

Summary of Meeting

Consumer Reference Group (CRG) Meeting No. 4

23 May 2013

Held face-to-face at Park Royal (Melbourne Airport) – Bendigo / Wangaratta Room, Level 5

Attendees:

CRG members (including representatives)—Dr Si Wei Goo, Graham Mawer, Helen Scott, David Headberry, Tennant Reed, Deanna Foong, Martin Jones, Bruce Mountain, Damien Sullivan, Mark Henley, Carly Allen, Luke Berry, Ro Evans, Bev Hughson, Robert Mallett, Heather I’Anson, John Hin.

AER staff members—Andrew Reeves, Warwick Anderson, Chris Pattas, Tanja Warre, Moston Neck, Lawrence Irlam, Mark McLeish, Arek Gulbenkoglu, Blair Burkitt, Scott Sandles, Yuliya Moore, Jeff Anderson, Ben Fisher, Jeevika Makani, Kurt Stevens

Apologies: Katrina Lee, Belinda Sandilands, Alexandra Geddes, Carolyn Hodge, Matt Helme, Janine Rayner, Jonathan Pavetto, Angus Nardi, Sue Fraser

On 23 May 2013, the AER held the fourth meeting of the CRG. The meeting was chaired by AER Chairman, Andrew Reeves, and was attended by AER staff members and CRG members who represent various consumer groups.

This summary broadly covers the key topics and themes that were discussed. The outline follows that of the agenda.

1 Welcome and update (Warwick Anderson)

The AER General Manager, Warwick Anderson began by thanking participants for their attendance. He noted that the meeting was designed to occur at a critical stage in the Better Regulation guideline development, as AER staff had commenced writing the draft guidelines. He also thanked CRG members for several submissions which we have received, which were being considered along with all other submissions.

Warwick stated that we recognise that network regulation is complex, and is trying to make it easier to understand for consumer representatives. We welcome any further ideas or requests to help CRG members.

Warwick noted we have received two key requests for the meeting; to consider

- how the Better regulation work streams fit together—Warwick acknowledged that work was typically focused on individual work streams. One of the focuses of this meeting was to consider the work streams as an integrated package. We distributed a policy note which explained how the work streams fit together.
- the important elements for consumer representatives to focus on—in response to this request, we put together the document ‘Workshop Overview and Issues’. This document covers the four work streams considered at this meeting, setting out the key issues and questions where consumer views can really make a difference.

2 CRG members’ objectives

CRG members nominated the following as objectives for the day:

- engagement on service levels (in particular, street lighting)
- better regulation of networks
- hear from all consumer groups
- better balance between NSPs and customers
- clarity around expectations of NSPs
- enough/more information from Guidelines
- process for consumers in/out, into
- better outcome from small business
- sharing the AER learnings
- understanding of non-binding
- consumer protection in energy
- consumer engagement
- overview of Better Regulation
- priorities for the next couple of months
- services for rural.

Warwick Anderson commented on concerns that we may not be inclined to shift from our draft positions. We would like to have gathered as much information and views to be able to develop strong positions for the draft guidelines. We will engage in further consultation after the draft guidelines are released, as stipulated in our consultation procedures. Ideally, the changes made between the draft and final versions of the guidelines should be in regard to the detail, rather than the direction. For this reason we have focused on seeking as much input from stakeholders earlier in the process.

While the guidelines are not legally binding, they will be adopted as our default position on various issues. The AEMC determined that the final position is still at the time we make a reset determination. If NSPs would like to depart from the guidelines, they can argue their

case at the time of a reset. They would have to present a convincing case to persuade us to deviate from the guidelines.

Explanatory statements will accompany the release of the draft guidelines. The explanatory statements will provide context around what the draft guidelines mean for consumers.

We will hold another face to face CRG meeting on 22 August, shortly after the draft guidelines are released. It will be an opportunity to work through the draft guidelines as a group. Before this meeting the CRG will discuss how to maximise its use of time.

3 NSP consumer engagement

The next discussion presented by AER staff was on the NSP consumer engagement guideline. Consumer representatives were consulted in March; we have since been consulting with NSPs. AER staff would start drafting the guideline on NSP customer engagement after this CRG meeting.

The overall objective of the Better Regulation program is to have alignment of network service provision with long term interest of consumers. Genuine engagement between NSPs and their customers can help achieve this. The issue is how to achieve genuine engagement. We are clear about the outcomes in this area: not a compliance checklist, but for NSPs to embed customer engagement into how they run their businesses in all areas. This a fundamental structural change.

CRG members highlighted four points:

- Iterative process—the aim is for cultural change and that takes time. NSPs cannot achieve perfect consumer engagement from the start, but this is the start of a process.
- Focus on ‘why’—CRG members have experience in how to do customer engagement and that is relatively straightforward, the real issue is ‘why’ and what areas should NSPs engage with customers.
- Patience—good intentions exist, and we will get there but it may take time.
- Building a relationship—it can be challenging to measure engagement through key performance indicators (KPIs), what is needed is to build a relationship so it is genuinely adopted.

AER staff explained that the purpose of this guideline is to influence NSPs’ strategies to adopt better consumer engagement. As such, the guideline should mirror a project plan covering the four components: best practices, priorities, deliverables, how to measure results. We also need to look at best practices around the world and within Australia.

The group divided into three tables to discuss three aspects of engagement:

i. Prescriptive versus innovation? Where should we be on the spectrum?

There is a trade-off between benefits of additional consultation and costs of added compliance. Consumer engagement is very tempting to prescribe, but it may stifle innovation and encourage a compliance approach. However, some prescription is required to achieve certainty and clarity of purpose.

Consumers noted some of the things NSPs do well in consumer engagement include:

- Multiple small group workshops
- Employed professional facilitator
- Gave feedback to workshop participants in follow up

ii. How to measure success?

Consumers identified two schools of thought on measuring success: activities (outputs – more accountable if you have); or outcome measurement (have they engaged in their revenue proposal)?

While outcomes are difficult to measure, a key outcome of consumer engagement is whether consumers have made change. However, consumers are not in favour of making change for the sake of making change.

The group then discussed interaction with NSPs. When NSPs hold focus groups it tends to be a data dump which makes it difficult for consumers to contribute. Consumers are not given the opportunity to comprehend the data and make constructive comments. Information also tends to go one way.

It would be useful if there was independence around selecting focus groups rather than the NSPs just choosing consumer groups that are likely to accept their positions. Representatives need an understanding of issues. It would be good if representatives had strong backgrounds in economic regulation, general economics, or engineering.

To overcome these issues it may be beneficial if consumers could report to the AER as well as NSPs. In conclusion, the CRG members considered that the outcomes of NSP engagement should be a mixture of process and outcome.

iii. How to get buy in?

The CRG members stated that as this is a non-binding guideline, the challenge is to get NSPs to engage of their own volition. NSPs should also be more transparent – this may include a clearer breakdown of charges on a retail bill. Engagement needs to be conducted on an on-going basis (not just once every five years before a reset). Consumer engagement may require cultural change in some businesses.

CRG members expressed concern about 'tick-a-box' regulation. NSPs will get more value from consumer engagement if they have the support of consumers. To do that, NSPs need to work with consumers and listen to their thoughts and develop appropriate engagement strategies with consumers.

Consumers considered that some sort of public reporting of consumer engagement would encourage buy-in from NSPs. If the AER were to report on, and make public comments about, consumer engagement of NSPs this would reward NSPs who do consumer engagement well and identify those that can improve.

4 Update on confidentiality work stream

Warwick Anderson provided a brief update on confidentiality. He noted that submissions so far have expressed a view to classify certain information categories as per se confidential. This approach may provide incentives to NSPs to classify information such that it fits into a confidential category and thus falls out of scrutiny.

Further discussion on this issue will take place with subgroup members.

[MORNING TEA]

5 Rate of return

Andrew Reeves stated that rate of return is a challenging and complex issue. Further, the Rate of return determines approximately half of network prices.

Andrew noted that the previous approach to determining the return on capital was relatively inflexible and subject to global economic conditions. Uncertainty in global economies has led to a lower return on capital for lower risk assets. The consequence of this environment has been a step change from higher rates of return on capital to lower rates of return on capital. Previously, we allowed rates of return in excess of 10 per cent for NSW, now the weighted average cost of capital (WACC) is 7 per cent which is a significant difference in a short period of time.

Andrew added that we are keen to hear CRG members' views on:

- Smoothing of price path – what do consumers think of the high level of volatility?
- “Set and forget” (reviewed every five years) OR portfolio of debt (annually reviewed).
- Rate of return needs to be the actual cost of financing (too low, NSPs will not spend the money; too high they will overspend. If NSPs just take the money, consumers receive no benefit).
- Should we use one or more benchmarks in determining the various WACC parameters? One benchmark is simple, but more may be more precise.

AER staff then provided an update on background and process:

- Unlike other guidelines, the rate of return guideline is for both gas and electricity.
- Previously, different rules applied for different sectors.
- We will review the guideline once every 3 years.
- The guideline is non-binding, but it will take strong reasons to convince us to depart.

We will be holding a series of workshops in June. We will send out dates for upcoming workshops. We keen to get as many consumer representatives to these workshops as possible – we do not want to just talk to NSPs.

One of the workshops will be on a piece of expert advice on what should be the benchmark firm. The purpose is not to look at exact circumstances of each firm, but the rate of return that an efficient firm would need.

The level of risk influences what an appropriate rate of return will be. We know NSPs are less risky than other players in the market. Some issues to consider are:

- Within the firms we regulate, how homogenous are they (in terms of risk)?
- Are some sectors more risky than others (perhaps gas transmission)?
- But electricity transmission is less risky, so lower financing costs? Therefore it may require a lower rate of return.
- What opportunities do they have to manage that risk?
- How should risk be shared between consumers and businesses?
- Who is best to manage what risk?

Frontier economics are providing expert advice to the AER – the draft of this report will be released publicly for comment in June.

Consumers then provided some comments on rate of return. The consultation paper was an important step in the process. The issues paper was quite open, but the consultation paper has helped bring it together as it highlighted some of the directions that the AER is moving.

Consumers would like for the guidelines to restore the balance between consumers and businesses. Consumers commented positively that it reformulated the regulatory hierarchy of where the guideline will sit – NEO, NEL, new rules, ROR objective, ROR guideline. It recognised important principles highlighted in previous determinations and appeals process. Consumers value simplicity and consider that complicated models are not necessary. The AER needs to demonstrate why the model it adopts achieves better outcomes for consumers.

There is a trade-off between minimising gaming and flexibility. There is no one right answer for dealing with volatility. Of the approaches considered, some will result in a lot of movement between regulatory periods; some will give movement within the regulatory

period. Consumers are wary about NSPs wanting certainty because it seems they also say they want flexibility as it suits them. Consumers generally favour approaches that minimise gaming opportunities. The best way to achieve that outcome seems to be an approach which has less choice for NSPs.

Consumers would prefer the AER use one benchmark firm for determining a benchmark rate of return. The risk of using more than one benchmark firm would be that the businesses could potentially use benchmarks that suit them. Consumers do not consider that businesses should be treated differently without robust reasoning.

The discussion then turned to the cost of debt. The rule change process opened up a lot of questions, in particular:

- How does the AER understand efficiency?
- How should the AER think about long term interest of consumers?
- What represents efficient financing behaviour – “On the day approach” or “portfolio approach”? Some feedback received already supports a portfolio approach.

Currently, the cost of debt is determined by looking at market cost of debt for a 10 year fixed maturity, which then gets fixed for the next 5 years. The underlying assumption in this approach is that businesses refinance debt entirely at the beginning of the regulatory period. This is unrealistic, as no one actually refinances in such a short time. Also, NSPs tend to use hedging to minimise their exposure to fluctuations in the cost of debt. As such, we have a strong concern around whether that would represent the efficient financing practice. Our preliminary view is that this current approach does not result in an efficient outcome.

We are considering whether a portfolio approach is more efficient. A portfolio approach incorporates different maturities of debts as it considers a portfolio of debt. Through the portfolio approach, NSPs can minimise their exposure to the risks associated with changes in the cost of debt. As such, we are considering both a trailing average approach (assumes efficient firm is refinancing in a staggered fashion) and hybrid approach (trailing average and on the day approach).

The rationale for on the day rather than trailing average is small network businesses tend to use on the day. Consumers advocated that the AER should adopt a primary model, and then make NSPs put the case for an alternative approach. Further, regulations should not be for the exceptional firms, the AER should not change the regime to allow for the minority.

A consideration is whether the AER should allow NSPs to select the preferred approach at every determination or whether the AER should “set and forget”? The risk to consumers is that if we give NSPs a choice between on the day approach and trailing average they will opt for the approach that benefits them without necessarily providing robust support for that approach.

We are still consulting on what is an appropriate maturity time for debt (it may not necessarily be 10 years). Further discussion from consumers on this included:

- the Economic Regulation Authority (ERA) came to a view that, on average, a normal debt term is 6 or 7 years. Alternatively, 5 years could be more appropriate. The AER should undertake research into what capital intensive businesses do.
- bank debt is less visible. The benefit of the ERA approach, rather than the fixed term approach, is that it has selection criteria for different bonds and samples whole selection of bonds – and the term is an average of this.

AER staff noted we are considering transitional arrangements if we move to a portfolio approach to stop windfall gains/losses to NSPs.

The discussion then turned to the discussion on return on equity, in particular, the stability of the return on equity. Stakeholders have expressed preference for stability in prices. Stability can be achieved in different ways. Multiple models can achieve stability or a single model is stable in a different way (stable input parameters).

Consumers noted that they do not like big shocks, particularly lower and medium consumers. Consumers would prefer a balanced approach over time that allows for wins and losses. Consumers would be happy with a price shock down although rarely happens.

Further, prices need to reflect movement in WACC that gives stability in prices. However WACC is just part of price shock, not the whole movement. Some other matters affect price increases, eg pass through of feed in tariff.

Consumers thought the AER should discuss international financing comparisons in a workshop.

[LUNCH]

6 Expenditure forecast assessment

Andrew Reeves commented that the expenditure forecast assessment work stream is important. This is an area where we have identified comparative difference between government and privately owned NSPs. We would like to publish more raw data so stakeholders can analyse efficiency for themselves. This will be useful long term to use econometric method. But for now, use the data to understand costs. The AER are considering whether actual costs can be used as a guide to efficiency or whether to use an external efficiency benchmark.

The first part of this discussion dealt with category based assessment. The purpose of this work is to provide more certainty on how we will make our assessments and data requirements. The outcome from this work is to set out what we expect businesses to put into their proposals.

In the past, NSPs had requirements to provide data for cost drivers (network opex, augmentation, etc). However, there was not much consistency in how this data was provided. This made it difficult to align these categories, eg what units NSPs are purchasing and to break it down into comparable bits. This consistency will allow us to assess what are legitimate differences in cost and what are inefficient costs?

AER staff noted that the guideline being developed is also considering which tools to apply and how to apply them, in particular, economic benchmarking. The economic benchmarking part of the guideline is focussing on outputs, and relative costs of how to deliver them. We will be releasing models shortly so consumer groups will be able to view them.

CRG members commented that the AER's proposed approach to assessing expenditure is important as it will inform how much to spend, and also affect incentives. The AER should be careful only to put as much weight on the model as it can bear.

The current regime assumes there is a symmetrical risk that businesses may underspend or overspend their allowance. In practice it is not a symmetrical risk because if they overspend they can roll it into the RAB, but if they underspend it will not get clawed back because it was under the allowance.

CRG members stated that with the tools currently available it can be difficult for the AER to question the efficiency of investments. Therefore, the AER should not revert to its old tools but rather should be considering new tools. For this reason CRG members were supportive of the benchmarking work.

CRG members noted that the NSPs are not generally in favour of the AER undertaking benchmarking whereas consumers are in favour of it. NSPs are generally in favour of using multiple benchmark firms. Consumers would prefer one benchmark firm.

Chris Pattas added that the purpose of the work stream is to move away from the current application of tools which are inadequate. We are also considering what weight we apply to give an overall assessment.

There was also general discussion around considering what international benchmarking is done. Ofgem was singled out as a good example. AER staff accepted that international benchmarking is important. We will start with Australian differences as a first step, and then perhaps consider how to do international benchmarking in the future.

AER staff stated that the data that we collect will feed into the NSP engagement process. In this context AER staff asked what information will be good for data requirements? What do consumers want to see that they can actually use?

CRG members stated that consumers would like:

- up-to-date capex. For example, if expectations of demand were wrong, then consumers would like to know what capex is being spent.
- data provided in a number of layers. Raw data would be helpful for someone with an analytical background to engage in deep analysis. Other consumers, without this background could understand the higher level picture (the AER should set out its methodologies and assumptions).

CRG members added that the focus of these expenditure discussions tend to be on regulatory resets. In fact, a lot goes on during regulatory control periods, eg contingent projects, RiT-D, RiT-T, pass throughs. Part of the problem is that consumers can see some of these processes occurring but have little idea how it fits in. It would be helpful to understand the context of expenditure.

Further, consumers would find it helpful to be able to observe the data in the context of the incentives. Where expenditure decisions are being made it would be helpful to know why it is being spent and when it is being spent. As an example, is expenditure occurring in the last year in particular?

Andrew Reeves stated that we are working towards providing data in a way that is more accessible and usable to consumers.

CRG members noted that the AER has talked regularly about benchmarks in the past. Consumers would favour the AER using benchmarks as a forecast, that is, in considering whether proposals for expenditure are acceptable.

CRG members noted that NSPs often have confidentiality concerns with this sort of information being released. Most consumer groups handle commercial in confidence material on a daily basis. Where the NSPs do have concerns around providing confidential information, the AER should have a process whereby consumer representatives be provided with, and use the information sensitively.

Another view from CRG members was that it can be dangerous to release information to some advocates and not others. Ideally, most information is not categorised as confidential.

Chris Pattas noted we are trying to maximise data that gets out which is not deemed confidential. For those that are confidential, we are open to releasing it to particular consumer groups where this can be negotiated with NSPs (this has been done in litigation and other industries).

CRG members noted that sometimes it is easy for consumers to get involved with regulatory processes. An example of good engagement was augmentation on Kangaroo Island. But general issues like reliability standards are more challenging. Part of the challenge is that different consumer groups have different preferences.

Consumers do not like the phrase, “base, step and trend” because it implies that prices are always moving upward. “Jump and slide” suggests that prices can go down.

7 Expenditure incentives

Andrew Reeves noted that we are looking for incentives for efficient expenditure, and how to share fairly with consumers. If incentives are too strong, then potentially the network deteriorates. We do care about health of network indicators. A powerful incentive is ex post review. The trigger will likely be an overspend in total. Once triggered we can go back and omit any inefficient expenditure over the allowance from the RAB. Andrew noted that incentives only work if people understand it.

AER staff stated that our focus is on getting ex ante incentives (rather than relying on an ex post review). The purpose of the capex efficiency sharing scheme (CESS) is to ensure that only efficient expenditure is included in the RAB. We are grappling with design issues. In particular, we are considering whether there should be different schemes between TNSPs or DNSPs; government or private?

We have not settled our position on whether the CESS for TNSPs and DNSPs should be different. We are considering arguments on the difference between government and private differences in investment strategies.

We would like for the CESS to be an asymmetric and continuous scheme, and have received support for this. NSPs already have some protection on the upside through pass throughs and contingent projects (only in transmission). We understand that NSPs now generally favour a low powered symmetric scheme, whereas consumers generally prefer an asymmetric scheme, which is more high powered.

We are also considering whether:

- we should allow exclusions from the scheme such as uncontrollable costs.
- a staged approach in relation to the ex post review would be appropriate.
- all overspends should be reviewed.

CRG members made the following comments:

- the AER has various incentive schemes, so the AER needs to ensure that when applied together, one does not distort the outcomes of another. There are also overt incentive programs, but there are also inbuilt incentives (like getting a higher WACC than actual WACC, automatic roll in of capital, deferring capex).

- Consumers generally consider that NSPs should not be able to recover the revenues associated with any overspends. If the AER does allow this revenue to be recovered, then the WACC should be reduced to reflect lower risk.
- CESS has to reflect what really happened. The targets should be changed to reflect exogenous shocks (why pay for it if demand never required it to be built?).

AER staff is considering our position on the situation where expenditure is initially deemed inefficient and it is then excluded from the RAB, but circumstances change and it becomes needed. The issue is whether this expenditure should be excluded from the RAB.

AER staff also commented that if NSPs keep more of the underspend, then this should result in longer run efficient costs for consumers, as there is more incentive to be efficient. We are also concerned about not allowing any capex overspend to be included in the RAB. Potentially efficient and necessary investment is deferred resulting in adverse consequences for the network.

CRG members noted the following concerns with the current incentives regime:

- government owned NSPs have incentives to overspend capex due to lower actual WACC
- inter period capex shifting
- intra period capex shifting
- The AER also needs to consider having an incentive which declines across the five year regulatory control period.

AER staff responded that it is not consistent or straightforward. We now have some robust evidence of privately owned businesses who are overspending, and government owned businesses who are underspending.

On ex post review, AER staff noted we are considering whether it is appropriate to review all capex or to only review certain capex. We are leaning towards the approach where we review any overspend, that is the trigger event for ex post review is any overspend. An issue with that approach is the demand forecast. If NSPs get a large allowance associated with demand, but demand does not eventuate, they may incur inefficient expenditure without the opportunity for us to review.

AER staff asked whether consumers have a preference for a 'bright line' threshold (that is, the point at which we would consider an ex post review)? If we do adopt that approach, that could be setting an expectation for NSPs they can overspend up to that point. In effect this would create a new revenue allowance.

CRG members then put forward the following views on this issue:

- if the threshold was less certain, then it would be more of an incentive for NSPs to underspend.

- the trigger should be any overspend. Whether the AER imposes that trigger should be left to the AER's discretion. The AER should stay silent if it does not have to comment.
- the AER should still allow for necessary overspend. The AER should allow flexibility to allow forecast to match reality.

CRG members considered that less certainty implies greater risk and, therefore, makes it less likely the NSPs will engage in overspend. Further, CRG members have a concern around the relationship with demand management incentive scheme to reduce other areas of expenditure.

Chris Pattas noted even if the Power of Choice work stream results in a demand management scheme, it still will not end up a classic incentive scheme for demand. But, other incentives exist which encourage non network options. Ultimately, this is a cultural shift – we need strong incentives to encourage non–network options.

[AFTERNOON TEA]

8 Wrap up and focus session (with Mark Henley)

Mark Henley stated that consumers' preference is for an AER that is independent, demonstrates leadership, and clear and strong decision making. The AER should actively encourage consumer engagement as an integrated component in all aspects of regulatory work. The Better regulation program is a genuine opportunity for change.

Mark commented that the 'workshop overview' document was concise, useful, and could be read in one sitting. Mark considered that a key point is that it demonstrates that the AER is listening to what consumers say rather than just what consumers write.

The priorities for consumers are:

- Consumer engagement—not one model of consumer engagement is appropriate for all firms.
- Rate of return—Mark stated that consumers:
 - favour the portfolio approach,
 - are not settled on the benchmark efficient firm,
 - support trailing average compared to on the day.
 - do not like price shocks.
- Expenditure forecast assessments:
 - consumers are considering what data is needed and how it translates into action,
 - international benchmarking is useful
 - data needs to be provided at different levels.
- Expenditure incentives –

- consumers agree with the AER that ex ante is the focus as it is hard to claw back
- any overspend should trigger an ex post review
- the AER needs to explain how incentives fit together
- consumers prefer an asymmetric scheme
- consumers should not have to pay for any overspend
- the AER should consider intra-period capex incentives
- Confidentiality – ideally all information should be open. If information has to be confidential, then the AER should consider a process which would make the information available on restricted basis.
- Power of choice – how demand management interplays with expenditure forecasting and RiT-D is being considered. The RiT-D guideline should state that NSPs need to consult with consumers.

9 Questions & Answers

Andrew Reeves noted that AER staff are always open to discussions with stakeholders. We are happy to test out ideas with customers as it settles its own positions. However we still do have a lot of work to do, and at some point we must formulate positions and publish the draft guidelines.

CRG members commented that consumers would like to discuss some matters further and follow up with the relevant AER directors.

AER staff commented that consumers should send through any examples of good consumer engagement that they are aware of as this would help him in finalising the NSP engagement guideline. The following views were then put forward:

- the recent engagement by the productivity commission would provide a good example – see Norman Mundy’s consumer engagement.
- good consumer engagement is about empowering consumers
- NSPs have monopoly power but consumers have a lot less bargaining power. But, this is an essential service. This then imposes a greater obligation on NSPs to do more for consumer engagement.
- consumers are pleased to see integration in work streams.
- consumers would like to see consumer engagement in the framework of incentives and monitoring.

10 Where to from here? (Luke Berry)

The meeting was one of the key opportunities for consultation before draft guideline but there are some lingering questions.

The nature of the draft guideline is that it is open for consultation. Consumers would like the AER to provide its positions for the draft guideline ahead of their publication.

Further consultancy work is required in Power of Choice. Consumers can help the AER with presentation and conference on Rate of return before 14 June.

11 Concluding remarks (Andrew Reeves)

Andrew Reeves concluded by thanking CRG members for their time involved in attending, preparing and participating on the day. Andrew also noted we are learning through this process.