Mr Warwick Anderson General Manager – Network Regulation Australian Energy Regulator GPO Box 3131 CANBERRA ACT 2601



positive energy

Submitted via email to: consumerengagement@aer.gov.au

Dear Mr Anderson,

Draft Consumer Engagement Guideline for Network Service Providers

Energex welcomes the opportunity to respond to the Draft Consumer Engagement Guideline for Network Service Providers (the *Guideline*), released for comment on 1 July 2013.

Energex strongly supports effective consumer engagement in the electricity sector and welcomes the non-prescriptive method outlined by the AER on the manner and approach it will use to assess engagement activities undertaken by Network Service Providers (NSPs). Energex has been actively working with the Energy Networks Association (ENA) and the AER in the development of the Guideline and broadly supports the position the ENA have outlined in their response.

Additionally, Energex notes in the explanatory statement accompanying the Guideline that the AER suggests NSPs adopt the International Association of Public Participation (IAP2) spectrum. The IAP2 spectrum underpins many of Energex's engagement activities. However, it should be noted that the IAP2 is one of many recognised engagement frameworks. The AER should therefore also consider the use of other frameworks and models, taking into account the circumstances or organisational settings.

Furthermore, Energex particularly endorses the AER's approach of assessing NSP engagement on a case by case basis. Energex does not believe a prescriptive approach to measurement of consumer engagement is appropriate given the different challenges and base levels of engagement that exist across the sector.

Energex looks forward to ongoing engagement with the AER in the further development of the Guideline and consumer engagement programs. We would also welcome the opportunity to meet with members of the AER Consumer Challenge Panel as we continue to build and develop our engagement program.

For more information please contact Davina McCormick, Customer Engagement Manager on 07 3664 5253.

Yours sincerely

Kevin Kehl

Executive General Manager

Customer and Corporate Relations

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