
CCP33 Advice to AER
Evoenergy - Access Arrangement Proposal
2026-31

Consumer Challenge Panel (CCP) Sub-Panel CCP33

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Acknowledgement of Country

We acknowledge the Traditional Custodians of the various lands on which Evoenergy owns and operates its networks and facilities. We honour the customs and traditions and special relationship of those Traditional Custodians with the land as well as those where this report is being prepared. We respect the elders of these nations, past and present.

Confidentiality

To the best of our knowledge this report does not present any confidential information.

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1 Summary

CCP33's schedule of work for Evoenergy's Access Arrangement (AA) proposal 2026-31 requires us to provide the AER with:

1. Advice on whether the long-term interests of consumers are being appropriately considered in Evoenergy's regulatory proposals and the Australian Energy Regulator's (AER) decision making
2. An assessment of consumer engagement and the extent to which Evoenergy's initial and revised proposals reflect consumer preferences

This CCP33 Advice responds to Evoenergy's *five-year gas plan 2026-31*¹ which presents the ACT and Queanbeyan-Palerang gas network AA Proposal 2026–31 and was lodged with the AER in June 2025.

Our Advice focuses on Evoenergy's engagement to inform its AA proposal and the extent Evoenergy's proposal reflects consumer preferences. CCP33 will provide further Advice when the AER makes its draft decision and as Evoenergy prepares its revised proposal.

Guided by the AER's *Better Resets Handbook*,² we consider:

- The nature and form of Evoenergy's engagement
- Evidence of the impact of Evoenergy's engagement on the development of its proposal
- Other substantive issues that predominantly result from the uncertainties facing Evoenergy in responding to the ambitious net zero targets set by the ACT Government

Evoenergy commenced its engagement program for the 2026-31 gas access arrangement early. It formulated an engagement strategy which was comprehensive, well planned and suited to the unique size and circumstances of the network. Evoenergy engaged broadly with its Community Forum, its standing Energy Customer Reference Council and the Energy Matters Forum for large customers. Following cessation of the role of the Energy Regulatory Advisory Panel we did not observe a similar focus on the depth of engagement as envisaged in the *Better Resets Handbook*.

Overall, we congratulate Evoenergy for being open to new thinking to address the challenges it faces as a network in decline. These include an innovative approach to demand forecasting through the work carried out by the Centre for International Economics (CIE), consideration of a new approach (sum-of-years-digits) to accelerated depreciation, and a proposed new framework for managing disconnections from the gas network.

Our Advice identifies two key areas where we believe additional engagement with customers would strengthen development of Evoenergy's revised AA proposal:

- Form of control
- Engagement with NSW customers to establish sound evidence of their preferences and issues in relation to Evoenergy's gas network and its future

¹ Evoenergy, *Evoenergy's five-year gas plan 2026-31*, June 2025

² AER, *Better Resets Handbook*, July 2024

2 Context for this advice

2.1 Regulatory process

Evoenergy provides gas transportation and associated services to users of the Evoenergy gas network, which distributes gas to approximately 153,000 customers across the ACT and the Queanbeyan-Palerang region in New South Wales.

Evoenergy lodged its AA proposal for the period 1 July 2026 to 30 June 2031 in June 2025, with the AER to make its final decision in April 2026.

Evoenergy is developing its AA proposal at the same time the ACT government is implementing its plans to electrify the ACT and phase out gas by 2045, while the NSW government does not yet have such plans. The ACT's unique position results in challenges in preparing the AA proposal. No other gas distribution network in Australia is preparing a regulatory proposal with the knowledge that the life of the network is expected to end at a relatively short and known point in time.

Regardless of jurisdictional differences, consumers throughout Australia are increasingly electrifying their homes and businesses, which will see a reduction in the number of customers connected to gas. In response, most gas network businesses are seeking to recover the cost of their assets sooner to mitigate against the risk of asset stranding while sufficient numbers of customers remain on their networks.

Our assessment of Evoenergy's customer and stakeholder engagement and the way it developed its proposal has been informed by:

1. Application of the *Better Resets Handbook* expectations to a Gas Access Arrangement
2. The AER's gas distribution network tariffs review 2023
3. Key issues associated with the future of gas
4. Implications of other recent AER gas AA decisions

2.1.1 Application of the *Better Resets Handbook* to gas access arrangements

The AER published the *Better Resets Handbook* in November 2021, to [emphasis added]:³

“encourage networks to develop high quality proposals through genuine engagement with consumers and that meet our expectations. This will lead to a number of benefits, including regulatory outcomes that better reflect the long-term interests of consumers.”

Although the AER made minor revisions to the Handbook in 2024, the aim remains the same. Importantly, the *Better Resets Handbook* sets out the AER's expectations of network businesses regarding consumer engagement and how the engagement outcomes should be reflected in regulatory proposals. Accordingly, we have assessed Evoenergy's engagement against these expectations and in particular, those detailed in Chapter 3 of the Handbook.

However, our capacity to observe Evoenergy's consumer and stakeholder engagement was limited by our late appointment as a CCP sub-panel, which unfortunately did not occur until November 2024, whereas Evoenergy commenced its stakeholder engagement in December 2023.⁴

³ AER, *Better Resets Handbook*, December 2021, p.3

⁴ In December 2023, Evoenergy established an Energy Regulatory Advisory Panel (ERAP) to engage more deeply on aspects of its regulatory proposal. The group met on six occasions until September 2024 when it was disbanded, so CCP33 has not had the benefit of observing any of that deeper engagement.

Consequently, we have needed to rely on secondary sources such as Evoenergy's published engagement reports for aspects of our assessment. We recognise that desktop review of materials gives a limited perspective compared to being able to observe events in person or online.

2.2 AER gas distribution network tariffs review 2023

In October 2023, the AER published its final decision on a review of gas distribution network reference tariff variation mechanisms and declining block tariffs.⁵

This review reflects the rapidly changing circumstances for gas businesses and resulted in a change to the AER's regulatory approach. There are several implications of AER's final decision for Evoenergy's current AA proposal:

1. The AER will make case by case decisions on gas distribution pipeline tariff variation mechanisms and tariff structures
2. The form of regulation, price cap or revenue cap, will be determined on a case-by-case basis with a hybrid tariff variation mechanism worthy of consideration
3. The AER expects substantive stakeholder consultation regarding tariff variation mechanisms
4. The AER will retain declining block tariffs on the basis they are economically efficient

2.3 Future of gas

The future of gas is a significant matter for all gas networks, regardless of whether their state/jurisdictional government has a firm view on the future of gas to achieve net zero emissions.

2.3.1 AEMO demand forecasts

As the energy transition has gathered pace in Australia, debates about the role of gas for household and commercial application, as well as for electricity generation, have intensified.

Most recently, in March 2025 the Australian Energy Market Operator (AEMO) published the 2025 Gas Statement of Opportunities (GSOO)⁶ for Australia's East Coast Gas Market. The GSOO considers different scenarios for the future of gas based on different assumptions around economic growth, pace of electrification, energy efficiency and International Energy Agency world energy scenarios.⁷ Regardless of the scenario, a decline in residential and commercial gas consumption is forecast, although the pace of decline varies according to the scenario.

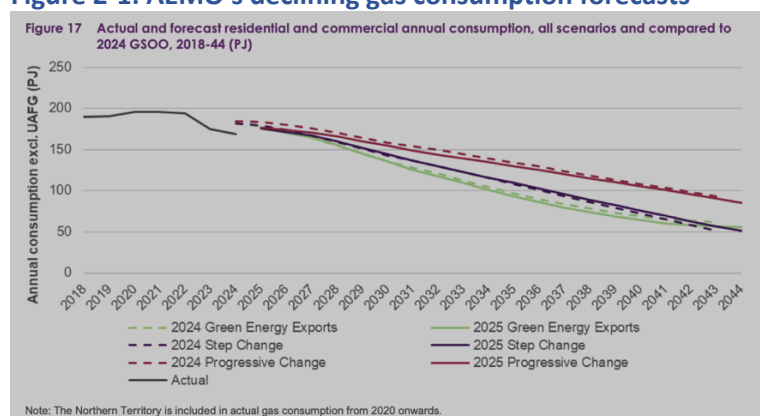
⁵ AER, *Review of gas distribution network reference tariff variation mechanism and declining block tariffs, Final decision*, October 2023

⁶ AEMO, *Gas Statement of Opportunities*, March 2025

⁷ Ibid, p.18

These declining gas consumption forecasts are illustrated in the following diagram from the GSOO:⁸

Figure 2-1: AEMO's declining gas consumption forecasts



2.3.2 Proposed rule changes: gas connection and permanent abolishment charges

In February 2025, Energy Consumers Australia (ECA) wrote to the Australian Energy Market Commission (AEMC) to propose four rule changes to the National Gas Rules including one that would see the connecting party pay for the costs of a new gas connection, rather than expose remaining gas customers to the risk of these new connections becoming stranded assets.⁹ In May 2025, the Justice and Equity Centre requested AEMC to consider an additional rule change to minimise the cost of permanent disconnections to only those required to make safe to discourage property owners from relying on unsafe temporary disconnections.¹⁰

In June 2025, the AEMC initiated a consultation process on these proposals. The AEMC received a number of submissions including one from the AER encouraging the AEMC to make an urgent decision, particularly on the connections pricing proposal as this would have significant implications for the AER's determination on Evoenergy's AA proposal.

2.3.3 ACT context

In 2010 the ACT Government legislated for the ACT to achieve net zero greenhouse gas emissions across all sectors by 2045.

Evoenergy's 2021-26 AA proposal was predicated on the ACT government's jurisdictional government policy to phase out reticulated gas, albeit the policy evolved during the development of that AA and continues to evolve, noting that part of Evoenergy's gas network is in NSW, which is not subject to the ACT's policy.

During the development of the proposal, Evoenergy engaged with stakeholders to understand the potential for stranded assets in the gas network and to elicit stakeholder feedback on Evoenergy's proposal to address the associated risks. Several participants sent a clear message that government should have a role, and consumers and other stakeholders wanted the discussion about accelerated depreciation to be part of a broader policy discussion.

⁸ Ibid, p.31

⁹ Energy Consumers Australia, *Gas Distribution Network Rule Change Requests*, 14 February 2025

¹⁰ Justice and Equity Centre, *Gas Distribution Network Rule Change Request – Fit for purpose gas disconnection arrangements*, 9 May 2025

The AER's final decision for Evoenergy's 2021-26 AA allowed accelerated depreciation on new assets only. This had a modest financial impact as the ACT's policy direction meant that Evoenergy's capex program was significantly lower than previous periods. The AER applied the decision to the whole network (i.e. including NSW), reversing its previous view that only ACT-based assets should be considered at risk.

2.3.4 Implications for this access arrangement period

Evoenergy is developing its 2026-31 five-year AA proposal knowing that its effective role as a gas distribution business, at least in the ACT, will end in 2045. Regardless, under the regulatory framework, Evoenergy will need to maintain its gas distribution network until the last customer disconnects. Consequently, an awkward balance must be struck between capex required to maintain the network and accelerating depreciation on existing and near future assets.

Evoenergy is expected to engage with customers and stakeholders on both the long-term future of gas question and remain prudent and efficient with its AA for the next regulatory period. Costs must be equitably shared between customers, but as customer numbers decline, maintaining equity becomes more challenging, with the burden falling on customers least able to respond to changing circumstances, such as lower income households and renters. The risk of a death spiral grows as fewer customers will remain on the gas network to bear the fixed costs of a less used network, driving up their costs.

How costs associated with risk are shared between current customers, future customers, the network's shareholders and government also has a direct impact.

2.4 Recent gas access arrangement decisions

In recent years the AER's gas AA decisions have highlighted:

1. Uncertainty about the future of gas, regardless of the jurisdiction
2. A clear intent among some gas network operators to transition to renewable gas
3. Exploration of options to accelerate depreciation to mitigate the risk of shortened life of gas assets
4. A desire to promote and even expand gas networks by some gas network operators, evidenced through proposals that included increased augmentation capex and opex, and marketing and education budgets to promote a gas future

While the ACT has a relatively clear roadmap and timelines to phase out gas and fully electrify, South Australia continues to identify and support a role for renewable gas. Victoria has a Gas Substitution Roadmap to largely phase out gas while the NSW is currently consulting on a gas decarbonisation roadmap which it expects to deliver later in 2026.

Gas networks, including Australian Gas Networks in South Australia and Jemena Gas Network in NSW, see they have a future if they can transition to renewable gas, and they seek to promote this future to consumers as evidenced through augmentation capex proposals and operating expenditure for marketing and education. Yet, at the same time they consider there is a risk that they will not recover the cost of their assets, given the likelihood that their asset lives will be shortened, and so they seek to accelerate the depreciation on their assets.

The AER's recent decisions have varied accordingly:

- In its final decisions for Jemena's 2025-30 and 2020-25 AA, the AER recognised the uncertain future of gas. For the 2026-31 period it allowed \$115 million (\$2024-25), with a 'base' real price increase limit of 0.5% for the 2025–30 period,¹¹ whereas for the 2020-25 period, the AER did not accept Jemena's proposal for accelerated depreciation on potential future investment as Jemena had not provided sufficient evidence to support its proposal.¹² However, as early as 2020 the AER indicated it was open to considering proposals for accelerated depreciation on a case-by-case basis.
- Given the clarity around the future of gas for the ACT, that is for significantly reduced gas consumption, driven by jurisdictional government policy, the AER allowed some accelerated depreciation of network assets for Evoenergy's 2021-26 AA.¹³
- In South Australia, AGN's engagement to inform the AGN (SA) AA proposal for 2021-26 focused on (green) hydrogen as a future renewable gas and AGN considered that the gas network had a continuing and likely expanding future; clearly a different scenario to Evoenergy at the same time. Accordingly, AGN did not seek any accelerated depreciation. Further, the AER observed that AGN customers were interested in renewable gas and supported AGN's further development of renewable gas options.
- The AER in its final decision for AusNet Services' gas AA in Victoria for 2023-28 (and similarly AGN and MultiNet also in Victoria), commended the quality of engagement but noted the challenges around its decision making. Significant issues remained after the AER's draft decision, contributed to by Victorian Government uncertainty on the view on the future of gas until it published its Gas Substitution Road Map in August 2022. For each of the three Victorian gas networks the AER ultimately allowed a modest amount of accelerated depreciation but also noted the uncertainties around future gas demand expectations.¹⁴
- In 2024, AusNet Services sought a revision to its 2023-2028 gas AA due to significant Victorian Government policy changes that will materially lower gas demand forecasts, and correspondingly sought to increase the accelerated depreciation it could recover from customers from \$105m (\$2022–23) to \$175m (\$2022–23).¹⁵ The AER did not accept AusNet Services' proposal,¹⁶ as it considered AusNet Services had not provided sufficient justification for the proposal; the transition is likely to be slower than proposed; the impact on consumers would be disproportionate given cost of living pressures and it was not widely supported by stakeholders. Regardless the AER indicated that the issues raised by AusNet Services could be better assessed in its 2028-33 AA proposal.
- Most recently, the AER applied a price-path approach, with a limit of 1% per annum (\$real) in response to Jemena's proposal for accelerated depreciation, despite consumer support for the proposal. The AER did not put significant weight on Jemena's consumer engagement due to

¹¹ AER, *Final Decision Jemena Gas Networks (NSW) Ltd Access Arrangement 2025 to 2030 Overview*, May 2025

¹² AER, *Final Decision Jemena Gas Networks (NSW) Ltd Access Arrangement 2020 to 2025 Overview*, June 2020

¹³ AER, *Final Decision Evoenergy Access Arrangement 2021 to 2026 Overview*, April 2021

¹⁴ AER, *Final decision AusNet Gas Services, Gas distribution Access Arrangement 1 July 2023 to 30 June 2028, Overview*, June 2023

¹⁵ AusNet, *Access arrangement information gas access arrangement review 2024 - Variation proposal*, September 2024

¹⁶ AER, *Draft decision AusNet Gas Services (Victoria) 2023–28 access arrangement variation proposal*, January 2025

concerns that consumers may not be aware of the limitations of accelerated depreciation for reducing long term prices for consumers.¹⁷

Significantly, the AER's accompanying depreciation report on its Jemena Gas AA decision provided some guidance regarding how networks should engage on accelerated depreciation.¹⁸ Key elements of the AER's guidance include:

- Presentation of multiple scenarios to reflect the uncertainties around the rate of decline of consumer demand
- An explanation of the limitations of accelerated depreciation as a risk management tool
- Projections of the potential price impacts of accelerated depreciation over multiple regulatory periods
- Consistency between the inputs and assumptions across all aspects of a proposal, including pairing a claim for accelerated depreciation with a minimisation of capex.

2.5 CCP reflections

CCP31 (Jemena Gas Network NSW AA proposal 2025-30) references the AER's decisions in more detail in its response to the AER's Issues Paper,¹⁹ and subsequent advice on the AER's draft decision and JGN's revised AA proposal²⁰. CCP31 provided the following comments which remain relevant when considering Evoenergy's current AA proposal:

1. There is no emerging clarity about what the future, even the near future, of gas looks like, even for a gas network which is not expected to exist beyond 2045
2. Forecasting gas demand is fraught, particularly for households and smaller businesses
3. Accelerated depreciation in various forms is a recurring theme in gas AA proposals, with the AER applying bespoke decisions in response to different gas business circumstances and their varying jurisdictional policy settings
4. Affordability concerns remain, including the risk of a descent into death-spiral settings where lower income households, including renters, are stuck with paying higher network fixed costs as those more able to afford a transition to electricity do so
5. Questions remain about who pays for the transition away from gas, including the cost of permanent disconnections

We have also reflected on the AER's guidance as to how networks should engage on accelerated depreciation, and we have considered these elements in our assessment of Evoenergy's engagement and its AA proposal.

¹⁷ AER, *Final Decision, Jemena Gas Networks (NSW) Ltd Access Arrangement 2025 to 2030 Attachment 4 Regulatory depreciation*, May 2025, p.21

¹⁸ Ibid., p.22

¹⁹ Consumer Challenge Panel, *CCP31 Advice to the Australian Energy Regulator Issues Paper: JGN Gas Networks NSW Access Arrangement Proposal, 23 August 2024 (Early Signal Pathway)*, September 2024

²⁰ Consumer Challenge Panel, *CCP31 Advice to the Australian Energy Regulator AER Draft Decision (November 2024) and JGN Gas Networks NSW Revised Access Arrangement Proposal (January 2024)*, February 2025

3 Evoenergy's engagement program

CCP33's Schedule of Work for Evoenergy's 2026-31 AA requires us to provide the AER with:

1. Advice on whether the long-term interests of consumers are being appropriately considered in [Evoenergy's] regulatory proposals and the AER's decision making, and
2. An assessment of consumer engagement and the extent to which [Evoenergy's] initial and revised proposals reflect consumer preferences.

This advice focuses on Evoenergy's engagement to inform its initial AA proposal and the extent to which the proposal reflects consumer preferences. CCP33 will provide the AER with further advice following the AER's draft decision and the lodgement of Evoenergy's revised AA proposal.

Guided by the *Better Resets Handbook*, we consider:

- The nature and form of Evoenergy's engagement; and
- Evidence of the impact of Evoenergy's engagement on the development of its proposal.

3.1 Overview of Evoenergy's engagement program

3.1.1 Energy Regulatory Advisory Panel

In December 2023 Evoenergy established the Energy Regulatory Advisory Panel (ERAP) of informed consumer representatives and regulatory specialists with an independent chair to engage more deeply on aspects of its AA proposal. Specifically, Evoenergy sought to *involve* the ERAP in the development of its proposal, including contributing to Evoenergy's engagement strategy to guide development of the gas network 2026–2031 AA proposal. Evoenergy published its engagement strategy in March 2024.²¹

Evoenergy met with the ERAP on six occasions until October 2024 when Evoenergy considered ERAP had fulfilled its role.

Over the six meetings Evoenergy engaged with ERAP on the following aspects of its proposal:

- Development of the engagement plan, and engagement outcomes
- Development of an energy narrative and scenarios for the energy transition
- Tariff variation mechanisms, tariff structures and reference services
- Accelerated depreciation and capital redundancy provisions
- Demand forecasts
- Abolishments and decommissioning
- Preliminary 2026-31 expenditure forecasts

CCP33 was appointed after the ERAP was disbanded, so our comment on the effectiveness of this engagement and its influence on Evoenergy's proposal is limited to published meeting materials.

²¹ Evoenergy, *Evoenergy Engagement Strategy for our gas network 2026–2031 access arrangement regulatory proposal*, April 2024

3.1.2 Engagement strategy

Evoenergy's engagement strategy for the 2026-31 gas network AA proposal was developed with input from the ERAP²². ERAP's contributions focussed on the engagement narrative, key messages, engagement topics and questions and scenarios to support engagement. An overview of the engagement strategy was presented to the Energy Consumer Reference Council (ECRC) in February 2024, with the engagement strategy published in March 2024.

3.1.3 Energy Consumer Reference Council

The ECRC is made up of a range of stakeholder representatives who meet with Evoenergy on a regular basis to represent their constituents' views and interests. Evoenergy explains that the ECRC is a key component of Evoenergy's ongoing engagement program and serves as a standing forum to test ideas, seek advice, and share information. While Evoenergy also undertakes engagement with the broader community through research, forums, and targeted consultations, the ECRC provides continuity, insight, and challenge.²³ Over the past 18 months, Evoenergy's gas AA proposal has been a recurring and prominent topic for ECRC discussion.

CCP33 observed three ECRC meetings in which Evoenergy presented and discussed inputs for the draft plan.

In March 2025, Evoenergy presented an overview of the draft plan to the ECRC. At the May 2025 meeting participants queried Evoenergy on a number of aspects of the draft plan including abolishment tariffs and permanent disconnections, depreciation, and demand forecasts. We return to these topics later in our Advice. In the June 2025 ECRC meeting, Evoenergy presented further information on demand forecasts and disconnection services and sought feedback on the overall draft plan.

3.1.4 Community Forums

In May 2024, Evoenergy established a panel, which it refers to as its Community Forum, of around 32 customers. Evoenergy engaged Communication Link to recruit participants to represent Evoenergy's customers and engage on aspects of its AA proposal. Communication Link also facilitated the sessions and reported on the process and outcomes. The panel met on ten occasions and also visited Evoenergy's gas receiving station. Meetings were predominantly face to face, but participants could choose to join online, helping form an inclusive engagement process.

Communication Link prepared an initial report in May 2024 after session 3 and a short Recommendations Report after session 6 in August 2024, which Evoenergy published on its website.²⁴

Unfortunately, CCP33 was only able to observe Community Forum sessions 7 to 10, so much of our commentary relies on Evoenergy's *Consumer and Stakeholder Engagement Report*²⁵ rather than our own observations. Based on our reading of that report, some key features of that engagement are:

²² Evoenergy, *Appendix 1.1: Engagement strategy 2026–31 gas access arrangement proposal*, June 2025 p. 10

²³ Evoenergy, *Appendix 1.3: Energy Consumer Reference Council (ECRC) engagement report*, June 2025, p. 3

²⁴ <https://www.evoenergy.com.au/About-us/Gas-network/Gas-network-plan>

²⁵ Evoenergy, *Attachment 1: Consumer and stakeholder engagement Access arrangement information ACT and Queanbeyan-Palerang gas network access arrangement 2026–31*, June 2025

- The recruitment process was open (advertised widely), 35 members were “randomly selected”.²⁶
- The community forum included a diversity of residential and small business customers, although NSW customers, vulnerable customers and small business owners were significantly underrepresented.
- Evoenergy claims it covered “all elements of the IAP2 Spectrum from ‘inform’ to ‘empower’” in its engagement.²⁷
- The engagement was centred on a clear narrative around the phasing out of gas in ACT and explored different scenarios with the Community Forum that resulted in a defined set of customer values for engagement on specific aspects of Evoenergy’s proposal, such as disconnection charges and safety implications, accelerated depreciation, and tariff structures.
- Over the ten sessions, the panel had an opportunity to build their understanding and knowledge of Evoenergy’s business and the energy transition in the ACT. This allowed customers to engage more confidently as time progressed and to express their views. However, based on our observations, the same participants within and between sessions were the most vocal and led the conversation, at times limiting the opportunity for quieter participants to express their views.
- In the final session in May 2025, Evoenergy presented participants with an overview of its draft proposal (informing), including the bill impacts (noting the Community Forum had been provided with an advance copy of the draft proposal to read).

3.1.5 ACTCOSS workshop

On 16 June 2025, the ACT Council of Social Services (ACTCOSS) organised a half day face-to-face workshop for representatives of a range of community support agencies in the ACT to introduce Evoenergy’s draft proposal, hear the views of the participants and garner interest in preparing a submission on the proposal for the AER. Evoenergy attended the first half of the workshop to present its proposal. CCP33 also attended as observers.

The second half of the workshop, after Evoenergy representatives left, involved a facilitated workshop to assist in gathering participant’s feedback on the proposal. CCP33 also observed this half of the workshop. This session provided CCP33 with a key opportunity to understand the impact of Evoenergy’s proposal from representatives of customers who are on low or fixed incomes who were formed a small minority cohort (underrepresented) in other Evoenergy engagements.

Key perspectives raised by participants were as follows:

- Evoenergy’s approach to full recovery of the capital base will lead to significant price increases. As a result, Evoenergy should pursue other options such as a contribution by the ACT Government
- How vulnerable customers would cope with the forecast bill increases, and additional government assistance would be needed for low-income customers, and therefore whether Evoenergy could do more to support their vulnerable customers

²⁶ We are not clear on the meaning of “random” as described in the report – whether the customer profile is a result of genuine random selection or whether certain groups were targeted to ensure they were represented in the survey sample. We also understand three dropped out leaving a total of 32 Community Forum participants

²⁷ Evoenergy, *Attachment 1: Consumer and stakeholder engagement Access arrangement information ACT and Queanbeyan-Palerang gas network access arrangement 2026–31*, Submission to the Australian Energy Regulator, June 2025, p.13

- Vulnerable ACT customers should not be required to pay for new connections in NSW, and that all proposed investments in the NSW network should be challenged
- The potential for recovering gas network costs through existing electricity services
- Evoenergy should involve community organisations in community education instead of trying to do it all themselves.

3.1.6 Demand forecast survey

An important additional input into Evoenergy’s proposal is its demand forecast survey. Evoenergy engaged the CIE to forecast how and when customers are likely to switch to electricity. This involved CIE undertaking a “statistically valid” choice model survey of 1,885 residential gas customers and 36 small to medium commercial customers, interview 24 large gas users and combine the findings with economic modelling to develop switching forecasts across different customer segments.²⁸

Evoenergy presented the outcomes of this research at various forums. Customer Forum participants were very interested in the demand forecasts presented and asked questions about the research. The ECRC also asked a lot of questions and asked to see the report to help them inform their views. However, as far as we are aware, the report was only made available when it was published as an attachment to Evoenergy’s proposal.²⁹

3.1.7 Other engagement activities

We note that Evoenergy has engaged with large commercial and industrial customers via the Energy Matters Forum, and also met directly with retailers, and other stakeholders such as the ACT Government. We understand that Evoenergy held one meeting with the Queanbeyan-Palerang Regional Council in March 2025 to seek their views on the implications of the ACT’s electrification plan on NSW gas customers.³⁰ Apart from attending one Energy Matters Forum, we had no direct exposure to these engagement activities.

3.2 Draft plan

In March 2025 Evoenergy published a comprehensive draft plan,³¹ which included 16 questions throughout the document (and listed in Appendix A of the draft plan) to encourage feedback and help the business prepare its AA proposal. Evoenergy set a consultation period of 5 weeks for interested stakeholders to provide feedback.

Evoenergy’s draft plan acknowledged the impacts of the ACT’s transition to electricity and the pressure the costs of the transition imposed on consumers, many of whom are already struggling with cost of living pressures, and so its aim was to “keep the impacts as low as possible” for consumers.³² For a typical residential customer, an increase in network charges of 13% per annum over the 5 years (excluding inflation) was forecast, amounting to a 4% per annum increase on a typical residential customers’ retail bill.³³

²⁸ Evoenergy, *Attachment 2: Demand forecast, Access arrangement information, ACT and Queanbeyan-Palerang gas network, access arrangement 2026–31*, Submission to the Australian Energy Regulator, June 2025, p.12

²⁹ Evoenergy, *Appendix 2.2 – CIE-Price elasticity of demand for natural gas*, June 2025

³⁰ Evoenergy, *Attachment 1: Consumer and stakeholder engagement Access arrangement information ACT and Queanbeyan-Palerang gas network access arrangement 2026–31*, Submission to the Australian Energy Regulator, June 2025, p.16

³¹ Evoenergy, *Evoenergy’s draft five-year gas plan Access arrangement proposal 2026–31*, March 2025

³² Ibid, p.8

³³ Ibid, p.11

3.3 Feedback on the draft plan

Evoenergy obtained feedback on the draft plan primarily from briefing sessions conducted with existing groups including the Community Forum, the Energy Matters Forum and the ECRC. A small number of ad hoc comments were provided via social media, and one written submission was received from the Tuggeranong Community Council³⁴. Key feedback themes are summarised below:

- Recovery of capital asset base
 - Concern about full investment recovery via the regulatory framework alone
 - ACT Government funding role was debated, and whether Evoenergy should fully recover its costs
- Accelerated depreciation
 - Some support for some accelerated asset base recovery
- Tariff variation mechanism
 - Some support for a revenue cap
- Rebalancing of tariffs
 - General support for flatter tariffs
- Permanent disconnection targeted approach
 - Support for the proposed approach to target permanent disconnection upon house sale/demolition
 - Support for differentiated permanent disconnection services to reduce costs for residential customers
- NSW network
 - Some support for an upfront contribution charge for new Queanbeyan-Palerang residential connections

3.4 Final plan

In June 2025 Evoenergy lodged its final plan (AA proposal) with the AER. The AA proposal maintains the forecast retail bill increase for a typical residential customer of 4% per annum (excluding inflation).

3.5 Summary of key features of Evoenergy's engagement

Key features of engagement that we identified from Evoenergy's consumer and stakeholder engagement report, published presentation materials, meeting minutes and our observations since November 2024 include:

- Engaging with the ERAP to develop an engagement plan
- Commencing engagement well in advance of publishing a draft plan, allowing sufficient time to ensure customers and stakeholders were well informed to engage on the subject matter
- Engaging broadly with customers through independently facilitated phased customer workshops
- Engaging deeply over a series of deep dives on more technical aspects of the proposal with the ERAP
- Publishing and engaging on a draft plan to inform the AA proposal.

³⁴ Evoenergy, *Attachment 1: Consumer and stakeholder engagement Access arrangement information ACT and Queanbeyan-Palerang gas network access arrangement 2026–31*, June 2025, p.20

Communication Link has prepared reports on the process and outcomes of Evoenergy's Community Forums and facilitated preparation of the *Community Forum Report* to Evoenergy.³⁵ We are not aware of any independent consumer report prepared either by the former ERAP or the current ECRC.

³⁵ Evoenergy, *Appendix 1.2: Communication Link Report of feedback from community forum sessions 1–10*, June 2025 p.48

4 Detailed assessment of engagement

The following table focuses on our assessment of Evoenergy's engagement against the *Better Resets Handbook* expectations.³⁶ The measures and attributes are derived directly from the Better Resets Handbook.

4.1.1 Nature of engagement

Measure	Attributes	Strengths	Issues/concerns
Sincerity of engagement	<ul style="list-style-type: none"> Genuine commitment from network businesses Boards and Executives Openness to new ideas and a willingness to change 	<p>Genuine commitment</p> <ul style="list-style-type: none"> The Evoenergy CEO and several General Managers attended most of the Community Forum workshops, ECRC meetings and Energy Matters Forums and have demonstrated a genuine commitment to engaging with customers and stakeholders <p>Openness to new ideas</p> <ul style="list-style-type: none"> Appointment of ERAP to provide independent and constructive feedback and challenge based on their expertise and insights was a new element of Evoenergy's engagement plan, introduced for this AA proposal development 	<ul style="list-style-type: none"> CCP33 has not observed board members in attendance at engagement events The ERAP's role was concluded late in 2024
	<ul style="list-style-type: none"> Ongoing engagement with consumers about outcomes that matter to them - consumers to 'set the agenda' Ensuring consumer confidence in the 	<p>Ongoing engagement</p> <ul style="list-style-type: none"> Evoenergy commenced its engagement early (in December 2023), and maintained a consistent engagement program over the following 18 months holding the following prior to lodging their AA proposal 	<ul style="list-style-type: none"> Engagement topics were primarily determined by Evoenergy e.g. in identifying network and energy transition issues. <ul style="list-style-type: none"> However, issues identified by participants in the Community Forum were addressed in workshops and several were included in the final <i>Community Forum Report</i> to Evoenergy e.g. the need for consumer protections, and views on the regulatory framework

³⁶ See Appendix A for a list of Evoenergy's engagement activities observed by CCP33 members.

Measure	Attributes	Strengths	Issues/concerns
	engagement process	<ul style="list-style-type: none"> Engagement included: <ul style="list-style-type: none"> 10 Community Forums (plus an optional guest speaker series) 11 ECRC meetings 6 ERAP meetings 7 Energy Matters forums Due to their role in advising Evoenergy on the Engagement plan, ERAP members were somewhat able to set the agenda by clarifying appropriate topics and approaches for engagement <p>Consumer confidence</p> <ul style="list-style-type: none"> Verbatim comments reported by Communication Link indicate that Community Forum participants generally expressed confidence in the engagement process. <ul style="list-style-type: none"> An exit survey of Community Forum participants reported that around 75% felt somewhat confident or very confident that “the Community Forum will influence Evoenergy’s planning”, with just one survey respondent reporting they were not very confident, and three expressing a neutral perspective.³⁷ 	<ul style="list-style-type: none"> Evoenergy engaged with the Community Forum, ECRC and Energy Matters Forum on a relatively narrow set of topics relevant to development of the AA proposal, i.e. <ul style="list-style-type: none"> Form of revenue control Tariff rebalancing Recovery of the capital asset base Disconnection from the gas network Customer support and education programs
Consumers as partners	<ul style="list-style-type: none"> Network businesses should collaborate with and, where appropriate, empower consumers in developing 	<p>Level of engagement</p> <ul style="list-style-type: none"> From the published meeting summaries, engagement with the ERAP appears to have occurred at the involve/collaborate levels of the IAP2 Spectrum 	<ul style="list-style-type: none"> Communication Link assessed the Community Forum’s development of customer values as they relate to the gas network to be an instance of engagement at the empower level of the IAP2 Spectrum

³⁷ Evoenergy, *Appendix 1.2: Communication Link Report of feedback from community forum sessions 1–10*, June 2025 p.18

Measure	Attributes	Strengths	Issues/concerns
	<ul style="list-style-type: none"> regulatory proposals Consumer engagement should be a continuous business-as-usual process 	Business as usual engagement <ul style="list-style-type: none"> Evoenergy's ECRC has been in place for over 10 years. It is a demonstration of the business's commitment to continuous business-as-usual engagement with customers and stakeholders The Energy Matters Forum is a business-as-usual engagement channel for Evoenergy's large electricity and gas customers 	<ul style="list-style-type: none"> However, most of the engagement with the Community Forum that we observed was informing and consulting participants on aspects of Evoenergy's proposal
Equipping customers	<ul style="list-style-type: none"> Networks must provide them with accurate and unbiased information necessary to meaningfully participate 	<ul style="list-style-type: none"> Evoenergy prepared detailed presentations for the Community Forum, ECRC, Energy Matters Forum, ACTCOSS Workshop and ERAP meetings Community Forum and ERAP meeting presentations are published on the Evoenergy website CCP33 has been provided with copies of the material presented to the ECRC Evoenergy's papers are clearly presented, and the information was also presented verbally, participants in all forums had an opportunity to question Evoenergy to clarify aspects they did not understand 	<ul style="list-style-type: none"> Apart from agendas, workshop participants and ECRC members did not generally receive presentation materials in advance of the meetings, which limited their opportunity to prepare for discussions at the meeting, and thereby also limited the opportunity to consider their preferences in detail and provide considered feedback CCP33 did not observe any Community Forum sessions where independent experts (such as ERAP members) were given an opportunity to challenge Evoenergy's views <ul style="list-style-type: none"> Evoenergy subject matter experts delivered information on the engagement topics to the Community Forum We are not aware that material was reviewed independently prior to being presented at the workshops This lack of alternative perspectives may have led to unintentional bias in the information presented and participants' feedback
	<ul style="list-style-type: none"> Consumers need to have the ability to 	<ul style="list-style-type: none"> The Community Forum was provided with an opportunity to attend three guest speaker sessions arranged by Evoenergy. The sessions covered the ACT Government's Integrated 	<ul style="list-style-type: none"> To our knowledge, consumers did not have the ability to source independent expert advice, and we understand the guest speakers were chosen by Evoenergy

Measure	Attributes	Strengths	Issues/concerns
	source independent expert advice <ul style="list-style-type: none"> Consumers are appropriately remunerated for their contribution to the development of proposals Independence and integrity of consumer engagement processes 	Energy Plan, perspectives of vulnerable energy customers and national energy transition and the ACT Remuneration <ul style="list-style-type: none"> ECRC and ERAP remuneration arrangements are specified in their respective Terms of Reference. We understand that Community Forum members were also remunerated for their time Independence and integrity <ul style="list-style-type: none"> External facilitators, Communication Link were engaged to facilitate and report on the Community Forum's sessions An independent chair was appointed for both the ECRC and the ERAP 	<ul style="list-style-type: none"> However, we question the extent a facilitator can objectively report on the effectiveness of the process
Accountability	<ul style="list-style-type: none"> Transparent reporting and consultation on delivery of commitments 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> While the ECRC was involved in the development of the 2025-31 AA proposal, and has similarly been involved in the development of earlier gas and electricity regulatory proposals, CCP33 has not seen evidence of ECRC holding the business to account for commitments made in earlier processes We have not observed any discussions about the processes required to hold Evoenergy to account for the commitments made in the current gas reset proposal

4.1.2 Breadth and depth of engagement

Measure	Attributes	Strengths	Issues/concerns
Accessible, clear and transparent engagement	<ul style="list-style-type: none"> Outlining objectives, engagement issues/topics and the level of participation and influence consumers can expect Consultation time frames should have regard to the complexity of the issues in the regulatory proposal and provide consumers with adequate time. Engagement on different aspects of the same issue may require different engagement methods 	<p>Engagement expectations</p> <ul style="list-style-type: none"> Evoenergy published their five-year gas plan engagement strategy in March 2024 to guide their overall engagement program³⁸ <ul style="list-style-type: none"> The strategy sets out the overall engagement approach, the engagement channels and the expected level of engagement with each customer or stakeholder group <p>Consultation time</p> <ul style="list-style-type: none"> Evoenergy spread its engagement over an 18-month period and multiple sessions and workshops with its various customer and stakeholder groups over that period The extended period provided an opportunity for participants to develop their knowledge and understanding of a set of sometimes complex topics <p>Engagement methods</p> <ul style="list-style-type: none"> Different engagement methods were used to obtain feedback from Community Forum members, including presentations, group discussions, worksheets, Post-it notes, on-line polling and group chats etc. Community Forum sessions were accessible <ul style="list-style-type: none"> They were scheduled outside regular working hours The face-to-face sessions were held at suitable central Canberra venue 	<ul style="list-style-type: none"> We cannot comment on the consistency between Evoenergy's intended engagement level and how the sessions were delivered for the engagement activities prior to December 2024 Since December 2024, Evoenergy's engagement with the Community Forum was predominantly about informing and consulting and to a lesser extent involving customers The level of engagement with the ECRC and the Energy Matters Forum was predominantly about informing and consulting Unfortunately, we could not assess Community Forum participants level of understanding during the early engagement stages <ul style="list-style-type: none"> However, in the later sessions (sessions 9 and 10) we observed that some participants still appeared confused when discussing topics such as revenue recovery options and demand scenarios, with comments such as "I can't take it all in – I need time to look back and reflect" and "this is too fast and confusing" and "It's hard to get across"³⁹ Given the extended period allowed for engagement and multiple sessions that equipped participants to engage, customer preferences and the divergence of views are not always apparent

³⁸ Evoenergy, *Appendix 1.1: Engagement strategy 2026–31 gas access arrangement proposal*, June 2025

³⁹ Quotes are taken from our unpublished meeting notes

Measure	Attributes	Strengths	Issues/concerns
		<ul style="list-style-type: none"> Participants could join in person or online Other events such as ECRC meetings and Energy Matters Forums were held during business hours to meet the needs of participants Engagement with the ECRC and Energy Matters Forum involved PowerPoint presentations by Evoenergy representatives, followed by question and answer sessions, and participants provided verbal feedback 	
Consultation on desired outcomes and then inputs	<ul style="list-style-type: none"> Consumers should guide, and be seen to guide, the development of proposals Networks will consult with their consumers on their desired outcomes (including opex and capex) and then craft the inputs of regulatory proposals Networks to engage with consumers on changes in opex and capex Engagement may explore a consumer's lived 	<p>Consumers guiding proposals</p> <ul style="list-style-type: none"> The Community Forum provided guidance to Evoenergy on the development of the proposal by defining a set of customer values as they relate to gas⁴⁰ While engaging on a set of key topics for the development of the proposal, Evoenergy invited participants to consider their own circumstances in relation to each topic such as tariff rebalancing, and introduced a range of personas to help participants understand the potential impacts of different approaches for different customer cohorts Given Evoenergy's unique circumstances of a network in decline with a known decommissioning date, and declining capex and opex forecasts there is arguably less reason to engage broadly with opex and capex forecasts In September 2024, Evoenergy presented preliminary capex and opex expenditure forecasts to the ERAP and received high-level feedback Evoenergy engaged with the Community Forum on the merits of a customer support opex step change, but 	<ul style="list-style-type: none"> We are not aware of any detailed engagement with customers or stakeholders on opex, capex or incentive mechanisms

⁴⁰ Evoenergy, *Appendix 1.2: Communication Link Report of feedback from community forum sessions 1–10*, June 2025, p.21

Measure	Attributes	Strengths	Issues/concerns
	experience within the energy system – including customer services and interactions with the network	ultimately decided to adopt a different approach to recovery of the proposed expenditure	
Multiple channels of engagement	<ul style="list-style-type: none"> Multiple complementary engagement channels are necessary Engage with (end) consumers as well as engaging with consumer representatives A network business should aim to understand, represent and balance the interests of all its consumer cohorts 	<p>Engagement channels</p> <ul style="list-style-type: none"> Evoenergy has engaged with end customers, customer representatives, retailers and other stakeholders using a variety of engagement channels Evoenergy engaged using a diversity of methods, including face-to-face an online focus groups, forums, surveys and one-on-one engagement <p>End customer engagement</p> <ul style="list-style-type: none"> The Community Forum members were recruited selectively with the objective of forming a panel aimed at being generally representative of the ACT population (noting underrepresentation of NSW customers and some other customer groups) Engagement with members of the Community Forum, ECRC and Energy Matters Forum occurred on many of the same topics. This meant that Evoenergy was well positioned to understand and balance the interests of its customer cohorts on these issues 	<ul style="list-style-type: none"> In February 2024, the ERAP advised Evoenergy to “include the NSW gas network and resulting consideration of NSW customers in engagement messaging”.⁴¹ Evoenergy’s Engagement strategy states that it will “ensure both an ACT and NSW perspective”⁴² Although NSW customers represent 10% of Evoenergy’s customers, the interests of NSW customers do not appear to be considered as part of the engagement process <ul style="list-style-type: none"> One member of the Community Forum was registered as a NSW resident We are not aware of any ECRC members with a NSW constituency We can only find reference to one meeting in the 18-month engagement period between Evoenergy and the Queanbeyan-Palerang Regional Council⁴³ We are unaware of specific issues or preferences that were identified for Evoenergy’s NSW customers Small business and vulnerable customers also appear to have been underrepresented in the Community Forum

⁴¹ Evoenergy, *Appendix 1.5: Energy Regulatory Advisory Panel (ERAP) meeting summaries*, June 2025, p.8

⁴² Evoenergy, *Appendix 1.1: Engagement strategy 2026–31 gas access arrangement proposal*, June 2025, p.14

⁴³ Evoenergy, *Attachment 1: Consumer and stakeholder engagement Access arrangement information ACT and Queanbeyan-Palerang gas network access arrangement 2026–31*, June 2025, p.19

Measure	Attributes	Strengths	Issues/concerns
Consumer's influence on the proposal	<ul style="list-style-type: none"> Engagement should consider the IAP2 Spectrum of Public Participation Network businesses and consumers should consult with each other on the range of issues consumers can have influence over Issues over which consumers will have more influence should be at the upper (empower) end of the IAP2 spectrum Network businesses should encourage consumers to test assumptions and processes that underpin the proposal 	<p>IAP2 Spectrum</p> <ul style="list-style-type: none"> Evoenergy explicitly set out the expected level of engagement with respect to the IAP2 Spectrum, stating that “we aim to attain the ‘involve’ level of IAP2 participation for all consumer and stakeholder segments”⁴⁴ <p>Consultation on issues where consumers can have influence</p> <ul style="list-style-type: none"> During engagement activities, Evoenergy clearly conveyed to participants what was ‘in scope’ and what was ‘out of scope’ for the engagement <p>Challenge and testing of assumptions</p> <ul style="list-style-type: none"> The ERAP appears to have challenged Evoenergy's assumptions and processes until it was discontinued in October 2024 	<ul style="list-style-type: none"> We did not observe engagement at the empower end of the IAP2 Spectrum – predominantly the engagement was about informing, consulting and to a lesser extent involving customers CCP33 observed limited challenge of Evoenergy's assumptions and processes

⁴⁴ Ibid, p.11

4.1.3 Clearly evidenced impact

Measure	Attributes	Strengths	Issues/concerns
Clearly evidenced impact	<ul style="list-style-type: none"> Proposals linked to consumer preferences Networks need to provide evidence of consumer preferences - for example through independent surveys, research or focus groups A comprehensive draft regulatory proposal for stakeholder comment to be developed Regulatory proposal submitted to set out how the NSP has responded to the submissions received on the draft regulatory proposal Networks to engage with consumers 	<p>Proposal linked to consumer preferences</p> <ul style="list-style-type: none"> Evoenergy's AA proposal describes how it has responded to the key engagement topics,⁴⁵ i.e.: <ul style="list-style-type: none"> Form of revenue control Tariff rebalancing Recovery of the capital asset base Disconnection from the gas network Customer support and education programs <p>Evidence of consumer preferences</p> <ul style="list-style-type: none"> Consumer preferences were distilled from published summary reports from the Community Forum, notes from Energy Matters Forums and verbal discussions at ECRC meetings <p>Draft plan</p> <ul style="list-style-type: none"> Evoenergy published a detailed draft plan in March 2025 Evoenergy engaged with its existing forums to seek feedback on the Draft Plan Evoenergy sought submissions on its draft plan Evoenergy received limited written feedback on the draft plan (one submission and some online comments) 	<ul style="list-style-type: none"> CCP33 has some concerns about the strength of customer support for aspects of Evoenergy's draft plan and proposal, given factors such as: <ul style="list-style-type: none"> Notable underrepresentation of some key customer groups (NSW customers, small business operators and customers experiencing vulnerabilities) The possibility of unintended bias in the information presented and the consequences CCP33 is not aware that Evoenergy engaged with consumers beyond those they consulted with in preparing the draft plan

⁴⁵ Evoenergy, *Attachment 1: Consumer and stakeholder engagement Access arrangement information ACT and Queanbeyan-Palerang gas network access arrangement 2026–31*, June 2025, pp. 32-39

Measure	Attributes	Strengths	Issues/concerns
	beyond those they consulted with in preparing their draft proposal		

4.1.4 Independent consumer support for Evoenergy's proposal

Measure	Attributes	Strengths	Issues/concerns
Independent consumer support for the proposal	<ul style="list-style-type: none"> Independent report from consumers setting out consumer perspectives on a proposal as lodged to the AER The independent consumer report can also provide views on technical issues in the proposal Independent report to address process for drafting the report and selection of an appropriately qualified and experienced author of the report 	<ul style="list-style-type: none"> Communication Link facilitated the preparation of a Community Forum Report <ul style="list-style-type: none"> The Report was prepared as an independent summary of the Forum's key areas of discussions and conclusion⁴⁶ 	<ul style="list-style-type: none"> We have some concerns whether the Community Forum report constitutes an <i>independent</i> consumer report on the proposal, given <ul style="list-style-type: none"> The timing of the report: Evoenergy presented the Community Forum with a draft plan overview in April 2025. However, the engagement report was prepared at the Community Forum's meeting in August 2024, approximately 6 months before Evoenergy published its draft plan The report does not consider engagement that occurred after August 2024 (including views on the process and outcomes since then) The report was prepared by the same consultants who facilitated the Community Forum, which may have limited participants' willingness to provide feedback about their experience with the process We are not aware of an independent consumer report prepared by either the ERAP or the ECRC

⁴⁶ Evoenergy, Appendix 1.2: Communication Link Report of feedback from community forum sessions 1–10, June 2025 Appendix C

5 Substantive matters

5.1 Missed engagement opportunities

5.1.1 Evoenergy's NSW customers

NSW customers comprise approximately 10% of Evoenergy's customers. Despite a commitment to consider both ACT and NSW perspectives (see section 4.1.2 of this Advice), NSW customers were underrepresented in Evoenergy's engagement program.

Evoenergy attempted to secure representative membership of the Community Forum and initially enrolled three NSW residents as Community Forum members. However, two representatives subsequently withdrew and they were not replaced.

We are not aware of any ECRC members with a NSW constituency.

As far as we have been able establish, the CIE survey commissioned by Evoenergy to support demand forecasts for the AA proposal does not include details of the size of the sample of NSW customers.⁴⁷ Neither the weighted nor the unweighted number of NSW customers is disclosed in the published report, so we have no sense of the statistical accuracy of the results for the NSW segment, or for any other segment.⁴⁸

While the report identifies that disconnection rates are likely to be lowest in NSW,⁴⁹ it has not analysed or presented how NSW customers may respond to the different financial arrangements and incentives in their jurisdiction, or how perspectives related to use of the gas network and disconnections may differ from NSW customers.

CCP33 considers that NSW customers form a significant cohort, potentially with specific perspectives and needs, as well as being under different jurisdictional arrangements. There is a higher level of uncertainty about the future of the gas network for NSW customers. It is unlikely that issues for NSW customers will be the same as for their ACT counterparts, particularly as they have not had the benefit of ACT government programs, support arrangements and incentives to electrify. We observe that the perspectives of NSW customers are largely missing from the engagement outcomes and therefore may not be reflected in the AA proposal.

Further dedicated engagement focussing on NSW customers would benefit Evoenergy by helping them to better understand the issues and risks associated with managing the diverse needs of these customers. This will become particularly important if the ECA rule change proposal for charging for new gas connections is successful.

5.1.2 ERAP

Between December 2023 and October 2024, the ERAP appears to have played an effective role in advising Evoenergy on its Engagement strategy, and challenging aspects of the engagement

⁴⁷ Evoenergy, *Appendix-22-cie-price-elasticity-demand-natural-gas*, June-2025

⁴⁸ We also note with interest that a whole chapter of the CIE report (Chapter 3) is dedicated to sampling and an attempt to demonstrate the sample quality, and the implications of weighting the data. However, sample sizes are not reported, and the reader is left to estimate these from a series of bar charts. We are also unclear as to the sample weighting procedure, which seems to indicate CIE weighted the data to ABS household numbers rather than the Evoenergy population which is not consistent given not all households in the ACT are connected to gas.

⁴⁹ Ibid, p.5

program, regulatory strategy and business plans. A number of the gaps we have noted in Evoenergy's engagement processes could have been filled by continued utilisation of the ERAP or a similar qualified group. Specifically, ERAP could have made a valuable contribution in the following areas:

- Ongoing review and independent advice on engagement materials to assist with clarity of explanations and minimisation of unconscious bias
- Assistance with interpreting and distilling feedback from engagement participants
- Offering an informed balance of views on positions presented by Evoenergy during engagement sessions
- Providing in-depth scrutiny of building block forecasts
- Submitting an independent report on the AA proposal to the AER

Without a group such as ERAP, or a subset of the ECRC, filling these gaps will continue to be a challenge for Evoenergy.

5.1.3 Bungendore Packaged Offtake Station (POTS) project

Bungendore is in the NSW area of Evoenergy's network. The Bungendore POTS refurbishment is a significant capital project that Evoenergy has included in its AA proposal. The project is aimed at addressing the obsolescence of crucial equipment in the facility to mitigate key operational and safety issues.⁵⁰ The project's options analysis identifies the preferred option for the project to be based on complete E&I equipment replacement and additional catalytic heater installation at an estimated cost of \$1.65 million, with operating costs of \$0.3 million over 10 years.⁵¹

CCP33 is not aware of any engagement with Evoenergy's customers relating to this project. However, we heard feedback at the ECRC meetings, and strong views from community representatives at the ACTCOSS workshop questioning the value of this expenditure. ACT-based customer representatives expressed concern that they are being asked to pay to extend the life of an asset in NSW, when an alternative approach may provide (in their view) a better outcome for all customers in the long term.

In particular, customer representatives asked whether electrification of the (relatively small) Bungendore component of the network had been considered as an alternative. They were interested in understanding the barriers to this option. Customers considered that this could present a useful opportunity for a case study into the electrification task facing Evoenergy's customers more broadly, and it would provide insights into network decommissioning issues for Evoenergy. We understand that Evoenergy has not considered the electrification option, and we suggest that this issue warrants further engagement with customers.

CCP33 conclude that customer support for this proposed expenditure is questionable.

⁵⁰ Evoenergy, *Appendix 3.7: Bungendore POTS – facilities obsolescence Options analysis*, p.1

⁵¹ *Ibid*, p.2

5.2 Tariff variation mechanism and risk sharing

In October 2023, the AER published its final decision on a review of gas distribution network reference Tariff Variation Mechanisms (TVM) and declining block tariffs⁵². The review determined that the form of regulation (or tariff variation mechanism), i.e. price cap or revenue cap, will be determined case-by-case with a hybrid tariff variation mechanism worthy of consideration. The AER also indicated that it expects substantive stakeholder consultation regarding tariff variation mechanisms.

In prior AA regulatory periods, Evoenergy's gas network has operated under a price cap mechanism. In its final decision on Jemena Gas Networks (NSW) AA 2025 to 2030,⁵³ the AER approved a new hybrid tariff variation mechanism for the gas transportation reference service, incorporating elements of both price cap and revenue cap regulation, stating that the hybrid mechanism reduces Jemena's incentive to grow the volume of gas carried by its network while mitigating year-on-year tariff volatility associated with revenue caps.

In April 2024, Evoenergy advised the ERAP that its "TVM position is under consideration and will be reviewed, refined and revisited as we continue to engage with our stakeholders and community".⁵⁴

Evoenergy engaged with the Community Forum on the TVM over two consecutive meetings in May 2024 to inform its Reference Service Proposal. Evoenergy informed participants of the different forms of price control, and their respective features at a high level. The hybrid option was mentioned as a possible alternative. However, this was not explored in any detail. In the May 2024 *Interim Report*, Communication Link reported that the Community Forum had mixed views on the TVM options, and participants were interested in exploring the hybrid option.⁵⁵

Evoenergy lodged its reference service proposal in June 2024, specifying a revenue cap TVM. The AER received two submissions, from the ERAP and the ACT Government. Both submissions expressed concern that the proposed revenue cap "appears to seek to transfer risk for declining transportation services to consumers".⁵⁶

AER's final decision on Evoenergy's reference service proposal stated "we consider Evoenergy should develop, in consultation with stakeholders, a hybrid tariff variation mechanism for haulage services for submission to the AER with its AA revised proposal"⁵⁷

Evoenergy's draft plan published in March 2025 continued to propose a revenue cap. Evoenergy invited feedback on the relative merits of a revenue cap, price cap or hybrid in the ACT context. Evoenergy received no formal written feedback. However, recognising the mixed views from stakeholders, Evoenergy advised that it intended to undertake further engagement on the TVM.

⁵² AER, *Review of gas distribution network reference tariff variation mechanism and declining block tariffs*, Final decision, October 2023

⁵³ AER, *Final decision Jemena Gas Networks (NSW) access arrangement 2025 to 2030 (1 July 2025 to 30 June 2030)*, May 2025

⁵⁴ Evoenergy, *GN26 Energy Regulatory Advisory Panel (ERAP) Meeting #3 Summary*

⁵⁵ Communication Link, *Evoenergy Community Forum Gas Network 2026-2032 access arrangement regulatory proposal Midway report of feedback received from sessions 1 – 3*, May 2024

⁵⁶ ACT Government, *Submission to Evoenergy - Access arrangement 2026-31 Reference Service Proposal*, August 2024

⁵⁷ AER, *Evoenergy 2026-31 Access arrangement - Reference service proposal - Final decision*, December 2024

Evoenergy discussed the TVM with the Community Forum for the third time in March 2025, using the following illustrative example:⁵⁸

Figure 5-1: Implications on TVO mechanisms according to demand

If actual demand is different to the forecast

which was 8 customers, \$12.50

		Slower electrification	Faster electrification		
	Customers	9	7		
	Cost to run network	\$100.00			
	Cost per customer	\$11.11	\$14.29		
Revenue cap	Customer pays	\$11.11	\$14.29	Customers pay amount Evoenergy needs	
	Evoenergy revenue	\$100.00	\$100.00		
Weighted average price cap	Customer pays	\$12.50	\$12.50	Customers pay more or less than Evoenergy needs	
	Evoenergy revenue	\$112.50	\$87.50		
Hybrid (5% threshold)	Customer pays	\$11.67	\$13.57	Customers pay more or less than Evoenergy needs	
	Evoenergy revenue	\$105.00	\$95.00		

This is an illustrative worked example.
What Evoenergy needs is assessed by the Australian Energy Regulator.

Official

evoenergy

Evoenergy then presented the assessed benefits of each approach as shown below:⁵⁹

Figure 5-2: Assessed benefits of TVO

Adjusting prices: draft plan	Revenue cap	Weighted average price cap	Hybrid
Guaranteed that customers pay only what is needed to maintain a safe and reliable gas network	✓	✗	✗
Consistency between gas and electricity network pricing approaches	✓	✗	✗
Low administration costs (e.g., risk of reopeners/regulatory period length)	✓	✗	✗
Low price variability if declining demand is faster/slower than forecast	✓ Medium to long term	✓ Short term	✓ Short term
Consistent with emissions reduction objectives	✓	✗	✗

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We question some of these assessment criteria and ratings. For example, customer price variability is a characteristic of a revenue cap. Nevertheless, it is clear from the information presented to the Community Forum as shown in Figure 5-2 above that a revenue cap is the “correct” answer (at least from Evoenergy’s perspective).

Evoenergy reported that “members are generally supportive and prefer the revenue cap”. We agree there was some support for a revenue cap, however given:

- The nudge provided to the Community Forum by the information Evoenergy presented
- Comments from some participants such as “there seems to be more of the community absorbing the costs”, “there is price variability under the revenue cap”, “this will penalise

⁵⁸ Evoenergy, *Evoenergy-community-forum-Session-9-presentation-pack*, March 2025, p.21

⁵⁹ Ibid, p.22

customers who are slower to get off gas, but provides 100% cost recovery for Evoenergy”, “revenue cap could give a significant increase in price if there are lower customer numbers”

- Not all workshop participants voted in the poll, suggesting some of them were unsure about the topic or the “right” answer

It is apparent to CCP33 that customers continued to struggle with their understanding of the implications of the different TVM options as well as the objectivity of the information presented. Consequently, we question the level of explicit support for a revenue cap and suggest that Community Forum members continue to have mixed views (and varying levels of understanding) about the TVM.

We have not observed any engagement on options for a hybrid TVM.

The proposed TVM was discussed with the Community Forum again in session 10 on 22 May 2025.⁶⁰ Responding to earlier feedback, Evoenergy presented several measures to address stakeholders’ concerns regarding the variability of customer bills under a revenue cap. These measures were:

- New demand forecasts
- An amendment to the proposed tariff rebalancing approach to remove the proposed reduction in the fixed charge
- Reducing forecast risk for ACT Government taxes and levies by using annual costs

Participants were asked for feedback on these proposed measures. Their views on the TVM were not re-tested.

It is unclear whether these measures are sufficient to address the risk imbalance between Evoenergy and its customers under a revenue cap TVM and therefore at this stage we cannot definitively support or reject Evoenergy’s TVM proposal.

5.3 Accelerated depreciation and price path

Engagement approach

Evoenergy has developed its AA proposal in accordance with the ACT Government’s legislated net zero greenhouse gas emissions targets and its Integrated Energy Plan.⁶¹ The Government’s policy is to phase out gas network services by 2045 and commence the phased decommissioning of sections of Evoenergy’s gas distribution network from 2035. These objectives have set clear and challenging requirements for Evoenergy’s consideration of how to recover its capital asset base investments within a 20-year time horizon in a way that does not heavily penalise those less able to leave the network early such as the financially vulnerable, renters, the occupants of multi-occupant dwellings and businesses with limited economically and/or technically viable solutions to fully electrify. Other gas network distribution businesses have grappled with this issue in recent gas resets (see section 2.4 of this Advice), with Evoenergy’s situation by far the most pressing.

Evoenergy engaged on capital asset base recovery primarily with the Community Forum. In their deliberations on depreciation, the Community Forum continually referred to two of their key values:

- Strong support for the ACT Government’s position to move to net zero emissions by 2045

⁶⁰ Evoenergy, *Evoenergy-community-forum-Session-10-presentation-pack*, May 2025

⁶¹ ACT Government, *The Integrated Energy Plan 2024–2030, our pathway to electrification*, June 2024

- A desire to ensure equity in the transition away from gas, such that residents and businesses that are not able to transition early are not overly penalised

Options presented by Evoenergy

Evoenergy presented a two-pronged approach to the Community Forum:

1. Depreciating assets over their anticipated economic lives rather than their technical lives
2. Accelerating depreciation with the aim of full recovery of the asset base by 2045

Initially Evoenergy presented the ‘straight-line’ method and the ‘customer-weighted’ methods of accelerated depreciation options to the Community Forum. Subsequently, in November 2024 Evoenergy introduced the ‘sum-of-years-digits’ option for consideration. Evoenergy advised the Community Forum that UK gas networks had adopted this option.

Evoenergy explained that regardless of the method adopted, depending on how quickly customers leave the network, there is still a risk that Evoenergy will not be able to recover past investments.

For each of the options, Evoenergy presented customer impacts on a cost per customer basis for each regulatory period up to 2045.

Community Forum participants generally supported the move to economic asset lives as being a “sensible” decision and supported the sum-of-years-digits accelerated depreciation method as being the “more equitable option”.

Bill impacts

In Session 9 in March 2025, Evoenergy presented the Community Forum with indicative bill impacts over the next 5 and 10 years (based on draft plan forecasts) for seven different customer personas to help participants appreciate potential outcomes for different customer cohorts.⁶²

With forecast average retail bill increases of 4% per annum (excluding inflation) over the next 5 years, both Evoenergy and the Community Forum members recognised the cost burden that the proposed accelerated depreciation will place on customers during the next regulatory period. Additionally, some community representatives in the ACTCOSS workshop indicated that with current cost of living concerns, their clients would not be able to cope with the increases.

While we observed significant concern for vulnerable and low-income customers particularly, we did not observe pressure on Evoenergy from Community Forum participants to reduce price increases by deferring accelerated depreciation. Indeed, Community Forum participants, emphasised the energy transition needed to occur, and therefore additional measures were required to support those needing assistance. They indicated vulnerable customers need greater assistance and support from the ACT Government to electrify.

CCP33 did not observe any exploration of the impacts for NSW customers who are likely to stay on the gas network longer (perhaps not surprising given the findings of the CIE survey (see Section 5.1.1 of this report)). We note that Evoenergy explored the idea of including a customer support package as a step change in its AA proposal. However, participants did not support the proposal on the basis that it would further increase bills.

⁶² Evoenergy, *Evoenergy-community-forum-Session-9-presentation*, March 2025

Who pays?

Throughout the multiple sessions, Community Forum members questioned why Evoenergy's capital asset base investment should be solely recovered from gas customers. Participants suggested other approaches that it encouraged Evoenergy to consider, including:

- The ACT Government providing funding on the basis that it is a government policy decision to close the gas network
- Evoenergy not to being able to recover their full costs
- Spreading costs over customers of both of Evoenergy's gas and electricity networks

Evoenergy explained that their AA proposal reflects the current regulatory framework, and that they are discussing other options with the ACT Government.

Exit charges

Evoenergy also canvassed applying an exit charge of \$2,000 to customers leaving the network to offset some of the capital base recovery risk, but this was dismissed by the Community Forum who thought it would introduce a disincentive for customers to disconnect which is inconsistent with the ACT Government's net zero ambitions.⁶³

In summary

Within the constraints of the current regulatory framework for accommodating the anticipated closure of a gas network, Evoenergy's customers supported the proposed arrangements for accelerated depreciation and price path. Customers re-iterated the need to boost government assistance for vulnerable customers in view of the significant bill increases. Participants also agreed there was a lack of fairness in the current framework, which requires costs to be recovered from gas network customers only.

Notwithstanding our more general concerns,⁶⁴ CCP33 considers that Evoenergy has largely met the AER's expectations on engaging on accelerated depreciation set out in Section 2.4.

5.4 Disconnections

Evoenergy's approach to who should pay for customer disconnection (abolishments) from the gas network evolved over the AA proposal engagement period.

In the current AA period, disconnecting customers are required to pay \$949,⁶⁵ for a permanent disconnection (abolishment), i.e. user pays, which at almost \$1,000 may be a barrier for some customers to proceed with a permanent disconnection.

At the Community Forum session in August 2024, Evoenergy reported that disconnections are continuing to increase to around 5,000 per year, however only 10% of them are permanent abolishments. This introduces a growing safety risk with active gas services still in existence at many residential and commercial properties, even though they may no longer be using gas.

⁶³ Evoenergy, session 4: *Community forum summary*, July 2024

⁶⁴ For example, our general concerns raised in section 4.1.3 of our advice

⁶⁵ Evoenergy, *Community-forum-Session-5-presentation*, August 2024

Evoenergy sought feedback from the Community Forum on the most equitable way to encourage permanent disconnection from the gas network. A number of participants considered that a 50/50 split between the disconnecting customer and all remaining customers on the network would be a fairer allocation of costs. The Community Forum Report highlighted concerns that the cost of a permanent disconnection is a barrier:⁶⁶

“A higher upfront price may make it harder to communicate the safety risk, and if it [sic] costs are too high, customers will not want to pay which may be a disincentive to disconnect. There were concerns that higher disconnection costs when compared to the cost of changing appliances may mean those with only one appliance may not disconnect to avoid the cost.”

Notwithstanding the feedback from the August 2024 Community Forum, Evoenergy advised the Forum at Session 7 on 24 November 2024 that it had decided to maintain the user-pays approach to disconnections. This approach was recommended by the ERAP in July 2024.⁶⁷

Following an independent safety assessment, Evoenergy’s draft plan⁶⁸ proposed a revised framework which would make permanent disconnections mandatory for property demolitions (already required) and residential property sales if all appliances are electrified and permit temporary disconnections otherwise. Permanent disconnections would further be broken up into basic, basic (urgent) and complex. The different disconnection services were presented to the Community Forum⁶⁹ with the proposed fee structure (see Figure 5-3 below). Evoenergy advised that the fee for a temporary disconnection would be \$134. This approach to disconnections was generally accepted.

Figure 5-3: Evoenergy’s proposed disconnection services

Evoenergy provides permanent disconnection when requested

Disconnection service	Description and examples	Charge (\$2026-27)
Abolishment (current)	<ul style="list-style-type: none"> Gas meter removed Pressurised gas purged Removed from ‘Customer List’, standing charge stops 	\$916
Basic	<ul style="list-style-type: none"> Detached single residential dwelling with electrified appliances 	\$751
Basic (urgent)	<ul style="list-style-type: none"> Completed in under 20 business days Construction projects or residential demolitions Single detached residential dwelling sale with electrified appliances 	\$986
Complex	<ul style="list-style-type: none"> Individual factors (e.g., concrete cutting, surface restoration, traffic management) Multi-occupant buildings with hot water meters Commercial and demand customers (e.g., restaurants, shopping centres, offices, universities) 	Individually priced

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⁶⁶ Evoenergy, session 5: Community forum summary, August 2024

⁶⁷ Evoenergy, GN26-ERAP-meeting-5-summary, July 2024

⁶⁸ Evoenergy, Evoenergy’s draft five-year gas plan Access arrangement proposal 2026–31, March 2025, p.60

⁶⁹ Evoenergy, community-forum-Session-10-presentation, May 2025, p.16

Given some Community Forum participants were still confused about the difference between a permanent and a temporary disconnection, Community Forum participants stressed the need for community education on the difference. Participants were advised that Evoenergy would direct approximately \$29 from each disconnection fee towards a community education program. They considered that approach to be reasonable. When they were briefed on the new disconnections framework, ECRC members endorsed the need for a community education program but queried whether Evoenergy should absorb this cost within its normal operating budget.

CCP33 understands that legislative change is required in the ACT to enforce this approach to permanent disconnections, and that the ACT Government is working towards this outcome. It is not clear to us how the approach will be enacted in NSW.

5.5 Demand forecasts

Given the criticality of demand forecasts to its business decisions and network planning for the next 20 years, Evoenergy engaged independent experts, the CIE, to develop a detailed gas demand forecast for the 2026–31 AA period, and beyond to 2045.⁷⁰ The report and analysis prepared by CIE adds to the research carried out by Sagacity in April 2024.⁷¹ Evoenergy state that:⁷²

“CIE delivered a first-of-its-kind approach for our gas network, combining econometric modelling with extensive customer research across residential, commercial and industrial market segments.”

CCP33 congratulates Evoenergy on this important innovation.

The results from this work forecast:⁷³

- Gas customer numbers declining by an average of 7.8% per year over the 2026-31 period, resulting in a total reduction of approximately 28%. This decline is driven primarily by residential customer electrification, in line with the ACT Government’s energy transition policies
- Total gas consumption decreasing by around 6.7% per year, or 24% over the period, with smaller residential customers exiting the network earlier, while larger customers take longer to electrify.

CCP33 offers the following reflections on Evoenergy’s demand forecasts.

- We question whether all survey respondents fully understood the context and implications of the survey, as we understand from ECRC discussions there are still some members of the ACT and NSW populations who are unaware of the move to decommission the gas network
- While we are aware of the CIE actions to correct for “hypothetical bias”,⁷⁴ we question whether the bias has been removed or whether it still influences the survey results
- The survey was conducted using an online data collection method which could have excluded a section of the population who do not have the access or capacity to engage in this way, or they

⁷⁰ Evoenergy, *Attachment 2: Demand forecast*, June 2025, p.5

⁷¹ Evoenergy, *Appendix 2.4-Sagacity Research-Future demand for natural gas in the ACT*, April 2024

⁷² Evoenergy, *Attachment 2: Demand forecast*, June 2025, p.6

⁷³ Ibid

⁷⁴ Evoenergy, *Appendix 2.2 – CIE-Price elasticity of demand for natural gas*, June 2025, p.12

choose not to engage online.⁷⁵ This group is likely to overrepresent residential customers who will find it more challenging to exit the network either because of cost or other reasons.

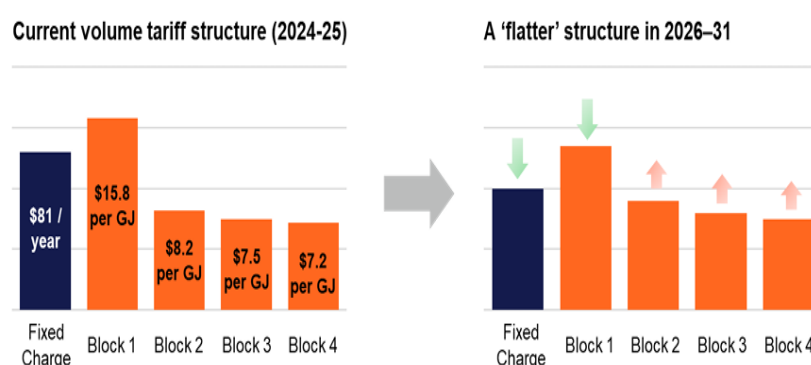
As a result, demand forecasts may overstate the rate of disconnections from the network.

5.6 Tariff rebalancing

In the draft plan, Evoenergy proposed to rebalance the volume tariff structure for 2026-31 by reducing the fixed charge and block 1 charges by 10% over the 5-year period, as shown below:⁷⁶

Figure 5-4: Draft plan - implications of flattening the current volume tariff structure

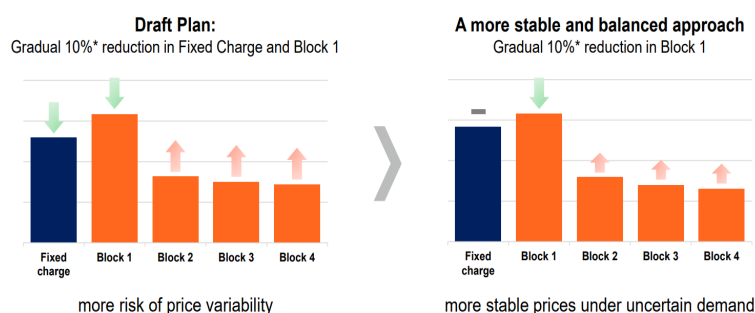
Figure 29 Flattening the current volume tariff structure



Community Forum participants were generally positive about the approach to rebalancing tariffs as they saw it as a driver for reducing gas usage and greenhouse gas emissions.

Evoenergy reconsidered their position on tariff rebalancing in the AA proposal. A revised approach was presented to the Community Forum in May 2025 which removed the 10% reduction in the fixed charge, as show below.⁷⁷

Figure 5-5: Revised tariff structure



* Tariff rebalancing excludes inflation

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⁷⁵ Acknowledging the high proportion of Australians who can access the internet via a computer, tablet mobile phone or other device; as recently reported by the Australian Communications and Media Authority, *Trends and developments in telecommunications 2023–24*, December 2024

⁷⁶ Evoenergy, *Evoenergy's draft five-year gas plan Access arrangement proposal 2026–31*, March 2025, p.54

⁷⁷ Evoenergy, *community-forum-session-10-presentation*, May 2025, p.35

Evoenergy explained that the change was made to provide “a more stable and balanced approach”,⁷⁸ which Evoenergy explained would reduce price volatility.

Most Community Forum members accepted the changes as described, but several participants pushed for Evoenergy to be more ambitious in its rebalancing of tariffs.

It is clear that the revised approach would improve revenue certainty for Evoenergy, however CCP33 is not aware of modelling which demonstrates the advantages of this change. Further, we are not aware of any discussions about the future projections for tariff rebalancing post to 2026-31 AA period.

⁷⁸ Ibid, p.35

Appendix: CCP33 meetings and observations

CCP33 meetings with Evoenergy

- Initial briefing: 9 December 2024
- Follow-up meeting: 13 January 2025
- Draft Plan briefing: 11 March 2025

Community Forum engagement observed by CCP33

- Community Forum - Session 7 (face-to-face and online): 14 November 2024 (observed online)
- Community Forum – Session 8 (face-to-face and online): 6 March 2025 (observed online)
- Community Forum – Session 9 (face-to-face and online): 27 March 2025 (observed online)
- Community Forum – Session 10 (face-to-face and online): 22 May 2025 (observed in person and online)

ECRC engagement observed by CCP33

- ECRC meeting #61 (face-to-face and online): 10 December 2024 (observed online)
- ECRC meeting #62 (face-to-face and online): 20 March 2025 (observed online)
- ECRC meeting #63 (face-to-face and online): 2 May 2025 (observed online)
- ECRC meeting #64 (face-to-face and online): 12 June 2025 (observed online)

Energy Matters Forum engagement observed by CCP33

- Energy Matters Forum (online): 18 March 2025 (observed online)