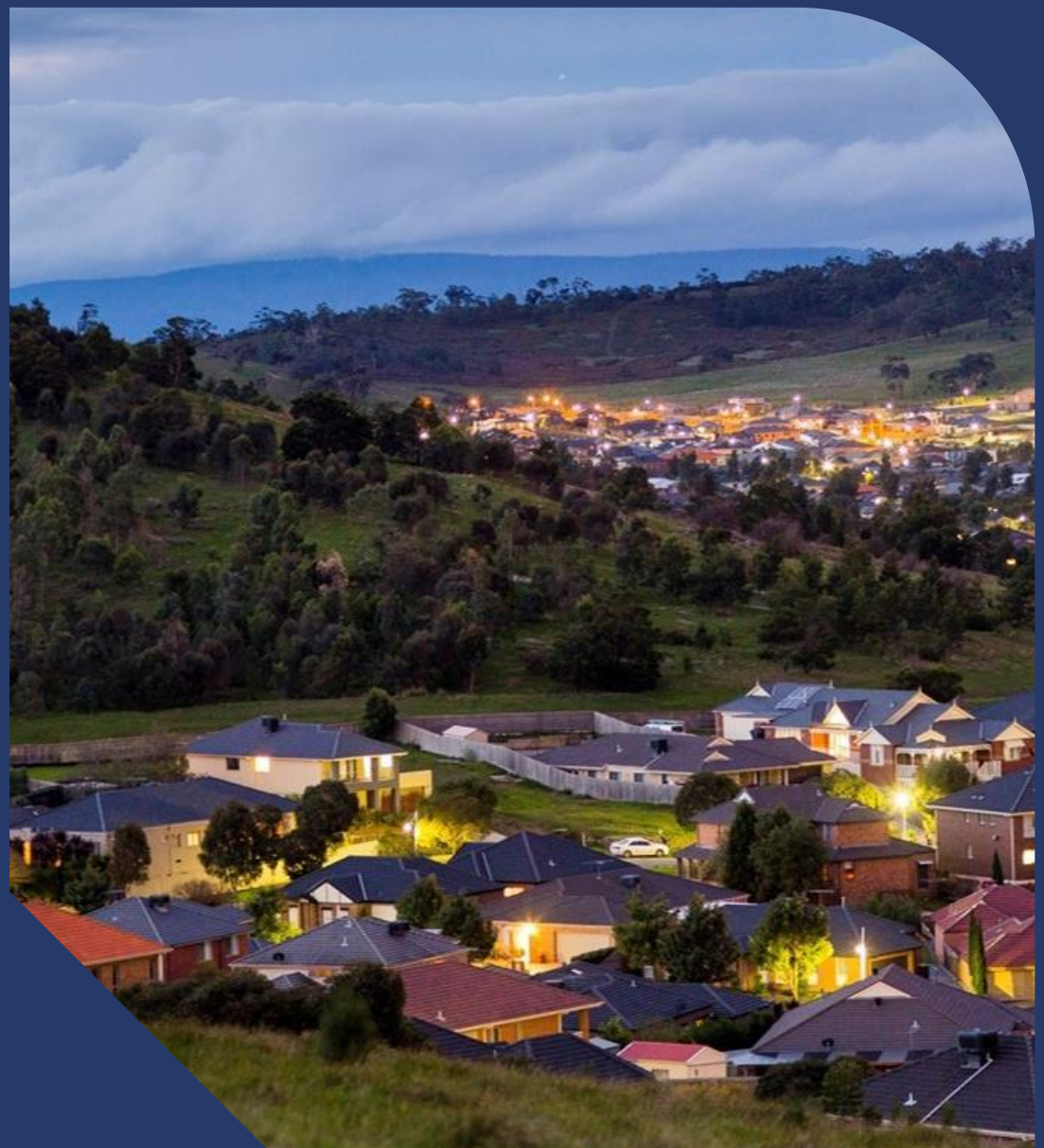


# AusNet

## Priority Services Program

Business Case

April 2022



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## 1 EXECUTIVE SUMMARY

The lives of our customers can change when they least expect them to. At any point in time, they can face circumstances that affect their use of, or access to essential services. The impacts of COVID-19 and the increasing frequency of severe weather events highlight this.

While it's difficult to know precisely how many Victorians are experiencing vulnerable circumstances, the Essential Services Commission (ESC) has estimated that as of June 2021, 43,376 residential gas customers (2.1%) were receiving tailored assistance from their retailer to help pay their bills<sup>1</sup>. In addition, research conducted by the Consumer Policy Research Centre (CPRC) suggested that among the broader population 1 in 3 experience some kind of financial stress in their life<sup>2</sup>.

A key pillar of AusNet's strategy is "Customer Passion". We believe no customers should have to choose between food on the table or paying gas bills, and that customers who experience extra barriers to accessing or engaging with their gas service should receive fit-for-purpose support. Whilst support for customers in vulnerable circumstances has typically been the remit of energy retailers who manage the financial relationship with end customers, our customers and stakeholders have clearly told us that as the managers of the physical gas assets, we also have a role to play. The feedback provided through out customer workshops showed that 81% of customers supported the development of a Priority Services Program (PSP).

To help design a Victorian-specific program of assistance for customers, we established an advisory panel consisting of representatives from several community organisations and peak bodies in the social service and public sectors. In addition, we assessed the initiatives that gas distribution networks globally, have implemented to support their customers (for example in the UK).

Through these processes we identified three key focus areas for our Priority Services Program:

1. Doing more to financially support our customers and improve affordability;
2. Improving how we communicate with our priority services customers and the community, especially Culturally and Linguistically Diverse (CALD) customers; and
3. Making it simpler and easier to get things done, ensuring our services are easily accessed by all.

Within these key focus areas, we worked with our customers and stakeholders to prioritise the delivery of new services that will provide the highest value to customers. These include:

- Gas appliance safety checks and emergency appliance repairs;
- Enabling customers to read their own gas meters;

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<sup>1</sup> Essential Services Commission 2021, Victorian Energy Market Update: September 2021, 30 September, p.6.

<sup>2</sup> CPRC, Exploring regulatory approaches to consumer vulnerability – A report for the AER, February 2020, p.5.

- Dedicated customer support team responsible for managing the program, developing referral programs for our customer service teams, and implementing the new services identified;
- Improving the accessibility of our communications, particularly for CALD customers;
- Providing check-ins and additional support to customers during outages e.g., heating and cooking facilities; and
- Establishing a Priority Services register, linked to the Customer Information System, enabling the identification of and management of customers on the PSP.

These prioritised initiatives were designed to be consistent with the other Victorian Distribution Businesses (i.e., Australian Gas Networks (AGN) Victoria and Multinet Gas Networks), enabling all customers across Victoria to have access to the same services. In addition, we assessed existing schemes and assistance in place for Victorians to ensure that the PSP does not duplicate or overlap with them.

We also identified initiatives that are beneficial to all customers that we will fund via the base and trend components of our proposed operating expenditure allowance. We will deliver these at no additional cost to customers, including:

- Additional training for front line staff to engage with empathy and sensitivity and refer priority service customers to other programs.
- 24-hour translation services for any service that we offer over the phone.
- Advice on efficient usage of gas or referrals to energy efficiency advice available through trusted organisations.

This business case is focussed on the new services included in the PSP that require a step change in our operating expenditure allowance to implement. We have assessed three options for the delivery of these initiatives:

- Option 1 – Do not implement any additional initiatives to support customers in vulnerable circumstances.
- Option 2 – Implement all PSP initiatives at the mid-point on the scale of delivery, at a cost of \$3,955,000 across the period.
- Option 3 – Implement all PSP initiatives at the full point on the scale of delivery, at a cost of \$6,980,000 across the period.

In our workshops, customers told us they supported the program, but did not want us to spend too much on it in this period. They wanted us to start small, focussing on establishing the program and tracking benefits to customers to ensure the initiatives identified are delivering value. Therefore, we are recommending we proceed with Option 2 to implement all of the PSP initiatives identified, at the mid-point scale of delivery i.e., using manual or low technology solution options.

The forecast cost to deliver Option 2 (excluding overhead) during the next five-year period (2024 to 2028) is \$791,000 pa. This is equivalent to \$1.05 per customer per year, which is within the acceptable range that our customers have told us.

Table 1: Option 2 annual breakdown of costs

Option 2	2024	2025	2026	2027	2028	Total
Capex	-	-	-	-	-	-
Opex	\$1,461,000	\$811,000	\$561,000	\$561,000	\$561,000	\$3,955,000
<b>Total</b>	\$1,461,000	\$811,000	\$561,000	\$561,000	\$561,000	\$3,955,000

Note: this forecast cost assumes the Customer Information Systems (CIS) component of IT spend (see CIS brief) is approved. If this does not occur, then revisions to the forecast cost will be required to include the cost of system changes associated with delivering the priority services register.

## 2 BACKGROUND

Our Gas Distribution network supplies natural gas to 763,412 residential and business customers in western Melbourne, central and western Victoria, through our network of underground gas pipelines. Our purpose is to “Connect communities with energy and accelerate a sustainable future”, underpinned by our key strategic pillar “Customer Passion”. We service many different types of customers from residential families and small businesses to large commercial and industrial suppliers.

### 2.1 Why focus on the experience of vulnerability?

Within our customer base it is likely that a significant percentage of customers are experiencing vulnerable circumstances, or disadvantage in some way. As of June 2021, the Essential Services Commission has estimated that 43,376 Victorian residential gas customers (2.1%) were receiving tailored assistance from their retailer to help pay their bills<sup>3</sup>. In addition, research conducted by the Consumer Policy Research Centre (CPRC), suggests that among the broader Australian population<sup>4</sup>:

- 1 in 3 experience some kind of financial stress in their life
- 1 in 5 have a disability
- 1 in 5 National Debt Helpline callers with energy issues in 2019 were experiencing mental health problems
- 1 in 6 women have experienced physical and/or sexual violence
- 1 in 5 speak a language other than English at home
- 44% have literacy levels below what is considered enough to get by in everyday life

As our understanding of customers experiencing vulnerable circumstances grew, we wanted to know more about the needs of this group and where in our distribution network they were located. AusNet commissioned quantitative analysis to identify the types and locations of households within our Electricity and Gas distribution

<sup>3</sup> Essential Services Commission 2021, Victorian Energy Market Update: September 2021, 30 September, p.6.

<sup>4</sup> CPRC, Exploring regulatory approaches to consumer vulnerability – A report for the AER, February 2020, p.5.



areas that are experiencing disadvantage. Combining data from the 2016 Census, and the Household, Income and Labour Dynamics in Australia survey, the CPRC identified the suburbs that contain high proportions of households with key measure of disadvantage: poverty, socio-economic disadvantage, persistent heating inability, low-income/high expenditure on energy, and/or persistent bill payment difficulty. The analysis showed there were 17 suburbs that appear on all five measures of disadvantage<sup>5</sup>. The majority of suburbs identified (12 out of the 17) were located in our gas distribution area, indicating a higher proportion of customers experiencing vulnerable circumstances in our gas network.

For our gas customers, the reliability and affordability of our services is essential to their daily lives, health, and wellbeing. Poorly designed products and services can disadvantage all customers but have more severe and far-reaching consequences or customers in vulnerable circumstances<sup>6</sup>. Therefore, we must ensure access to our services are inclusive and responsive to our customers circumstances.

## 2.2 What do we mean by vulnerability?

Currently, there is no uniformly accepted definition of customer vulnerability. As research continues in this space, we intend to continue to refine our understanding of vulnerability and disadvantage.

Importantly, we understand that vulnerability and disadvantage are not static – i.e., a person's experience can change over the course of their life<sup>7</sup>. In addition, the factors contributing to a person experiencing vulnerability are wide and varied. The Index of Relative Socio-economic Disadvantage (IRSD) includes variables such as low-income households, families with children who live with jobless parents, one parent families and people who do not speak English well.

The meanings of vulnerability and disadvantage are nuanced, however are used interchangeably. Through our partnership with CPRC, we have defined vulnerability and disadvantage as below.

*'A customer in **vulnerable circumstances** can be described as someone who is at risk of suffering detriment, while a customer in **disadvantaged circumstances** can be described as someone who is actually experiencing detriment.'*

Together we identified the characteristics that allow us to identify disadvantage (and potentially pre-empt vulnerability) in energy:

1. **Poverty** (i.e., low-income people lack the opportunity to participate on par with peers)

<sup>5</sup> CPRC, Households Experiencing Disadvantage in the AusNet Services Distribution Area – a report for AusNet Services, March 2019, p.20.

<sup>6</sup> .George, M., Graham, C. and Lennard, L. (2016) Consumer Vulnerability – Mainstream, not Marginal, Centre for Consumers and Essential Services, University of Leicester.

<sup>7</sup> Consumer Affairs Victoria, 2004, 'What do we mean by vulnerable and disadvantaged consumers?', p.8.

2. **Relative socio-economic disadvantage** (i.e., people's access to material resources, and their ability to participate in society)
3. **Fuel poverty** (i.e., low-income people who spend a high proportion of their income on energy, are unable to pay bills, and restrict their consumption)<sup>8</sup>

These definitions are important internally, to help employees understand the specific needs of customers in vulnerable or disadvantaged circumstances. However, research shows that describing additional support as being 'for the vulnerable' or designing programs to cater to people in 'hardship', can discourage customers from seeking the help that's available.

The risks associated with the use of broad categorisation and labels was highlighted in the Australian and New Zealand Journal of Public Health, *Rethinking the use of 'vulnerable'*<sup>9</sup>. The paper argues that:

*"Widespread, indiscriminate use of the term 'vulnerable' is problematic. When used as a term to describe certain individuals or populations in a nondescript and vague manner, the reader 'fills in the blanks' of why a certain individual or group is vulnerable. Being vulnerable could be seen as an intrinsic deficit, inferiority, or inability to protect the individual's own best interests. This can in turn reduce both perceived and actual agency of the individual or group, depicting them as 'others' who are powerless and in need of protection. This may also result in further stigmatisation and exclusion of these individuals and groups.*

As such, we have decided to move away from a program that labels the customers we are seeking to provide services for (e.g., "vulnerable customers") and focus on the services we are seeking to offer i.e., "Priority Services". Therefore, we will refer to the additional support services available to customers as a "Priority Services Program".

Based on the research outlined, and similar programs designed for customers in other jurisdictions (see section 2.4 for more detail), we consider customers registering for the Priority Services Program a priority because they are *"more reliant on the safe, reliable and affordable delivery of our services"*. This includes, but it not limited to:

- Culturally and Linguistically Diverse (CALD) customers
- Customer experiencing family domestic violence
- Elderly customers
- Customers experiencing financial hardship
- Physically or intellectually disabled customers
- Chronically ill customers
- Customers suffering from mental health issues

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<sup>8</sup> CPRC, Households Experiencing Disadvantage in the AusNet Services Distribution Area – a report for AusNet Services, March 2019, p.3 - 6.

<sup>9</sup> Munari, S., Wilson, A. and Ngaree, B. (2021) Rethinking the use of 'vulnerable' - Australian and New Zealand Journal of Public Health.

- Customers who have low levels of literacy.

It is important to note that not all customers in these groups will need additional support.

### **2.3 What is the role of gas networks?**

Traditionally primary support for people experiencing vulnerable circumstances has been available from the Victorian and Commonwealth Governments and not-for-profit organisations. In the energy market, retailers are responsible for providing additional support, focussing mainly on providing financial support through hardship programs.

Access to these programs has been valuable to customers. According to the ESC energy market update, at the end of June 2021, 60,148 electricity and 43,376 gas residential customers were receiving tailored assistance from their retailer to help pay their bills<sup>10</sup>. However, early observations from the ESC's review into the payment difficulty framework highlight that "consumers are entering tailored assistance with already high arrears" and "1 in 2 consumers disconnected did not receive assistance in the six months prior"<sup>11</sup>.

Retail hardship programs are offered at the final step of the process for customers, and only focus on financial support. This means the opportunity for early identification of customers in vulnerable or disadvantaged circumstances is lost, as well as the opportunity for other support services earlier in the customer journey. In addition, gas network businesses are in the unique position of having regular face to face touchpoints with customers.

An example of the importance of this interaction is at the point of disconnection. Energy retailers request disconnections for non-payment (customer is in arrears on their retail bill) or disconnection for non-identification (customer has not contacted their retailer and usage has been detected on the meter). Over 50% of gas disconnections in AusNet's distribution area are closed out as 'incomplete' following field staff engaging directly with customers or because they do not have access to the meter (gate or door locked). At the point of disconnection, AusNet field staff knock on the customers door to make them aware that they will lose their gas supply. Field staff make customers aware of the need to contact their retailer and do not go ahead with the disconnection if they have been able to talk to customers. Most customers report being unaware of the status of their connection and following the face-to-face interaction with AusNet field staff, commit to contacting their retailers to resolve the issue.

The CPRC report for the AER on Exploring regulatory approaches to consumer vulnerability highlights the role for networks, as "*essential service providers can*

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<sup>10</sup> Essential Services Commission 2021, Victorian Energy Market Update: September 2021, 30 September, p.6.

<sup>11</sup> Essential Services Commission 2021, Payment difficulty framework implementation review: early observations: November 2021.



*exacerbate harm if they do not respond in an informed, sensitive way to the personal circumstances of their customers. Vulnerability can be addressed at multiple stages of the customer journey. While many regulators and legal frameworks have traditionally focused on debt and payment difficulty, some are also looking more closely at the design of products and services, to help create inclusive markets where people can secure what they need at a fair price, without being excluded or taken advantage of. This approach has the potential to deliver deeper, more comprehensive market change and positive consumer outcomes.<sup>12</sup>*

## 2.4 What support have other networks provided?

Network businesses in other parts of the world, for example the UK, have been offering additional support services to customers for approximately 12 years. The UK's programs are funded through their regulated price control mechanism and actively monitored by Ofgem, which has similar responsibilities to the Australian Energy Regulator. Ofgem have clearly communicated the importance of networks supporting customers in vulnerable circumstances, stating *“Our objective for RIIO-2 is to ensure that regulated network companies deliver the value for money services that both existing and future consumers want. In particular<sup>13</sup>, that the price controls are designed **so that networks play a full role in addressing consumer vulnerability issues.**”*

UK network businesses offer a range of additional services to support customers in vulnerable circumstances through the 'priority services register' which is a free support service to help customers (see figure 2.0).

Each energy supplier and network operator offer these services and maintains their own register. Customers can sign up to be part of the register themselves, or via a referral from various support organisations. In addition, retailers can pass customer information on to network providers to prevent customers applying multiple times<sup>14</sup>.

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<sup>12</sup> CPRC, Exploring regulatory approaches to consumer vulnerability – A report for the AER, February 2020, p.3.

<sup>13</sup> Ofgem, RIIO-2 Framework Decision, 2018, pp. 4 and 7.

<sup>14</sup> <https://www.ofgem.gov.uk/getting-extra-help-priority-services-register>

Figure 1: UK Priority Services Register

## 1. The UK Priority Services Register

### Who can register for Priority Services?

Customers are eligible to register if they:

- have reached the state pension age
- are disabled or have a long-term medical condition
- are recovering from an injury
- have a hearing or sight condition
- have a mental health condition
- are pregnant or have children under 5
- have extra communication needs (e.g., non-English speaking).

Customers can also register for reasons not listed e.g., if they need short-term support after a stay in hospital.

### What help is available to customers?

All energy suppliers and network operators offer the same minimum set of initiatives for customers. These are:

- Advance notification of planned power outages.
- Priority support in an emergency, for example providing heating and cooking facilities when customers do not have access to them.
- Identification and password scheme, so customers are confident the people contacting them are genuine.
- Regular meter reading services to help customers if they cannot read their meters and avoid estimated bills.
- Helping customers move their prepaid meters to accessible locations so they can safely top up.
- Ensuring customers have access to information in their preferred format, for example multi-lingual, large print, or braille.

Each business can also offer their own additional services that they deem provide value for customers.

Northern Gas Networks in the UK have implemented a range of other initiatives for customers in vulnerable circumstances<sup>15</sup>. This includes:

- Conducting carbon monoxide and energy efficiency awareness campaigns and providing referrals for further help with in-house measures
- Providing funding to charities to provide services to hard-to-reach customers
- Working with specialist organisations to train staff to help identify signs of vulnerability and to provide appropriate support and referrals.

<sup>15</sup> Northern Gas Networks, Customers in vulnerable situations strategy – A7 – NGN RIIO-2, 2019)

### 3 PRIORITY SERVICES PROGRAM ENGAGEMENT

Other than our dedicated services for life support customers, AusNet does not have any formal programs in place to support residential gas customers experiencing vulnerability. We currently provide support on a case-by-case basis when we become aware that customers may have specific needs, however this occurs on an ad-hoc basis and is not centrally managed or well-coordinated.

#### 3.1 Our engagement approach

To design a Priority Services Program that best addressed the needs of customers in vulnerable circumstances and is fit for purpose for Victorians, we set out to engage deeply with customers and appropriate customer representatives. We identified the key groups in table 2 as critical to input into these plans.

Table 2: Key customer, customer representative and stakeholder groups in engagement plan.

<b>Gas customers</b>	<b>Advisory panel</b>	<b>Key stakeholders</b>
<p>We established a group of gas residential and small business customers to represent the views of customers across our network. These were held in four key locations: Craigieburn, Warrnambool, Bendigo, and Geelong.</p> <p>Each group had approximately 20 customers, who were recruited to represent a range of social and demographic areas. The process considered age, gender, education level, housing ownership and income (see figure 2). We also ensured inclusion of the areas in our distribution patch that appear across five or more measures of disadvantage.</p> <p>In addition, we had one dedicated Culturally</p>	<p>To develop a program that really delivers on the needs of priority services customers, we established an expert advisory panel.</p> <p>The panel consists of advocates from organisations that represent a range of customers experiencing vulnerable circumstances, including:</p> <ul style="list-style-type: none"> <li>• Council on the Ageing</li> <li>• Ethnic Communities' Council of Victoria</li> <li>• Victorian Council of Social Service</li> <li>• Financial Counselling Vic</li> <li>• Safe Steps Family Violence Response Centre</li> <li>• Consumer Action Law Centre</li> <li>• Brotherhood of St Laurence</li> <li>• Energy &amp; Water Ombudsman Victoria</li> </ul>	<p>We also wanted to hear from other key stakeholders such as major users and development associations. We discussed the PSP at the September Victorian Gas Network Stakeholder Roundtable (VGNSR).</p> <p>We also presented our plans to retailers at our operating expenditure (opex) deep dive. Collaboration with retailers is a key element to ensure success of the program.</p>

- and Linguistically Diverse (CALD) group in Geelong.
- Uniting
  - St Vincent de Paul

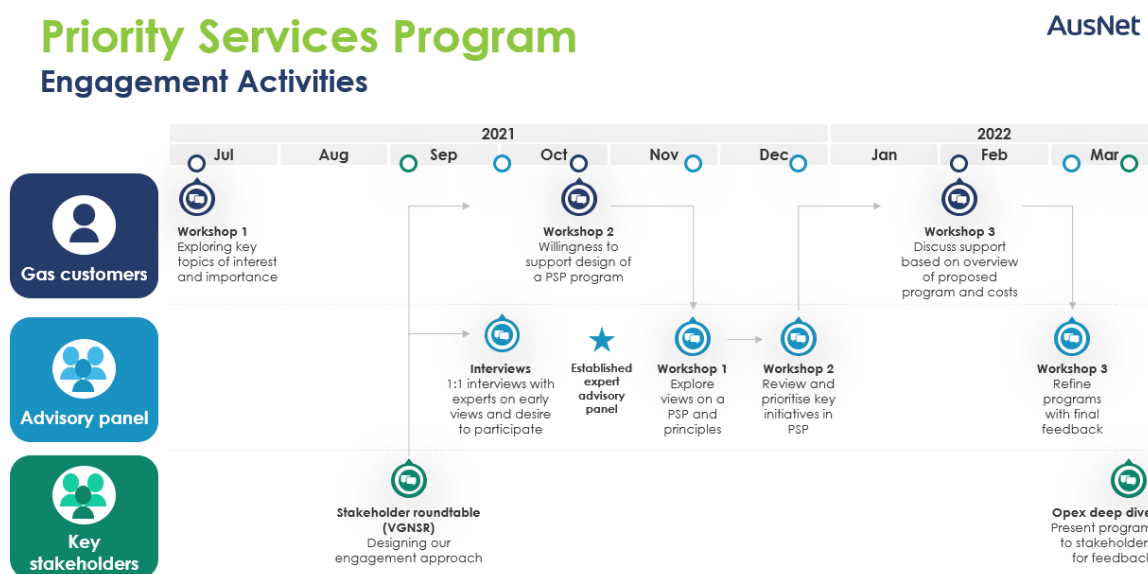
Figure 2: Customer workshop demographics provided by our independent facilitator, Communication Link.



### 3.2 Our engagement activities

We designed an engagement program with regular touchpoints, giving each key group the opportunity to continuously shape the program and allowing us to share insights between groups to support their thinking (see figure 3).

Figure 3: Priority Services Program engagement activities



The intent of this engagement was to help understand:

- The **level of support** from customers and customer representatives to AusNet offering this new service, and the **role of gas networks in supporting customers** in vulnerable circumstances.
- The **types of customers** that should be eligible for the Priority Services Program (based on existing research, programs in other jurisdictions and customer/customer representatives experience).
- The **programs and support that already exist** for Victorian customers and the gaps in these.
- Opportunities for **cross-sector collaboration** in the delivery of initiatives.
- The initiatives that would **be most impactful** for customers in vulnerable circumstances.

For both gas customers and the expert advisory panel we held a series of three workshops, each building on the concepts and feedback from the last to refine the program.

Table 3: Priority Services Program engagement activities

	Workshop 1	Workshop 2	Workshop 3
Customers	<ul style="list-style-type: none"> <li>• Presented on the gas industry to help customers understand our role.</li> <li>• Broad discussions on what customers value and where</li> </ul>	<ul style="list-style-type: none"> <li>• Discussed concept of a PSP and customer eligibility.</li> <li>• Generated ideas for PSP initiatives.</li> <li>• Discussed support for further exploration of a PSP.</li> </ul>	<ul style="list-style-type: none"> <li>• Reviewed and updated the PSP principles.</li> <li>• Discussed proposed program and other initiatives.</li> </ul>



	they want us to focus.		<ul style="list-style-type: none"> <li>Level of comfort with proposed PSP costs.</li> </ul>
<b>Advisory panel</b>	<ul style="list-style-type: none"> <li>Stakeholder views on a PSP.</li> <li>Existing research and programs, and the gaps in these.</li> <li>The role of gas networks in a PSP.</li> <li>Where a PSP can add most value.</li> <li>Principles for program design.</li> </ul>	<ul style="list-style-type: none"> <li>Reviewing and prioritising initiatives for a PSP.</li> <li>Identifying implementation risks and opportunities for cross-sector collaboration.</li> <li>Refining our plans with stakeholders ahead of publishing our draft plans.</li> </ul>	<ul style="list-style-type: none"> <li>Reviewing and providing feedback on the PSP programs for each business.</li> <li>Discussing PSP implementation considerations and providing feedback.</li> </ul>

### 3.3 What did we hear?

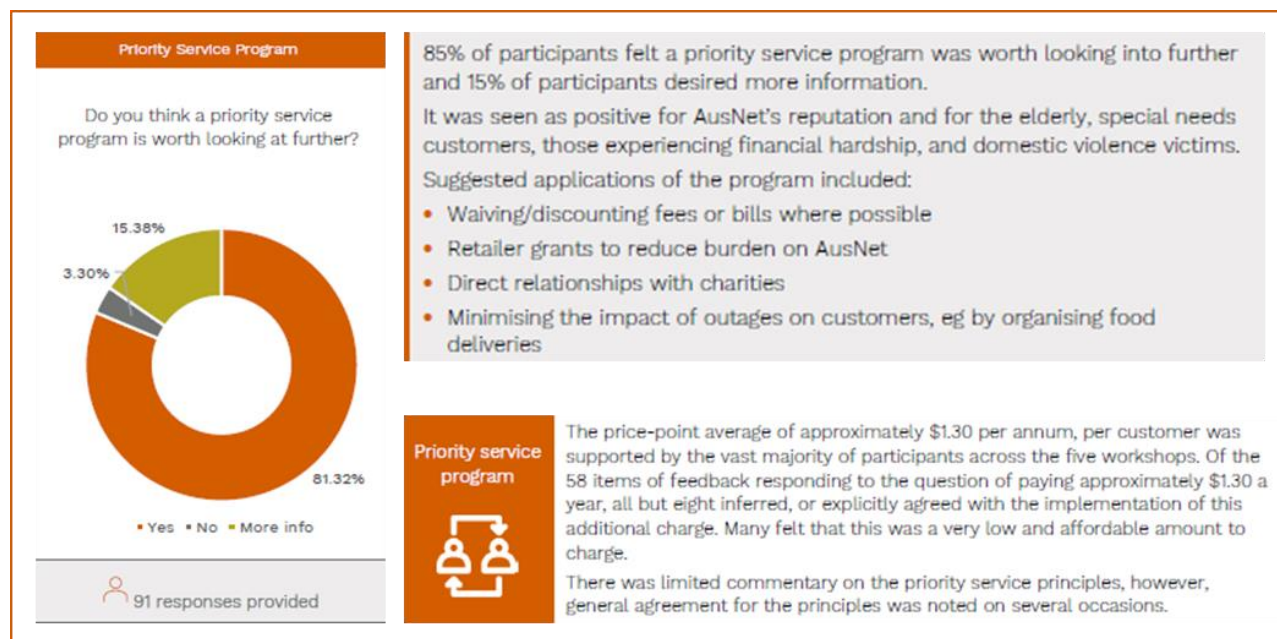
Overall customers, advisory panel and other key stakeholders were supportive of the concept of the Priority Services Program. More than 4 in 5 customers (81%) thought a Priority Service Program was worth investigating further and seeking expert input on. Only 3% did not support this. Customers were clear that, whilst they support the program, they did not want AusNet to spend too much money on it, as affordability is top of mind. Customers believe the proposed additional charge of approximately \$1.30 per customer per annum is acceptable and the proposed principles for the PSP put forward by AusNet were broadly supported<sup>16</sup>.

Feedback from our end customer workshops, led by an external facilitator, is summarised in Figure 4.

<sup>16</sup> Communication Link, Engaging Victorians on the future of the gas networks – consultation report, April 2022, p.

Attachment 12 – Priority Services Program business case

Figure 4: Priority Services Program customer workshops feedback summary, prepared by independent company



Workshops with the advisory panel were jointly facilitated by AusNet and AGIG (Australian Gas Networks and Multinet Gas Networks) engagement teams. A summary of feedback from stakeholders across all three workshops is provided in table 4 below.

Table 4: Priority Services Program Advisory Panel feedback summary

POSITIVE ASPECTS OF THE PROGRAM	THINGS TO KEEP THINKING ABOUT
Feedback from stakeholders was that the engagement process was well run and generated great discussion on supporting customers in vulnerable circumstances.	The advisory panel had mixed thoughts on the request for a step change to support the program. Some panel members suggested that the cost of these initiatives be incorporated into AusNet's BAU costs.
The advisory panel agreed there is a role for networks to play in supporting customers in vulnerable circumstances in Victoria and customers and stakeholders see value in this.	The advisory panel were clear that the program initiatives should provide additional support to customers, but not fund improvements that should occur as part of business-as-usual activities e.g., good inclusive design of BAU products and services.
The advisory panel agreed that AusNet should continue to look for partnerships to help promote and streamline the delivery of the program, such as with retailers and social service organisations.	The panel highlighted that AusNet should remain open to continuously learning and adjusting the program as required. They discussed the ongoing use of appropriate language to ensure inclusivity.
The advisory panel agreed that a broader definition of customers in vulnerable	The panel and AusNet recognised the challenge of implementation, agreeing

<p>circumstances was welcome, and the groups identified as eligible were appropriate, noting eligibility criteria are fluid and will be updated as required. The panel specifically acknowledged that customers could move in and out of the program based on their circumstances, thus addressing the transient nature of vulnerability experienced by some.</p>	<p>that ongoing discussions with experts and customers are needed to appropriately co-design the registration process.</p> <p>The panel highlighted the need for consistency in the Victorian distribution business's programs, to make it easier for customers to understand what support is available across the board. It will also aid other organisations when sharing this information with customers.</p>
<p>The panel agreed that the process identified the appropriate focus areas and many positive initiatives to support customers, delivering high customer benefits.</p>	<p>The panel highlighted the need to ensure that the services provided in the PSP do not duplicate existing programs in Victoria.</p> <p>The panel noted customer sentiment around ensuring the impact of the program is measurable.</p>

## 4 PRIORITY SERVICES PROGRAM

Together with our customers and customer advocates we have co-designed a Priority Services Program to materially improve the experiences of customers who need support most. We have developed this program to ensure the benefits flow directly to customers, at the lowest cost to all. We intend to implement this Priority Services Program in the next access arrangement period.

### 4.1 Principles for design of the program

We collaborated with our customers and advisory panel to create 9 program principles that guide the development of the PSP. These are:

1. **Be fit for purpose and customer-led**
2. **Not duplicate** existing programs
3. **Be inclusive** (e.g., through use of language)
4. **Be consistent** across networks and jurisdictions (where practical)
5. **Encourage partnering** on delivery with other trusted organisations and the community
6. **Be accessible** to those the program is designed to support
7. **Provide a good customer experience** and support customer agency
8. **Be measurable** to ensure the benefits are delivered to customers (e.g., through a PSP customer satisfaction surveying program)
9. **Keep affordability for all customers front on mind**, focussing on delivering the biggest impact initiatives at the lowest cost

## 4.2 Prioritised initiatives for inclusion in the program

We plan to introduce a new Priority Services Program, offering a new set of services to customers. This will enable us to recognise the individual circumstances of our customers and provide tailored support where they need it.

Based on the needs of customers requiring additional support or assistance from us, we identified three key focus areas for the program:

1. Doing more to financially support our customers and improve affordability
2. Improving how we communicate with our priority services customers and the community, especially CALD customers, and
3. Making it simpler and easier to get things done, ensuring our services are easily accessed by all.

Through engagement with customers and the advisory panel, we identified and prioritised initiatives that would deliver the biggest benefits to customers in these focus areas. These include:

### Core enablers for the program

- Establishing a **Priority Services register**. This forms the basis for providing the range of key services. The register will be linked to the Customer Information System (CIS), enabling the identification of and management of customers on the PSP. Customers will be able to register online at their own discretion or be referred to our program by a third party. The integration to the CIS will enable simple workflows and straightforward case management of PSP customer enquiries and tracking of services.
- Establishing a **dedicated customer support team**, comprising of 2 to 2.5 full time equivalent employees. This team will be specifically trained and dedicated to support customers in vulnerable circumstances. They will be responsible for managing the program, developing referral programs for our customer service teams, implementing the new services identified and providing rapid and sensitive case management for customers on the program. In addition, they will support the upskilling of the broader customer service team in identifying signs of disadvantage or vulnerability to proactively support customers.

### Additional support services for customers to access

- Offering free **Gas appliance safety checks** Victorian customers in disadvantaged or vulnerable circumstances. Customers can contact AusNet for assistance and our dedicated support team will work with them to organise their check.
- Offering funding to support customers when they need **emergency appliance repairs**. In unexpected circumstances customers can contact AusNet to assist with safely repairing their appliances.
- Enabling customers to **read their own gas meters**. This will mean customers will reduce the number of times a meter reader steps on to their property by taking a photograph of their meter and sharing it with AusNet.
- Improving the **accessibility of our communications**, particularly for **Culturally and Linguistically diverse (CALD) customers**. This will mean information is

available in multiple languages, across multiple channels for customers. A range of methods will be employed to improve readability and accessibility such as community-based translation of materials, easy English, and visuals.

- Providing **check-ins and additional support to customers during outages** e.g., supply temporary heating and cooking facilities and vouchers for accommodation.

Table 5 outlines the material improvements these initiatives will deliver to customers.

Table 5: Prioritised initiatives for the Priority Services Program

Focus area	Prioritised initiatives	Benefits to customers
<b>1. Doing more to financially support our customers and improve affordability</b>	Gas appliance safety checks	<ul style="list-style-type: none"> <li>• Keeping our customers safe and providing peace of mind in an emergency.</li> </ul>
	Emergency appliance repairs	<ul style="list-style-type: none"> <li>• Direct financial benefits to customers as there will be no out of pocket expenses incurred by them.</li> <li>• Improving safety and reliability of gas appliances and gas use</li> </ul>
	Meter self-reads	<ul style="list-style-type: none"> <li>• Reducing anxiety and improving the feeling of safety and autonomy for customers as no strangers onsite at their homes, particularly those suffering any mental health conditions.</li> <li>• Reducing estimated bill reads, improving customers ability to plan for bill payments.</li> </ul>
<b>2. Improving how we communicate with our priority services customers and the community, especially CALD customers</b>	Dedicated customer support team	<ul style="list-style-type: none"> <li>• Dedicated, trained professionals who can deliver more focussed and personalised customer service.</li> <li>• Specialists in understanding the nuanced experiences of customers in vulnerable and disadvantaged services, enabling them to continuously improve the program.</li> <li>• Direct liaison with community organisations, developing referral programs that will enhance customers access to a variety of support.</li> <li>• Providing rapid and sensitive case management of complaints, cases or enquiries for customers on the program.</li> </ul>
	CALD communications	<ul style="list-style-type: none"> <li>• Tailored, digital and easy English communications designed for customers who cannot speak or read English well.</li> </ul>



		<ul style="list-style-type: none"> <li>Customers will be able to better understand and access the information provided by AusNet about their essential service.</li> </ul>
<p><b>3. Making it simpler and easier to get things done, ensuring our services are easily accessed by all.</b></p>	<p>Check-ins and additional support during outages</p>	<ul style="list-style-type: none"> <li>Additional care and consideration for customers during extended gas outages.</li> <li>Access to services to keep customers warm and fed if their gas service is interrupted e.g., temporary heating or cooking facilities.</li> <li>Direct financial benefits to customers as they will not have to pay for the above services.</li> </ul>
	<p>Priority services register</p>	<ul style="list-style-type: none"> <li>Enable fast, tailored, and streamlined management of customers information so we can provide support and access to the services above.</li> <li>Customers can easily sign up for the register, without the burden of proof, reducing potential stigma associated with asking for support.</li> <li>Importantly, customers will only need to share their story once (or not at all once if managed online), reducing the mental load and strain on them.</li> </ul>

To implement the initiatives set out above will require a step change in our operating expenditure allowance. Section 5 of the business case assesses the options, costs and benefits associated with implementing the program.

The options assessed are:

- Option 1 – Do not implement any additional measures to support customers.
- Option 2 – Implement all PSP initiatives at the mid-point on the scale of delivery
- Option 3 – Implement all PSP initiatives at the full point on the scale of delivery

The options are based on the **extent to which we will deliver these initiatives** (see Figure 5). Through our engagement we identified and prioritised the initiatives in Table 5. Several initiatives were deprioritised because they either delivered low value to customers, had high complexity to deliver, or created inconsistencies in the program (see Table 6). The prioritised initiatives are all important components of the PSP, so we are proposing they all form part of the program. However, we have varied the solutions to deliver them between manual/low technology changes and high technology/automated options.

Attachment 12 – Priority Services Program business case

Figure 5: Scale of delivery for Priority Service Program Initiatives

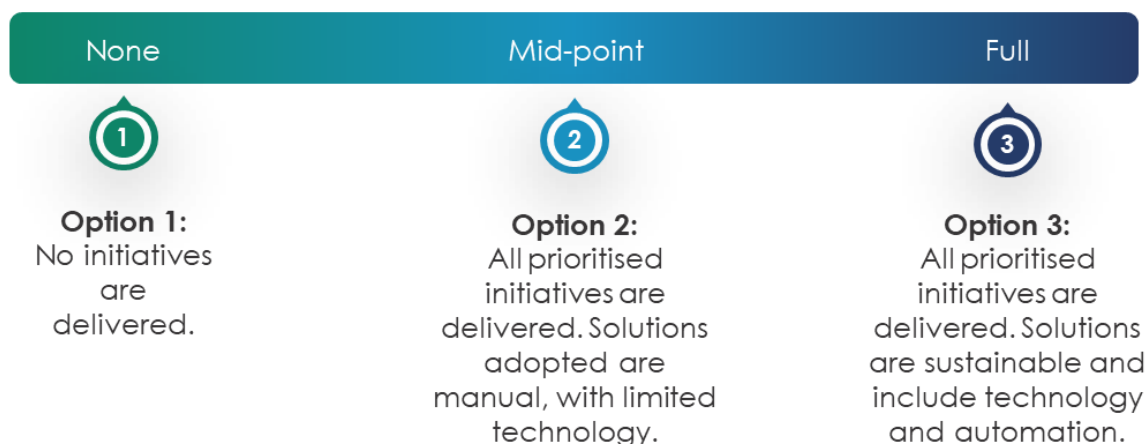


Table 6: De-prioritised initiatives for the Priority Services Program

Potential initiatives	Reasons for de-prioritisation
<p><b>Fee waivers:</b> <i>Removing fees for distribution connection services (e.g., reconnection after disconnection).</i></p>	<p>Fees for services are passed on to customers through their retail bills, and not directly administered by AusNet. As a result, this presents challenges in implementation and high complexity to deliver.</p>
<p><b>Efficient appliance funding:</b> <i>Providing rebates to customers to fit new, more energy efficient appliances in their homes).</i></p>	<p>PSP principle 2: Avoiding duplication of existing programs. Efficient appliance funding is available to customers through other mechanisms e.g., the Victorian government Energy Savings package or Energy retailer's appliance replacement schemes. Customers will be referred to these programs through our dedicated support team or trained front line staff.</p>
<p><b>Priority restoration and connections:</b> <i>Fast-tracking restoration post a gas outage or disconnection.</i></p>	<p>Existing performance for restoration and connection timeframes is high, with all customers receiving their service within 24 to 48 hours. We are committed to continuing to restore, supply and connect all customers as soon as possible and will continue to improve this through our business-as-usual processes. In addition, guaranteed service levels apply for connections and restoration. If we do not connect customers or restore their supply in a timely manner, they are eligible for a direct payment.</p>

<p><b>Pay it forward:</b> <i>Enable customers to donate towards the bills of customers in vulnerable or disadvantaged circumstances.</i></p>	<p>PSP principle 7: Provide a good customer experience and support customer agency. Feedback from the advisory panel was that this was complex to deliver and offered low customer benefit. Of particular concern was the impact on recipients as it could impact their sense of agency.</p>
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### 4.3 The program is consistent and complements other services offered in Victoria

Throughout the co-design process we received strong feedback from the advisory panel that, to the best extent possible, the initiatives that form the PSP should be consistent across Victoria. We worked closely with AGN Vic and MGN to address this feedback and align the initiatives. Figure 6 highlights this, providing an overall comparison of the initiatives included in each businesses' Priority Services Program, the initiatives incorporated into existing operations and those explored but deprioritised based on customer and stakeholder feedback.

Figure 6: Comparison of AGIG (AGN Vic and MGN) and AusNet Priority Services Programs

#### Priority Service Program

### Comparison of programs

Priority Service Program initiatives	AGN & MGN	AusNet	Key
Dedicated customer support team	✓	✓	✓ = included in PSP program and opex step change
Check-ins and additional support during outages	✓	✓	
CALD communications	✓	✓	
Gas appliance safety check	✓	✓	BAU = initiatives incorporated into existing operations, at no extra cost to customers
Emergency appliance repair	✓	✓	
Meter self reads	BAU	✓	
Additional training for front line staff	BAU	BAU	* = explored, but not included in program (low customer benefit or support provided elsewhere)
Translation services	BAU	BAU	
Advice on efficient usage of gas	BAU	BAU	
Fee waivers	*	*	
Efficient appliance funding	*	*	
Priority restoration and connections	*	*	
Pay it forward	*	*	

Another key principle of our program design was to ensure we did not duplicate services already offered in Victoria. The intent of the program is to complement or build on existing support services, not replace them. We researched support services already available through the Victoria Government, Energy retailers and community and not for profit organisations and presented these to our advisory panel for further input. Table 7 summarises the initiatives we identified. These largely focus on supporting customers who may be facing financial hardship and require bill support.

Table 7: Summary of support services available in Victoria

Victorian Government	Retailers	Community / not for profit organisations
<ul style="list-style-type: none"> <li>• <b>Power saving bonus</b> a one-off payment of \$250 to bill stressed households as a result of Covid-19 (ends early 2022)</li> <li>• <b>Utility relief grant scheme</b> can assist customers with up to \$1,300 to pay off overdue bills</li> <li>• <b>Non-mains energy concession</b> can refund some of the cost of buying firewood and bottled gas</li> <li>• <b>Winter gas concession</b> provides 17.5% off winter gas bills (May to October)</li> <li>• <b>Excess gas concession</b> gives 17.5% off gas bills &gt; \$1,644</li> <li>• <b>Energy Saving Package</b> which includes efficient appliance rebates, housing upgrades and new standards for rental properties.</li> </ul>	<ul style="list-style-type: none"> <li>• Retailer financial hardship programs:               <ul style="list-style-type: none"> <li>○ Payment plans &amp; debt management</li> <li>○ Deferral outside of credit management</li> <li>○ Dedicated support teams</li> <li>○ Training of call centre staff</li> <li>○ Advice on energy efficiency/ audits</li> <li>○ Referrals to financial counselling &amp; other support services</li> </ul> </li> <li>• Life Support Customer provisions</li> </ul>	<ul style="list-style-type: none"> <li>• Financial counselling services such as the National Debt Helpline</li> <li>• Other broader social support programs</li> <li>• Uniting Vic Tas and Jemena on efficiency audits</li> </ul>

#### 4.4 What support exists today and what will become BAU?

Through engagement we recognised that there are several initiatives that will be important for all customers. We are planning to introduce these at no extra cost to customers and no step change operating expenditure allowance. They include:

- **Additional training for front line staff** to engage with empathy and sensitivity and refer priority service customers to:
  - the AusNet Priority Services Program;
  - the appropriate dedicated support services where required; and
  - their energy retailers' dedicated support programs.
- **24-hour translation services** for any service that we offer over the phone, including our key interactions: planned and unplanned outages, new connections and claims and complaints. This increases our ability to connect

with customers with limited or no English language proficiency (access to over 160 different languages).

- **Advice on efficient usage of gas** or referrals to energy efficiency advice available through trusted organisations.

We will also continue to offer the services currently available to support customers in vulnerable circumstances, including:

- **Management of life support customers**, with tailored communications for key interactions.
- **Field staff door knocking** and talking to customers before disconnecting a gas supply.

#### **4.5 How will we implement this program?**

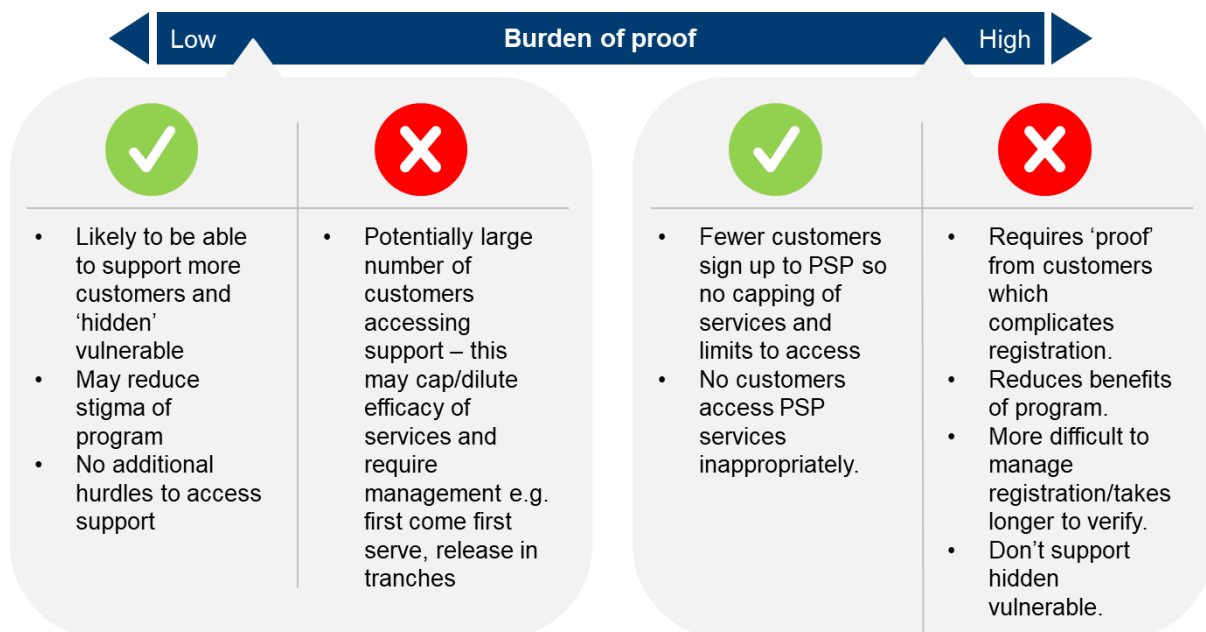
A key consideration in the delivery of the PSP is how we will set up the people, processes, and technology internally to manage customer information and access to support services. The advisory panel provided strong feedback that the registration process and access to services should be as simple and easy as possible, otherwise we risk creating a barrier for customers in accessing support. However, our customers, whilst supportive of ensuring the program is easy to access, expressed some concerns over the management of the program. They wanted to ensure that appropriate checks and balances were in place to prevent fraud and misuse and that it be understood that people's circumstances change over time.

The pros and cons of different approaches, outlined in Figure 7, were discussed with the advisory panel.



Attachment 12 – Priority Services Program business case

Figure 7: Positive and negative impacts of program design on customers, based on low or high burden of proof.



Based on their feedback, we believe the most appropriate approach in establishing this program is to proceed at the lower end of the burden of proof scale. This ensures we can support as many customers as possible, without inadvertently exacerbating harm.

We also discussed the proposed customer journey in Figure 8 with the advisory panel. There are several questions still outstanding that need to be addressed in the detailed design of the program such as:

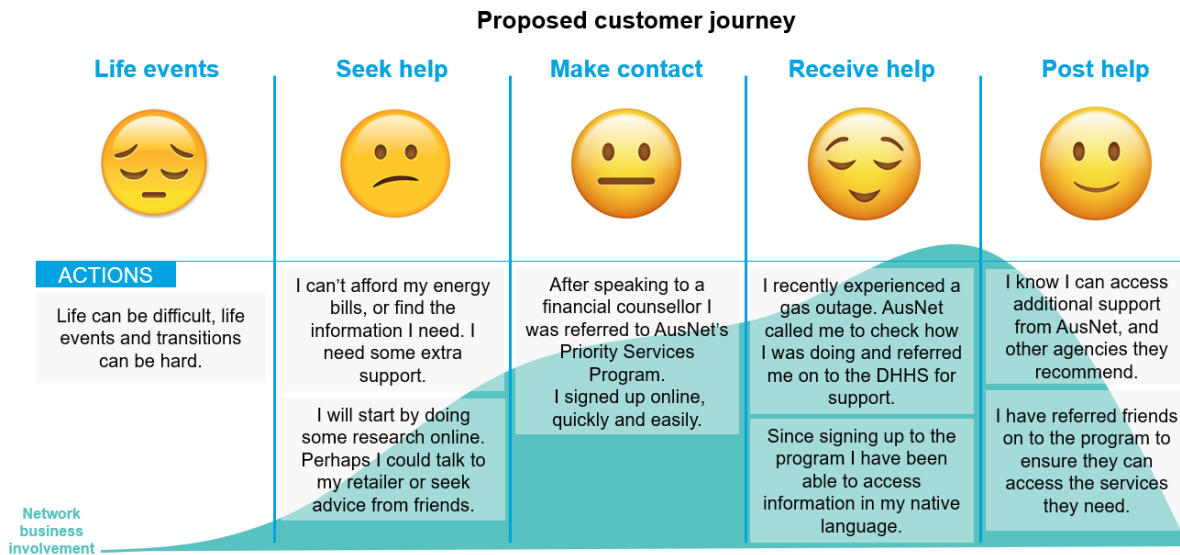
- How should customers be referred to this program?
- Is there a time limit on how long customers are on the register before they reapply?
- Do we enable customer to self-select the initiatives they want access to, or should they be able to access them all?
- Should there be any 'proof of status' required for registration? And if so, what should this be?
- How do we 'advertise' these services and what industries/areas should we focus on?

Based on discussions to date we created a prototype of the Priority Services Program registration form (see Appendix 1). We will test this with customers and experts in future co-design workshops and one on one interviews.

Figure 8: PSP customer journey

Priority Service Program | Workshop #3

## Creating the priority services register



Successful, inclusive design of the priority services register is key to ensuring successful access to additional support services for customers in vulnerable and disadvantaged circumstances. We will continue to work with customers and experts representing customers to ensure we co-design a solution that is appropriate.

### 4.6 Further considerations of the program

In considering all the feedback provided in response to the PSP so far, some further considerations for implementation and successful delivery include:

- **Dependency on the Customer Information System (CIS):** The cost estimates provided in the options analysis assume that the proposed IT spend related to the Customer Information System (CIS) is approved. If this does not occur, then revisions to the forecast costs will be required to account for the system related changes associated with the CIS.
- **Continued relationships with customers and experts to co-design the PSP:** This program is not something AusNet will deliver alone. As this is the first program of its kind for the business, we intend to continue to work with customers and relevant experts on the design and delivery of the initiatives that make up the final program. We will also continue to work closely with AGN Vic and MGN to ensure the consistency between our programs remains strong.
- **Dedication to continuous learning and improvement:** We are committed to continuing to learn from the latest research and experts in the field to ensure our language is appropriate and the program continues to adapt to what is most important for customers. We recognise that we may need to adjust the initiatives in the program during the next AA period if we find that some are

more effective than others or identify other opportunities that will deliver greater benefits to customers.

- **Ensuring the program is measurable:** We will work with customers and the advisory panel to outline clear criteria and success metrics so we can track and report on our progress in a transparent manner.
- **We require an approved step change in our operating expenditure allowance to deliver these new services:** Current business as usual costs (reflected through our base year opex) is insufficient to fund these initiatives. As such, we can only support these initiatives with an approved step change in operating expenditure allowance.

## 5 OPTIONS ANALYSIS

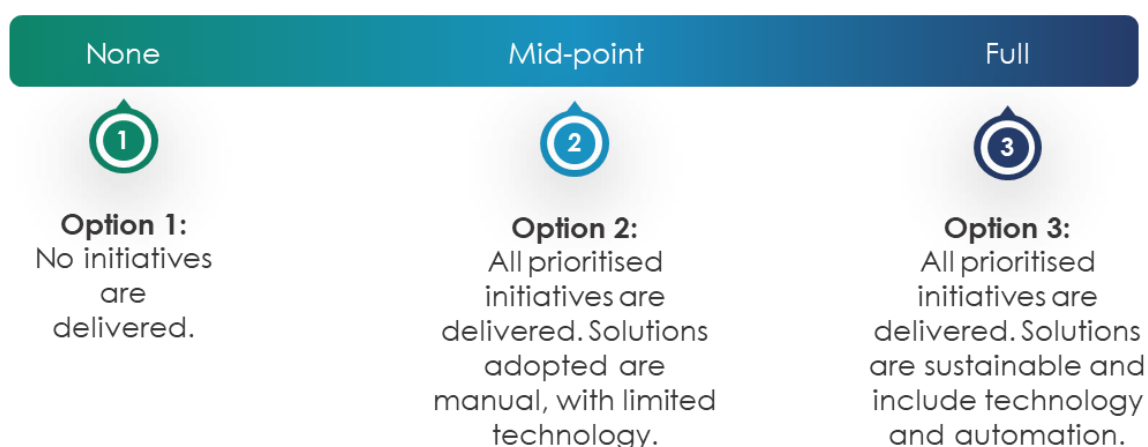
### 5.1 Options considered

We have considered the following options to implement the Priority Services Program and deliver benefits to customers in vulnerable circumstances. These are:

- Option 1 – Do not implement any additional measures to support customers.
- Option 2 – Implement all PSP initiatives at the mid-point on the scale of delivery.
- Option 3 – Implement all PSP initiatives at the full point on the scale of delivery.

The options are based on the **extent to which we will deliver these initiatives** (see Figure 9). Our engagement with customers and the advisory panel deemed all of the initiatives in Table 5 to be of value to customers. In each option we have varied the solutions to deliver them between manual/low technology changes and high technology/automated options.

Figure 9: Scale of delivery for Priority Service Program Initiatives



## 5.2 Option 1 – Do not implement any additional support measures

Under this option, no additional initiatives to support customers in vulnerable circumstances would be delivered, resulting in no step change in operating expenditure and no additional benefits to customers.

AusNet will continue to offer services that are currently available, and introduce the measures outlined in Section 4.4 to support customers at no additional costs. These include:

- Additional training for front line staff to engage with empathy and sensitivity and refer priority service customers to other programs.
- 24-hour translation services for any service that we offer over the phone.
- Advice on efficient usage of gas or referrals to energy efficiency advice available through trusted organisations.
- Management of life support customers, with tailored communications for key interactions.
- Field staff door knocking and talking to customers before disconnecting a gas supply.

Whilst there are no step change in operating expenditure for this option, there are considerable risks associated with not providing support or recognising the circumstances of customers. As highlighted in the CPRC report for the AER on Exploring regulatory approaches to consumer vulnerability *“essential service providers can exacerbate harm if they do not respond in an informed, sensitive way to the personal circumstances of their customers.”*<sup>17</sup>

Customers require support at multiple stages of the customer journey. Focussing on debt and payment difficulty, whilst valuable, constrains the definition of vulnerability and those who may require other services e.g., CALD customers. This means whole cohorts of customers will continue to connect in with distributors, seeking additional help and support, but we are unable to service them efficiently and systematically.

## 5.3 Option 2 – Implement all PSP initiatives at the mid-point on the scale of delivery

Under this option we propose implementing a lower-cost version of the Priority Services Program initiatives, with a focus on the highest value. It will comprise of all the measures listed in Table 5, at the mid-point on the scale of delivery. This means the solutions implemented are more manual or require lighter touch technology changes.

The implementation of this option is estimated to cost \$791,000 per annum over the next AA period (2024 to 2028), which is equivalent to approximately \$1.05 per customer per annum.

The initiatives, solutions proposed and basis for cost estimate are outlined in Table 8 and 9 below.

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<sup>17</sup> CPRC, Exploring regulatory approaches to consumer vulnerability – A report for the AER, February 2020, p.3.

Table 8: Option 2 initiatives and cost estimates

Initiative	Cost estimate
<p><b>Priority services customer register</b> Develop a Priority Services customer register, enabling customers to sign up online through a web-based form and linking this to the Customer Information System, enabling simple workflows and straightforward management of PSP customer enquiries. Crucially, this register will form the basis for all PSP services.</p>	<p>The development of a priority services customer register is estimated to cost a total of \$405,000 or an average of \$81,000 per annum across the next AA period. This cost is based on a technology best practice assessment. The majority of the cost will be consumed up-front with the implementation of the PSP register and the integrations with the Customer Information System. There will be a component of ongoing licensing/support costs the following years.</p> <p>The total cost includes the enhancements required to build out the core Customer Information System (adding a flag to PSP customers' accounts), the online registration form, case management capability within the CIS (enabling tracking of open PSP customer cases) and any ongoing licensing and management of the system.</p>
<p><b>Dedicated customer support team</b> Establish a new, dedicated Priority Services Customer Support Team to sit within AusNet's Customer Service Centre. This team will be specifically trained and dedicated to support customers in vulnerable circumstances. They will be responsible for managing the program, developing referral programs for our customer service teams, implementing the new services identified and providing rapid and sensitive case management for customers on the program. In addition, they will support the upskilling of the broader customer service team in identifying signs of disadvantage or vulnerability to proactively support customers.</p>	<p>The establishment of a dedicated priority services customer support team is estimated to cost a total of \$1,275,000 or an average of \$255,000 per annum across the next AA period.</p> <p>This represents the cost of employing 2 full time equivalent (FTE) staff members, onboarding, and training costs. The proposed team would be comprised of 1 senior Priority Services (PSP) Team Lead and 1 mid-level Customer Service agent. These FTE costs are based on similar level roles that already exist within AusNet's Customer Service Team.</p>
<p><b>Check-ins and additional support for Priority Services Customers during outages</b> This includes setting up the ability to proactively identify customers who may be impacted by the outage</p>	<p>Additional support during outages is estimated to cost a total of \$350,000. This cost has been estimated using a similar historical project as a benchmark and some demand forecasts based on expected program uptake. The total cost represents:</p>

<p>through a digital report so that the dedicated support teams can reach out to customers and arrange to provide additional support services e.g., accommodation, temporary heating, and cooking facilities.</p>	<ul style="list-style-type: none"> <li>• \$100,000 for the process and technology design &amp; build of a digital report that highlights potential customers experiencing an outage.</li> <li>• \$250,000 (\$50,000 per annum) as a capped bucket of support funding for things like food and accommodation vouchers and temporary heating for priority services customers.</li> </ul>
<p><b>Meter self-reads</b> This solution is based on customers accessing an online form, submitting their own gas meter information, and uploading accompanying images so that meter readers don't need to step onto their property. This meter information will flow into the CIS workflow where an AusNet metering team member will manually validate and process this meter read.</p>	<p>Implementing the online form and process for meter self-reads is estimated to cost a total of \$275,000. This cost is based on a technology best practice assessment, including:</p> <ul style="list-style-type: none"> <li>• \$250,000 for the public-facing web form design, an internal interface to process the form submissions and some built-in validations to link the customer in the CIS.</li> <li>• \$25,000 for process design, change management and training on the new process.</li> </ul>
<p><b>A Culturally and Linguistically Diverse (CALD) Communications Uplift Program</b> Taking a targeted approach by improving the most frequently used web pages and common customer correspondence so that they are available in multiple languages and more accessible to our CALD customers. The focus for this program would include:</p> <ul style="list-style-type: none"> <li>- Building translation and accessibility features into our top web pages on the AusNet website.</li> <li>- Translation and easy English letter variants for our standard customer letter suite.</li> <li>- Hosting community drop-in sessions with other support organisations.</li> </ul>	<p>The implementation of a CALD Communications Uplift program is estimated to cost a total of \$750,000. This cost is based on industry-standard T-shirt sizing of webpage development and prior project experience. The total cost represents:</p> <ul style="list-style-type: none"> <li>• \$450,000 for a website upgrade. This will include some static accessibility options and page translation for our top web pages. Web accessibility consulting services will support the design and delivery of these pages.</li> <li>• \$50,000 to support the letter suite uplift and translation into some common languages.</li> <li>• \$250,000 (\$50,000 annually) for community drop-in sessions where CALD community representatives will be on hand for customer support.</li> </ul>
<p><b>Gas appliance safety checks and emergency gas appliance repairs</b> Access to direct savings for these services to 600 customers.</p>	<p>The provision of funding for gas safety checks and emergency gas appliance repairs has been capped at \$180,000 per annum. This includes funding for 400 Gas Safety checks and 200 emergency</p>



Attachment 12 – Priority Services Program business case

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	<p>appliance repairs to be available for Priority Service Customers each year.</p> <p>The nature of appliance repairs means that the cost per repair is unknown based on the parts and fixes required. However, our estimates are based on the knowledge of standard gas fitter rates and typical appliance costs. These have been validated by our external supplier.</p>
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Attachment xxx – Priority Services Program business case

Table 9: Option 2 annual breakdown of costs

Option 2		2024	2025	2026	2027	2028	Total
Dedicated Customer Support Team		\$275,000	\$250,000	\$250,000	\$250,000	\$250,000	\$1,275,000
Priority Services Customer Register		\$281,000	\$31,000	\$31,000	\$31,000	\$31,000	\$405,000
Check-ins and support during outages		\$150,000	\$50,000	\$50,000	\$50,000	\$50,000	\$350,000
Meter self-reads		\$275,000	\$0	\$0	\$0	\$0	\$275,000
CALD Communications uplift		\$300,000	\$300,000	\$50,000	\$50,000	\$50,000	\$750,000
Gas Safety Checks	Cost per safety check	\$200	\$200	\$200	\$200	\$200	\$400,000
	No. of checks	400	400	400	400	400	
	<u>Total Cost</u>	\$80,000	\$80,000	\$80,000	\$80,000	\$80,000	
Emergency Appliance Repairs	Cost per repair	\$500	\$500	\$500	\$500	\$500	\$500,000
	No. of repairs	200	200	200	200	200	
	<u>Total cost</u>	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	
<b>Total</b>		\$1,461,000	\$811,000	\$561,000	\$561,000	\$561,000	\$3,955,000
						Av. cost p.a.	\$791,000

Table 10: Breakdown of costs in capex and opex.

Option 2	2024	2025	2026	2027	2028	Total
Capex	-	-	-	-	-	-
Opex	\$1,461,000	\$811,000	\$561,000	\$561,000	\$561,000	\$3,955,000
<b>Total</b>	<b>\$1,461,000</b>	<b>\$811,000</b>	<b>\$561,000</b>	<b>\$561,000</b>	<b>\$561,000</b>	<b>\$3,955,000</b>

The main benefits of this option for customers are that it will:

- Remove any potential stigma and feelings of anxiety for customers in accessing additional support services and sharing their story with us. Customers will only have to tell their story once, without the burden of proof, or need to navigate a complex sign up process.
- Set up a team of dedicated, trained professionals who can deliver more focussed and personalised customer service. This will result in faster and more sensitive case management of complaints and enquiries. This team will be specialists in understanding the nuanced experiences of customers in vulnerable and disadvantaged services, enabling them to continuously improve the program. In addition, they will develop key referral programs that will enhance customers access to a wider range of support.
- Reduce the financial barriers that some customers in vulnerable or disadvantaged circumstances face in terms of utilising gas more efficiently or ensuring their appliances are operating in a safe and reliable manner.
- Reduce anxiety and improve the feeling of safety and autonomy by enabling meter self-reads so that meter readers no longer need to physically visit their property.
- Improve the accessibility of both digital and printed communications that all AusNet customers interact with and rely on, specifically uplifting the experience of CALD customers who will have access to tailored, easy English communications in their native language. Customers will be better able to understand the key information being shared about their essential service.
- Provide additional support for customers who are experiencing an interruption to their gas supply. Rather than go without heating, hot showers or a warm meal, they can access these services at no cost to them.

#### 5.4 Option 3 – Implement all PSP initiatives at the full point on the scale of delivery

Under this option all the initiatives listed in Table 5, at the full solution end of the scale of delivery will be implemented. This means the solutions implemented are more sustainable as they are supported by high technology or automated solutions.

The implementation of this option is estimated to cost \$1.396 million per annum over the next AA period (2024 to 2028), which is equivalent to \$1.86 per customer per annum.

The initiatives, solutions proposed and basis for cost estimate are outlined in Table 11 and 12 below.

Table 11: Option 3 initiatives and cost estimates

Initiative	Cost estimate
<p><b>Priority services customer register</b> Develop a Priority Services customer register, enabling customers to sign up online through a web-based form and linking this to the Customer Information System, enabling simple workflows and straightforward management of PSP customer enquiries. Crucially, this register will form the basis for all PSP services.</p>	<p>The development of a priority services customer register is estimated to cost a total of \$405,000 or an average of \$81,000 per annum across the next AA period. This cost is based on a quote produced by an external supplier.</p> <p>The total cost includes the enhancements required to build out the core Customer Information System (adding a flag to PSP customers' accounts), the online registration form, case management capability within the CIS (enabling tracking of open PSP customer cases) and any ongoing licensing and management of the system.</p>
<p><b>Dedicated customer support team</b> Establish a new, dedicated Priority Services Customer Support Team to sit within AusNet's Customer Service Centre. This team will be specifically trained and dedicated to support customers in vulnerable circumstances. They will be responsible for managing the program, developing referral programs for our customer service teams, implementing the new services identified and providing rapid and sensitive case management for customers on the program. In addition, they will support the upskilling of the broader customer service team in identifying signs of disadvantage or vulnerability to proactively support customers. There will be 2.5 total FTE in this option, as opposed to 2 FTE in option 2. An additional part-timer would be included in the team to ensure backfilling ability and allow the senior team member to focus some time on</p>	<p>The establishment of this dedicated Priority Services Customer Support Team is estimated to cost a total of \$1,525,000 or an average of \$305,000 per annum across the next AA period. This represents the cost of employing 2.5 full time equivalent (FTE) staff members, onboarding, and training costs. The proposed team would be comprised of 1 senior Priority Services (PSP) Team Lead and 1.5 mid-level PSP agents.</p> <p>These FTE costs are based on similar level roles that already exist within AusNet's Customer Service Team.</p>

<p>building capability and upskilling the rest of the Customer Service Team.</p>	
<p><b>Check-ins and additional support for Priority Services Customers during outages</b> This includes setting up the ability to proactively identify customers who may be impacted by the outage through a report so that the dedicated support teams can reach out to customers and arrange to provide additional support services e.g., accommodation, temporary heating and cooking facilities. This option includes an additional \$50k per annum (\$250k total) to expand the amount of support we can provide PSP customers during outages.</p>	<p>Additional support during outages is estimated to cost a total of \$750,000. These costs were estimated using technology best practice assessment and some demand forecasts based on expected program uptake. This cost represents:</p> <ul style="list-style-type: none"> <li>• \$250,000 up-front for the setup of technology to automate outbound communications directly to customers based on identified outage areas.</li> <li>• \$500,000 (\$100,000 per annum) as a bucket of support funding for things like food and accommodation vouchers and temporary heating for priority services customers.</li> </ul>
<p><b>Meter self-reads</b> This solution is based on customers accessing an online form, submitting a photo of their meter and the system, using optical character recognition (OCR) software, automatically interprets the reading. Additionally, there will be some built-in automation to process these meter reads in the backend.</p>	<p>Implementing the online form, OCR technology and process automation meter self-reads is estimated to cost a total of \$500,000. This cost was produced using a conservative technology assessment. Expected costs incurred would be the following:</p> <ul style="list-style-type: none"> <li>• \$100,000 for the public-facing web form design.</li> <li>• \$400,000 for the integration of the OCR technology and the automation to speed up the metering processes after submission.</li> </ul>
<p><b>A Culturally and Linguistically Diverse (CALD) Communications Uplift Program</b> This program option will involve a much more comprehensive CALD uplift with dynamic accessibility web features and automated translation capability. The focus for this option of the program would include:</p> <ul style="list-style-type: none"> <li>- Dynamic accessibility features across the entire AusNet website.</li> <li>- Enabling customers to leave messages in their native language and automated</li> </ul>	<p>The implementation of a CALD Communications Uplift program is estimated to cost a total of \$2,000,000. This cost is based on industry-standard 'T-shirt' sizing of web development and best-practise technology assessment. This cost represents:</p> <ul style="list-style-type: none"> <li>• \$1,500,000 for the enhancements required to create a dynamic &amp; accessible web experience on AusNet's website, including some forms and customer portals.</li> </ul>

<p>translation of the inquiry within the CIS.</p> <ul style="list-style-type: none"> <li>- Translation and easy English letter variants for our standard customer letter suite.</li> <li>- Hosting community drop-in sessions with other support organisations.</li> </ul>	<ul style="list-style-type: none"> <li>• \$250,000 (\$50,000 annually) for community drop-in sessions where CALD community representatives will be on hand for customer support.</li> <li>• \$100,000 to support the letter suite uplift and translation into many languages.</li> <li>• \$150,000 for an Interactive voice response (IVR) integration that would enable a workflow for translated voice to case creation within CIS.</li> </ul>
<p><b>Gas appliance safety checks and emergency gas appliance repairs</b> Access to direct savings for these services to 1200 customers.</p>	<p>The provision of funding for gas safety checks and emergency gas appliance repairs is estimated to cost a total of \$360,000 per annum. This includes funding for 800 gas safety checks and 400 emergency appliance repairs to be available for Priority Service Customers each year.</p> <p>The nature of appliance repairs means that the cost per repair is unknown based on the parts and fixes required. However, our estimates are based on the knowledge of standard gas fitter rates and typical appliance costs. These have been validated by our external supplier.</p>



Attachment xxx – Priority Services Program business case

Table 12: Option 3 annual breakdown of costs

<b>Option 3</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>	<b>Total</b>	
Dedicated Customer Support Team	\$325,000	\$300,000	\$300,000	\$300,000	\$300,000	\$1,525,000	
Priority Services Register	\$281,000	\$31,000	\$31,000	\$31,000	\$31,000	\$405,000	
Check-ins and support during outages	\$350,000	\$100,000	\$100,000	\$100,000	\$100,000	\$750,000	
Meter self-reads	\$250,000	\$250,000	\$0	\$0	\$0	\$500,000	
CALD Communications uplift	\$600,000	\$600,000	\$600,000	\$100,000	\$100,000	\$2,000,000	
Gas Safety Checks	Cost per safety check	\$200	\$200	\$200	\$200	\$200	\$800,000
	No. of checks	800	800	800	800	800	
	Total Cost	\$160,000	\$160,000	\$160,000	\$160,000	\$160,000	
Emergency Appliance Repairs	Cost per repair	\$500	\$500	\$500	\$500	\$500	\$1,000,000
	No. of repairs	400	400	400	400	400	
	Total cost	\$200,000	\$200,000	\$200,000	\$200,000	\$200,000	
<b>Total</b>	<b>\$2,166,000</b>	<b>\$1,641,000</b>	<b>\$1,391,000</b>	<b>\$891,000</b>	<b>\$891,000</b>	<b>\$6,980,000</b>	
					Av. cost p.a.	\$1,396,000	

Table 13: Breakdown of costs in capex and opex.

<b>Option 3</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>	<b>Total</b>
Capex	-	-	-	-	-	-
Opex	\$2,166,000	\$1,641,000	\$1,391,000	\$891,000	\$891,000	\$6,980,000
<b>Total</b>	<b>\$2,166,000</b>	<b>\$1,641,000</b>	<b>\$1,391,000</b>	<b>\$891,000</b>	<b>\$891,000</b>	<b>\$6,980,000</b>

The main benefits of this option for customers are that it will:

- Remove any potential stigma and feelings of anxiety for customers in accessing additional support services and sharing their story with us. Customers will only have to tell their story once, without the burden of proof, or need to navigate a complex sign up process.
- Set up a team of dedicated, trained professionals who can deliver more focussed and personalised customer service. This will result in faster and more sensitive case management of complaints and enquiries. This team will be specialists in understanding the nuanced experiences of customers in vulnerable and disadvantaged services, enabling them to continuously improve the program. In addition, they will develop key referral programs that will enhance customers access to a wider range of support. A larger team will ensure there is always a PSP specialist available to customers.
- Reduce the financial barriers that some customers in vulnerable or disadvantaged circumstances face in terms of utilising gas more efficiently or ensuring their appliances are operating in a safe and reliable manner. This option allows access to funding for a greater number of customers.
- Reduce anxiety and improve the feeling of safety and autonomy by enabling meter self-reads so that meter readers no longer need to physically visit their property.
- Improve the accessibility of both digital and printed communications that all AusNet customers interact with and rely on, specifically uplifting the experience of CALD customers who will have access to tailored, easy English communications in their native language. Customers will be better able to understand the key information being shared about their essential service. This option enables all communications to be translated and allows for two-way conversation as customers can communicate with AusNet in their native language.
- Provide additional support for customers who are experiencing an interruption to their gas supply. Rather than go without heating, hot showers or a warm meal, they can access these services at no cost to them. This option allows a greater number of customers to access these support services.

## 5.5 Recommended option

Option 2 is the recommended option for the AusNet Priority Services Program as it delivers the highest value to customers, at the lowest cost. The initiatives involved in the program include:

- **Establishing of a Priority Services Register** that allows customers to sign up easily online or be referred by third parties.
- Establishing of a **dedicated customer support team**, consisting of 1 senior Priority Services (PSP) Team Lead and 1 mid-level Customer Service agent. They will be responsible for managing the program, developing referral programs for our customer service teams, implementing the new services identified and providing rapid and sensitive case management for customers on the program.
- Providing **check-ins for Priority Services customers** during outages, by proactively reaching out to those without gas and providing them with access to additional support services e.g., accommodation, temporary heating and cooking facilities.
- Enabling customers to **read their own meters** so that meter readers do not need to access their property.
- Improving communications with CALD customers, making key information available in multiple languages and easy English.
- Providing funding to support **free gas appliance safety checks** and **emergency gas appliance repairs**.

As well as the above initiatives that require a step change in operating expenditure to deliver, we will also deliver the following initiatives within our current BAU costs. These include:

- Additional training for front line staff to engage with empathy and sensitivity and refer priority service customers to other programs.
- 24-hour translation services for any service that we offer over the phone.
- Advice on efficient usage of gas or referrals to energy efficiency advice available through trusted organisations.
- Management of life support customers, with tailored communications for key interactions.
- Field staff door knocking and talking to customers before disconnecting a gas supply.

Overall, the Priority Services Program will improve the customer experience for customers in vulnerable or disadvantaged circumstances. The key benefits, delivered directly to customers include:

- Removing any potential stigma and feelings of anxiety for customers in accessing additional support services and sharing their story with us. Customers will only have to tell their story once, without the burden of proof, or need to navigate a complex sign up process.
- Setting up a team of dedicated, trained professionals who can deliver more focussed and personalised customer service. This will result in faster and more sensitive case management of complaints and enquiries. This team will be specialists in understanding the nuanced experiences of customers in vulnerable

and disadvantaged services, enabling them to continuously improve the program. In addition, they will develop key referral programs that will enhance customers access to a wider range of support.

- Reducing the financial barriers that some customers in vulnerable or disadvantaged circumstances face in terms of utilising gas more efficiently or ensuring their appliances are operating in a safe and reliable manner.
- Reducing anxiety and improve the feeling of safety and autonomy by enabling meter self-reads so that meter readers no longer need to physically visit their property.
- Improving the accessibility of both digital and printed communications that all AusNet customers interact with and rely on, specifically uplifting the experience of CALD customers who will have access to tailored, easy English communications in their native language. Customers will be better able to understand the key information being shared about their essential service.
- Providing additional support for customers who are experiencing an interruption to their gas supply. Rather than go without heating, hot showers or a warm meal, they can access these services at no cost to them.

Delivering this option addresses the feedback we heard from our customers in our workshops: *“AusNet customers support the introduction of a priority service program for vulnerable customers. They believe the additional charge of approximately \$1.30 per customer, per annum is acceptable and the proposed principles for the priority service program put forward by AusNet were broadly supported. Customers were interested in the design of the program, particularly that it would be accessible but not open to exploitation, and that the impact would be measured.”*<sup>18</sup>

The forecast cost to deliver Option 2 (excluding overhead) during the next five-year period (2024 to 2028) is \$791,000 pa. This is equivalent to \$1.05 per customer per year, which is below the \$1.30 spend that customers told us they were comfortable with.

Delivering this option also reduces the likelihood that we unfairly impact customers who need additional support by inadvertently exacerbating the financial hardship, harm, or disadvantage that customers may face.

The costs outlined are prudent and have been based on best practice input, market rates or previous, similar projects. The initiatives will be delivered using a combination of internal and external resources.

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<sup>18</sup> Communication Link, Engaging Victorians on the future of gas networks - Consultation report, April 2022, p.3.

6 APPENDIX

6.1 Appendix 1: Priority Services Program registration form prototype (draft)

The screenshot displays a web form for the Priority Services Program registration. The page header includes the AusNet services logo and navigation links for Electricity, Gas, Solar, Safety, and Outages. The main heading is 'Sign up for priority services'. A progress indicator shows three steps: 01 Your details (active), 02 PSP support, and 03 Final confirmation. The 'Your details' section is titled 'Tell us about you' and contains several input fields: First name, Last name, NMI, Meter no., Email, and Phone. Below this is a section 'Let us know your circumstances' with checkboxes for 'Age related' (Pensionable age, Children under 5), 'Communication support' (Unable to communicate in English, Blind), and 'Poor mobility' (Physical impairment, Unable to answer door). There is also a 'Temporary' checkbox for 'Temporary - life changes'. The next section, 'Let us know what additional support services would be useful to you', includes checkboxes for Financial assistance, Self reading your meter, Priority connections/restoration, Translated communications, Check ins during outages, and Gas usage efficiency advice. The final section asks 'How long would you like access to these services for?' with 'From' and 'To' date pickers (DD/MM/YYYY) and an 'Indefinitely' checkbox. A 'Submit' button is located at the bottom of the form.

## 6.2 Appendix 2: Direct response to feedback on the PSP

Provider	Feedback	AusNet response
Brotherhood of St Laurence	<p>Victorian distributors ran a useful consultation process with stakeholders from the community energy advocacy sector, to explore the best focus for the design of a program to support vulnerable gas consumers. We applauded the engagement done towards this possibility and appreciate the opportunity to discuss the proposal through the engagement.</p> <p>We also note that our participation in the engagement sessions did not constitute endorsement of the program proposed.</p> <p>Our organisations feel that the engagement has identified some important areas of focus, however, we do not support the establishment of a new fund.</p>	<p>The feedback provided by all members of the advisory panel was extremely useful in informing the development of the Priority Services Program. We will continue to engage stakeholders from the community energy advocacy sector in the detailed design of the program registration and initiatives to ensure we deliver material benefits to customers.</p> <p>We note that Brotherhood of St Laurence do not support the establishment of a new fund and we will respond to their detailed feedback. We would seek to continue to work with them on all initiatives regardless of the outcome of this proposal.</p>
Brotherhood of St Laurence	<p>We feel that the process has identified many positive initiatives that can be incorporated within the distributors' BAU operations, without the need for additional funds. These include those identified as BAU actions in the distributors' presentation – but also some actions from the proposed funded PSP activity stream.</p>	<p>We identified several key initiatives that we will incorporate into our BAU operating expenditure allowance and deliver at no extra cost to customers. Current business as usual costs (reflected through our base year opex) are insufficient to fund the new initiatives. As such, we can only support these initiatives with an approved step change in our operating expenditure allowance.</p>
Brotherhood of St Laurence	<p>We suggest the title 'Priority Services Program' does not accurately describe the proposed intention for the program (but we appreciate the attempt to avoid the difficulties associated with nominating customers as 'vulnerable.'). We suggest 'Additional Support Program' or something similar, as a more accurate description of services.</p>	<p>We appreciate the feedback and suggestion in relation to the program name. We deliberately chose 'priority service', following the review into best practice programs. The UK refer to their program as a 'Priority Service Register' which has been running for over 10 years. 'Additional support program' shares a similar sentiment to Priority Services. We are open to test the perceptions and impacts of these names with customers.</p>
Brotherhood of St Laurence	<p>We are concerned about the way the program has been costed. The progression of the consultation suggests that the funds were allocated before the program was designed through the engagement program. We do not agree that funds should be allocated to the program based on the indication of a consumer focus groups' nominated willingness</p>	<p>To discuss the idea of a PSP more fully with customers and advocates we nominated a reasonable price cap of \$5 million, based on the AGN SA submission. This was used as a guide for the maximum cost of a Priority Service Program. As we learnt more through co-design, we refined the program</p>



Provider	Feedback	AusNet response
	to pay, alone. It is also important that any critical measures are properly costed.	and developed bottom-up cost assessments for the delivery of the prioritised initiatives. We agree that the program should be discrete and measurable and have committed to work with customers and the advisory panel to outline clear criteria and success metrics so we can track and report on our progress in a transparent manner.
Brotherhood of St Laurence	There is a lot of value in consistency of services across Victoria. We encourage development of a consistent program for the distributors' formal proposal.	In workshop 3 with the Advisory Panel, the AusNet, AGN Vic and MGN programs differed on several initiatives. Following feedback at this session AusNet refined our program to match the services offered by AGN Vic and MGN. The programs are now largely consistent across Victoria. The only difference is that the AusNet program includes meter self-reads, but the AGN Vic and MGN program does not. This is because AGN Vic and MGN already offer this service.
Brotherhood of St Laurence	Avoiding expanding the distributors operations is an appropriate economy given the networks' identification of a stranding risk.	We note this feedback and agree that AusNet is prudent in expanding operations. We see the Priority Services Program as even more important to implement in a period of uncertainty as customers in vulnerable and disadvantaged circumstances are most at risk of being significantly impacted in the energy transition. The additional services proposed are important to ensure customers can access financial support, simple processes, and communications in their native language.
Consumer Challenge Panel	We note AusNet has guaranteed service standards for its gas customers and its electricity distribution business has a customer charter detailing its commitments to its electricity customers. We question whether the proposed PSP is a genuinely new initiative and why AusNet's recently published a Customer Charter for its electricity customers could not be adapted to meet the needs of its gas customers.	Guaranteed Service Levels apply to the time to complete connection service orders and restore power. We initially proposed 'Prioritised Connections and Restoration' as an initiative in the PSP, however we removed this based on the rationale outlined in section 4.2, table 6: <i>"Existing performance for restoration and connection timeframes is high, with all customers receiving their service within 24-48hours. We are committed to continuing to restore,</i>

Provider	Feedback	AusNet response
		<p><i>supply and connect all customers as soon as possible and will continue to improve this through our business-as-usual processes.</i></p> <p><i>In addition, guaranteed service levels apply for connections and restoration. If we do not connect customers or restore their supply in a timely manner, they are eligible for a direct payment."</i></p> <p>The remaining initiatives in the PSP are not covered by the GSL scheme and deliver different benefits to customers as multiple points of the customer journey.</p>
Consumer Challenge Panel	Will this PSP also benefit AusNet's electricity customers, and if so what proportion of this AusNet's proposed PSP opex step change is associated with AusNet's gas distribution network customers and what proportion would relate to a benefit for electricity customers?	No, the PSP related to gas customers only. We are considering exploring a similar service for electricity customers in the EDPR.
Consumer Challenge Panel	Customers need to understand and have confidence in what AusNet's PSP will deliver for customers, this should include its proposed oversight, governance, performance and accountability arrangements.	We will work with customers and the advisory panel to outline clear criteria and success metrics so we can track and report on our progress in a transparent manner. In addition, we will continue to work with customers and stakeholders from community organisations to co-design the PSP services. We believe this oversight will be sufficient to ensure confidence in the program.
Consumer Challenge Panel	AusNet's <i>Draft proposal</i> indicates it will require "digital technology upgrades to support the program". AusNet needs to explain the difference between this item and its IT opex proposal so customers can be confident these are different	The digital technology upgrades to support the program relate to the proposed IT spend on a Customer Information System (CIS). This is the key enabler for the PSP register. Remaining IT spend refers to technology changes required for

Provider	Feedback	AusNet response
	<p>expenditures. We also note in its <i>Final decision</i> on AusNet's 2021 to 26 electricity price distribution review the AER allowed AusNet \$2.6 million (\$2020-21) for an IT cloud step change to "recover costs related to the rollout of a Customer Relationship Management system". AusNet needs to also explain the difference between this item and its IT opex proposal.</p>	<p>specific initiatives e.g. development of web forms. If approval of the CIS IT spend is not approved revisions to the forecast costs will be required to account for the system related changes associated with the CIS.</p> <p>The \$2.6 million in the EDPR relates to just the electricity business and is not related to gas.</p>
Consumer Challenge Panel	<p>AusNet has an existing marketing opex allowance (see below). The AER should require AusNet to use its existing allowance to support the PSP before approving additional marketing funds for the PSP.</p>	<p>An outstanding question outlined in section 4.5 on program implementation is how we will advertise to customers that these services are available. We propose that the dedicated customer support team will work directly with third parties to establish referral programs. Broader communications will be absorbed as part of our current operating allowance. We do not have an existing marketing opex allowance and will not use any allowance for marketing.</p>
Consumer Challenge Panel	<p>Given the importance of the PSP to customers it is also in their interests that networks are accountable to customers for effective implementation and administration of the program. The AER should require AusNet to commit to delivering the PSP in the next regulatory period.</p>	<p>We agree that it is important to deliver these services to customers as quickly as possible so they can access the benefits as soon as possible. The majority of spend for the PSP falls in 2024 and 2025 (the first two years of the next regulatory period). This is to ensure the program is established and initiatives set up as quickly as possible, with the remaining costs in ongoing management an delivery.</p>
Consumer Challenge Panel	<p>AusNet should be required to report on its delivery of the program at a suitable frequency (e.g., quarterly or annually),</p>	<p>We agree that transparent reporting of the program is key. We have proposed to work with customers and the advisory</p>

Provider	Feedback	AusNet response
	including clear outcome measures, in a similar way that AusNet through its Customer Forum in its last EDPR committed to and developed a Customer Interaction and Monitoring Report.	panel to outline clear criteria and success metrics so we can track and report on our progress in a transparent manner.
Consumer Challenge Panel	The AER, in association with consumer representatives should review the PSP's administration and efficacy after two years, to ensure it is meeting consumers' needs and expectations.	We welcome a review of the program by the AER and consumer representatives to ensure tangible benefits are being delivered to customers. We suggest this review include an assessment of customer satisfaction with the program.
Consumer Challenge Panel	AusNet should be required to fund all overheads associated with the PSP.	The cost build up for the PSP excludes overheads.