

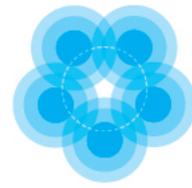
The Energy
Charter
**INDEPENDENT
ACCOUNTABILITY
PANEL**

ISSUES PAPER

Call for submissions

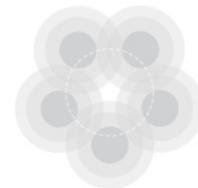
4th October 2019





CONTENTS

Introduction – Call for Submissions	3
The Energy Charter	4
Signatories to the Energy Charter	4
Beyond compliance	5
A Summary of the Energy Charter and its Principles	5
Disclosures under the Energy Charter	7
The Energy Charter Independent Accountability Panel	8
Call for Submissions	9
Timetable	9
Format	9
Submission	9
Publication	9
Conforming submissions	9
Sources of information	10
The Energy Charter in detail	10
Signatory Disclosures	10
Public Forums	10
The Panel’s website	10
Issues to Consider in Submissions	11
Guiding questions	11
Linking submission content to Principles	11
Linking submission content to Disclosures	11
Use of examples and case studies	11
Complaints about your energy provider	12
Enquiries	12



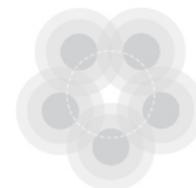
Introduction – Call for Submissions

This Issues Paper has been released by the Energy Charter Independent Accountability Panel (“we” or the “Panel”) to solicit submissions from household and business stakeholders and your representative organisations (“you”) in response to the inaugural disclosures made by signatories to the Energy Charter.

Submissions will assist the Panel in the preparation of our assessment report, where we measure the disclosures against the commitments made by signatories to the five principles of the Energy Charter.

In this Issues Paper, we:

- Briefly outline the Energy Charter;
- Describe our role as the Panel – in particular, seeking stakeholder feedback to assist us in preparing our report;
- Set out the process for making a submission;
- Provide references to the key source information – including upcoming public forums; and
- Set out several questions we believe are relevant in our assessment, to guide your submission.



The Energy Charter

The Energy Charter was developed in consultation with a range of energy industry stakeholders and launched in January 2019.

The Energy Charter is a statement about energy businesses **putting the customer at the centre of their businesses** and delivering better outcomes for them.

The Energy Charter notes its purpose is:

“to progress the culture and solutions required to deliver a more affordable, sustainable and reliable energy system for all Australians. It is focused on embedding a customer-centric culture and conduct in energy businesses to create tangible improvements in affordability and service delivery.”

Signatories to the Energy Charter

The Energy Charter member organisations (the “Signatories”) represent many of the key participants in the Australian energy sector, spanning gas and electricity, generation, networks infrastructure and retailing, and government, listed and private ownership models. Membership is voluntary.

Refer to <https://www.theenergycharter.com.au/signatories/> for detail of each organisation.

TABLE 1 – Energy Charter Signatories in 2019

Signatory	Main Business Area
ActewAGL	Electricity and Gas Distribution, Energy Retail, (ACT)
AGL	Electricity Generation and Energy Retail (NSW, QLD, SA, VIC and WA)
APA	Gas Transmission and Storage, Electricity Generation (National)
Aurora Energy	Energy Retail (TAS)
Ausgrid	Electricity Distribution (NSW)
Australian Gas Infrastructure Group	Gas Transmission and Distribution (National)
CleanCo	Electricity Generation (QLD)
CS Energy	Electricity Generation (QLD)
Endeavour Energy	Electricity Distribution (NSW)
Energy Australia	Electricity Generation and Energy Retail (ACT, NSW, QLD, SA and VIC)
Energy Queensland	Group of Electricity Distribution (QLD) and Retail (Regional QLD) businesses
- Energex	Electricity Distribution (SE QLD) (part of Energy Queensland)
- Ergon Energy Retail	Energy Retail (Regional QLD) (part of Energy Queensland)
- Ergon Energy Network	Electricity Distribution (Regional QLD) (part of Energy Queensland)
- Yurika	Energy solutions (part of Energy Queensland)
Essential Energy	Electricity Distribution (NSW)
Jemena	Electricity Distribution, Gas Distribution and Transmission (National)
- Ovida	Energy solutions (same ownership as Jemena)
Meridian Energy	Electricity Generation (NSW, SA, VIC)
- Powershop	Energy Retail (NSW, SA and VIC)
Origin Energy	Electricity Generation and Energy Retail (ACT, NSW, QLD, SA and VIC)
Powerlink	Electricity Transmission (QLD)
Stanwell	Electricity Generation (QLD) and Retail
TransGrid	Electricity Transmission (NSW)



Beyond compliance

Signatories consider full compliance with relevant legislation, rules and regulation to be a minimum standard.

The Energy Charter does not seek to address this compliance behaviour but complement it – with commitments to go above and beyond the minimum standard in order to deliver improved customer outcomes.

A Summary of the Energy Charter and its Principles

The Energy Charter consists of five Principles – which are commitments made by the Signatories about how they will place the customer at the centre of their business model. For each of these, the objectives for best-practice are captured in Principles in Action.

A summary of the Energy Charter Principles and Principles in Action follows. Further information about the Energy Charter and its Signatories is found at www.theenergycharter.com.au

Principle One: “We will put customers at the centre of our business and the energy system”

Having the right culture underpins the way we behave, the decisions we make and the outcomes we deliver. We recognise that getting the culture right for our customers is crucial not only to deliver on our customer commitments, but also to the long-term success of our businesses.

We will develop the culture within our businesses that puts the customer at the centre and will work together and with our stakeholders to deliver the safe, affordable, reliable and sustainable energy system the community expects.

Principle One in Action

1. *To fulfil this principle energy businesses should:*
 - 1.1. Have a Board that actively oversees the business’ culture so as to be aligned with Energy Charter Principles.
 - 1.2. Have management operationally accountable for embedding a ‘customer at the centre’ culture.
 - 1.3. Ensure their work force is engaged and incentives are aligned to drive positive customer outcomes.
 - 1.4. Have robust processes to determine customer and community needs and be accountable on how feedback has been considered and incorporated into decision making.
 - 1.5. Demonstrate a culture of innovation and collaboration for positive customer outcomes, including through the sharing of insights with government, research institutions and across the supply chain, as well as joint advocacy on regulatory, policy and operational issues.

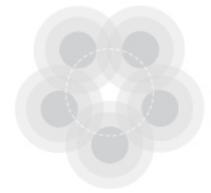
Principle Two: “We will improve energy affordability for customers”

We recognise that affordable energy is essential for Australian households and businesses.

We will do what we can to make energy more affordable, by running our businesses efficiently so customers benefit, by offering customers energy deals that best meet their needs, helping them manage their energy use, and by working together to improve energy affordability, as well as innovating for cost effective solutions that meet residential and business customer needs.

Principle Two in Action

2. *To fulfil this principle energy businesses should:*
 - 2.1. Ensure that investment, commercial and operational decisions are cost efficient, and explain how customers benefit from these decisions.
 - 2.2. Offer customers energy deals that best meet their needs, supported by effective tools and incentives for customers to manage their energy use and cost.
 - 2.3. Work cooperatively across the supply chain and with other stakeholders to improve affordability over the short and long term.
 - 2.4. Innovate to deliver competitive energy solutions for business and residential customers.



- 2.5. Advocate on behalf of customers to improve energy affordability through engagement in regulatory and policy processes.

Principle Three: “We will provide energy safely, sustainably and reliably”

We recognise the essential nature of energy and the need to deliver and use energy safely, sustainably and reliably. We recognise the role of energy businesses to respond to the shift to a cleaner energy system that is already underway. We understand the value energy brings to the community and the potential consequences and impacts for customers when reliability and quality of energy supply is compromised.

We will provide energy safely, sustainably and reliably. We will listen to customer preferences and demonstrate how they inform decisions and outcomes and how the community benefits.

Principle Three in Action

3. To fulfil this principle energy businesses should:

- 3.1. Maintain the highest standards of safety for their people, the community and the environment.
- 3.2. Engage with customers and the community on investments, and manage operations in line with their expectations, demonstrating how communities’ benefit.
- 3.3. Develop business strategy and manage operations to respond to the shift to a cleaner energy system that is already underway.
- 3.4. Work with government, other energy businesses, the community and industry bodies to develop a planned transition to a cleaner energy system.
- 3.5. Facilitate new services and technologies that support sustainable energy solutions that meet the changing needs of the market.
- 3.6. Implement solutions across the supply chain:
 - a. that support energy connection, service and reliability that meets customers’ needs.
 - b. to resolve service issues that impact customers and the community.

Principle Four: “We will improve the customer experience”

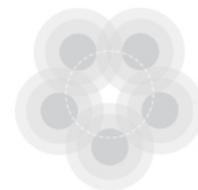
We recognise that it should be easy for customers to make informed decisions about their energy use and services that outcomes should be transparent, and all customers should benefit from the transformation of the energy system. Customer service from energy businesses should be respectful, efficient and seamless, particularly if things go wrong.

We will make it easy for everyone to get the best product or service for them regardless of their ability to engage, or interest in, the energy market. We will continually improve our processes and communication and will work together to provide better services across the supply chain to meet customer needs.

Principle Four in Action

4. To fulfil this principle energy businesses should:

- 4.1. Enable customers to get fair outcomes regardless of their ability or desire to participate in the energy market.
- 4.2. Empower customers by:
 - a. making sure all communication is clear, in plain terms, accessible and understandable
 - b. providing insightful and useful information and accessible tools; and
 - c. streamlining access to, and portability of, customer energy data.
- 4.3. Ensure that innovation and design in products and services, as well as communication platforms and tools, are driven by customers’ needs and preferences.
- 4.4. Have effective and accessible dispute resolution processes, co-ordinated across the supply chain, to resolve customer issues and implement process improvements in response.

**Principle Five: “We will support customers facing vulnerable circumstances”**

We recognise that some households and businesses may experience vulnerability that requires support from energy providers, which may require collaboration with governments and community service organisations. Not all experiences of vulnerability will be the same and providing support requires solutions tailored for different circumstances.

We will establish processes for early recognition of, and engagement with, customers facing vulnerable circumstances, support customers to navigate periods of vulnerability and collaborate with the community and government to assist those who need it most.

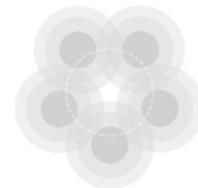
Principle Five in Action**5. To fulfil this principle energy businesses should:**

- 5.1. Have processes to enable early identification of and engagement with customers at risk of vulnerability, coupled with intervention measures that can prevent customers falling into hardship.
- 5.2. Provide products and services that are tailored to customers facing vulnerable circumstances and support them to get back on track.
- 5.3. Provide flexible solutions that are easy to access and are provided by specially trained frontline staff with expertise in supporting those customers who face additional barriers to engaging with the energy market.
- 5.4. Take a collaborative approach, partnering across the energy supply chain and with government and community service organisations to implement innovative solutions that improve outcomes (affordability or experience) for customers facing vulnerable circumstances.

Disclosures under the Energy Charter

Each year the Signatories have agreed to publicly account for how they are delivering against the Principles in the Energy Charter, by providing an annual disclosure (the “Disclosures”). In this first year of reporting the minimum reporting period is 1st January 2019 to 30th June 2019.

The inaugural Disclosures were made on 30 September 2019, and are available for review at www.theenergycharterpanel.com.au/industry-disclosures.



The Energy Charter Independent Accountability Panel

Within the Energy Charter governance structure, the Panel's role is to assess the annual Disclosures and publish a report to assist the Signatories in understanding how their current status and progress is being perceived.

As part of this process, the Panel considers feedback from stakeholders about the Disclosures.

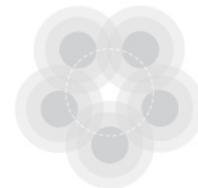
In this way, the Panel provides accountability that the Signatories are delivering on the promises they make to consumers by joining the Energy Charter.

The report will seek to highlight best practices as well as interesting and innovative approaches – to assist in driving progress towards the Principles in Action for all Signatories.

The Panel will also identify and highlight those areas where the gap between the Principles and the current state may be widest, or may be closing least rapidly.

The Panel was established in June 2019. It consists of four members, selected to represent key energy industry stakeholders, assisted in their analysis and reporting by an expert resource.

Details of the current Panel may be found at www.theenergycharterpanel.com.au.



Call for Submissions

This Issues Paper sets out the process for public submissions to be provided to the Panel.

Our role is to review the Disclosures against the principles of the Energy Charter – and a key part of the Panel’s evaluation is its public consultation process.

We are keen to hear from household and business customers and their representatives about how the Signatories are performing for their customers, and what would deliver better outcomes for all customers.

We are interested to hear:

To what extent do the Disclosures represent your experience in the first half of 2019?

We are calling for written submissions to assist the Panel in our task.

Submissions will inform the Panel’s report on the inaugural Disclosures, which will be published in November.

Timetable

Submissions are due by **5:00pm Sydney time on Friday 25th October 2019**.

Format

Submissions are to be made in pdf format, with naming convention “[name] Energy Charter 2019.pdf”

Submission

Email submissions to submissions@theenergycharterpanel.com.au with subject header “Energy Charter Panel 2019 Public Submission from [name]”.

Publication

Submissions will be reviewed by the Panel, and conforming submissions will be published to the Panel website in full. Each submission must include the name of the submitter and a means of contact. The Panel will operate on the presumption that all submissions are public. **The Panel is unable to accept non-public submissions.** The Panel may use its discretion, in exceptional circumstances, to publish a de-identified submission i.e. where the submitter’s name and contact details are supplied to the Panel and the submitter has requested the Panel to withhold their name from publication.

Conforming submissions

Public submissions to the Panel process are an opportunity to gain a wide range of stakeholder feedback on the Disclosures, in the context of the Energy Charter and its Principles.

We are seeking **specific, succinct and constructive feedback** via these submissions.

We highlight that the Disclosures relate (in this first year) to the **six-month period from January to June 2019**. As the Signatories are referring to their contemporary situation, **submissions should also be assessed against the current state, not the past.**

The Panel will only publish submissions, which **respond directly to the Disclosures**, the degree to which Signatories and Australian energy industry business in general are progressing towards meeting the Principles, and means by which the businesses may attain best practices most rapidly.

The Panel is unable to make use of (or publish) submissions which are out of scope (such as matters of government policy outside the Signatories’ influence) or which are in substance standard-form or template submissions, or submissions prepared for other purposes, with limited direct relevance to the development and success of the Energy Charter and its objectives.



Sources of information

Public submissions should be prepared with reference to the following material.

The Energy Charter in detail

The Disclosures are directly related to the Energy Charter – and review of this in detail is important in framing a response in Submissions. Refer to <https://www.theenergycharter.com.au/publications/>.

Signatory Disclosures

Disclosures have been published at www.theenergycharterpanel.com.au/industry-disclosures, as well as on individual Signatory websites.

Public Forums

The Panel is hosting forums in Brisbane, Sydney and Melbourne in October 2019. Each forum will follow the same format, and will be recorded for subsequent review by stakeholders. In addition, the Panel will host an online forum to hear from rural and regional households and businesses and interested stakeholders outside those cities who are unable to attend a forum in person.

This is an opportunity for stakeholders to hear from the Panel and the Energy Users Consultative Group (which represents energy users in the Energy Charter governance structure), and to provide feedback to the Panel directly.

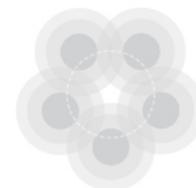
TABLE 2 – Public Forums

Date	Location	Time	Venue
Thursday 10 th October 2019	Brisbane	3:30pm – 5:30pm	Sofitel Hotel, Turbot St
Friday 11 th October 2019	Sydney	3:30pm – 5:30pm	Grace Hotel, York St
Monday 14 th October 2019	Melbourne	3:30pm – 5:30pm	Rendezvous Hotel, Flinders St
Wednesday 16 th October 2019	Online	2:00pm – 3:00pm	Register online

Details of the forums are available at <https://theenergycharterpanel.com.au/news/> including instructions on how to register, and how to access the material remotely, or after the event has concluded.

The Panel's website

From time to time the Panel may publish other material relevant to our assessment of the disclosures. Interested stakeholders may visit www.theenergycharterpanel.com.au, and subscribe in order to remain up-to-date.



Issues to Consider in Submissions

We provide some guidance to ensure your submissions are best-suited to assist the Panel in our assessment.

Guiding questions

The Panel would appreciate responses which **focus on the following general questions**, which the Panel seeks to address in our report.

TABLE 3 – Questions

Question	
1	What are specific examples of practices or behaviour by Australian energy businesses which are contrary to the Energy Charter Principles and Principles in Action , which should be discouraged?
2	What are specific examples of practices or behaviour by Australian energy businesses which are consistent with the Energy Charter Principles and Principles in Action , which should be more widely encouraged?
3	What emerging or innovative technology, systems, practices or processes exist to help energy businesses move closer toward the Principles of the Energy Charter?
4	Are there examples of analogous customer-centric behaviours, processes or metrics in other Australian industries, or internationally , which might be adopted by Australian energy businesses to better meet the Energy Charter Principles?
5	For particular Principles in Action, what metrics might be most appropriate to assess and measure progress over time – and why?

Linking submission content to Principles

The Panel intends its report to follow the structure of the Energy Charter itself – addressing each of the five Principles in turn.

As a result, submissions should **clearly identify which Principle (or Principle in Action) is being addressed** wherever possible, when responding to the above questions or other matters.

Linking submission content to Disclosures

The Panel must assess the Disclosures. Submissions which either **reinforce, rebut or provide alternative points of view in relation to specific Disclosures** are most likely to assist us in considering and reflecting your viewpoint in our assessment.

Use of examples and case studies

The Panel appreciates that the Energy Charter is seeking to ensure the customer is placed at the centre of the energy industry. The human impact of energy supply to your home or business is very relevant, and so the Panel is interested in **specific case studies or stories which are relevant to the Principles and/or the Disclosures**.



Complaints about your energy provider

It is not the role of the Panel, nor does it have the capacity, to respond to individual complaints about your energy provider(s). Submissions are not an appropriate mechanism to raise complaints (e.g. reinstating a connection, or other matters where you are seeking an immediate resolution).

To make an individual complaint, you should first contact your electricity or gas retailer or distributor (if relevant). If that does not resolve your issue you can contact the Ombudsman in your State or territory.

This fact sheet from the ACCC may help you with your issue:

https://www.accc.gov.au/system/files/What-can-I-do-if-I-have-a-complaint-about-my-energy_0.pdf

TABLE 4 – Energy Ombudsman contact details

State	Ombudsman	Telephone	Website
QLD	Energy and Water Ombudsman Queensland	1800 662 837	www.ewoq.com.au
NSW	Energy & Water Ombudsman NSW	1800 246 545	www.ewon.com.au
ACT	ACT Civil and Administrative Tribunal	02 6207 1740	www.acat.act.gov.au
VIC	Energy and Water Ombudsman (Victoria)	1800 500 509	www.ewov.com.au
SA	Energy and Water Ombudsman South Australia	1800 665 565	www.ewosa.com.au
TAS	Energy Ombudsman Tasmania	1800 001 170	www.energyombudsman.tas.gov.au
NT	OmbudsmanNT	1800 806 380	www.ombudsman.nt.gov.au
WA	Energy and Water Ombudsman Western Australia	1800 754 004	www.ombudsman.wa.gov.au

Enquiries

For matters which are not addressed by this Issues Paper or the key websites (www.theenergycharter.com.au and www.theenergycharterpanel.com.au) please contact the Panel via chair@theenergycharterpanel.com.au.