenges and the Imperative for Innovation.....	8
Planning for an Uncharted Energy Future .....	9
Transforming Regulation in a Rapidly Evolving Sector.....	9
Navigating the Transition.....	9
The Future Operating Environment.....	9
Key Customer Consideration .....	9
3. Evaluation of Energex’s Approach to Engagement.....	10
Nature of Engagements:.....	12
Breadth and Depth of Engagement:.....	14
Clearly Evidenced Impact: .....	18
4. RRG engagement .....	18
5. Recommendations and Future Considerations .....	19
6. Appendix 1: Vignettes of specific engagements.....	21
Vignette 1: Customer Service Incentive Scheme .....	21
Vignette 2: DER integration .....	22
Vignette 3: Public Lighting .....	24
Vignette 4: Allocation of Legacy Metering Costs.....	26
Vignette 5: Network Tariffs for Small Customers.....	26
7. Appendix 2: Consumer and Stakeholder Engagement in Distribution Resets – the example of Ausgrid 2024-29.....	30
8. Appendix 3: RRG Engagement Activities .....	33

## 1. Executive summary

As Australia ventures further into its energy transition, where electricity is foundational to every aspect of our lives and work, the future of our electrical grids, from their design and operational strategies to investment decisions, demands a collaborative approach. It is essential that all customers, communities and stakeholders' preferences are sought, considered and ultimately, where possible, incorporated into the foundations of regulated distribution companies' regulatory proposals. This is critical now so more than ever, as consumers have connected well in excess of \$10 billion<sup>1</sup> in generation and storage capacity to the National Energy Market (NEM) and have a clear right and interest to be at the centre of this conversation.

The Australian Energy Regulator (AER) has recognised this, producing the Better Resets Handbook<sup>2</sup>. This handbook is designed to facilitate effective and meaningful engagement between network businesses and their customers to seek to better understand consumer preferences and "value" and ensure they are incorporated during development of the five-year regulated revenue proposals. In short, the Handbook aims to ensure regulated outcomes better reflect the long-term interests of consumers.

This report has been produced by the independent Energy Queensland Regulatory Reset Group (RRG) who have provided feedback to inform the development of the Energex network regulatory proposal. This feedback sought to assist Energex in attaining improved customer engagement through their process. It is the first of two reports the RRG will make on the Energex revenue proposal for 2025-30 which was submitted to the AER in January. The second report will be a more technical report focussing on the building block expenditure components and Tariff Structure Statement.

### Objectives of the report.

The objectives of this report are multifaceted and aimed at providing an evaluation of the customer and stakeholder engagement efforts by the Energy Queensland team. Specifically, we aim to:

- Evaluate the quality of customer engagement undertaken by Energex in preparing its 2025-30 revenue proposal, scrutinising the methods employed, as well as the breadth and depth of engagement activities conducted,
- Assess the extent to which customer and stakeholder views have been considered and integrated into Energex's regulatory proposal, and
- Analyse how well Energex's approach to customer and stakeholder engagement aligns with the expectations set forth in the Better Resets Handbook.

This report is crafted to aid the AER and other parties in assessing the robustness and effectiveness of the engagement process executed by Energex in the period leading up to the submission of their Regulatory Proposal. Our goal is to illuminate the degree to which customer input has shaped the proposal and its projected outcomes, providing insights into the level of consumer support for this proposal.

Compiled by the RRG team, this document details our observations, views and analysis of the engagement initiatives conducted by Energex. We would like to acknowledge that throughout this process, the Regulatory team at Energy Queensland has demonstrated a commitment to optimising these engagement activities, notwithstanding the myriad challenges encountered. Their responsiveness to the RRG's inquiries and openness to considering our recommendations underscore a proactive and customer-focused approach to regulatory proposal development.

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<sup>1</sup> Australian Photovoltaic Institute • Market Analyses (apvi.org.au) estimate there is 14.362 gigawatts of rooftop solar (installations less than 9.5kW) at an assumed average price of \$1,000 per kW.

<sup>2</sup> [Better Resets Handbook - December 2021 | Australian Energy Regulator \(AER\)](#)

This report is laid out as follows.

- Section 2 discusses the challenges and opportunities faced by electricity networks in Queensland, including the transition to State and Federal government mandated net zero targets, energy technological advancements and broader community and consumer behaviour changes. It outlines the imperative for innovation, planning for an uncertain energy future, regulatory transformations and the need for networks to prioritise flexibility and resilience.
- Section 3 evaluates Energex's customer engagement strategies, focusing on their nature, breadth, depth, and impact. It identifies successful engagements and areas for improvement, it will highlight where customer feedback has shaped the Energex's regulatory proposal.
- In Section 4 the report details the engagement activities of the Reset Reference Group (RRG) with Energex, including planning, coordination, and customer engagement activities. It highlights the dialogue and the contributions of the RRG to refining Energex's engagement strategy.
- Section 5 offers recommendations for Energex on enhancing ongoing and future customer engagement and addressing key issues that emerged during the engagement process. It emphasises the importance of continued engagement and cultural change within the organisation to better align with customer expectations and regulatory standards.
- Appendix 1 provides detailed case studies on specific engagement topics such as Customer Service Incentive Scheme, DER integration, Public Lighting, Allocation of Legacy Metering Costs and Network Tariffs for Small Customers. These vignettes illustrate the engagement process, customer feedback, and how it influenced Energex's regulatory proposal.
- Appendix 2 provides summary of the Ausgrid engagement process up to the submission of its 2024-29 revenue proposal to the AER in January 2023 as a contrast to the Energex engagement process. Members of the RRG were members of the Ausgrid equivalent Reset Customer Panel and the AER CCP for that reset process.
- Finally, Appendix 3 lists all the engagement activities conducted by the RRG, including planning sessions, customer forums, stakeholder forums, and workshops. This appendix provides a comprehensive overview of the RRG's involvement in the engagement process for Energex's regulatory proposal.

## Overall Assessment

Our assessment of the Energex's Customer Engagement program for their Regulatory Determination Project 2025 (RDP2025) is that the planning and execution of this activity fell well short of the best practice customer engagement observed in recent resets in other jurisdictions. As a result, this has impacted the program's overall effectiveness.

There are, however, good examples of engagement and the results of those effective engagements are evident in the proposal.

Despite the organisation's initial ambitious intentions and commitment to deliver, it is clear that insufficient time allocation and lack of resources to cover two large and diverse networks has hindered the ability to engage with customers as effectively as Energex aspired to, and as recommended under the Better Resets Handbook.

Simply put, the delay in the start of engagement meant that the original scope has to be significantly reduced. For example, there was virtually no detailed engagement on the capex program. In addition, a number of engagement channels suffered as there was a lack of, or limited pricing information provided by Energex to customers, limiting the ability of participants to make informed value judgements. Where engagement started early, such as public lighting, or later in a very focussed way, like tariff structures, the benefits were evident. These shortfalls have placed the organisation behind its peers, marking a deficiency in meeting the benchmarks set by other networks applying the Better Resets Handbook.

Given the delay in starting detailed engagement, the Energy Queensland team, with the help of the RRG, reduced their focus to areas that consumers could meaningfully influence within the limited time. Other

consideration included the time available to bring participants up to a level of understanding where they could give an informed view to engage on what in many cases are complex topics and associated issues.

Ultimately, this approach resulted in Energy Queensland's efforts reflecting a more effective consultation process on those issues that time allowed. Their actions underscored a genuine commitment to engagement. However, while the will was there, the outcomes were always going to be limited.

Regular engagement with the Board's Regulatory and Policy Committee and senior leadership team was welcomed by the RRG.

We hope that the genuine engagement conducted by Energy Queensland for this reduced scope has laid a foundation for future growth and development within the organisation's approach to customer engagement and business-wide cultural change. In particular we highlight the research on impacts of network utilisation in a transforming electricity market.

In the immediate future we are encouraged by Energy Queensland's commitment to a comprehensive engagement process with consumers, stakeholders and the RRG in the lead-up to the Draft Decision in September and Energex's final proposal to be submitted in December. Energex is well-positioned to enhance its customer engagement effort and recover some of the ground lost in its engagement efforts to date.

In the longer term the commitment to improvement is evident and, with strategic adjustments, there is potential for significant advancement in future initiatives. This path forward is not only necessary but within reach, provided the organisation maintains its dedication to learning from this experience and applying these insights to drive meaningful engagement with customers.

## The Energy Queensland Reset Reference Group

### *Purpose & establishment*

The establishment of the Reset Reference Group (RRG) reflects the current standard practice for networks undertaking AER regulatory resets following the Better Resets Handbook guidance on best practice engagement. As an independent advisory entity, RRG members have a wide experience across utility sector engagement, particularly on AER regulatory resets.

Creation of the RRG is a deliberate effort to infuse the planning and decision-making efforts of Energex with a broad spectrum of customer perspectives and preferences. This initiative is part of a wider strategy aimed at crafting a regulatory proposal that transcends the mere fulfillment of technical and operational benchmarks, but one that seeks to resonate deeply with the expectations and aspirations of the customers it is designed to serve. This cooperative model fosters a regulatory development ambiance characterised by transparency, inclusivity, and responsiveness, ultimately enhancing the proposal's legitimacy and acceptance across the stakeholder spectrum.

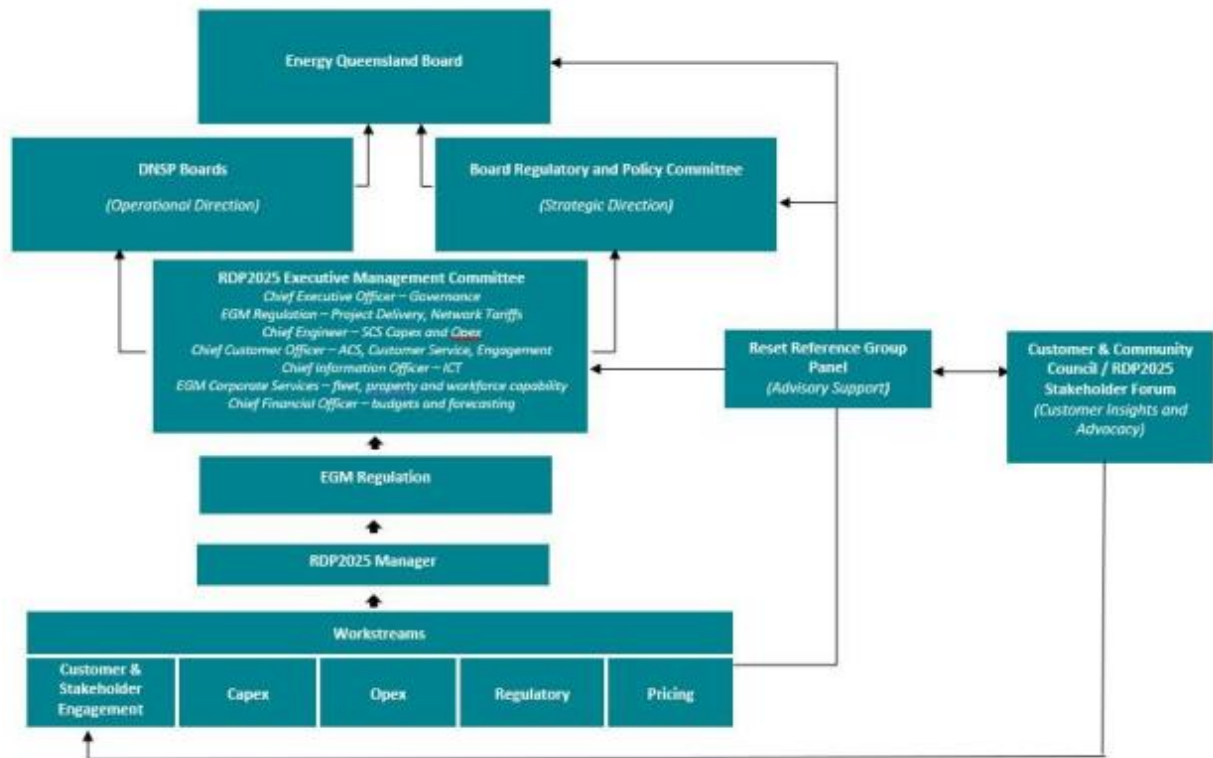
### *Role and Functionality*

The RRG have undertaken a range of roles for this Regulatory Reset Project:

- Engaging in a constructive dialogue with Energy Queensland to refine the engagement strategy that forms the foundations of the Regulatory Proposal for the period spanning 2025 to 2030 for the Energex network.
- Delineating the priorities, needs, expectations, and preferences that drive various customer and stakeholder cohorts.
- Offering counsel on the orchestration of the engagement program, including the spectrum of activities planned.
- Participating as observers in a variety of engagement initiatives to gauge their effectiveness and alignment with stakeholder expectations, and
- Presenting challenges to Energex regarding its business strategies, foundational components of the reset, and tariff structure statements, with the objective of ensuring these elements authentically mirror customer preferences.

### *Governance, Interrelationships and Collaboration*

The governance structure outlining the relationships with the RRG is seen in the following figure.



As a working group of the Customer & Community Council, the RRG serves as a dedicated conduit for strategic discussions around customer and community essential needs. Created with the express purpose of concentrating on the RDP2025 program, the RRG operates as a pivotal link between Energex and its diverse customer base. By facilitating a continuous exchange of insights, feedback, and recommendations, the group plays a crucial role in steering Energex's engagement strategies and the content of its regulatory proposals towards a path that is both reflective of and responsive to customer needs and preferences.

In its operational capacity, the RRG is privy to regular updates on pertinent issues, and reciprocally, it keeps the Customer and Community Council, the Energy Queensland Board's Regulatory and Policy Committee and the Energy Queensland Executive Management Committee well-informed. Regular interactions with the Energy Queensland regulatory team underscore the cooperative relationship that underpins this collaborative effort.

#### *Membership and Autonomy*

The deliberate curation of the RRG's membership to include a mix of customer representatives and regulatory experts ensures the infusion of a rich, multifaceted perspective into the deliberations on Energex's engagement endeavours and the evolution of its regulatory proposal. The independence of the group is paramount, equipping it to evaluate Energex's strategies and deliverables with an objective lens, free from conflicts of interest. Current membership of the RRG includes:

Robyn Robinson (Chair)  
Mark Grenning  
Gavin Dufty  
Frank Edwards  
Neil Horrocks

Council on the Ageing Queensland  
Energy Users Association of Australia  
St Vincent de Paul  
Capricorn Enterprise  
Independent

## 2. Queensland Context

In the rapidly evolving energy landscape of today, electricity networks stand at a critical crossroads, facing a unique blend of challenges and opportunities for transformation. The push for decarbonisation, the emergence of advanced technologies and evolving consumer behaviours are fundamentally reshaping the sector. At the same time all consumers, whether small or large are facing an affordability crisis that has the potential for reducing consumer support for the transition. While surveys continue to indicate majority support for the transition, a key issue is how much to do consumers pay and how much do Governments and other parties pay<sup>3</sup>? Deciding the consumer share provides a great challenge to Energex to drive efficiency at the same time as meeting consumer demand for an innovative, resilient, and forward-thinking network.

Energex has identified four investment priorities:



### Immediate Challenges and the Imperative for Innovation

Central to the current energy transition is the drive towards decarbonisation, positioning electricity networks at the forefront of the global shift towards renewable energy. This pivotal transition, essential for climate change mitigation, brings about grid variability and unpredictability, primarily due to the intermittent nature of renewable sources. The task of balancing supply and demand amid such intermittency calls for the adoption of advanced energy storage solutions and grid management technologies, ensuring grid reliability and stability.

Moreover, the potential electrification of everything will see a shift away from reticulated, natural gas and transportation based on liquid fuels. This coupled with technological advancements, particularly in distributed energy resources (DERs) like rooftop solar, battery storage, and electric vehicles (EVs), are revolutionising the way we interact with the energy ecosystem.

These changes and innovations empower consumers to become 'prosumers'—simultaneously producers and consumers of electricity—thereby adding layers of complexity to grid management and challenging the traditional model of centralised electricity production and distribution. Adapting to this decentralised and digitalised operating environment is crucial for networks to effectively manage these changes.

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<sup>3</sup> The latest Redbridge poll found that a majority of voters nominating lower costs for power supply and maintaining reliability over faster emissions reduction; <https://www.afr.com/politics/federal/voters-back-energy-cost-relief-over-emissions-reduction-poll-20240228-p5f8d9#:~:text=New%20polling%20from%20Redbridge%20showed,relability%20over%20faster%20emissions%20reduction>



Additionally, fast changing consumer expectations introduce further complexity to system that was in a relative steady state for many decades. Today's consumers demand sustainability, affordability, and flexibility in their energy services. This shift necessitates that electricity networks adopt a more customer-centric operational model, utilising data analytics and digital tools to enhance service delivery and cultivate an interactive consumer relationship.

### Planning for an Uncharted Energy Future

A significant hurdle for electricity networks is the planning and development of infrastructure for an energy future that remains largely misunderstood by the general public. Educating consumers on the significance of this transition and the role innovative technologies play is imperative and challenging. Networks are tasked with acting in the long-term interest of consumers, making strategic decisions amidst uncertainties, and investing in infrastructure that supports a sustainable, efficient, and resilient energy future. This visionary approach requires anticipation of future needs and the creation of an environment that fosters the adoption of green technologies.

### Transforming Regulation in a Rapidly Evolving Sector

The evolution of industry regulation also presents challenges. Often, the pace of technological adoption outstrips regulatory reforms, leading to a gap that may impede the integration of new technologies and business models. The electricity market is ripe for innovation, with entrepreneurs introducing new commercial transaction models and developing new markets for previously unconsidered opportunities. Thus, a regulatory environment that is both flexible and supportive of innovation is essential.

### Navigating the Transition

To navigate these challenges successfully, electricity networks must prioritise flexibility, resilience and innovation. Embracing flexibility in integrating storage technologies and dynamically managing electricity flows is crucial. Building resilience against climate change and cybersecurity threats ensures a stable and secure energy supply. Moreover, fostering technological and regulatory innovation allows networks to adapt to a decentralised, digitalised, and dynamic operating environment.

At the heart of this challenge, networks must ensure they retain the customers' needs and expectations at the forefront of their work.

### The Future Operating Environment

The future operating environment for electricity networks will be markedly different, characterised by increased decentralisation, digitalisation, and dynamism. Networks will evolve from mere conduits of power to platforms facilitating transactions among various market participants. This future necessitates significant investment in infrastructure, skills, and research, and calls for collaboration across all sectors to co-create sustainable energy systems.

Despite the challenges, the path forward for electricity networks is replete with opportunities for significant transformation. By adhering to the principles of flexibility, resilience and innovation, and by tackling the challenges of planning for an uncertain future and transforming regulatory frameworks, networks can guide the energy transition towards a sustainable, efficient, and consumer-centric future. This journey is crucial not only for the evolution of electricity networks but also for realising a sustainable energy future for all.

### Key Customer Consideration

At customer engagement events over the past year, Australian households and businesses large and small consistently voiced their key concern: affordability.

With the cost of living on an upward trajectory, the spectre of rising electricity bills looms large for households, reflecting broader economic pressures faced by Australian families. At the same time, business input costs, especially costs of financing and raw materials continue to increase pressure on business margins.

While the transition to renewable energy, enhancement of grid reliability and incorporation of new DER/ CER technologies are critical, electricity network owners must also heed the immediate needs of customers. Balancing these long-term infrastructure objectives with the pressing demand for affordable electricity poses a formidable challenge. Networks must tread this fine line with care, ensuring that forward-looking plans do not unduly burden customers financially. Through innovative cost management, judicious capital expenditure, and transparent communication about the long-term benefits of these investments, network owners can align their strategies with customer interests. This balanced approach will not only meet immediate customer needs but also lay the groundwork for a sustainable and inclusive energy future.

### 3. Evaluation of Energex’s Approach to Engagement

At the onset, Energy Queensland worked with customers and stakeholders to develop four themes – affordable, clean, reliable and smart. As an essential service provider, customer service excellence was placed at the centre of their focus.



Energy Queensland then engaged with various stakeholders to test and refine the development of their Regulatory Proposal. This engagement process spanned across multiple platforms, including major customer and retailer forums, the residential Voice of the Customer Panel, and the Network Pricing Working Group. Through this engagement strategy, Energy Queensland gathered valuable feedback, leading to several adjustments and enhancements to their Tariff Structure Statement.

The development of Energy Queensland’s Engagement Strategy for the 2025-2030 Regulatory Reset commenced with an online consultation in August 2022 utilising 'Recollective', an online community engagement platform. This initial engagement was due to be conducted face to face but at the last minute COVID protocols meant it had to move to being online. This initial phase sought to gather diverse perspectives, develop a shared understanding of the overarching objectives and contribute to the strategic approach for achieving these goals. The adoption of a co-design approach by Energy Queensland in formulating their Engagement Strategy is consistent with broader industry practice and consistent with the AER’s Better Resets handbook.

While there was a promising start in co-design in August 2022, a notable gap occurred between this initial engagement phase and the publication of the resulting Engagement Plan in March 2023. This delay resulted in a compressed timeframe for initial engagement activities, which were then limited to just six months in mid-2023, prior to the scheduled publication of the Draft Plan in September 2023. This compressed timetable also put constraints on the scope of consultation post the Draft Plan.

To maximise available value, the Energy Queensland team consulted with the RRG and the Voice of Customer engagement partner Mosaic Labs, to develop a much more targeted and bespoke engagement focus on a small number of topics where customers expressed an interest and could have an influence. The selection of topics also had to recognise that the late start meant that the usual 'capacity building' phase of engagement was not possible. This led to consultation being primarily on network tariffs, customer service (CSIS), distributed energy resources (DER), property and fleet.

As a result of the compressed timeframe, some of the proposed engagement streams had to be curtailed:

- Initial plans for face-to-face engagement had to be abandoned and were replaced by online engagements in most instances.
- The 'Perspectives' engagement stream which was aimed at revealing the concerns and preferences of the 'quiet voices' such as people with a disability, older customers, renters, people with English as a second language, etc. For expediency, representatives from all of these customer cohorts were combined in two joint sessions. This was less than ideal as it didn't allow for the richness of conversation and surfacing of issues that can occur when these groups are consulted separately. Nevertheless, output from these sessions was provided to Voice of Customer participants as background information.

The other material issue impacting the engagement was availability of resources.

The Energy Queensland resources delivering the Energex Regulatory proposal, also had carriage of the Ergon Energy Regulatory proposal. Members of the RRG who have reviewed other network regulatory proposals commented that the resources available to conduct those two engagement programs would be considered stretched in delivering a single engagement program in other networks, a testament to the work conducted by the staff interfacing with customers. Further, the geographical area covering customers affected by these two proposals represents more than 20% of the entire nation.

The RRG noted that the leader of the Regulatory team was elevated to the Executive Committee at Energy Queensland, giving them regular exposure to key Management which proved important for proposal development but at the same time it burdened this role with additional workload that comes with sitting on the executive, stretching resources further.

The record should also state that the Ergon network suffered storm, cyclone and flooding damage in both early and late 2023 and the Energex network similarly suffered bushfire, storm and flooding damage also in late 2023. These events, at times, materially reduced available resources further and slowed progress on the proposal.

The notable exception to this was Energy Queensland's very effective engagement with state and local governments on public lighting. Begun early, it did not have the time constraint of the other engagement activities and had the advantage of engaging with informed customer representatives. This approach facilitated quick comprehension and productive discussions, ultimately leading to a consensus on preferred options.

The engagement on public lighting was characterised by:

- A clear program of issues that required engagement.
- A clear and well delivered capacity building program.
- The provision of full costings and details
- Deep and earnest discussions on the issues
- Future focussed discussions in technology challenges facing the sector during this period and agreement on a framework for approaching those challenges in a collaborative fashion.
- A regulatory proposal that fully reflects customer preferences

Further details of this engagement are included in the vignettes section of the appendices.

Similarly, engagements with retailers regarding the transition to new default tariffs following installation of smart meters showcased Energex's ability to foster consensus among diverse stakeholder groups.

In summary we believed that:

- There was too long a delay from the Recollective engagement in August 2022 to publication of the Energy Queensland's Engagement Plan in March 2023
- The plan was too ambitious given the remaining time, resources and customer capacity.
- The adjustment made to develop the more limited scope was reasonably efficiently implemented by an engaged and receptive, but resource constrained, Energex engagement team that grew in confidence over the course of the engagement.
- However, the effectiveness of this engagement was limited by the delay in finalising building block expenditure, and hence the required data on tariff impacts for the narrow scope of issues engaged on was not available.

Appendix 2 summarises the consumer and stakeholder engagement undertaken by Ausgrid in the lead-up to the submission of their initial revenue proposal for 2024-29 in January 2023. This is an example of an extensive engagement program begun early that was suitable for that organisation. The RRG are not suggesting that Energex should have necessarily sought to replicate the extent of that program. We simply provide this information as an example of what another network achieved in their application of the Better Resets Handbook.

The RRG is currently working with Energex to finalise the engagement plan for the period up to the AER Draft Decision in September and then post this until submission of the final proposal in December. We look forward to this providing as much opportunity as possible to engage with a wide range of customers on a proposal that currently results in significant price rises for most customers through a combination of factors both within and outside of Energex's control.

### Nature of Engagements:

The AER's emphasis on the nature of engagement between network businesses and customers seeks a fundamental shift from traditional, one-way information flows to a more dynamic, collaborative interaction. This approach envisions customers not merely as end-users but as active partners in the decision-making process, advocating for a departure from superficial engagement practices. The goal is to ensure customers are equipped with the necessary information, tools, and opportunities to genuinely influence outcomes. Such engagement is expected to be sincere, aiming not just to fulfill regulatory checkboxes but to meaningfully incorporate customer feedback into decision-making processes. This change aims to transform regulatory proposals into customer-centric documents, where language, definitions, customer preferences and needs are considered from the beginning, rather than as an afterthought.

With this in mind, Energy Queensland began their engagements with a high-level introduction to the revenue reset process e.g. role of building blocks. Their categorisation of their expenditures as either uncontrollable or controllable was important and when understood, demonstrated that a significant amount of the revenue requirements relate to issues currently outside customer control. Following this, controllable costs, which could be influenced by customer feedback, required, and generally received, more explanation to customers.

This guided the conversations towards topics where customer feedback was sought.

Throughout this process, Energy Queensland demonstrated a commitment to accountability in this engagement, particularly when customers faced difficulties grasping complex concepts. The Regulatory team regularly displayed agility and responsiveness, pausing presentations to customers as needed to clarify and ensure understanding. This respectful and caring approach to inclusiveness fostered a more open and participative atmosphere among customer representatives, encouraging them to engage more freely with challenging topics. This responsiveness is a testament to the Regulatory team's dedication to listening and ensuring that all customer representatives can effectively contribute to the conversation, underscoring the importance of customers as partners in the regulatory process.

The RRG observed a notable development in customer perceptions throughout the engagement process. Customers' preferences evolved as they were presented with more information, leading to a deeper understanding of the issues at hand. The Energy Queensland team played a pivotal role in this evolution, developing the narrative and adapting its engagement strategy and capability-building processes to accommodate changing customer viewpoints. This flexibility in response to customer feedback is commendable and highlights Energy Queensland's commitment to meaningful engagement on the narrow scope.

However, the RRG expressed concerns about the pace at which information was relayed to customers, potentially limiting their ability to fully comprehend the issues and ask pertinent questions. These concerns were somewhat alleviated through direct conversations with customers, who acknowledged initial difficulties in grasping certain concepts but reported an improved understanding over time, facilitated by Energy Queensland's informative content and peer discussions.

While one of the key engagement themes was affordability, there was little engagement on how this might be achieved. Apart from limited engagement on DER capex, there was little or no engagement on substantive parts of the building blocks that drives affordability. The lack of bill impact data meant that the engagement process was unable to discuss affordability either with respect to the limited specific topic engagement nor to obtain views on the overall proposal.

A recurring theme throughout the process was Energy Queensland's quest to balance the demand for safe, reliable, clean, smart electricity supply, and efficient service delivery with the need for affordability. Energy Queensland offers insight into customer perceptions of this issue through questions asked in the Queensland Households Energy Survey (QHES). Conducting a more detailed analysis that includes quantitative cost-benefit trade-offs and exploring various options could provide a more robust foundation for their position. Achieving better understanding by customers of this balance is important and continuous engagement to evolve customers' understanding and perceptions of value for money will support this.

When discussing specific topics related to a regulatory proposal, the provision of options and clear communication of the bill impacts of these options are crucial for effective consideration and evaluation by customers. This process ensures that customers are fully informed about how different choices can affect their bills, enabling them to make balanced decisions based on their preferences and financial considerations. It promotes transparency, builds trust between the network and its customers, and empowers customers to actively participate in the decision-making process.

Prior to the release of the Draft Plan, the engagement sought customers' views on a range of matters without being able to show participants the bill impact of the alternatives presented which limited the usefulness of the engagement as an influence on the proposal.

The limited engagement post Draft Plan contained more bill impact data, though still not comprehensive especially for larger customers. This helped customers give more informed opinions on the limited range of issues discussed and led in some cases to a change of customer preferences.

One specific topic where there was detailed engagement was the Customer Service Incentive Scheme (CSIS). This scheme is designed to replace the current telephone answering service part of the Service Target Performance Incentive Scheme (STPIS) where networks receive additional revenue for achieve a range of targets, including reliability. The telephone answering part provides the network a benefit if it is able to answer calls to its fault reporting telephone line within 30 seconds. Other DNSPs have recognised that this measure is outdated and the CSIS scheme was developed to replace it.

We provide a case study of this engagement in Appendix 1. In summary the proposal does accurately reflect the engagement outcome of not supporting the introduction of a CSIS. However, we believe that the way it was presented by Energex - not being explicit enough from the start about it replacing the outdated telephone answering measure - contributed to that outcome. Customers in many other network businesses have supported a CSIS as an efficient way to incentivise improved customer service and spent considerable time considering what the metrics should be.

## Breadth and Depth of Engagement:

### *ACCESSIBILITY, TRANSPARENCY and CLARITY*

When technically driven utilities undertake customer engagement, language and clarity are important. Engagement on regulatory proposals is challenging and many of the concepts are foreign to audiences asked to comment on these activities.

By nature, these regulatory engagements feature presentations by engineering staff who are used to communicating work concepts to audiences with some understanding of the environment (colleagues, industry peers, suppliers, consultants). Effort is required to adopt more familiar language and simpler phrasing. Even non-technical staff in the networks absorb and adopt acronyms and technical terms for items that have more common names (conductors/wires, transformer/voltage changer).

In the face of this challenge, the Energy Queensland team, at the continued encouragement of the RRG progressively improved their customer communications, slide packs and messaging. After the release of the draft plan, as they returned to the discussion of the building blocks, they developed a simple and accessible analogy about owning, equipping, operating and financing a coffee shop that was relatable to most customers and easily digestible. However, while this was appropriate to assist in developing a base level of knowledge to answer the less complex questions being asked, the lack of time meant that further education to enable customers to answer more complex questions commonly asked in these engagement processes could not occur.

The engagement process revealed a broad spectrum of customer understanding regarding the energy transition. Customers already investing in Customer Energy Resources (CER) demonstrated a high level of insight and were vocal about their views. Conversely, Energex faces the challenge of engaging customers who have not yet actively participated in the energy transition and those who may never wish to participate. Recognising this, Energex has committed to enhancing educational efforts around the concept of an "Electric Life" acknowledging the significant task of garnering widespread customer support for future network investments in a landscape many customers are yet to fully understand and at a time of significant cost of living pressures.

As stated previously, pricing emerged as a critical concern for customers, underscoring their eagerness to engage on this topic. Unfortunately, detailed analyses of bill impacts arrived late in the engagement process, affecting the quality of initial discussions. Moreover, these discussions were somewhat confused by the use of terms such as real or nominal prices in slides and draft proposal comparisons, a concept unfamiliar to many customers, thereby complicating their ability to effectively engage with the pricing information presented.

The complexity of pricing was further exacerbated by the introduction of new tariff charges in this proposal, such as export tariffs and storage tariffs, and incentives, like zero distribution charge windows, which seek behavioural change and can often only be fully appreciated through lived experience to appreciate their impact. This aspect of the energy transition represents a significant challenge that is likely to persist in the coming years.

Through these discussions, the RRG felt that there was insufficient time available to

- delve into the new designs.
- explore the justifications for the new designs.
- unpack the behaviours that would unlock incentives.

In early engagements there was also limited quantitative data (bill impact data) available to help customers understand the trade-off between behaviour change and the reward for change. The Energy Queensland team were upfront about this.

Energex has recognised these shortcomings and the need to continue engagement during the leadup to the Draft Decision and following that. They have discussed the establishment of an ongoing tariff reference group for customers as a pathway to improving engagement on this subject.

The RRG recognise the challenges of this engagement and will seek to assist Energy Queensland with the development, capacity building and tasking of that group.

More details on this engagement are provided in the engagement vignettes included in the appendix.

#### *CONSULTATION THEN INPUT*

After many years of considering customers as key stakeholders and managing them accordingly, networks are on a journey towards best practice customer engagement and collaboration. Importantly, the transition from stakeholder management to customer engagement requires an organised communication approach aimed at informing, interacting and ultimately understanding customers at a strategic level. This is in stark contrast to stakeholder management which explains decisions that are independently developed responses to issues. Subtly but importantly, customer engagement is a deeper, more authentic activity designed to gather perspectives and customer journeys and collaboratively consider issues involving customers with the aim of embedding their views more deeply into decisions.

Reflecting on the RRG's time observing customer engagement activities, we now recognise Energex's own transition from stakeholder management to customer engagement. Early discussions on relatively simple issues associated with property (should a workshop continue to be located in what is now a residential area or move to an industrial area) and fleet (views on the pace of transition to EVs) gave us the impression of a guided discussion to achieve a pre-determined outcome. Over time, the methods improved materially, into more effective customer engagement activities that delved into the details of issues such as cost allocation for legacy metering where customers were provided with a greater understanding of impacts and benefits and were able to interactively explore each of the options with Energex staff. These customer engagement activities were evidently effective, based upon the increasingly lively discussions witnessed by the RRG, the earnest conversations and trade-offs as well as clearly agreed and adopted outcomes that were reflected in the regulatory proposal. More details of that engagement are included in the Vignettes section of the appendix.

Conversations on new tariff designs were a key feature of this engagement, introducing concepts such as "zero distribution charge windows" in the middle of the day and export tariffs for rooftop solar customers. These were important but complicated changes and the RRG are disappointed that more detailed engagement with customers could not have been achieved. However we recognise that more effective engagement on these issues will likely only be available after consumers have some lived experience with these tariffs. We also note separate comments from retailers who express concerns with incorporating increasingly complex network tariffs into retail tariffs in a manner that is transparent and evident to customers.



*MULTI CHANNEL*

Engaging with a representative sample of a network’s customer base is challenging. Certain groups such as small business customers can be difficult to access and engage with and a lot of effort is required to obtain their views. Understanding these challenges can help in developing more effective strategies for targeting of engagement. Energy Queensland was able to establish limited conversations with some of these traditionally hard-to-engage consumer groups at different times during their activities including:

- Low-Income Households
- Older Consumers
- Non-English-Speaking Households
- Renters
- Some smaller Customers with Non-Standard Needs
- Consumers with Disabilities or health issues
- Young Adults
- Some small business

Engagement came through a range of formal channels, using a number of techniques such as face-to-face forums and interviews, web meetings, surveys and informal conversations:

Business as usual (BAU) channels	Targeted Engagement channels
Customer and Community Council	Regulatory Reset Group
Agricultural Forum	Network Pricing Working Group
Queensland Household Energy Survey	Voice of the Customer Panel
Talking Energy	Customer Focus Group
Land Developer Conversations	Perspectives Group
Energy Retailer Forum	RDP2025 Stakeholder Forum
	Customer Conversations
	Large Customer forums
	Public Lighting Forums
	Individual Retailer Conversations
	Draft Plan consultation and webinars

We are uncertain how feedback from all of the BAU channels fed into development of the regulatory proposal.

Time limited the number of conversations able to be held with each of the targeted groups and at times the RRG pushed Energy Queensland to increase communication frequency with some of these groups (for example, large customers).

Ideally, the RRG would have liked to see greater engagement with a wider group of large business customers, and we felt the influence from the large end of town was less than optimal. Engagement with small and medium enterprises was also less than ideal. While acknowledging that this is a characteristic of that market that is experienced across the NEM and across sectors, RRG consider that had more time and resources been available, more effective engagement with these groups could have been achieved.



### *CUSTOMER LEVEL OF INFLUENCE OBSERVED*

As previously referenced, constraints limited the range of topics that Energex were able to engage upon and the time available to understand and explore the issues.

During the engagement activities, Energex engaged customers on a number of key topics including:

- Costs and approach associated with the integration of DER.
- Customer service incentive schemes, expectations and service performance reporting
- New tariff structures, speed of implementation for tariff changes and opportunities to access lower network charges through behavioural change.
- Managing costs of legacy metering.
- Preferences for pace of investment in electric vehicles.
- Converting existing public lighting infrastructure to LED equivalents.

The discussions were limited by time on both sides, which is to say the time available for Energy Queensland to consult and then gain input and the time customers were willing and able to make available to participate in the process.

That issue affected both the breadth and depth of discussion as did availability of bill impact data that was previously discussed.

The RRG have witnessed Energy Queensland reflecting on these issues and committing to learning from them for future proposals.

Separately, there were highly effective engagements with:

- Local and state government stakeholders relating to conversion of public lighting fleets to LED and accounting for the remaining depreciation of legacy infrastructure.
- Retailers about timing of conversions to default network tariffs following smart meter installations.

Both of these engagements were undertaken with customer groups who were well equipped already and able to engage deeply on key issues without a great need for capacity building. In both of these engagements, Energy Queensland managed the engagements expertly and with great clarity and transparency. Stakeholders from these groups expressed their support for the process verbally during these activities.

The Energy Queensland team spent time helping customers to understand the components that contribute to capital and operating costs and calling out specific items such as Olympic Games specific expenditures. Whilst these are the key contributors to network costs in the longer term, the RRG recognise that the detail, complexity and time needed make these topics accessible meant that they were difficult to engage upon in detail with novice customer representatives during this period.

Appendix 1 to this document contains vignettes providing further details of these customer discussions regarding CSIS, DER integration, allocation of legacy metering costs, public lighting and the extended discussions on tariff design as the key activities undertaken by Energy Queensland and their response to feedback.

Within those vignettes are details of the engagement on DER integration. The interesting issue about this engagement activity is the manner in which customer preferences shifted and converged once bill impacts associated with the options were provided.

Ultimately, consultation and input from customers was limited.

The RRG has spent time reviewing regulatory proposals from other jurisdictions and some members of the RRG have been active participants on panels related to those proposals. Some RRG members were involved in the 2024-29 reset process for NSW DNSPs which were the first networks seeking to fully implement the

Better Resets Handbook. As an example of this Appendix 2 summarises the engagement undertaken by Ausgrid in 2021-22 in the lead-up to their submission to the AER in January 2023 of their regulatory proposal for 2024-29. It provides a comparison point for what some consider to be best practice adoption of the Better Resets Handbook framework. The RRG believes that every network needs to arrive at a program appropriate to their needs but all will benefit from an early start and commitment of appropriate resources by the network.

#### Clearly Evidenced Impact:

The proposal provided by Energex outlines their engagement with customers and stakeholders, highlighting areas where the interactions influenced the outcomes of their proposal. This report not only identifies these key areas of engagement but also documents the changes in Energex's approach to their proposal as a result of this customer and stakeholder input.

The RRG has observed earnest and transparent conversations between Energex and various customer groups for the very limited scope of issues discussed.

Over time, discussions on topics such as the integration of Distributed Energy Resources (DER), allocation of legacy metering costs, and ICT enablement for customer service evolved as additional information on bill impacts became available, in some cases leading customers to reconsider their positions based on this critical data.

During the process, participants in the RDP2025 Stakeholder Forum were kept informed of the progression of customer engagement. The Forum's feedback charted a course that underscored a growing comprehension of key issues and a steadfast concentration on customer priorities:

- Initially, there was a strong emphasis on affordability, simplicity, bill impacts, and customer-centric engineering.
- Midway, the focus remained on affordability and bill impacts, with a renewed call for Energex to deepen its consultation efforts, including aspects such as network resilience. The Forum also highlighted the need for more customer education, especially regarding tariff changes, and continued advocacy for customer-focused engineering solutions.
- As the engagement process neared its conclusion and the full implications of bill impacts began to emerge, the Forum reiterated the importance of affordability and efficient investment, underscoring these as enduring priorities.

#### 4. RRG engagement

Members of the RRG, in their substantive roles on the Customer and Community Council, were involved with the first major discussion around the design on the August 2022 Recollective. Then, following the formation of the RRG in November 2022, the Reset Project Team engaged in regular fortnightly meetings with the RRG as part of a genuine, open and cooperative engagement between the RRG and the Reset Project Team. These meetings have covered a range of topics:

- developing and refining the engagement program e.g. overall engagement plan and schedule and how the scope should be adjusted given time constraints, recruitment of engagement partners, the content and approach for Voice of Customer (VoC) and Customer Forum engagement sessions.
- development of a business narrative in customer-focused language,
- development of the Draft Plan, and
- relatively high-level briefings from Energy Queensland on topics such as learnings from the last regulatory reset, the Network Investment Governance Framework, Capital Contributions Policy, Demand Forecasting and CER/DER integration.

The RRG's met regularly with the Energy Queensland's Board's Regulatory and Policy Committee and Executive Management team. This provided good opportunity for broad and frank discussions on key issues such as affordability, equity in the energy transition, and the need for greater customer centricity. Notably, the RRG challenged the Executive Management Committee early in the process regarding the introduction of two-way tariffs, advocating for their inclusion in community consultations to support equity in the energy transition. This feedback was positively received, with two-way tariffs proposed in the 2025-30 Tariff Structure Statement.

Appendix 3 of this document provides details of all customer engagement activities that the RRG attended.

The RRG identified a need for more detailed information on capex and opex forecasts to fully endorse these investment proposals. This has led to the scheduling of 'deep dives' on selected building block topics post lodgement of the Revenue Proposal, which will inform the RRG's 'Technical Report' for a more detailed examination of these issues.

## 5. Recommendations and Future Considerations

Regulatory determinations are inherently jurisdiction specific. In Queensland, the unique context of public-owned networks introduces additional complexities. Issues that might remain under the radar in other regions can become politically challenging in Queensland, complicating the engagement process for an essential service like electricity distribution, currently undergoing significant transitions. Addressing these challenges necessitates careful framing of issues and engagement strategies, potentially extending the timelines for meaningful customer dialogues.

During the engagement process, several key issues emerged that warranted deeper exploration, but time did not permit:

- Resilience – Given the expected growing impact of climate change on the electricity grid, the history of major climate events in Queensland and the intense discussions in other distribution networks, the lack of focus on climate resilience was surprising. Other networks are having deep conversations with their customers about the advantages and disadvantages of proactive (ex-ante) versus reactive (ex post) spending on resilience measures as well as modelling related to cyclone, flooding and bushfire risks. Such conversations could have shed light on customer preferences for upfront investments in the network's resilience to climate change impacts versus addressing these challenges as they arise.
- Value for money - Another area that merited deeper discussion was the discussion on overall revenue requirements. Specifically, there was a need for a more in-depth conversation about finding the optimal balance between making necessary investments in the network to ensure it remains clean, reliable, and intelligent and the imperative to keep customer costs as low as possible. Discussing the bill impacts in detail could have helped clarify how different investment strategies might affect customer bills and what trade-offs customers are willing to accept to achieve a balance between network performance, future network utility and cost trajectories. This is a long term, ongoing discussion.

Throughout the engagement process, addressing these areas in depth could have enriched the dialogue between Energex and its customers, providing clearer guidance on how to align network investments with customer values and priorities. The exploration of these topics in detail could have fostered a mutual understanding of the challenges and opportunities facing the network, ultimately guiding more informed and customer-centric decision-making. RRG recommends that Energex considers including these topics in future engagement processes.

The proposal to introduce two-way tariffs represents a new dimension in the pricing strategy for Energex in the 2025-30 regulatory period. Energex has taken a proactive stance on two-way tariffs, acknowledging the

need for further discussions to flesh out the details and implications of this approach. Key topics for these discussions include customer equity, the quantification of export tariff impacts, exploration of export tariff reward opportunities and the integration of Dynamic Operating Envelopes to mitigate export tariff consequences for customers. Recognising the necessity for additional work in this area, the RRG commends Energy Queensland for its commitment to addressing these concerns, through the establishment of a dedicated customer tariff working group to ensure a more informed and collaborative approach moving forward. Work on this initiative must proceed at pace.

While Energy Queensland's engagement practices have shown notable improvement and development, there is a long way to go before they approach best practice in both breadth and depth. We look forward to working with Energy Queensland to further improve engagement over 2024.

Culturally, opening up every facet of a business model to customer scrutiny is challenging, a requirement underscored by the Better Reset Handbook and essential as our energy system transitions. The RRG encourages Energy Queensland to continue to evolve in this space.

The RRG appreciates the Energy Queensland Regulatory team's dedication to enhancing customer engagement, which has laid a solid foundation for the revised proposal. However, there is consensus between the RRG and Energy Queensland that further refinement in engagement and significant internal cultural change within the business is needed to lay the foundations for a BAU approach that fully captures the diverse needs of their customer base. Building on the progress made, we encourage Energy Queensland to deepen its engagement efforts, enriching its understanding of customer perspectives and reinforcing its commitment to being a customer-centric organisation.

It is the RRG's opinion that the engagement that was undertaken occurred in an increasingly sincere and accountable manner.

## 6. Appendix 1: Vignettes of specific engagements

### Vignette 1: Customer Service Incentive Scheme

A proposal to introduce a Customer Service Incentive Scheme (CSIS) was one of two broad issues introduced for engagement with the Voice of Customer (VoC) group.

The CSIS is an optional new incentive scheme introduced by the AER in 2020. This is the first regulatory reset process in which the Energex has an opportunity to consider adoption of a CSIS. Energy Queensland committed to consulting with Energex customers to determine whether they support the introduction of a CSIS to replace the telephone answering component of the existing Service Target Performance Incentive Scheme (STPIS), and if so, the service measures to be incorporated in the scheme.

Energy Queensland elected to consult with customers on the potential introduction of a CSIS through the Voice of Customer (VoC) engagement stream. During this community consultation, they provided participants with an overview of the customer service metrics that they measure internally together with their current performance against those metrics. They also covered other performance monitoring schemes they are subject to including the Queensland Government's Guaranteed Service Level (GSL) Scheme and the service monitoring components of STPIS. Energy Queensland explained monopoly regulation and the theory behind CSIS, and the need for incentives within monopoly service provision.

An overview was provided of how CSIS is being approached in other network distribution companies, and what these companies are talking to their customers about. VoC participants were engaged in conversations about what good customer service looks like to them, and what might be specific options for the Energex, for example power restoration time following an outage, emergency response timeframes, speed of new connections and meter reading (special and scheduled).

Energy Queensland proposed three incentive scheme options:

1. Retain the current incentive scheme for telephone answering times in STPIS.
2. No scheme at all
3. A new CSIS

#### *VoC feedback*

In the workshops, VoC participants initially had difficulty understanding the differences in principle and application between the GSL scheme which provides direct payments to customers who are adversely impacted by the business's performance, staff recognition/incentive schemes, and a CSIS. Participants also found it difficult to separate customer service in general from the specific telephone answering service. Energy Queensland sought to differentiate and explain these issues.

Overall, it was clear that the VoC struggled with the notion of implementing a customer service incentive scheme, in particular that the Energex network should receive a financial reward for improved customer service. Participants believe that Energex should, as a matter of standard practice, be focused on providing excellent customer service and should not need a reward to do this. Participants also indicated that if Energex is not entitled to a financial reward for exceeding performance targets, then it is not fair to apply a penalty for under-performance.

There was a consistent theme in the VoC's Panel Report that service performance targets (or KPIs) are important, and performance should be monitored by the regulator and/or the ombudsman. The Panel called for Energex to institute and publish performance reporting but did not identify specific performance metrics to be reported on, and the process and purpose of the reporting.

### RRG assessment

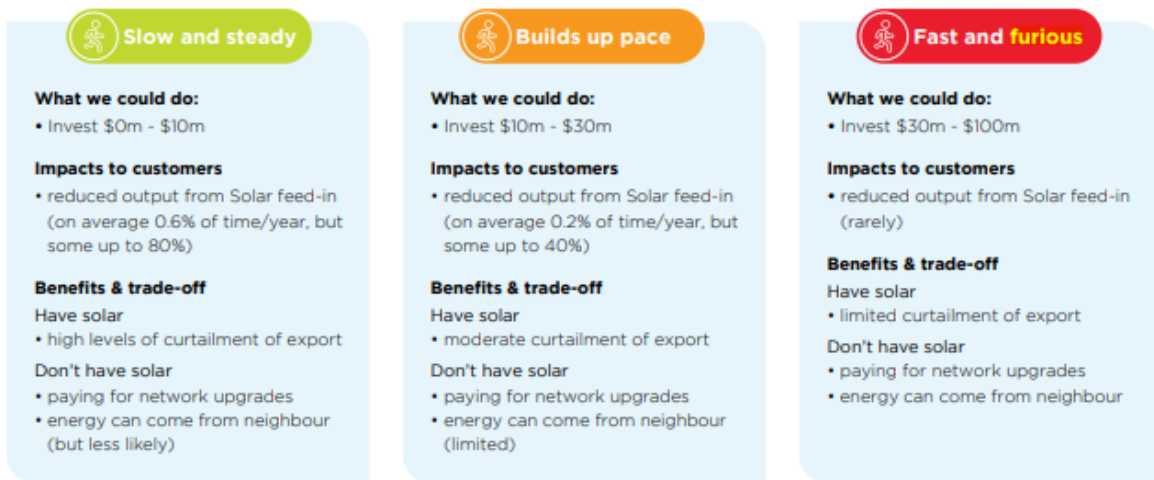
There was some early confusion among participants between the STPIS and the CSIS, RRG members observed a very strong sentiment against the idea of rewarding (or penalising) customer service. We consider that this customer sentiment has been reflected in the Regulatory Proposal by:

- Energex not proposing to introduce a CSIS in the next regulatory period; and
- Proposing withdrawal of the incentive for telephone answering which is currently embedded in the STPIS.
- Committing to developing performance data for customer service.

The RRG contend that the Energex proposal could have taken the further step of initial definition of the alternative performance reporting and monitoring regime called for by customers. We suggest that withdrawal of the STPIS incentive should be contingent upon the details of the alternative reporting and monitoring regime being developed and agreed with customers.

### Vignette 2: DER integration

Consultation on Distributed Energy Resources was undertaken with Energex customers in two sessions of the Customer Focus Groups. An initial session held on 19-20 August 2023 focussed on introducing DER concepts to the group, including how DER is affecting network demand and presenting future forecasts for DER. Participants' views were sought on investment options for DER including preferences around affordability and reliability.



Participants were asked to decide how fast they think Energex should progress investing in the network to support integration of DER: Fast and Furious, Build up Pace, or Slow and Steady with different levels of capex for each option. Energex did not present any bill impact data for any option. In the absence of this information participants indicated that 'Fast and furious' (80% support) was the preferred investment pace for the following reasons:

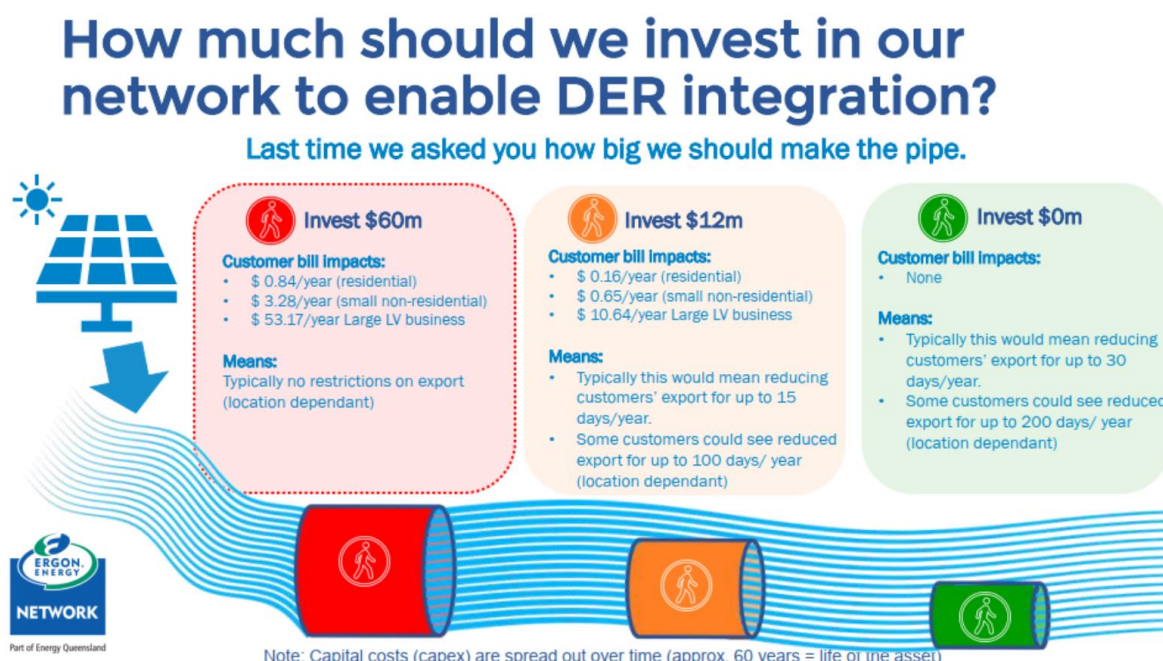
- Given the inevitability of solar in the grid, a fast investment pace is imperative.
- It is important that Energex encourages customers to install solar.
- Customers need confidence that their investments in solar will be supported.
- The increase in costs now would be offset by the benefits received in the future.



The remaining 20% of participants indicated that they preferred 'Build up pace'. These participants stated that they were concerned about the equity of increasing costs for all customers (to allow for increased uptake of solar) when only some customers would realise the benefits. Participants also stated that some more disadvantaged customers would be the hardest hit.

In the Draft Plan, Energex noted that engagement was still ongoing in this area.

The second session on DER was undertaken on 22<sup>nd</sup> October 2023. This session provided the participants with overview of DER investment in the Draft Plan and how feedback had been considered from the first session, along with a discussion on costs and bill impacts of three DER investment options, summarised per the graphic below.



Given the provision of bill impacts, participants were asked to undertake group discussions to consider whether they still felt the same as the first session and if their opinion had changed. Participants' group responses were:

- All groups changed their preferred choice to the 'build up pace' option (orange option - \$12M)
- They considered that the 'fast and furious' option (red option - \$60M) was too expensive, inequitable for those without DER, and may be overcapitalising given the uncertainty of future technology and energy usage.
- They considered that with the uptake in residential solar, 'slow and steady' (green option - \$0M) was not a viable option.

In the Energex Draft Plan, it was forecast that \$67 million in network capital expenditure would be required for the integration of DER. This expenditure was framed as the 'build up pace' investment option to ensure that undue cost pressures were not imposed on customers and acknowledging participant concerns about whether vulnerable customers might pay for this option.

In its Final Proposal Energex has forecast that it will require \$56m for DER integration, a reduction of 16% on the Draft Plan. Energex indicated that stakeholder feedback in response to the Draft Plan was focused on affordability, with specific feedback on the pace of DER-related investment being a proactive but balanced approach to allow customers to benefit from investing in new technologies, while not creating undue cost pressures.

### RRG assessment

Energex’s capex program includes plans to upgrade its network to support from the connection and operation of more rooftop solar and batteries (DER Integration). Part of this expenditure relates to a discretionary increase in hosting capacity. This discretionary component was the focus of the customer engagement.

Before the Draft Plan, customer feedback suggested a greater preference for quickly expanding the discretionary capacity of Distributed Energy Resources (DER), with costs estimated between \$30 and \$100 million. However, considering concerns about the potential financial impact on vulnerable customers from some customers, Energex decided to adopt a more gradual "build up pace" approach for expanding this capacity.

In the Draft Plan, Energex proposed spending \$67 million in total to integrate DER, including the discretionary spending on network capacity. Following the release of the Draft Plan, Energex provided and consulted on more accurate and lower estimates and details on customer bill impacts, customers support moved entirely to the "build up pace" option for adding this discretionary capacity.

The RRG recognise that this is one of the components of the Regulatory proposal Energex sought to engage customer in detail.

Debate amongst customers was lively and the quality of the debate improved in the second session when more detailed costs and billing data was provided. Ultimately, Energex customers reached consensus and Energex reflected that preference in the regulatory proposal.

### Vignette 3: Public Lighting

Public lighting customers (Councils and Department of Transport and Main Roads) expressed their views on Energex’s proposed public lighting strategy for 2025-2030 through a program of Public Lighting Forum engagement sessions commencing in October 2022. This process involved the engagement activities as shown in the diagram below, spanning a 26-month period.



The public lighting engagement program began in November 2022 via information and education session on relevant aspects including the regulatory reset process, smart controller benefits and tariff design. The RRG noted during the sessions up to May 2023 there were a number of Councils who did not participate in the process and as a result we encouraged Energy Queensland to approach these councils directly as a more flexible approach to engage with those quiet voices. In response, Energex conducted 13 individual customer engagement sessions during which it provided customer-specific impact analysis.



Subsequent to the initial phase, the engagement program transitioned to information sharing that was focussed on the key issues associated with the 2025-2030 regulatory determination. The five key areas were:

- full conversion of the remaining conventional lights to LED by 2030
- funding options to support the proposed strategy.
- the proposed changes to the public lighting tariffs
- recovery of the residual value of the legacy public lighting assets, and
- options for deployment of smart control devices that provide additional benefits over photoelectric cells.

A Public Lighting Issues Paper was developed as a key discussion piece for the consultation program in July 2023. This paper provided a comprehensive overview of the proposed 2025-30 Public Lighting Strategy, including indicative revenue, charges and customer impacts.

Following the publication and presentation of the Public Lighting Issues Paper, customer feedback was sought on the Five key issues. Feedback on these issues was encouraged with customers invited to provide written responses to each statement by 25 July 2023. From the total of 13 customers, there were 4 submissions (30%) received in response. The results and responses communicated were:

- **Statement 1:** Unanimous support for the Accelerated (100%) deployment of LEDs by 2030, with this preference is to be included in the Regulatory Proposal.
- **Statement 2:** Unanimous support for retaining the current suite of tariffs until 2030, the current suite of tariffs will be retained except for proposed changes to Rate 4.
- **Statement 3:** Clear support to avoid bill shock and mitigate the cost of recovering the residual value of Conventional lights. 'In principle' support from some with a requirement of further forecasts of the residual value that would be carried over beyond the regulatory period 2025-2030. Energex will provide financial forecasts of the residual value that would be carried over beyond the regulatory period 2025-2030 and how this will affect tariffs.
- **Statement 4:** Overwhelming majority of support for Energex to fund replacement of Rate 2 conventional assets. Some feedback indicated customers would like to retain the option to initiate their own LED upgrade projects. Some feedback expressed concern on the proposed increase to the Rate 2 LED tariff being applied to existing LED Rate 2 assets. In response, Energex will retain current suite of tariffs except for proposed to change to Rate 4 – Tariff Rate 4 will be retired and repurposed with existing assets transferred to Rate 2 LED. Tariff Rate 2A will be created and will be applied to Rate 2 assets where Ergon Energy has funded the upgrade of the luminaire to LED. Customer initiated Rate 1 LED upgrades will be assigned to the Rate 2 LED tariff.
- **Statement 5:** Overwhelming majority of support for Option 1, customers advised preferences including the option to utilise smart controls as a user pays system, utilise on an as-needs basis, and adopt a delayed approach due to the current regulatory uncertainty. Energex supports the user-pays approach and commits to focusing on this matter during the next phase of engagement.

In summary, Energex's engagement on public lighting was effective throughout, covering the key issues facing public lighting customers over the coming 5-year regulatory period. The engagement program supported customers through education, development of customer impact modelling and communication of issues associated with changes to proposed public lighting tariffs. The RRG was pleased to note that Energex was prepared to listen to customer's formal and informal feedback and reflect that feedback in the Regulatory Proposal. This was a good example of effective customer engagement.

#### Vignette 4: Allocation of Legacy Metering Costs

Energy Queensland consulted with the RRG on the proposed changes to the treatment of Type 6 metering services at the RRG Meeting held on 2 August 2023. The RRG supports the concept of the proposed change in charging arrangements for legacy metering services as it seeks to provide fair and equitable charging arrangements for customers, whilst supporting the objectives of the AEMC and the Queensland Government in achieving 100% smart meter deployment in Queensland by 2030.

Energex subsequently proposed in its Draft Plan to reclassify legacy metering services as Standard Control Services in order to reduce the cost burden on customers who will be the last to receive a smart meter, including vulnerable customers. This proposal supported the intent of ensuring a fair and equitable transition to 100% penetration of smart meters by 2030. Energex flagged in the Draft Plan that it intended to seek feedback from customers on the treatment of costs for these remaining meters.

Energy Queensland then consulted with customers on this issue at the second Customer Focus Group workshop held on 22 October 2023. A session on this topic was held with 14 participants who attended the in-person engagement session in Brisbane. The session included a presentation detailing an overview of metering services provided by Energex; service classifications and cost recovery options; issues with maintaining metering as an ACS; options for cost recovery and bill impacts. Via group activities, participants' views were sought on the classification of metering as ACS or SCS and if cost recovery should be accelerated. The groups indicated that:

- Costs should be recovered from all customers because it was likely that vulnerable consumers would be the last to own legacy meters.
- Energex should accelerate recovery of these costs to fully depreciate legacy meters by 2030; and
- Rebates should be introduced for those who cannot afford to change to a smart meter due to switchboard replacement costs.

It should also be noted that Energex socialised the proposed changes to the legacy metering services and associated customer impact at the Retailer Forum held in October 2023. No significant issues were raised by retailers.

#### RRG Assessment

In summary, Energy Queensland consulted with the RRG on the issue prior to publication of the Draft Plan, and subsequently with customers via the Customer Focus Group channel. Engagement was clear and detailed and included bill impact information. Customers indicated a clear preference to support the proposed change in for allocation of costs for legacy metering services as it provides fair and equitable charging arrangements for all customers.

Energex reflected customer preferences in the regulatory proposal.

This was a good example of conducting a short and targeted engagement where all information was provided and the topic was explained well to customers so that they were able to exert influence on the issue.

#### Vignette 5: Network Tariffs for Small Customers

Responding to the Energex draft proposal, the RRG noted that there were two main categories of these small customers:

Category	Number of Customers	Energy (GWh)	DUOS Revenues 2023/24
Residential	1,455,090	7,297	\$686m
Small business	110,860	1,793	\$148m

Tariff consultations for these groups prior to the Draft Plan were conducted with the Voice of Customer groups and mainly focused on the overall design / structure of the tariff in terms of moving from energy-only tariffs to the addition of time of use demand charges, export charges and rewards, and what duration time windows would customers prefer with regards to peak pricing (high cost) and off-peak pricing (lower cost).

The VoC was consulted on:

- Strengthening the peak price signal including extending the transitional peak pricing signal introduced in the current regulatory period.
- Time of Use pricing windows, including how long and when the low (midday) and high (peak) price windows should be.
- Introduction of two-way tariffs for customers with rooftop solar. These tariffs would include a one and a half kilowatt 'free' basic export level and offer export rewards during the peak period.

At that time, the RRG raised concerns that customers were not given sufficient information and time to explore and gain an understanding of the transition and the potential impact the transition might have on the operation of the network. The understanding of how these changes might affect various household types was also mixed, with some seeing opportunities while others expressing concern about peak pricing occurring in the late afternoon and the impact that this might have on families who are unable to shift demand to the middle of the day.

During engagement, some customers, particularly those with roof top solar, expressed concern about the introduction of two-way pricing as they believe it would have a direct impact on their solar investment, with voices seeking Energex and/or the Queensland Government to provide subsidies and supports for batteries so households could avoid these charges. There was little to no conversation regarding the financial incentives for self-consumption of solar energy, and/or promoting increased customer consumption in the middle of the day, which would negate the need for export pricing at minimum demand times.

The RRG also flagged at that time, the lack of modelling of the distributional bill impact across various customer classes under the various tariff proposals as a short coming to the customer engagement. This lack of detail constrained the conversation to broad tariff design concepts and did not allow a more nuanced discussion on issues such as:

- exploring distributional bill impacts,
- changes over time both across the network in terms of improved utilisation, but also within the various customer cohorts' opportunities to reduce their energy cost, and
- how this might change over the duration of the regulatory reset period given the Queensland Government's emissions reduction commitments, and the Queensland Government's Energy and Jobs Plan.

As such the RRG did not believe VoC participants were able to engage deeply in these discussions due to the lack of detailed modelling. While it was clear that participants understood the concepts with regards to tariff design, the actual pricing impacts of the proposed tariff options were not available, and as a result people were left to create their own perceived outcomes and scenarios that were not necessarily based on fact. For some of these changes, only lived experience will enable authentic discussion on impacts.

Separately, the RRG participated as members of the Energex's Network Pricing Working Group. Detailed modelling of the distributional impacts of proposed tariff reforms remained a priority for the NPWG throughout 2023 and the Energy Queensland Network Pricing team were able to provide further detail which reached the Network Pricing Working Group in September. At that stage, detailed engagement with customers on this issue was impractical.

### *RRG Response*

Via the NPWG, the RRG has shared comments and reflections which have seen significant progress in addressing a number of our concerns. This has included detailed analysis on:

- impacts on various groups, including those households with “traditional” energy use i.e. those without solar photovoltaic systems and other emerging households that are taking up newer consumer energy resources, such as those households with solar / home battery / electric vehicles; modelling should include an overlay of two-way reward, and export pricing with a basic export limit.
- exploration of impacts on particular vulnerable groups, in particular renters and low-income households.
- the do-nothing option, i.e. keeping the current tariffs and show how future costs will be allocated under this scenario.

More modelling is required and should look at overall societal benefit achieved through tariff reform in regard to changes to network utilisation. This modelling is critical given the overall proposed increases in network charges being sought by Energex and contributes to explaining the additional indirect value that will be delivered to consumers in the long term. Energy Queensland is now undertaking some innovative modelling work in this space.

It was also evident that customers see Energex as an organisation they can trust. Customers believe that Energex has a critical role in providing information regarding the energy transition including why the changes are necessary and how consumers can optimise their outcomes with regard to various tariff price signals. This was reflected in the VoC’s recommendations which had strong messages regarding the provision of clear information to consumers, indicating they understand the nature of the proposed changes. It is important for Energy Queensland to consider the information provision opportunities that fall within the remit of a distribution network business and customers’ willingness to pay for improved information channels.

Another tariff engagement activity focussed on the rate and pace of change regarding introducing tariff reform. Customer views were varied.

Some consumers suggested Energex should move quickly to introduce changes for those with appropriate metering, while others suggesting delays until all households have smart meters installed. The RRG believe that these views are possibly a result of the lack of more detailed information around the outcomes and impacts of the various tariff proposals.

Similarly, there was detailed conversations around the offering of load control tariffs, including conversations to consolidate the load control tariffs to one tariff.

The RRG welcome the more detail in the Tariff Structure Statement in Energex’s Proposal and will provide a detailed response in our Technical Report in May 2024.

Separately, the NPWG also discussed with Energy Queensland the establishment of an ongoing reference group early in 2024 and this is now proceeding with expressions of interest. We look forward to this being established to allow knowledge building and more informed engagement, not just for the Revenue Proposal, but also beyond.

### *RRG Assessment*

As stated above, initially, the RRG noted the division of Energex customers into two main categories, highlighting the significance of understanding the impacts on both residential and small business customers. This understanding frames the consultation on transitioning from energy-based to demand-based tariffs, exploring customer preferences for peak and off-peak pricing periods. Such consultations aim to delineate

the overall design and structure of tariffs, considering how changes might benefit or concern various customer groups.

As an additional observation, the RRG identified the challenge of conveying the technical aspects of tariff reforms and the potential benefits of two-way pricing, particularly for households with solar installations. The lack of detailed modelling on the distributional impacts across customer classes constrained discussions to broader tariff design concepts, preventing a deeper exploration of specific impacts and opportunities.

There was more customer impact analysis presented post the Draft Plan which aided engagement albeit that restarting this discussion with detailed data and limited engagement time was challenging. This detailed analysis is critical for explaining the broader value of proposed tariff changes and for guiding consumers through the energy transition with clear, trustworthy information.

The VoC's recommendations underscored the need for Energex to provide transparent information to consumers, reflecting an understanding of the proposed changes and a trust in Energex as a reliable source of guidance. However, divergent views on the pace of change and the support for community batteries and technology-neutral tariffs indicate a spectrum of consumer readiness and preferences.

Looking forward, the RRG anticipates the establishment of the ongoing reference group to facilitate continuous knowledge building and engagement. This initiative, along with Energex's commitment to more consultation on network tariffs, sets a foundation for informed decision-making and engagement in future regulatory periods.

Energy Queensland's efforts in navigating the complex landscape of network tariffs and pricing arrangements demonstrate a commitment to principled, community-informed consultation. The shift towards demand-based pricing, the exploration of two-way pricing, and the introduction of flexible load tariffs exemplifies Energy Queensland's adaptive approach to meeting customer needs and preferences. We look forward to further engagement now that the TSS has been published.

Energex reflected customer preferences related to tariff design and introduction timing but more work is still required to ensure the revised submission extends this engagement.

## 7. Appendix 2: Consumer and Stakeholder Engagement in Distribution Resets – the example of Ausgrid 2024-29

A key measure of the effectiveness of customer engagement is around the measures of ‘breadth’ and ‘depth’. Members of the Energy Queensland RRG were members of the corresponding reset panels as well as the AER CCP for all three NSW distributors for the 2024-29 reset period and so have significant experience on the ‘breadth’ and ‘depth’ used by those DNSPs.

This Appendix describes what Ausgrid did in the lead-up to submission of the initial proposal in January 2023 and is seen as representative of the level of engagement of all three NSW DNSPs. It draws on the report by *bd Infrastructure*<sup>4</sup> plus information from membership of the Ausgrid Reset Customer Panel (RCP).

Topic	Ausgrid 2024-29 Reset
Role of reset panel and consumer/stakeholder engagement	<ul style="list-style-type: none"> <li>• Specific tasks for the Reset Panel – observe the consumer/stakeholder engagement and engage in 'deep dive' type analysis of particular building block topics across opex, capex and tariffs.</li> <li>• Consumer/stakeholder engagement across various work streams of different cohorts</li> <li>• Engagement started ~ 12 months before publication of the Draft Plan in August 2022 and then continued prior to submitting the Regulatory Proposal in January 2023</li> </ul>
<u>Consumer/stakeholder engagement</u>	
Engagement with residential customers	<p>Three streams:</p> <ul style="list-style-type: none"> <li>• Voice of Customer – the ‘deliberative core’ of engagement; ~45 customers in three regions covering all Ausgrid (Hunter, Central Coast and Metropolitan)</li> <li>• Lived experience – customers who find themselves in vulnerable circumstances e.g. ‘life’ (income, housing tenure, age and disability) geography (edge of network, prone to flooding, storms and bushfires) and health (life support customers)</li> <li>• Key voices – CALD, indigenous</li> </ul> <p>These groups met multiple times, initially online given COVID restrictions and then face to face with meetings regularly going a number of hours and all day in many cases for the VoC as issues were considered and Ausgrid responded in a cycle – seeking views, Ausgrid going back to reflect the views they heard to see if they had heard correctly, proposing expenditure/services on the basis of the engagement results, seeking views on these proposals and asking for the parameters under which they would expect Ausgrid to revert if circumstances change.</p> <p>The VoC groups prepared reports back to Ausgrid on their conclusions.</p>
Topics considered with residential customers	Network role in community batteries, how to achieve Ausgrid’s net zero targets, two-way tariffs, options to improve customer service e.g. through upgraded IT systems at different cost levels, options for capex/opex for innovation, options for

<sup>4</sup> <https://www.aer.gov.au/system/files/Ausgrid%20-%20BD%20Infrastructure%20-%20Att%203.1%20-%20Engagement%20overview%20-%202031%20Jan%202023%20-%20Public.pdf>

	cost/level of cyber security, options for capex to improve reliability; a lot of discussion around willingness to pay for particular services with Ausgrid providing data on bill impact of particular expenditure proposals
Engagement with small business	Specific engagement stream; based on Ausgrid complaints data three LGAs the focus of SME engagement; range of meetings with 9 organisations representing small business e.g. Small Business Association of NSW; included in Voice of Customer engagement; detailed discussions with five SMEs; engagement limited by COVID
Engagement with C&I	Specific engagement stream; engaged with 21 customers across data and information (4) energy (3), government (3), manufacturing (4), mining (2), property (3) and large retail (2); 12 detailed interviews identified 8 overarching topics then two C&I forums attended by 12 customer organisations to verify themes and test options on reliability, costs, outage information and ancillary network service fees
Resilience	The RCP co-designed the resilience engagement framework that was used for extensive engagement for a number of months across three LGAs that research indicated had the greatest exposure to severe weather events – Central Coast, Lake Macquarie and Port Stephens; Ausgrid was the first network to seek to implement the AER’s Network Resilience Note <sup>5</sup>
Councils	Engaged with all 33 councils in the network area with engagement covering public lighting, innovation and sustainability, vegetation management and resilience. Multiple meetings with Southern Sydney Regional Organisation of Councils (SSROC)
Ancillary service providers	Engagement sessions with a total of 100 Level 1, 2 and 3 ASPs at three separate sessions
Retailers	A number of engagement sessions with six retailers with topic covered including – the overall TSS and new tariff trials effective from 1 July 2022 with particular topics including residential. two-way tariff, residential Flex Load Electric Vehicle (EV) Charging tariff and Community Battery tariff.
Support for customer/stakeholder engagement	Aside from the Ausgrid staff and the RCP there were consultants to support: <ul style="list-style-type: none"> <li>• co-design of the Engagement Framework and delivered the Lived Experience and small and medium business engagement streams.</li> <li>• design and deliver the VoC Panel process.</li> <li>• manage the recruitment process for engagement participants.</li> <li>• expert speakers on particular topics to present independent views.</li> <li>• facilitated the Engagement Framework co-design process and support the VoC panel.</li> <li>• deliver the CALD engagement stream.</li> <li>• support delivery of the event-affected customer engagement stream</li> <li>• support the delivery of the Indigenous engagement stream.</li> <li>• help with customer data analysis using artificial intelligence (AI) to analyse large volumes of data.</li> </ul>

<sup>5</sup> <https://www.aer.gov.au/system/files/Network%20resilience%20-%20note%20on%20key%20issues.pdf>

<u>RCP specific scope of work</u>	
Panel deep dive topics	<p>Four workstreams with different RCP members and Ausgrid chair for each</p> <ul style="list-style-type: none"> <li>• Sustainability and future grid – DER integration strategy; tariff reform; connection policy; innovation; service classification and DSO</li> <li>• Ausgrid experience – ‘moments that matter and pain points’; digital strategy; customer transformation; consumer protections, CSIS.</li> <li>• Resilience – community resilience; network investment strategy; insurance and risk management; cost pass through; cyber risk management strategy and STPIS</li> <li>• Value for money – opex strategy and benchmarking; productivity; fleet and property investment strategy; financeability; CESS and EBSS, depreciation</li> </ul>
Specific deep dive topics	<p>These topics involved extended discussions over many meetings on both the planning and governance of proposed expenditure and well as specific expenditure proposals across all parts of opex, capex and tariffs e.g.:</p> <ul style="list-style-type: none"> <li>• Reset wide e.g. corporate vision and regulatory proposal objectives, network strategy and external environment context, demand forecasts, detailed analysis of specific expenditure categories as they were refined.</li> <li>• Opex – AER benchmarking report, productivity improvement, rate of change, step changes (insurance, GSLs, cyber, ICT accounting changes metering and resilience), OEFs, EBSS</li> <li>• Capex – AER benchmarking report, current period delivery, overheads productivity, governance framework, forecasting/CBA methodology (value framework to monetise risk, unit cost methodology, REPEX model), specific business cases (Cyber, ICT, property fleet) property strategy, fleet asset categories and expenditure, operational technology and innovation, DER, innovation, resilience, public lighting, ACS metering, growth capex, PIRs e.g. ADMS, CESS</li> <li>• Incentives schemes e.g. CESS and EBSS</li> <li>• Tariffs – export tariffs, storage tariffs, TOU charging windows; tariffs impact by customer persona, tariff assignment for EVs, embedded network tariffs; proposed tariff trials, developing comms for behavioural change from tariffs, Roadmap cost recovery</li> </ul>



## 8. Appendix 3: RRG Engagement Activities

The following table summarises the RRG’s involvement in Energex’s customer engagement activities. The type of engagement is denoted by P (planning / coordination activity) or C (customer engagement activity).

Date	Engagement Activity	Activity Title	Activity Type
19-Jul-22	Co-design engagement strategy and plan	SEC Newgate AER Engagement Co-Design	P
23-Aug-22	Co-design engagement strategy and plan	Engagement Strategy Co-Design - Recollective Engagement and Live Zoom Activities	C
25-Aug-22	Co-design engagement strategy and plan	Engagement Strategy Co-Design - Recollective Engagement and Live Zoom Activities	C
25-Jan-23	Reset Reference Group	Ergon Energy Network and Energex Reset Reference Group Meeting (1 of 2)	P
30-Jan-23	Reset Reference Group	Ergon Energy Network and Energex Reset Reference Group Meeting (2 of 2)	P
17-Feb-23	Reset Reference Group	Briefing Session - Energex/Ergon Expenditure 2025-30 high level overview (1 of 2)	P
7-Mar-23	Reset Reference Group	Briefing Session - Energex/Ergon Expenditure 2025-30 high level overview (2 of 2)	P
16-Mar-23	Australian Energy Regulator	RDP2025: Looking Back, Looking Forward - Briefing Session (RRG//AER)	P
17-Mar-23	Voice of the Customer Forum	EQL / RRG / MosaicLab - initial meeting	P
20-Mar-23	Network Pricing Working Group	Network Pricing Working Group / Tariff Engagement - finalise purpose, scope, approach etc	P
27-Mar-23	Voice of the Customer Forum	Customer Engagement Co-Design Workshop - EQL/RRG/MosaicLab	P
4-Apr-23	Public Lighting Forum	Consultation session on Smart Controllers	C
11-Apr-23	Voice of the Customer Forum	Customer Engagement Planning - Online 'refinement' Session 1 - EQL / RRG / MosaicLab	P
25-May-23	Public Lighting Forum	Proposed Revenue & Tariff Forum - Energex Network - online	C
29-May-23	Voice of the Customer Forum	Energex Perspectives/Insight Gathering online session	C

1-Jun-23	RDP Stakeholder Forum	Ergon Energy Network and Energex Regulatory Proposals Development	C
7-Jun-23	Voice of the Customer Forum	Energex Perspectives/Insight Gathering online session	C
15-Jun-23	Voice of the Customer Forum	Meet and Greet / Overview Session	C
18-Jun-23	Voice of the Customer Forum	Full Day Session (1)	C
3-Jul-23	Network Pricing Working Group	Network Pricing Working Group (NPWG) - Meeting (1)	C
6-Jul-23	Retailer Forum and Individual Retailer Conversations	Retailer Forum – Ergon Energy Network and Energex Tariff Structure Statement	C
10-Jul-23	Retailer Forum and Individual Retailer Conversations	Retailer Forum – Ergon Energy Network and Energex Tariff Structure Statement	C
11-Jul-23	Retailer Forum and Individual Retailer Conversations	Retailer Conversation - Ergon Energy Retail	C
12-Jul-23	Retailer Forum and Individual Retailer Conversations	Retailer Conversation - Red Energy	C
12-Jul-23	Public Lighting Forum	Proposed Revenue & Tariff Forum - Energex - online	C
16-Jul-23	Voice of the Customer Forum	Full Day Session (2)	C
17-Jul-23	Retailer Forum and Individual Retailer Conversations	Retailer Conversation - Altina	C
19-Jul-23	Retailer Forum and Individual Retailer Conversations	Retailer Conversation - Origin Energy	C
1-Aug-23	Large Customer Forum	Large SAC, CAC & ICC Customer Forum	C
6-Aug-23	Voice of the Customer Forum	Full Day Session (3)	C
8-Aug-23	Network Pricing Working Group	Network Pricing Working Group - Workshop (2)	C
10-Aug-23	Public Lighting Forum	Update on responses to Issues Paper and Next Step	C
19-Aug-23	Customer Focus Group Workshops	Focus Group - Day 1	C
20-Aug-23	Customer Focus Group Workshops	Focus Group - Day 2	C
27-Aug-23	Voice of the Customer Forum	Full Day Session (4)	C

6-Sep-23	RDP Stakeholder Forum	Ergon Energy Network and Energex Regulatory Proposals Development	C
26-Sep-23	Network Pricing Working Group	Network Pricing Working Group - Meeting (3)	C
3-Oct-23	Draft Plan Consultation and Webinars	Energex 2025-30 Draft Plan - Webinar 2	C
5-Oct-23	Large Customer Forum	SAC Large Customer Forum	C
10-Oct-23	Large Customer Forum	CAC & ICC Customer Forum	C
22-Oct-23	Customer Focus Group Workshops	Focus Group - Round 2	C
24-Oct-23	Retailer Forum and Individual Retailer Conversations	Retailer Forum	C
29-Oct-23	Voice of the Customer Forum	Full Day Session (5)	C
17-Nov-23	Reset Reference Group	EQL & RRG Planning Session - RDP2025 Topics for Engagement and Engagement Activities in 2024	P
23-Nov-23	Network Pricing Working Group	Network Pricing Working Group - Workshop 4	C
14-Dec-23	RDP Stakeholder Forum	Ergon Energy Network and Energex Regulatory Proposals Development	C