



Conservation
Council SA

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Andrew Reeves

Chair

Australian Energy Regulator

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Dear Andrew

RE: Consultation on the Draft AER Stakeholder Engagement Framework

The Conservation Council of South Australia welcomes the opportunity to contribute to the AER Stakeholder Engagement Framework (Framework) and supports the AER commitment to work towards its vision in a way that transparently, meaningfully and consistently considers stakeholders' needs and interests.

When it comes to energy matters, the Conservation Council has a strong focus on reforms that would provide greater confidence protections and choice for consumers that seek lower greenhouse gas emissions associated with the energy that they consume. This is a discreet segment of the market that includes millions of customers that have participated in renewable energy programs either as household renewables, or as GreenPower paying electricity customers, or in many simply seeking to choose electricity from a provider that has lower greenhouse gas emissions associated with their generation portfolio.

Does the Framework cover the appropriate range of AER activities and stakeholders affected by the AER's activities and decisions?

Comment on Section 4.1. Who are our stakeholders?

The proposed Stakeholder Engagement Framework does not adequately acknowledge different types of consumers or the advocacy areas where groups may seek to represent those different types of consumers.

Energy consumers are not simply large or small, business or household. In addition to those described in the draft Engagement Framework, they include average and general customers, low income or vulnerable customers, customers in more remote locations, GreenPower Paying electricity customers and electricity customers participating in renewable energy programs.

Whilst the draft Engagement Framework could be regarded as covering all these groups in a general sense, in practice, there have not been adequate pathways for engagement with the AER, accessibility, or transparency when dealing with matters from a renewable customer perspective.

Policies, programs reviews and reports relating to energy from Federal Government departments, the AEMC, AER often fail to include or even acknowledge the GreenPower consumer perspective in their scope. The Power of Choice Review and subsequent program of activities is one such example.

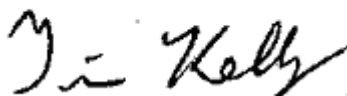
The Conservation Council therefore recommends to the AER that Section 4.1 specifically lists a range of energy consumers that reflect their interests to ensure that when the final Stakeholder Engagement Framework is implemented, that the engagement performance of the AER is measurable against these different consumers. As a minimum inclusion, The Conservation Council recommends that the following consumers are included in this list.

- GreenPower paying electricity consumers
- Consumers seeking greenhouse disclosure and carbon pass through cost clarity and disclosure (should this continue)
- Consumers seeking to make choices based on the greenhouse intensity of the generation portfolio of generator-retailers (acknowledging that this is not possible for those companies that are retailers only),
- Consumers participating in household solar and generation programs.

I commend the AER in consulting on its draft Stakeholder Engagement Framework and believe that with this broadening of the description of the different kinds of stakeholders that this will support better engagement with consumers on energy regulation matters.

I would be happy to discuss this submission with the AER in more detail.

Yours sincerely

A handwritten signature in black ink that reads "Tim Kelly". The signature is written in a cursive, slightly slanted style.

Tim Kelly

Chief Executive

Conservation Council of South Australia