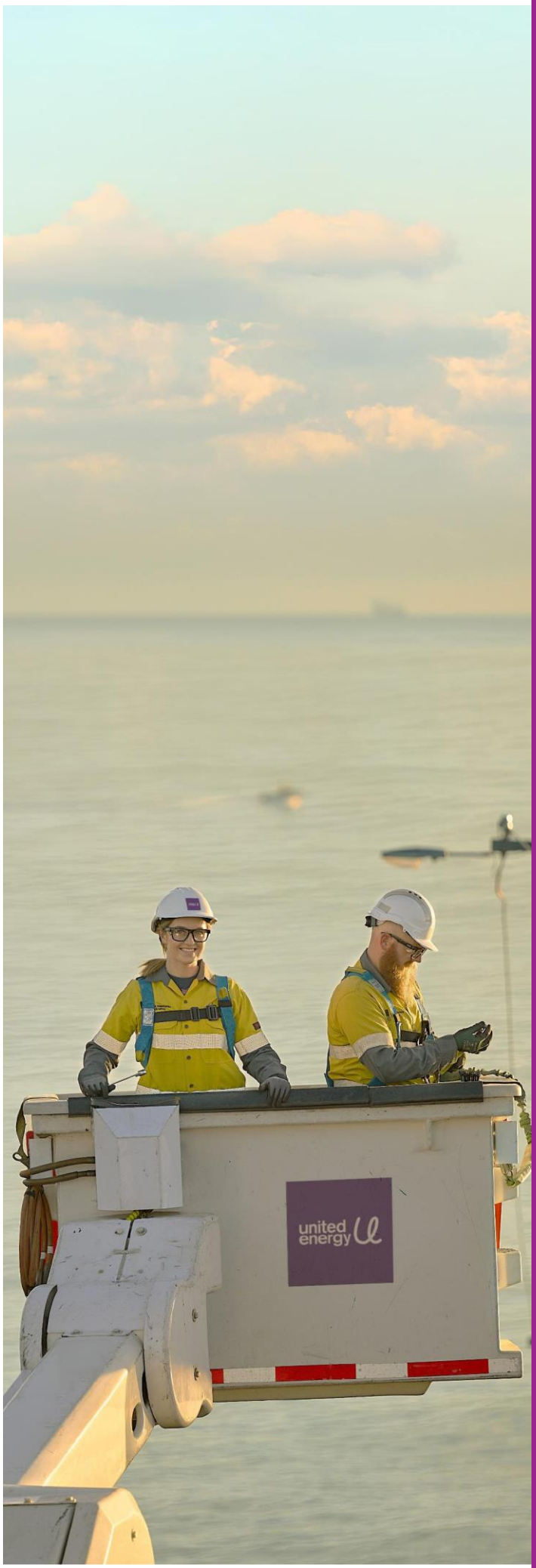

INFORMATION AND COMMUNICATIONS TECHNOLOGY

TELEPHONY

UE BUS 7.11 – PUBLIC
2026–31 REGULATORY PROPOSAL

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1. Overview

Our existing telephony systems address three distinct areas:

- Contact centre – this refers to the management of general enquiries, faults, connections and IT services operating on Cisco WxCCE Cloud.
- Corporate - desktop phones are currently provided operating on a CISCO on premise platform and utilised across the organisation in both head office and depots. Before July 2026 we will transition to a new cloud platform telephony solution.
- Network Control & Operations (NC&O) - the British Telecom telephony platform (BT Command) is utilised by our Network Control Centres who manage the day-to-day operations of the distribution networks

During the 2026–31 regulatory period our three existing telephony platforms will require investment to ensure we are able to continue to meet our regulatory obligations.

We considered three options to meet this need:

1. **Do not maintain currency** – this option performs least possible maintenance with an aim to maintain minimum services
2. **Maintain basic currency** – this option implements modest upgrades to existing telephony capabilities to maintain currency
3. **Modern currency** – this option would re-architect and transform our contact centre and corporate telephony solutions to take advantage of the latest innovations, supporting continued evolution of existing customer services and introduction of new channels, services and capabilities for our customers. The NC&O technology would be supported through prudent currency upgrades and introduce new features and capabilities.

Option three is recommended as it ensures we able to meet our regulatory obligations across the 2026–31 regulatory period while also ensuring we can provide improved experiences for customers and meet all future regulatory obligations. The costs of each option are provided in the table below.

TABLE 1 OPTIONS ANALYSIS SUMMARY ($M, 2026)

#	OPTION	CAPEX	OPEX
1	Do not maintain currency	1.4	0.4
2	Maintain currency	4.1	-
3	Modern currency	5.7	-

2. Background

We currently support the following areas of our business with telephony solutions:

- Contact Centre/Connections/Service Desk
- Corporate services
- Network Control and Operations

2.1 Contact centre, connections and service desk telephony solution

The Cisco WxCCE cloud contact centre platform supports the management of around 800,000+ customer interactions each year via voice channels. This includes all Contact centre/fault lines for CitiPower, Powercor, United Energy and South Australian Power Networks. Our Contact Centre, which manages general enquiries and faults, is primarily located in our Bendigo depot.

The contact centre platform is also utilised to manage inbound enquiries from customers and industry partners including new connections, solar and business to business enquiries. The platform also supports employee calls in relation to IT Services. These services are managed from our head office in Melbourne as well as many of our regional and suburban depots. Remote working capability is available for individuals as required.

Cisco WxCCE Cloud was recently implemented to ensure a fully supported Contact centre solution is in place and existing functional capability for Interactive Voice Response (IVR) and routing call flows continues to be supported and can be expanded to incorporate non-voice channels to provide customers with further interaction choices.

2.2 Corporate telephony solution

Our corporate services are located at various offices and depots across the three networks. The current on-premises CISCO corporate telephony system will soon be replaced by a new cloud product due to ending vendor support. An assessment of all options will be undertaken, and a new solution implemented before July 2026. Consideration will be given to the Cisco solution aligned with the WxCCE cloud product currently utilised for Contact centre services. A cloud solution delivers benefits such as flexibility in scaling and the ability to run the solution outside of our network. Running telephony services off the network allows for your corporate phone number to “follow” you on whichever device you are using. Users will effectively have a soft corporate phone on their iPad or iPhone. They can interact with external parties, including customers via a cloud corporate platform.

2.3 Network control & operations telephony solution

Our NC&Os are responsible for the day-to-day operations of the distribution network and are reliant on a core set of mission critical tools which include the British Telcom Integrated Trading System (BT ITS) that handles voice traffic in and out of the NC&Os with on average 200,000 inbound and outbound calls per annum.

The NC&O British Telecom telephony platform was recently upgraded from BT P31 to the fully supported BT Command which provides a state-of-the-art telephony solution. In addition to new functionality, the upgrade delivered a consolidation of the Powercor/CitiPower and United Energy telephony solutions into one platform.

The NC&O is dependent on a reliable and working telephony solution to ensured continued management of the following critical functions:

- Network Access – responsible for all types of switching instructions to enable safe access to the networks, operational authorisations and investigations.
- Network Control – the Control Room manages the operation and status of the electrical network. This involves the provision of safe access for both planned and unplanned work, including switching activities, major fault and escalation management.
- Works Dispatch & close out (faults) – the dispatch room provides an interface between identified network faults and the crews who respond, repair and restore supply. The dispatch activities centre around the validation of incoming information, the prioritisation of the issue and then matching this to the appropriate crew.

Network Control and Operations functions are primarily managed across a number of key sites with the ability to devolve operations to other regional and suburban sites as required.

2.4 What we heard from customers

As part of our customer engagement on our 2026–31 regulatory reset, we conducted extensive research on customer preferences with regard to access to their data and account information, as well as ease of contact and communication between us and our customers. Around 80% of our customers support improvements in ease of access to their information and enhanced customer experiences, whether through the Contact centre or through our customer portals. Our customers have advised they want us to use innovation and technology to maintain a positive customer experience. They highlighted that efficient, easily accessible and responsive customer services are a priority

Ease and speed of communication is particularly important for our commercial and industrial customers where the time taken to get the necessary information to make commercial decisions (e.g., duration of outage) can result in significantly different commercial outcomes.

2.5 Regulatory obligations

2.5.1 Distribution code of practice

There are various obligations outlined in the Distribution Code of Practice relating to the provision of a telephony service, which could not be met if we did not invest to safeguard our Contact centre telephony solution. For example, as an electricity distributor we must provide our customers with a 24-hour telephone service for fault enquiries and emergencies so they have access to unplanned fault information and can be connected to a customer service agent if required. We recently invested in a major system upgrade to our Contact centre telephony platform. Without this investment, there was a risk of that the vendor would no longer provide software upgrades or security patches, thereby undermining system stability and security.

2.5.2 Other

CitiPower/Powercor has a contract with South Australian Power Networks to answer and manage phone calls on their Faults and Emergency line. Under the associated Service Level Agreement (SLA), at least 90.5% must of calls to this line must be answered within 30 seconds. Any degradation of services though not maintaining currency of our telephony solution could impact our ability to meet our obligations under this SLA.

2.6 Recent changes

2.6.1 United Energy contact centre insourced

Since our last reset submission, the United Energy general enquiries and connections contact centre has been insourced and integrated with CitiPower/Powercor. This change provided the opportunity to improve customer enquiry satisfaction measures, strengthen services and improve interactions. While performance was adequate, weaknesses were identified with the outsourced model such as a high

staff turnover resulting in a loss of knowledge and a lack of flexibility for issues not covered by work instructions. This was reflected in reduced customer satisfaction levels when compared to the services provided by the onshore contact centre in Bendigo which services CitiPower and Powercor customers.

Following a decision to insource the United Energy general enquiries and connections contact centre and integrate with the existing CitiPower/Powercor contact centre, we were required to analyse, design, build, test and deploy new UE specific IVR applications and routing. The telephony platform capability was uplifted, and a new 1800 number added. The integration was successful and has led to a saving to customers through economies of scale. The Bendigo Contact Centre now manages customer interactions for CitiPower, Powercor and United Energy.

2.6.2 Contact centre telephony platform upgrade

A new contact centre solution was implemented from 2021-2023 to ensure continuity of customer service with all core functional capabilities for IVR and routing call flows. The old business critical telephony platform was nearing end of life; and with this was a risk that the vendor would no longer provide software upgrades and/or security/functional patches.

Effective management and resolution of customer calls has a direct impact on our corporate reputation and regulatory obligations. Therefore, this risk needed to be addressed by ensuring a fully supported contact centre platform was in place and existing functionality was supported. The contact centre telephony upgrade established a new, modern contact centre solution in Cisco's cloud environment (WxCCE). By implementing a new (upgraded) solution to a known technology stack, risks in transition and project delivery were mitigated.

The transition to a cloud-based contact centre service has provided greater flexibility, allowed agents to work remotely and avoided future infrastructure upgrade expenditure while welcoming expanded functionality. The project has delivered improved system resilience, capacity and scalability. Processes have also been streamlined for future functionality enhancements and application upgrades.

2.6.3 Network control and operations telephony consolidation and refresh

Experiences with the telephony system utilised by NC&O during escalation and weather events identified the need to accommodate geographical flexible working. This was to allow additional dispatch support resources to work across various office / depot sites during escalation events. In 2022/23 we embarked on a project to refresh the telephony solution utilised by NC&O.

A modernisation/refresh of the British Telecom software to Command provided a state-of-the-art telephony solution for our NC&O team and delivered the following:

- Consolidated the Powercor/CitiPower and United Energy telephony systems into one platform.
- Provided easier call handling and management.
- Replaced aged telephony hardware.
- Upgraded the voice recording solution.
- Enabled a performance and quality uplift for inbound and outbound control room calls.
- Resolved security vulnerabilities through the roll out of upgraded technology.
- Delivered a more reliable solution with failover capability.

In addition, 71 TouchPro touchscreens phones were successfully deployed across 6 control room sites in Victoria. The upgraded technology enabled flexibility for Network Control teams to stand-up additional consoles for assisted dispatch outside of the control room and in depots on the corporate user network.

2.7 Shared IT systems

This business case covers IT expenditure related Untied Energy[1]. Due to long term common ownership of these distribution businesses, over time we have developed a shared telephony system for CitiPower, Powercor and United Energy to enable the lowest cost delivery of our IT requirements. For example, when we are required to make changes to our business processes, we are only required to make these changes once, rather than having to make similar changes across separate IT systems.

[1] Total telephony expenditure forecast has been split 63% Powercor/CitiPower and 37% UE

3. Identified need

To continue to deliver a safe and reliable electricity supply, we must continue to maintain the currency of our telephony platforms. Our telephony platforms enable us to:

- communicate with customers through the contact centre, including general enquiries and faults/emergencies.
- manage customer enquiries relating to connections.
- request assistance with an IT service.
- communicate effectively within the business across various offices and depots.
- maintain reliable real-time communication from and with the network control and dispatch teams.

Without efficient working telephony solutions, we would lose the ability to effectively communicate with our customers in response to faults, emergencies or to answer general enquiries. We would also lose the ability to effectively communicate across the business and network operations teams. This would be reflected in a significant reduction to customer satisfaction measures and an increase in the minutes off supply metric.

3.1 Essential support during escalation events

In February 2024, Victoria experienced a catastrophic storm event that damaged 12,000 km of powerlines and poles across the state's electricity distribution businesses, causing power outages that impacted more than 500,000 homes and businesses[2]. Of these, 365,000 customers were impacted across the CitiPower, Powercor and United Energy networks. Bushfires in western Victoria, and extensive damage to poles, wires and other electrical infrastructure created extremely challenging conditions for our crews to safely restore customers power in a timely manner.

As the climate changes, catastrophic events and destructive weather patterns will become more frequent and more extreme. It is critical that we can mitigate, manage and recover quickly from these events.

During these events, it is essential that we continue to inform and support impacted customers and communities via multiple channels. As well as utilising a customer's chosen communication method (SMS/email), we provide updates on our website and encourage customers to register any unknown outages. During this event in February, over 749,00 SMS messages were sent to customers in a single day. When a customer experiences a power outage, they may choose to telephone our contact centre to report the fault or enquire about restoration. Calls received are directed using the IVR to ensure customers can receive up to date information regarding outages or to speak with a customer service advisor.

This significant event in February 2024 was the first major test of our newly upgraded Webex CCE contact centre platform. Over **32,000 calls** from customers were efficiently and effectively managed. Over 800 concurrent calls were managed without a call overload[3]. This level of activity on the old

[2] Taken from Victorian State Government media release. https://www.premier.vic.gov.au/sites/default/files/2024-02/240220-Independent-Review-To-Examine-February-2024-Storms.pdf?utm_source=miragenews&utm_medium=miragenews&utm_campaign=news

[3] Call overload occurs when the demand for calls exceeds the capacity of the incoming lines / system capacity, resulting in customers being unable to reach us. It is a requirement of our licence that customers can contact us

telephony platform would have resulted in a call overload event with a negative impact to the customer experience.

To provide some context the average daily volume of calls received between August 2023 and February 2024 was 2,700.[4]

In order to successfully manage call volumes during unexpected significant weather events and provide our customers with a high level of customer service, it is essential that we continue to maintain currency of both the platform and the bespoke voice applications and integrations that provide efficient and responsive customer service outcomes.

[4] Call volumes across CitiPower, Powercor and United Energy

4. Option analysis

We have considered three options to ensure currency of our telephony systems:

1. **Do not maintain currency** – this option performs least possible maintenance with an aim to maintain minimum services
2. **Maintain currency** – this option implements modest upgrades to existing telephony capabilities to maintain currency
3. **Modern currency** – this option would re-architect and transform our contact centre and corporate telephony solutions to take advantage of the latest innovations, supporting continued evolution of existing customer services and introduction of new channels, services and capabilities for our customers. The NC&O technology would be supported through prudent currency upgrades and introduce new features and capabilities.

The costs and associated net present value of each of the options is presented in Table 2, and set out in further detail in our attached cost model.[5]

TABLE 2 OPTIONS ANALYSIS SUMMARY ($M, 2026)

#	OPTION	CAPEX	OPEX
1	Do not maintain currency	1.4	0.4
2	Basic currency	4.1	0
3	Modern currency	5.7	0

4.1 Risk monetisation framework

To assess our investment options, we worked with EY to develop an ICT risk framework.[6]

Table 3 provides a summary of each risk category included in our framework.

TABLE 3 RISK FRAMEWORK SUMMARY

CATEGORY	DESCRIPTION
Reliability	Risks related to events or failures that cause unforeseen impacts to electricity supply or export capability. For example, customer supply or solar export
Compliance	Risks of regulatory, legal, or financial penalties due to failure in meeting compliance obligations, such as delays in publishing key market data or unauthorised access to sensitive data

5 UE MOD 7.18 - Telephony cost - Jan2025 - Public
6 UE ATT 7.02 - EY - IT risk monetisation framework - Jan2025 - Public

Bushfire	Risks that outages of critical operational systems may increase bushfire likelihood by impairing visibility of the network and timely decision-making
Safety	Risks affecting public and staff safety, such as loss of supply impacting life-support customers or disruptions to protective systems
Customer experience	Risks where customer interactions are impacted, such as outages of customer-facing IT systems
IT outage	Risks of systems becoming unavailable due to poor infrastructure maintenance or resource constraints, resulting in prolonged downtimes or outages
IT suitability and sustainability	Risks arising from legacy systems that are prone to failures, inefficiencies, and incompatibilities. These systems may lead to increased maintenance costs, failures, and cyber vulnerabilities if not updated

4.2 Option one – do not maintain currency

Under this option we would maintain a minimum service level for contact centre and corporate telephony. Currency of the telephony solution utilised by Network Control and Operations would not be maintained. This option would provide a lower level of currency maintenance than currently delivered.

4.2.1 Contact centre & corporate telephony

We would apply annual basic minimum currency upgrades. Due to a compliance requirement under the Distribution Code to provide our customers with a 24-hour telephone service for fault enquiries and emergencies, we must maintain a minimum level of service.

We would not be able to improve services or build capability into future business solutions. It is unlikely that we could meet the improved services identified by our customers under the CSIS[7] or meet any changes to regulatory requirements.

4.2.2 Network control and operations telephony

Software version currency would not be maintained. The software currency updates recommended by the software vendor would not be applied. Under this option system stability issues are likely to arise which would have a negative impact on the 'minutes off supply' measure. The number of minutes off supply would increase as 24x7 communication processes between the network control room and field operations staff rely on a working telephony system.

There is also a risk that we would be unable to meet changed regulatory requirements or of critical process failures due to not maintaining currency of the software. As this option does not assume investment, there is not any capital expenditure associated. However, under this option the software vendor which provides software for the Network Control and Operations function would charge for additional/extended support. This is reflected in the forecast for option one as operating expenditure.

The table below summaries an assessment of option one against our key risk criteria.

[7] CSIS – Customer Service Incentive Scheme.

TABLE 4 OPTION ONE RISK SUMMARY

#	RISK	DESCRIPTION
1	Reliability	This option would result in an increase to the 'minutes off supply' measure if system instability issues arose in the telephony system utilised by NC&O. Communication processes between NC&O and field operations personnel rely on a working telephony system 24 hours a day so that network reliability can be optimised.
2	Compliance	Under this least possible approach to currency of the contact centre and corporate telephony solutions, there is a risk that system stability issues may arise. If this occurred, we would be in breach of our obligations under the Distribution code and our duty of care to customers. The NC&O telephony system may not be able to meet future regulatory / compliance requirements due to system currency not being maintained.
3	Bushfire	In the event of a bushfire, NC&O would need to utilise the telephony solution to communicate and coordinate our response. For example, if supply to an area of the network needed to be turned off for safety reasons. If instability of the telephony solution prevented urgent communications, this would have an adverse impact on bushfire and safety risks.
4	Safety	A customer may need to phone our Contact Centre to report a safety issue related to the electrical network. If instability of the telephony solution prevented this interaction, early resolution of the safety issue would be prevented. A failure of communication processes between NC&O and field personnel could cause a preventable safety event to an employee.
5	Customer experience risk	If a customer is unable to telephone us due to instability of our telephony system, then immediate resolution of their query or issue would not be possible.
6	IT system outage	There is an increased risk of IT system instability with the contact centre and corporate telephony solutions due to a least possible expenditure approach to maintenance. There is an increased risk of IT system instability with the NC&O telephony solution due to a least possible expenditure approach to maintenance.

7	IT system suitability and system sustainability	This option does not allow for any changes or improvements to telephony services. Therefore, we would be unable to meet evolving customer needs. There is an increased risk of system instability and outages when we do not invest sufficiently in maintaining product currency. New security threats are not addressed through frequent application of vendor provided upgrades. As new security threats are identified, vendors will incorporate suitable barriers to cyber-attack within the latest software version. As new security threats are identified, vendors incorporate suitable barriers to cyber-attack within the latest software version. By not ensuring technical currency of our NC&O telephony solution, new security threats cannot be addressed.

The table below sets out the expenditure associated with option one.

TABLE 5 OPTION ONE EXPENDITURE FORECAST ($M, 2026)

OPTION ONE	FY27	FY28	FY29	FY30	FY31	TOTAL
United Energy	0.3	0.4	0.4	0.4	0.4	1.8

4.3 Option two – maintain basic currency

Under this option we would perform modest upgrades to existing telephony capabilities to maintain currency.

4.3.1 Contact centre & corporate telephony

We would maintain our current cloud platforms by performing modest upgrades. This would ensure our current capabilities are maintained. However, this option may not allow future technologies to be implemented, making innovations to enhance customer experience more difficult and expensive to implement.

4.3.2 Network control and operations telephony

We propose to maintain prudent currency of telephony solution supporting the NC&O functions with upgrades every 3-4 years. This option will deliver a fully supported platform which will provide an operational environment delivering on security, performance, and stability. The benefits of this approach include:

- software defects are resolved with the new release.
- enables development of new algorithms to identify safety risks on the network.
- hardware compatibility is maintained with newer software versions. Hardware refreshes can introduce incompatibility issues with older software versions.

The application of vendor upgrades to ensure currency provides both functional and technical improvements to the software product. These are not changes we have requested but rather improvements delivered by the vendor as part of a new software version which can provide benefit to end users and our customers.

A working telephony solution enables us to restore a customer's electricity supply faster in the event of an outage. If all else remained equal, then we would be able to maintain the current 'minutes off supply' measure.

4.3.3 Benefits of maintaining basic currency

It is essential to ensure our telephony solutions remain within vendor support to safeguard the delivery of the telephony services to customers, employees and the critical NC&O functions.

The application of vendor upgrades to ensure currency provides both functional and technical improvements to the software product. These are not changes we have requested but rather improvements delivered by the vendor as part of a new software version which may provide benefit to end users and our customers.

Functional improvements

The application of software upgrades provided by the vendor can deliver new and improved functionality while also addressing existing issues. These changes to the core software are provided as part of the standard software purchase and are distinct from requested enhancements to meet non-recurrent requirements. Examples of new functionality delivered by the vendor during recent upgrades to the core software are shown in Table 6.

TABLE 6 NEW FUNCTIONALITY

SYSTEM	FUNCTIONALITY DELIVERED
Contact centre CISCO platform	Remote connectivity enabling agents to work outside our network, providing extra connectivity and business continuity options.
NC&O BT platform	Softphones enabling NC&O telephony to operate at any corporate site to support operational flexibility.

Technical improvements

Within a software upgrade package, the vendor may also provide technical improvements. Table 7 provides some recent examples of technical improvements delivered as part of ensuring system currency.

TABLE 7 TECHNICAL IMPROVEMENTS

IMPROVEMENT CATEGORY	SOFTWARE UPGRADE/WHEN PERFORMED	IMPROVEMENT/BENEFIT DELIVERED
Security	NC&O BT Command 2022/23	The software upgrade to BT Command resolved existing security vulnerabilities within the Verint voice recording solution mitigating the risk of external access to customer voice recordings under the Privacy Act 1988. This risk was not able to be remediated by the previous software version.
Performance	Contact centre WxCCE	The upgrade to WxCCE for Contact centre services improved both system capacity and resiliency as well as allowing more timely response to security patching and software upgrades.

4.3.4 Limitations of maintaining basic currency

Maintaining currency does not allow us to utilise all new technologies and functionality in the marketplace to meet changing customer needs.

Our extensive consumer engagement shows customers value ease of access to their data and information and want us to enhance their experience through our customer portal and our contact centre. This would not be possible by just maintaining currency.

The table below summarises an assessment of option two against our key risk criteria.

While the risk of a system issue arising is minimised when compared to option one, this option has limited ability to meet changing customer preferences, improve reliability and adopt future IT solutions.

The table below summaries an assessment of option two against our key risk criteria.

TABLE 8 OPTION TWO RISK SUMMARY

#	SYSTEM	DESCRIPTION
1	Reliability	The current ‘minutes off supply’ measure could be maintained due to system currency being maintained.
2	Compliance	While ensuring system currency and stability would allow us to meet current requirements, it does not support improvements and therefore we may not meet future regulatory/compliance requirements.
3	Bushfire	If basic currency is maintained and stability of the telephony solutions is ensured, then this option does not create a bushfire risk. However, if an improvement

		opportunity is identified which would assist in a bushfire scenario, this could not be implemented.
4	Safety	If basic currency is maintained and stability of the telephony solutions is ensured, then this option does not create a safety risk. However, if new safety related enhancements are identified, we would be unable to implement. A preventable safety risk to customers or employees could not be addressed.
5	Customer experience risk	This option does not allow for any changes or improvements. Therefore, we would be unable to meet evolving customer needs.
6	IT system outage	Minimised risk of service outages as maintaining system currency reduces the risk of system instability. As new security threats are identified, vendors incorporate suitable barriers to cyber-attack within the latest software version. By ensuring technical currency, new security threats can be addressed.
7	IT system suitability and system sustainability	This option may not allow some future technologies to be implemented, making innovations to enhance customer experience more difficult and expensive to implement.

The table below sets out the expenditure associated with option two.

TABLE 9 OPTION TWO EXPENDITURE FORECAST ($M, 2026)

OPTION TWO	FY27	FY28	FY29	FY30	FY31	TOTAL
United Energy	0.6	1.5	0.9	0.9	0.2	4.1

4.4 Option three – enhanced currency

Under this option we would seek to evolve and innovate to improve our contact centre and telephony capabilities and deliver new and improved services to customers in line with the rapidly evolving capabilities expected to come to market over the course of this regulatory period.

4.4.1 Contact centre & corporate telephony

Artificial Intelligence (AI) capabilities are rapidly evolving, with significant developments being announced at an unprecedented rate. This rapid advancement is likely to transform customer service delivery. More pervasive machine learning/AI enablement is currently coming to market which exceeds the capability of current customer service automations. This may include dynamic customer responsive IVR design, automated routing and skill management, new channels as well as AI enabled forecasting and scheduling capabilities. To fully realize the potential of these new capabilities to enhance customer experiences, we will need to re-architect our contact centre and telephony solutions. These technology suites are expected to include substantial improvements that will directly impact the level of service we can provide to our customers.

4.4.2 Network control and operations telephony

This option will allow us to evolve our current capabilities to deliver new innovations, enabling NC&O to better support efficient and responsive customer outcomes through application of new technology solutions.

4.4.3 Benefits of enhancing currency

We anticipate that AI technology will empower us to provide innovative solutions to our customers, enhancing their interactions with our distribution businesses. This will facilitate easier and quicker access to their information. The implementation of the latest customer service technologies is anticipated to save customers time and effort when contacting us, enabling improved management and outcomes of customer inquiries. Consequently, the overall customer experience will be enhanced. Furthermore, these technologies are expected to facilitate innovative services and improvements across our corporate and NC&O telephony platforms.

The table below summarises an assessment of option three against our key risk criteria. This option achieves a similar level of risk reduction compared to option two, however it will develop telephony systems that are able to meet future customer and compliance requirements.

The table below summaries an assessment of option one against our key risk criteria.

TABLE 10 OPTION THREE RISK SUMMARY

#	SYSTEM	DESCRIPTION
1	Reliability	Provides potential to improve the 'minutes off supply' measure as the new technology will provide improvement opportunities.
2	Compliance	Newer technology aids straight forward application of compliance driven changes.
3	Bushfire	The adoption of new and improved technologies will provide more robust capabilities with the ability to implement enhancements to support a bushfire scenario.
4	Safety	Enables adoption of new and improved technologies will provide more robust capabilities with the ability to implement safety focussed enhancements; leading to a decreased safety risk to customers or employees.
5	Customer experience risk	Technology is likely to include significant improvements which have a direct impact to the level of service we can provide to our customers. We will adopt new and improved technologies so that we can service our customers through newly available capabilities, including AI enabled automations.
6	IT system Outage	Utilising new technology will improve system resilience and minimise the risk of a system outage. As new security threats are identified, vendors incorporate suitable barriers to cyber-attack within the latest software version. By ensuring technical currency, new security threats can be addressed.

7	IT system Suitability and system sustainability	Newer platforms provide latest technologies and remain aligned with best practise IT architecture and operating models. This will enable us to implement improvements and introduce complimentary IT solutions.

The table below sets out the expenditure associated with option two.

TABLE 11 OPTION THREE EXPENDITURE FORECAST ($M, 2026)

OPTION THREE	FY27	FY28	FY29	FY30	FY31	TOTAL
United Energy	0.6	3.0	1.1	0.9	0.1	5.7

5. Recommendation

Following our option analysis, we recommend progressing option three which will enhance our telephony currency, reducing risks related to not meeting future customer and compliance requirements while improving our telephony capabilities and delivering new/improved services to customers.

Enhancing our telephony solutions is also in line with the strong customer feedback we received, with customers willing to support expenditure related to improvements in ease of access to their information and enhanced customer experiences.

Our recommendation also considered a number of general factors (e.g. project concurrency, resource availability, etc.) to ensure that the option selected and upgrade timing was pragmatic, actionable, and would have the highest probability of delivering a successful outcome.

Our proposed expenditure profile is provided in Table 12.

TABLE 12 RECOMMENDED OPTION EXPENDITURE FORECAST ($M, 2026)

OPTION THREE	FY27	FY28	FY29	FY30	FY31	TOTAL
United Energy	0.6	3.0	1.1	0.9	0.1	5.7

For further information visit:

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