

Ref: NB/TF/JD



30 August 2013

Ms Jacqui Thorpe
General Manager – Retail Markets
Australian Energy Regulator
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MELBOURNE VIC 3001

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Dear Ms Thorpe

Re: AER's Draft Stakeholder Engagement Framework

Ergon Energy Corporation Limited (EECL), in its capacity as a Distribution Network Service Provider in Queensland, and Ergon Energy Queensland Pty Ltd (EEQ), in its capacity as a non-competing area retail entity in Queensland, welcome the opportunity to provide comment to the Australian Energy Regulator (AER) on its *Better Regulation: Draft Stakeholder Engagement Framework* (the Framework). In this submission, EECL and EEQ are collectively referred to as 'Ergon Energy'.

Ergon Energy broadly supports the objectives of the Framework proposed by the AER and considers that an appropriately structured Framework will provide stakeholders the opportunity to meaningfully engage across a range of AER processes, including those through which the AER makes its decisions.

General Observations

Ergon Energy notes that the AER has proposed a principles-based approach to its engagement activities, which is generally consistent with the approach proposed in the Draft Consumer Engagement Guidelines for Network Service Providers. Ergon Energy supports this approach to engendering expectations on the Regulator consistent with those expected of Network Service Providers.

At this stage, Ergon Energy agrees that the Framework covers an appropriate range of AER activities and refers to an adequate range of stakeholders affected by the decisions and activities of the AER. With that being said, Ergon Energy would expect that the breadth of both issues and stakeholders is indicative rather than exhaustive, and that where appropriate, additional stakeholders and activities can be considered for inclusion.

Avenues for communication

Ergon Energy suggests that with the benefit of time, there may be a need or opportunity to consider additional engagement tools to the spectrum already proposed by the AER. Ergon Energy believes that stakeholders are often best placed to describe the means by which they prefer to communicate, and considers that to the extent that there are avenues preferred beyond what is already considered, the AER will be made aware by stakeholders as the need arises.

Evaluation and review

Ergon Energy agrees that the suggested three year timeframe for review is appropriate, and assumes this refers to a formal review of the entire Framework. In the interim, Ergon Energy would suggest that ad hoc and ongoing evaluation of the Framework be permitted to ensure a natural evolution in line with stakeholder preferences can occur.

Currently Ergon Energy reviews the effectiveness of its engagement with consumers, and believes these practices are a crucial element to ensuring that appropriate means of engagement are applied where warranted. Ergon Energy would expect that a commensurate level of ongoing review will be committed to and undertaken by the AER.

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact either myself on (07) 4092 9813, or Trudy Fraser on (07) 3851 6787.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Doyle', with a long horizontal flourish extending to the right.

Jenny Doyle
Group Manager Regulatory Affairs

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