

Technology program

Customer Information Services

Program Brief

Table of Contents

1	Document Background	3
1.1	Purpose of this document	3
1.2	References	3
1.3	Document history	3
1.4	Approvals.....	4
2	Executive summary	5
2.1	Program summary.....	6
3	Context.....	8
3.1	Background	8
3.2	Current limitations.....	9
3.3	Objective.....	10
3.4	Customer outcomes.....	11
3.5	Business drivers	12
4	Options	13
4.1	Overview.....	13
4.2	Option #1 Business as usual.....	14
4.3	Option #2 Integration of Customer IM for key required services (RECOMMENDED).....	19
4.4	Option #3 Dedicated CIM solution integrated with application ecosystem	24
5	Assessment and recommended option	29
5.1	Assessment of the options.....	29
5.2	Recommended option.....	31
6	Attachment 1 – Risk level matrix.....	32

Program Brief

1 Document Background

1.1 Purpose of this document

The purpose of this document is to outline a business case for a proposed program of work that will form part of AusNet Technology GAAR submission.

1.2 References

Document	Version	Author
AusNet Services FY19-FY23 Technology Plan	V1.0	AusNet Digital
2021 Gas Business Plan	V1.0	Joanne Soysa
GAAR Technology Strategy 2024-2028	V1.0	Ausnet Digital

1.3 Document history

Date	Version	Comment	Person
03/08/2021	V0.1	Creation of document	Shannon Shi
25/08/2021	V0.2	Updated options	Lynda Osborne
31/08/2021	V0.3	Updated cost figures	Leo Saito
20/09/2021	V0.4	Sent PwC for feedback	Matt Abraham
15/10/2021	V0.5	Updated based on feedback	Lynda Osborne
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27/10/2021	V.07	Draft Brief reviewed	Priya Nellaiappan
02/02/2022	V.08	Post Internal review	Matt Abraham
05/05/2022	V.09	Feedback incorporated	Matt Abraham
01/06/2022	V.10	Post review formatting	Matt Abraham

Program Brief

1.4 Approvals

Position

Technology Leadership Team

Program Brief

2 Executive summary

The table below provides a summary of the program discussed in this brief. Additional information is provided following the table and throughout the brief.

Table 2-1 Summary table

Key objective(s) of the program	To improve the interactions between AusNet and our customers, by integrating the disparate systems so that customer engagement activities can be tailored to customer needs. It is also focused on remaining compliant with evolving regulatory requirements for customer information collection, storage and distribution.						
Key benefits	<ul style="list-style-type: none"> Improved ability to cost effectively meet increasingly sophisticated regulatory driven data collection requirements such as the Consumer Data Rights Accurate standing data management to ensure that correct and accurate information is collected and stored appropriately for support Life Support & Vulnerable customers Improved customer experience by supporting agents with customer specific context at the time of interaction e.g., Vulnerable or Life Support customer identification Uplifting customer experience through the provision of more informed notifications related to planned outages, restoration, and increased customer connections Improved customer categorisation and segmentation allows AusNet to better understand customers and their needs Lower costs associated with notifications and planned customer outages through the provision of relevant customer data to asset / works management teams that will allow them to plan works in a more customer-centric manner. This should result in fewer calls to the contact centre. 						
Cost allocation	Electricity Distribution	75%	Electricity Transmission		0%		
	Gas Distribution	25%					
Program type	Recurrent				<input checked="" type="checkbox"/>		
	Non-Recurrent				<input checked="" type="checkbox"/>		
	Client Devices				<input type="checkbox"/>		
Program timings	Program duration:	5 years					
Expenditure forecast	(\$m)	FY24	FY25	FY26	FY27	FY28	Total
	Capex	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$2.90
	Opex	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$7.37
	Gas Distribution Cost	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$10.27
	Total program	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$19.05

Program Brief

Estimated life of system	The recommended option is a subscription service leveraging gas industry specific solution removing the need for customisations. In scope integrations are an AusNet specific solution and have an expected life of 5 years consistent with similar implementations.
Customer Engagement	<p>This program was proposed (and approved) as part of AusNet’s Electricity Distribution Price Reset (EDPR) and Transmission Revenue Review (TRR) submissions. This brief pertains to the Gas Access Arrangement (GAAR) allocation of these costs.</p> <p>We have undertaken significant stakeholder engagement.</p> <p>As part of the EDPR process, we held deep dive workshops with stakeholders on ICT. In that engagement, we described the importance and need for ICT expenditure to meet our customers’ evolving needs and to support compliance with regulatory and legal obligations.</p> <p>We acknowledge the feedback received from both sessions and have taken it into consideration when proposing the most appropriate option for this business case.</p> <p>This brief has also taken into consideration:</p> <ul style="list-style-type: none"> • The challenge we received from stakeholders as part of the GAAR engagement process to minimise discretionary IT spend where possible – a challenge consistent with the broader feedback we received on our capital investments. • Recent customer engagement studies conducted by AusNet, including the Energy Sentiments Survey (2021) and the AusNet Listening Report “Engaging Victorians on the Future of the Gas Networks” (2021).

2.1 Program summary

AusNet is operating in an environment where the role of, and interactions with our customers is rapidly evolving away from a relatively simple relationship to one that is more responsive to customer needs and preferences. In the current regulatory period, CY2018-22, customers are indicating preferences for more digital communication methods (e.g., SMS, websites, more self-serve methods), greater transparency regarding services, improved timeliness of complaints handling, and the ability to self-serve. This trend will continue through the next regulatory period and beyond with customers becoming increasingly proactive in terms of monitoring their energy usage, and its impact on the environment. Customers’ expectations are also evolving rapidly based on their experiences with other service providers, which are increasingly digital, quick and simple to use. Customer outcomes can be enhanced by providing them with tailored services that are efficient and allow them to obtain the information they need or resolve their issue in a single interaction.

Furthermore, our customer service staff expect to have a contemporary customer information system (CIS) that provides them with relevant customer information to address customer queries when they are engaging with a customer. Ideally this is a single platform that consolidates:

- All customer data including service order status
- Interaction history (including voice recording of calls)
- Communication channel preferences
- Upcoming outages
- Complaints and case management

Program Brief

In addition, automation of business processes will support customer service agents in providing consistent and high-quality services to customers and allow agents to focus more on addressing customer needs. Such capabilities will enhance customer outcomes by:

- Providing agents with the tools required to provide tailored and efficient services.
- Providing the ability to integrate customer data with platforms such as GIS, network operations and asset management systems.

This will assist in understanding the specific customer related impacts of immediate and long-term activities on the network and making more customer-centric decisions where practical. A contemporary CIS will also allow AusNet to adopt customer-related regulatory changes in a timelier and more cost-effective manner, as the systems architecture will be simplified.

This program brief recommends investment to enhance AusNet's CIS capabilities (including customer information management (CIM) and customer relationship management (CRM)) to enable more targeted and relevant customer service and communication with our different customer segments. This brief proposes establishing a Customer Information System (CIS) to achieve the customer outcomes described above. The establishment of the CIS will be formed by a combination of the following investments:

- Implementation of a central customer information management (CIM) platform to manage all customer related data
- Implementation of customer relationship management (CRM) capabilities to enable digital communication methods (e.g., SMS, website) in the future and support agent business processes (e.g., initiate a connection request)
- Implementation of complementary capabilities to ensure that customer related data is accurate, readily available, and integrated as required e.g., standing data management, outage communications, and an interface for retailer and market interactions
- Integration of CIM and CRM data and / or capabilities with relevant systems such as GIS.

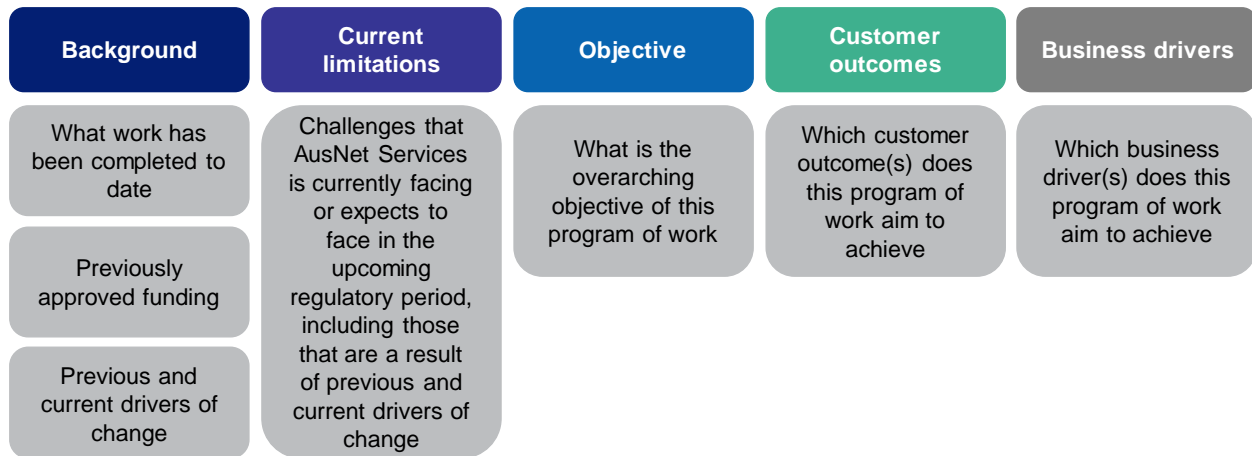
The CIS will allow AusNet to manage customer data more easily, increase automation of customer interactions and workflow, and better understand customers and their context to improve customer outcomes.

Program Brief

3 Context

This chapter provides an overview of the program of work and the key areas to be discussed.

Figure 3-1 Key areas of the context to be discussed



3.1 Background

The proposed investment in customer capabilities is driven by the need to continue to uplift customer outcomes. Specifically, key business and market drivers for CIS include:

- Active engagement with the Life Support and Vulnerable customers enabling AusNet to ensure customer safety and welfare
- Potential regulatory changes requiring communication to customers in their preferred communication channels
- Alignment to CSAT strategy - consistency in customer experience regardless of fuel type
- Increased need to demonstrate the value of AusNet gas services to customers given rising gas prices.

Our Gas business has been active in engaging a diverse range of stakeholders to participate in a number of customer centric forums to understand requirements that drive:

- AusNet's short to medium-term vision. This vision is to embed customers in the centre of AusNet thinking
- Options for technologies will support the achievement of this vision
- Operating model implications of the technology changes and the vision
- The customer journey and our understanding of the value of different customer segments.

In the current regulatory period AusNet has focused on:

- Undertaking studies to develop both customer and digital strategies, which broadly recommended the use of digital channels to improve customer experience
- Documenting and analysing existing business processes in the contact centre
- Assessing operational 'pain points' to identify tactical solutions to improve both internal and external capabilities in relation to customer experience and internal processes, through leveraging current systems.

These incremental, iterative changes have been driven by anticipated future regulatory changes which require AusNet to establish enhanced customer data management capabilities. However, they do not constitute contemporary CIS capabilities or a CRM system. We believe that centralising our customer

Program Brief

data onto a single, contemporary platform will increase our ability to safeguard customer data, which will become increasingly important given pending Consumer Data Right (CDR) legislation.

An example of a more recent regulatory change is the protections for customers requiring life support equipment. This rule change requires AusNet to securely collect, store and manage more private and sensitive information in relation to not only the account holder, but also the carer and medical practitioner of the individual requiring life support equipment.

Although AusNet proposed a business case to implement an enterprise-wide CRM system in this regulatory period, this did not proceed.

During the next regulatory period AusNet anticipates that it will need to address two key challenges that specifically impact the way in which its customer relationships are managed:

- **The need for greater customer-centricity** – enhancing customer outcomes and uplifting customer satisfaction require more customer-centric operations where the impact of various decisions on the customer is anticipated and understood. Decisions may range from planned outage work, to network augmentation, the processing of a connection request, or the handling of a complaint. Customers expect that strategic and operational decisions consider the impact to their gas service.
- **Evolving customer preferences** – customers are becoming more proactive and informed regarding their energy usage and expect to have the information and tools available to them to make choices about energy use.

This program brief proposes three options to uplift AusNet's CIM capabilities, including the benefits, risks, and impacts on customer outcomes and business drivers. This is discussed in Sections 4 and 5.

3.2 Current limitations

Despite a focus on tactical solutions implemented over the current period, the current customer information system (CIS) has the following limitations:

- **Manual processes** – AusNet currently utilises multiple systems to manage customer data, customer interactions, complaints, and communications. This requires manual steps to get sufficient customer data for certain tasks. This is time consuming and has the potential for inconsistencies and errors.
- **Limited tracking of end-customer information** – AusNet receives end-customer information via retailers however it is not always complete or updated sufficiently. There is also limited tracking of customer information based on interactions with AusNet. Therefore, AusNet is unable to tailor messages or information to customers or deliver customer service in a way that is specific to a customer's circumstances.
- **Limited ability to view customer consumption data** – Customer expectations and needs are changing, particular in relation to energy usage. If AusNet is unable to gain visibility around changing customer consumption patterns and their resultant network requirements, it will be unable to appropriately plan supply costs and other services.
- **Customer engagement throughout the customer journey** – Customers want to be able to access information via multiple channels, including via phone, via the internet or a mobile app. A CIS will facilitate AusNet's ability to enable digital channels, and better manage customer interactions, including issue management. An upgraded web portal for customers will also aim to improve the customer experience.

Program Brief

- **Customer information is not integrated with asset information** – The CIS captures customer endpoint information, the Asset Management system captures asset data, and the GIS stores data regarding the location of assets. As this information is disparate, it is difficult to utilise the information to inform decisions around the optimisation of maintenance and delivery of asset works in line with customer priorities. Similarly, it is difficult to use asset information to inform how decisions impact customers.

3.3 Objective

As noted above, AusNet’s vision for customer information management is to embed customers in the centre of our thinking. Specifically, for the 2024-2028 regulatory period, AusNet is aiming to better understand the evolving interactions between AusNet and our customers.

In line with this vision, this program of work aims to achieve the following objectives:

- Centralise customer data to remove manual data handling across disparate systems, improve customer data quality, and enable efficient customer interactions and responses to customer queries.
- Know the customer by offering digital communication channels and tracking their communications preferences.
- Ensure the business is well placed to meet expected upcoming regulatory rule changes, which require increasingly sophisticated data management. Examples of upcoming rule changes include communication requirements for vulnerable and life support customers regarding accurate registering and deregistering of life support premises ¹.
- Make it easy for customers to make inbound service requests, such as for new connections or network disconnections.
- Greater customer-centricity with respect to decisions e.g. planning of works and maintenance.

3.4 Risk drivers

In designing the program, we have considered how investment can support AusNet to maintain compliance with distribution network obligations. As customer preferences evolve, our programs must continue to improve and enhance our capabilities to ensure we remain compliant and can meet the needs of customers safely and reliably. The selected option must be aligned to the distribution network rules and enable AusNet to meet the needs of customers.

The table below outlines risk drivers for network operations and the role of technology in mitigating them.

#	Risk Driver	Details	Consequence	Likelihood	Risk Rating
D1	Meet Demand	Ability to meet or manage the expected demand for network services over the regulatory period.	Major	Likely	B
D2	Regulatory Compliance	Compliance with all applicable regulatory obligations or	Major	Likely	B

¹AER, Life support registration guide, 2019.

<https://www.aer.gov.au/system/files/AER%20Life%20support%20registration%20guide%202019.pdf>

Program Brief

		requirements associated with the provision of network services.			
D3	Maintain Current Performance	Maintaining current performance of supply of gas distribution network services.	Moderate	Possible	C
D4	Maintain Reliability	Maintaining the reliability, safety and security of the distribution system through the supply of gas distribution network services.	Moderate	Possible	C
D5	Maintain Price	Maintaining the price and quality of gas supply.	Moderate	Possible	B
D6	Maintain Safety	Maintaining the safety and security of assets and network operations.	Moderate	Possible	C
D7	Knowledge Loss	Mitigate the risk of knowledge loss due to workforce attrition and tacit knowledge.	Moderate	Possible	B
D8	Aging Platforms	Mitigate the risk that aging systems and a complex architecture inhibit the ability to accommodate regulatory and rule changes cost effectively.	Major	Likely	A
D9	Cyber Security	Mitigate the risk that aging systems are vulnerable to security threats which would compromise the security of the network.	Catastrophic	Possible	A
D10	Legacy Processes	Mitigate the risk that manual processes will increase the rate of errors.	Major	Almost Certain	A

3.5 Customer outcomes

Through customer research carried out by AusNet, a succinct list of key customer outcomes and priorities were identified. These customer outcomes are:

- Deliver on the basics – Ensure reliability of services
- Keep customers informed – Keep customers posted and improve customer service
- Provide affordable services – Lower costs for customers
- Adapt to the future – Sustainability and the future supply of gas
- Operate safely – Make networks safer, regarding health, safety and positive environmental impacts

All expenditure programs identified and proposed by AusNet will have regard to the customer outcomes and can be directly linked to at least one of these five outcomes.

Program Brief

We consider that this program of work will be most relevant to “**deliver on the basics**”, “**keep customers informed**” and “**be ready for the future**”, as it:

- Ensures that AusNet is able to meet the expected regulatory rule changes around vulnerable and life support customers (“deliver on the basics”)
- Assists with improving the collation, and resultant provision of information and education to customers (“keep customers informed”)
- Positions AusNet for the future in terms of customer information and data requirements, as not only are there increasingly sophisticated requirements from the regulator, but customers also expect AusNet to be able to seamlessly engage with them via multiple technological channels (“be ready for the future”).

We will further explore this in the discussion of each of the options.

3.6 Business drivers

In the face of significant industry disruption resulting in a period of substantial uncertainty and increasing complexity across the industry, AusNet has selected four key business drivers which set the direction for the entire business.

These business drivers are:

- Maintain current service performance
- Lead energy transformation, embracing change
- Drive effectiveness throughout the portfolio
- Generate trust and respect with customers and partners.

To drive effectiveness throughout the portfolio, remaining top quartile in operating effectiveness in the industry and ensuring that prudent and sustainable network investment is always undertaken will be key considerations. AusNet’s commitment to delivering valued services to customers will also contribute to generating trust with customers, as well as the maintenance of network safety in accordance with the Gas Safety Case. This will also help drive maintenance of current service performance.

All expenditure programs identified and proposed by AusNet will have regard to the business drivers and can be directly linked to at least one of these initiatives.

We consider that this program of work will be most relevant to “**drive effectiveness throughout the portfolio**”, as it includes initiatives that bring disaggregated sources of customer data into a consolidated system, which allows AusNet to engage with customers more effectively. We will further explore this in the discussions of each of the options.

Program Brief

4 Options

4.1 Overview

This section provides an overview of the options that may alleviate the current limitations.

Table 4-1 Brief overview of the options

Brief overview of each of the options	
Option 1	<p>Business as Usual:</p> <p>This option involves continuing to manage customer information through current systems, making improvements where practical to maintain the level of service that is provided today. This option includes:</p> <ul style="list-style-type: none"> • Retailer interface changes for Customer Details Notification/Life Support Notification to ensure necessary customer data is captured and managed appropriately. • Integration of the outage management system with the CIS system, for Customer Details Notification/Life Support Notification functions to ensure that outage communication notifications are managed appropriately • Lifecycle refresh of mail house and Life Support portal to ensure these remain current. • Implementation of our CIS and outage communications systems to enable the integrated notification of outages to customers.
Option 2 (Recommended)	<p>Integrated CIS for Gas</p> <p>This option involves implementing an integrated customer information system including core CIS, outage communications, standing data management, and retailer and market interface functionality.</p> <p>This option also provides a Gas-specific customer system, and integrates customer information in a central repository, improving the customer experience and targeted efficiency of AusNet's internal actions, to service customer needs.</p> <p>Key initiatives include:</p> <ul style="list-style-type: none"> • Implementation of a CIS, outage communications, and standing data management for core customer information management functionality and outage notifications. • Consolidation of all customers related information into a consolidated system • Automation of business processes to simplify work for contact centre agents (e.g. processing of a connection request service order) Replacement of the market interface with a contemporary product that has vendor support, to simplify our architecture and simplify the approach to accommodate market schema changes
Option 3	Enterprise-wide CIM

Program Brief

	<p>Adopt an enterprise-wide approach for customer management capabilities, with customer reference and transactional data stored in a central system.</p> <p>Key initiatives include:</p> <ul style="list-style-type: none"> • CIS system enablement for CIM capabilities such as contact management, product management, account management • CIM integration with the IVR system • Implementation of a CIS, outage communications, and standing data management • Implementing workflow management and B2B automation in Hansen • Integration, remediation and consolidation of the market gateway (from NSI to CIS system).
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4.2 Option #1 BAU

This option involves continued use of AusNet's current tactical solutions for managing customer data and supporting customer interactions. It includes:

- Retailer interface changes for Customer Details Notification/Life Support Notification to allow AusNet to receive all necessary information from retailers about life support customers according to the updated obligations
- Integration of OMS with CIS platform, for Customer Details Notification/Life Support Notification functions.
- Lifecycle refresh of mail house to ensure that written correspondence can continue to be issued to customers in an automated way
- Implementation of CIS system and outage communication system integration.

This option allows AusNet to make specific changes to existing CIS systems to accommodate any changes in regulatory requirements (e.g. life support notification). It also allows AusNet to make improvements to individual functions of its customer information systems where there is a clear customer requirement and benefit.

This option does not involve significant improvements to AusNet's customer data management, in terms of the diversity and quantity of data collected, or the integration of various customer data to provide a comprehensive view of the customer through a single system. Specifically, it does not support objectives related to:

- Centralise customer data to remove manual data handling across disparate systems, improve customer data quality, and enable efficient customer interactions and responses to customer queries.
- Know the customer by offering digital communication channels, such as SMS, websites, interactive messaging, and recording and storing their communications preferences.
- Cost effectively accommodates regulatory rule changes, which require may increasingly sophisticated customer data management. Examples of upcoming rule changes include communication requirements for vulnerable and life support customers regarding accurate registering and deregistering of life support premises.

Program Brief

This option is not recommended due to the limitations described above. This option sustains an ineffective, and costly systems' architecture and provides very limited customer benefits. Implementation of future rule changes and regulatory requirements will be complicated and relatively expensive. This option does not allow AusNet to more easily consolidate and analyse customer data, therefore limiting the ability to make informed decisions about how to better service customers and enhance outcomes. Customers cannot be segmented, and services cannot be tailored for particular customer segments as a result. Furthermore, this option does not allow AusNet to understand the communication preferences of its customers or support the provision of greater digital channels in the future. It therefore has minimal impact on enhancing customer outcomes.

From the perspective of contact centre staff, this option doesn't provide any workflow support or scripting to agents, which will result in ongoing reliance of manual processes and slow, less informed customer service. The absence of a centralised customer management system also makes it difficult to integrate relevant customer data with asset, network operations, and geospatial systems therefore preventing asset and network staff from easily identifying specific customer implications of decision making related to asset and works planning, and pipeline management.

4.2.1 Alignment to objectives

We do not consider that this option achieves all of the intended objectives of this program of work, as shown in the table below.

Table 4-1 Objectives analysis of option 1

Comments	
Centralise customer data to remove manual data handling across disparate systems, improve customer data quality, and enable efficient customer interactions and responses to customer queries.	As AusNet is continuing to adapt to regulatory requirements and make tactical improvements to both internal processes as well as customer related interactions. This may be more costly and / or result in a more complicated systems environment due to the nature of the current systems. AusNet will be able to improve its interactions with customers, albeit in a minor way.
Know the customer by offering digital communication channels and tracking their communications preferences.	No implementation of improved digital communications or record of customer communication preferences.
To visualise customers' consumption profile to improve demand management	Without a central repository of customer data or a single customer information management system, it will be difficult for AusNet to integrate information about different customer segments together, to gain a view of different customer segments. This limits the ability of AusNet's demand management, and ability to understand which areas of the network may need additional support.
Meet increasingly sophisticated regulatory rule changes around the collection and distribution of customer information	Without a central repository of customer data or a single customer information management system, it will be difficult for AusNet to meet regulatory rule changes which require more sophisticated collection or distribution of customer information, as this may require transformation of multiple existing systems (or implementation of a new system, which is not part of this option).

Program Brief

Make it easy for customers to make inbound service requests, such as for new connections or network disconnections.	No implementation of inbound customer communications or self-service portal.
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4.2.2 Costs

The cost of option 1 is \$7.88m. The distribution of these costs over five years, including capex and opex is provided below.

Table 4-2 Costs of option 1

(\$m)	FY24	FY25	FY26	FY27	FY28	Total
Capex	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$2.43
Opex	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$5.45
Gas distribution cost	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$7.88
Total program cost	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$14.25

We expect there to be an associated ongoing average opex step change of \$1.69m per annum. This investment will cover a broad spectrum of initiatives in the implementation of the Gas CRM solution along with B2B (retailer interface) exception handling by the Contact Centre team and facilitate the SMS communications to our customer.

4.2.3 Benefits

The tactical improvement in customer data management and existing customer systems provides limited improvements to AusNet's customer interactions, both in terms of employee productivity and customer outcomes. The benefits are limited due to a number of constraints, such as:

- There is no integration or centralisation of existing or new data. As a result, it will continue to be difficult for AusNet to gain a complete understanding of our interactions with customers, and even more difficult for AusNet to target and visualise different types of customer segments and their consumption profiles.
- AusNet will retain a reactive approach to customer information management preventing us from being proactive in adapting to any rule changes or government policy decisions around information collection or data access.

4.2.4 Mitigation of key risk drivers

This option will partially mitigate some risk drivers, however, as its scope is limited compared to other options, not all risks will be mitigated. Where we consider that a risk driver is not directly affected by the option or irrelevant, 'N/A' is applied.

Table 4-3 Risks of option 1

#	Risk Driver		Mitigation	Consequence	Likelihood	Risk Rating
D1	Meet Demand	✘	N/A	N/A	N/A	B

Program Brief

D2	Regulatory Compliance	✓	This option will maintain the current compliance obligations through although it may be more costly and could result in a more complicated technology environment.	Major	Unlikely	C
D3	Maintain Current Performance	✓	This option includes some lifecycle refreshes to reduce risk of system failure allowing AusNet to maintain current performance.	Moderate	Possible	C
D4	Maintain Reliability	✗	N/A	N/A	N/A	D
D5	Maintain Price	✗	N/A	N/A	N/A	B
D6	Maintain Safety	✗	N/A	N/A	N/A	B
D7	Knowledge Loss	✗	As there is no central repository of customer data and limited customer data collected, there is risk of knowledge loss.	Moderate	Possible	B
D8	Aging Platforms	✗	This option sustains some older, in-house solutions e.g. NSI which doesn't represent good practice from an architectural or operational support perspective.	Moderate	Likely	B
D9	Cyber Security	✗	Maintaining some older, in-house solutions rather than investing in more contemporary solutions may increase the risk of cyber threats.	Catastrophic	Unlikely	B
D10	Legacy Processes	✗	Legacy and manual processes are not addressed through this option.	Major	Almost Certain	A

4.2.5 Risks

There are a number of risks associated with delivery of this option, as highlighted in the table below. Based on the consequence and likelihood of each risk, we have rated each of the individual risks blue, green, yellow, orange or red (order of severity). See Attachment 1 – Risk level matrix for additional information on this rating system.

Table 4-2 Delivery risks of option 1

Ref.	Risks	Consequence	Likelihood	Risk rating
R1.1	AusNet is unable to holistically map customer journeys and understand their interactions with the network.	Level 3. Continued customer dissatisfaction.	Almost certain	B
R1.2	AusNet is unable to meet future, unknown, higher complexity, regulatory requirements in relation to data aggregation or access, as its current data management is not sophisticated and meets current basic requirements.	Level 4. Unable to meet regulatory requirements.	Possible	B
R1.3	Higher cost of implementation in response to any future regulatory changes.	Level 4. Unable to meet regulatory requirements.	Possible	B

Program Brief

Overall, we consider the risk of this option to be high.

4.2.6 Customer related drivers of expenditure

As discussed in Section 3.5, key customer outcomes have been identified through discussions with customers. The table below highlights how this option will achieve these outcomes. Where we consider that a customer outcome is not directly achievable by the option or irrelevant, 'N/A' is applied.

Table 4-3 Customer drivers of option 1

Customer outcome	How this option achieves this
Deliver on the basics	This option delivers on the basics by ensuring that AusNet can meet upcoming regulatory rule changes around customer information management for vulnerable and life support customers.
Keep me posted	N/A
Affordable for me	N/A
Adapt to the future	This option adapts to the future with respect to allowing for future market schema changes only.
Always safe	N/A

4.2.7 Business related drivers of expenditure

As discussed in Section 3.6, there are business drivers that AusNet has identified, and is focusing on over the next regulatory period. The table below highlights how this option will support the drivers where relevant. Where we consider that a business driver is not directly relevant to the option, 'N/A' is applied.

Table 4-4 Business drivers of option 1

Business drivers	How this option achieves this
Maintain current service performance	This option maintains current service performance as AusNet will identify and implement tactical improvements to some customer information management processes, including those that are required by regulatory change or sees immediate demonstrable improvement.
Lead energy transformation, embracing change	N/A
Drive effectiveness throughout the portfolio	N/A
Generate trust and respect with customers and partners	N/A

Program Brief

4.3 Option #2 Integrated CIS (RECOMMENDED)

This option involves implementing a consolidated CIS solution as the central repository for Gas customer data, integrating key customer information, and supporting functionality such as service management (e.g. safety or outage notifications), outage communications, and standing data management. This central repository of information and associated functionality will provide a consolidated view of the customer and improve customer interactions. It is a necessary foundation to improve customer outcomes and enhance customer service, and will enable the following:

- Provide contact centre agents, and other end users in AusNet, with a readily accessible single view of the customer through the provision of a trusted, single source of customer information.
 - This will support agents in providing context-specific services and communications to customers at the time of interaction, rather than engaging with customers with only partial data at hand.
 - It also minimises the subsequent follow up an agent may need to do to resolve a customer's query therefore increasing the effectiveness of agents and improving customer satisfaction.
- Inform AusNet's decisions related to customer management strategies, as well as help to assess the customer impacts of asset management and network management decisions.
 - The integration of customer data with asset management, GIS and outage management systems allows non-customer facing staff to identify the implications of decisions related to network augmentation, works planning, and the management of incidents.
- Support digital methods of communication that customers expect, providing a consistent view of a customer's account, preferences and interaction history regardless of which communication method is used. Digital communication methods will also enable compliance with EIC obligations through methods other than traditional mail. These capabilities cannot be achieved in the absence of a central repository for customer data.
- Ability to respond more easily to data access requirements such as the Consumer Data Right.

The option involves:

- Retire NSI (integration & orchestration) – this removes the in-house built system that is currently used to communicate with retailers and the market, and support the integration of various systems where customer data resides today
- Agent and customer workflow automation – this reduces the need for manual steps in business processes such as connection and disconnection requests, improving compliance outcomes
- Implementation of the CIS solution, retailer (B2B) / market (B2M) interface, standing data management, , and outage communications modules to provide consolidated customer management functionality and customer data
- Migration of customer data from existing systems into the new CIS solution.
- Organisational change management to support staff with changes to their tasks and business processes.

Program Brief

4.3.1 Alignment to objectives

The table below shows how this option supports the program of work objectives.

Table 4-5 Objectives analysis of option 2

Comments	
To improve the interactions between AusNet and their customers	As AusNet is centralising its customer information management and integrating its customer data specific for Gas as part of this option, this will assist AusNet in improving its interactions with customers based on a better understanding of their needs and requirements.
To visualise customers' consumption profile to improve demand management	As this option consolidates customer data in a single solution, this option provides the ability to visualise customers' consumption profiles. It is not anticipated that this would be standard functionality in this option, but future reporting / IM tools could help to visualise the data.
To meet increasingly sophisticated regulatory rule changes around the collection and distribution of customer information	As AusNet is implementing a subscription-based solution that is tailored for the Australian utilities market as part of this option, it will be able to adapt more easily to meet any future regulatory rule changes should this be necessary.

4.3.2 Costs

The cost of option 2 is \$10.27m and includes implementing:

- Implementation of a CIS, outage communications, and standing data management platform
- Consolidation of all customer related information into a single platform
- Implementing workflow management and B2B automation
- Integration, remediation and consolidation of the market gateway

Table 4-6 provides a breakdown of the expected costs of option 2.

Table 4-6 Costs of option 2

(\$m)	FY24	FY25	FY26	FY27	FY28	Total
Capex	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$2.90
Opex	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$7.37
Gas distribution cost	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$10.27
Total program cost	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$19.05

We expect there to be an associated average ongoing opex step change for the subscription-based CIS of approximately \$225k per annum and cost of digital communications (e.g. SMS), at \$90k per annum. Additionally, as a result of the accounting standards reclassification of certain costs related to

Program Brief

SaaS, what would previously have been considered capex is now classified as opex. These relate to initiatives that have integration and aspects of system customisation.

4.3.3 Benefits

The key benefits of this option are:

- It leverages the existing investment that the Gas business has made in to uplift meter data management (MDM) and outage communications (for vulnerable / life support customers) capabilities. While only the MDM and outage communications capabilities exist today, these can be augmented with standing data management, customer information management, and other functionality described in this option. The market interface functionality is also tailored for the local market, which minimises the work AusNet is required to do to accommodate rule changes.
- It results in all customer and customer related data residing within a single platform, forgoing the need for investment in systems or data integration to obtain a complete view of the customer, and maximising ease of use for end users.
- It is independent of any programs of work being undertaken in the Electricity distribution business, therefore the implementation of this option is expected to be less complex than a program that has dependencies with Electricity.

Other benefits of this option primarily result from the centralisation of customer data, increased agent effectiveness, and improved customer satisfaction, and include:

- Reduction in non-value add activities such as manual data consolidation and reconciliation from centralising customer and other relevant data into a single CIS solution, will result in increased time spent on customer focused initiatives
- Increased customer satisfaction since having a single CIS solution improves the efficiency of customer interactions with AusNet
- Automation and workflow management in a fit-for-purpose, Gas-specific consolidated customer information system which reduces the time required for manual tasks.

4.3.4 Risks

This option will mitigate a number of risk drivers as described in the table below. Where we consider that a risk driver is not directly affected by the option or irrelevant, 'N/A' is applied.

Table 4-7 Risks of option 2

#	Risk Driver		Mitigation	Consequence	Likelihood	Risk Rating
D1	Meet Demand	N/A	N/A	N/A	N/A	B
D2	Regulatory Compliance	✓	This option will maintain the current compliance obligations and make it easier and less costly to accommodate regulatory requirements in the future.	Major	Unlikely	C
D3	Maintain Current Performance	✓	This option enhances current performance due to the implementation of contemporary and integrated CIS functionality.	Moderate	Unlikely	C
D4	Maintain Reliability	✓	N/A	N/A	N/A	D
D5	Maintain Price	✓	This option supports current prices being maintained due to the	Moderate	Unlikely	B

Program Brief

#	Risk Driver		Mitigation	Consequence	Likelihood	Risk Rating
			increases in agent effectiveness that it enables.			
D6	Maintain Safety	✓	Through integration with Network Operations and Asset Management systems, this option has the potential to maintain safety by automating safety messages for customers and ensuring they are well informed of incidents and (planned) outages.	Moderate	Unlikely	B
D7	Knowledge Loss	✓	This option mitigates the risk of knowledge loss as it provides a central system to capture and manage a broad set of customer and related data.	Moderate	Unlikely	B
D8	Aging Platforms	✓	This option replaces many aging platforms and mitigates the risk of operating aging platforms in the future.	Moderate	Unlikely	B
D9	Cyber Security	✓	This option improves the ability to maintain high levels of cyber security.	Catastrophic	Unlikely	B
D10	Legacy Processes	✓	This option provides the opportunity to remove legacy and manual processes.	Major	Unlikely	A

There are also a number of risks associated with delivering this particular option, as highlighted in the table below. Based on the consequence and likelihood of each risk, we have rated each of the individual risks blue, green, yellow, orange or red (order of severity). See Attachment 1 – Risk level matrix for additional information on this rating system.

Table 4-15 Delivery risks of option 3

	Risks	Consequence	Likelihood	Risk rating
R2.1	AusNet is unable to holistically map customer journeys and understand their interactions with the network.	Level 3. Continued customer dissatisfaction.	Unlikely	D
R2.2	AusNet is unable to meet future, unknown, higher complexity, regulatory requirements in relation to data aggregation or access, as its current data management is not sophisticated and meets current basic requirements.	Level 4. Unable to meet regulatory requirements.	Possible	B
R2.3	There is a dependency on Electricity programs of work involving the shared platforms which may delay the implementation of Gas specific requirements.	Level 4. Unable to deliver enhanced customer outcomes in desired timeframe.	Likely	C

Program Brief

We consider that overall this option is rated medium risk.

4.3.5 Alignment to customer related drivers of expenditure

As discussed in Section 3.5, five key customer outcomes have been identified through discussions with customers. The table below highlights how this option will achieve these outcomes. Where we consider that a customer outcome is not directly achievable by the option or irrelevant, 'N/A' is applied.

Table 4-8 Customer drivers of option 2

Customer outcome	How this option achieves this
Deliver on the basics	This option delivers on the basics by ensuring that AusNet meets all known upcoming regulatory rule changes around customer information management for vulnerable and life support customers.
Keep me posted	This option enhances AusNet's ability to share information with customers, including outage information as well as provide a centralised system for ease of access to customer data for use in external interactions with customers.
Affordable for me	N/A
Adapt to the future	This option improves adaptability for the future through digitisation of previously paper-based communication methods.
Always safe	This option supports improved safety by enabling more targeted communications with customers regarding incidents and outages.

4.3.6 Alignment to business related drivers of expenditure

As discussed in Section 3.6, there are four business drivers that AusNet has identified and is focussing on over the next regulatory period. The table below highlights how this option will support the business drivers where relevant. Where we consider that a business driver is not directly relevant to the option, 'N/A' is applied.

Table 4-9 Business drivers of option 2

Business drivers	How this option achieves this
Maintain current service performance	This option involves a centralised customer information system which enables better communication to customers regarding outages. Centralised information can also relate asset data to customers to help understand the customer impacts of planned and unplanned outages, and asset-related issues.
Lead energy transformation, embracing change	N/A
Drive effectiveness throughout the portfolio	This option drives effectiveness throughout the portfolio as AusNet will be able to store its customer information and

Program Brief

	transaction data centrally for gas thus removing slow manual processes.
Generate trust and respect with customers and partners	Better management of our customer information will help us to generate trust and respect with our customers, through better communication and efficient customer query and complaint resolution.

4.4 Option #3 Enterprise-wide CIS

This option involves transitioning to a dedicated enterprise-wide CRM by leveraging the existing [C-I-C] platform that is currently used by the Electricity distribution business for customer management. This platform requires Gas-specific configuration to accommodate Gas requirements however it is anticipated that some existing, core functionality can be leveraged. This option also involves ongoing use of the existing solution for core CIS capabilities.

Similar to option 2, this option provides customer information management, standing data management, outage communications, and B2B / B2M interfaces.

This option involves:

[C-I-C] enablement for CRM capabilities such as contact management, product management, account management

CRM integration with the IVR system

- Implementation of CIS system, outage communications, and standing data management
- Implementing workflow management and B2B automation in CIS system.
- Integration, remediation and consolidation of the market gateway (from NSI to CIS system).

This option provides a key benefit of having a single CRM system for contact centre staff, and other staff, to service both electricity and gas customers, and is aligned with the revised operating model for Gas which came into effect in September 2020.

The key disadvantage of this option is the relatively higher cost of [C-I-C] that is being implemented for Electricity Distribution. Given that the Gas business is less complex than Electricity, higher implementation and operating costs may not be justifiable particularly when compared with option 2. The other key disadvantage of this option is the integration of customer data between the gas CIS and [C-I-C] platforms, adding complexity to the overall customer solution for Gas. Given these disadvantages, this option is not recommended.

4.4.1 Alignment to objectives

We consider that this option achieves all of the intended objectives of this program of work, as shown in the table below.

Table 4-10 Objectives analysis of option 3

Comments	
To improve the interactions between AusNet and their customers	As AusNet is centralising its customer information management and fully integrating its customer data as part of this option, this will assist AusNet in improving its interactions with customers based on understanding their needs and requirements. For example, AusNet may be able to identify its customers that are schools, and appropriately schedule outages to occur outside of school

Program Brief

	hours. Alternatively, AusNet may be able to identify customers with a dog on the premise, ensuring that field employees can take appropriate precautions during visits.
To visualise customers' consumption profile to improve demand management	As AusNet is implementing a full CRM system as part of this option, AusNet will be able to gain an integrated view of different customer segments and utilise this information to visualise customers' consumption profile, improving demand management.
To meet increasingly sophisticated regulatory rule changes around the collection and distribution of customer information	As AusNet is implementing a fully integrated CRM system as part of this option, it will be able to incorporate any customer information requirements as required by regulatory rule changes should this be necessary.

4.4.2 Costs

The cost of option 3 is \$13.85m. The distribution of these costs over five years, including capex and opex is provided below.

Table 4-11 Costs of option 3

(\$m)	FY24	FY25	FY26	FY27	FY28	Total
Capex	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$7.50
Opex	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$6.35
Gas distribution cost	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$13.85
Total program cost	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	[C-I-C]	\$45.85

We expect there to be an associated ongoing opex step change for the subscription-based CIS of approximately \$225k per annum, and digital communications of \$90k per annum. Additionally, as a result of the accounting standards reclassification of certain costs related to SaaS, what would previously have been considered capex is now classified as opex. These relate to initiatives that have integration and aspects of system customisation.

4.4.3 Benefits

Adopting an enterprise-wide CRM approach allows AusNet to simplify its approach to engaging with both its Gas and Electricity customers. This can benefit workforce planning and workforce effectiveness by having a single team that can service customers on both networks. It can also reduce training costs.

The integrated customer information provided by this option can be used to improve interactions with customers and other services managed by AusNet, such as outage management and asset management. Other benefits of this option include:

- Increased productivity due to reduced time spent on manual processes and / or existing separate information management systems

Program Brief

- Provision of an integrated view of customers and visibility of key customer information, which can assist in reducing the number of safety incidents e.g., around violent customers or dogs on premises.
- Increased customer satisfaction due to the reduction in time required to address customer enquiries
- Increased ability to meet increasingly sophisticated, regulatory driven data requirements.
- Greater choice of communication channels, including digital channels, to accommodate customer preferences
- Leverage the existing investment in the Electricity distribution business CRM platform
- Rationalise processes across Gas and Electricity customer management.

4.4.4 Risks

This option will mitigate a number of risk drivers as noted below. Where we consider that a risk driver is not directly affected by the option or irrelevant, 'N/A' is applied.

Table 4-14 Risks of option 2

#	Risk Driver		Mitigation	Consequence	Likelihood	Risk Rating
D1	Meet Demand	N/A	N/A	N/A	N/A	B
D2	Regulatory Compliance	✓	This option will maintain the current compliance obligations and make it easier and less costly to accommodate regulatory requirements in the future.	Major	Unlikely	C
D3	Maintain Current Performance	✓	This option enhances current performance due to the implementation of contemporary and integrated CIS & CRM functionality.	Moderate	Unlikely	C
D4	Maintain Reliability	✓	N/A	N/A	N/A	D
D5	Maintain Price	✓	This option supports current prices being maintained due to the increases in agent effectiveness that it enables.	Moderate	Unlikely	B
D6	Maintain Safety	✓	Through integration with Network Operations and Asset Management systems, this option has the potential to maintain safety by automating safety messages for customers and ensuring they are well informed of incidents and (planned) outages.	Moderate	Unlikely	B
D7	Knowledge Loss	✓	This option mitigates the risk of knowledge loss as it provides a central system to capture and manage a broad set of customer and related data.	Moderate	Unlikely	B
D8	Aging Platforms	✓	This option replaces many aging platforms and mitigates the risk of operating aging platforms in the future.	Moderate	Unlikely	B

Program Brief

#	Risk Driver		Mitigation	Consequence	Likelihood	Risk Rating
D9	Cyber Security	✓	This option improves the ability to maintain high levels of cyber security.	Catastrophic	Unlikely	B
D10	Legacy Processes	✓	This option provides the opportunity to remove legacy and manual processes.	Major	Unlikely	A

There are also a number of risks associated with delivering this particular option, as highlighted in the table below. Based on the consequence and likelihood of each risk, we have rated each of the individual risks blue, green, yellow, orange or red (order of severity). See Attachment 1 – Risk level matrix for additional information on this rating system.

Table 4-15 Delivery risks of option 3

	Risks	Consequence	Likelihood	Risk rating
R3.1	AusNet is unable to holistically map customer journeys and understand their interactions with the network.	Level 3. Continued customer dissatisfaction.	Unlikely	D
R3.2	AusNet is unable to meet future, unknown, higher complexity, regulatory requirements in relation to data aggregation or access, as its current data management is not sophisticated and meets current basic requirements.	Level 4. Unable to meet regulatory requirements.	Unlikely	D
R3.3	There is a dependency on Electricity programs of work involving the shared platforms which may delay the implementation of Gas specific requirements.	Level 4. Unable to deliver enhanced customer outcomes in desired timeframe.	Likely	C

Overall we consider that overall this option is rated low risk.

4.4.5 Customer related drivers of expenditure

As discussed in Section 3.5, five key customer outcomes have been identified through discussions with customers. The table below highlights how this option will achieve these outcomes. Where we consider that a customer outcome is not directly achievable by the option or irrelevant, 'N/A' is applied.

Table 4-12 Customer drivers of option 3

Customer outcome	How this option achieves this
Deliver on the basics	This option delivers on the basics by ensuring that AusNet can meet upcoming regulatory rule changes around customer information management for vulnerable and life support customers.

Program Brief

Keep me posted	This option enhances AusNet's ability to share information with customers, including outage information as well as provide a centralised system for ease of access to customer data for use in external interactions with customers. The centralised platform also supports self-service capabilities that includes customisable push notifications.
Affordable for me	N/A
Adapt to the future	This option allows AusNet's to be ready for future regulatory or customer requirements relating to data management and meet growing customer expectations for a digital experience.
Always safe	This option can help to mitigate outage risks or other asset management risks through the visualisation of customer consumption.

4.4.6 Business related drivers of expenditure

As discussed in Section 3.6, there are four business drivers that AusNet has identified and is focussing on over the next regulatory period. The table below highlights how this option will input into the initiatives where relevant. Where we consider that a business driver is not directly relevant to the option, 'N/A' is applied.

Table 4-13 Business drivers of option 3

Business drivers	How this program achieves this
Maintain current service performance	This option will drive improved levels of service delivery through the ability to visualise customer consumption.
Lead energy transformation, embracing change	The investments described in this option will enable AusNet to participate in the ongoing energy transformation, as many new products and services require direct customer communication.
Drive effectiveness throughout the portfolio	This program drives effectiveness throughout the portfolio as AusNet will be able to store its customer information and transaction data centrally.
Generate trust and respect with customers and partners	Better management of our customer information will help us to generate trust and respect with our customers, through better communication and increased transparency for their service.

Program Brief

5 Assessment and recommended option

5.1 Assessment of the options

To identify a recommended option for this program of work, we have selected a number of criteria to assess each of the options. We consider that these criteria represent a comprehensive view of each option, in achieving AusNet's business and customer objectives as well as requirements of the AER in ensuring that any expenditure is both prudent and efficient.

The table below summarises our assessment of each of the options against the criteria.

Table 5-1 Assessment of the options

	Option 1	Option 2	Option 3
Alignment to objective	Aligned to one program objective	Aligned to most program objectives	Aligned to all program objectives
Costs	\$7.88m	\$10.27M	\$13.85M
Overall risk rating	High	Medium	Low
Alignment to customer related drivers of expenditure	Low alignment	Medium alignment	High alignment
Alignment to business related drivers of expenditure	Low alignment	High alignment	High alignment

Based on this assessment and the points below, Option 2 is the recommended option.

- Option 1 only meets one objective of this program of work. It is not aligned with AusNet's architectural principles to simplify and modernise the technology environment. Despite its relatively low cost, it also has relatively few benefits.
- Option 3 requires significant investment. Given that the provision of Gas services is less complex than Electricity services the increased investment to leverage an enterprise-wide CRM platform is not justified.
- Option 2 provides a fit-for-purpose, Gas-specific solution for AusNet and leverages investment in an existing platform. It consolidates all customer and customer-related data into a single platform improving compliance outcomes and making it easier for this data to be accessed directly by contact centre staff, as well as integrated with other systems that can be enriched with customer data to enhance customer outcomes (e.g., asset management, network operations systems).

5.1.1 NPV analysis

As defined in the AER Consultation Paper – ICT Assessment Approach, the AER is refining its approach to ICT assessment, requiring a disaggregation of ICT expenditure into recurrent and non-recurrent ICT expenditure.

As this program includes 80% non-recurrent expenditure, **Table 5-2 NPV analysis (\$FY21m)**

	Costs (NPV)	Benefit (NPV)	Net benefit (NPV)

Program Brief

Option 1	\$5.74	\$0.55	-\$5.20
Option 2	\$7.41	\$8.37	\$0.96
Option 3	\$11.99	\$8.85	-\$3.13

below shows the NPV analysis for this program, further demonstrating the cost effectiveness of Option 2, the recommended option.

Table 5-2 NPV analysis (\$FY21m)

	Costs (NPV)	Benefit (NPV)	Net benefit (NPV)
Option 1	\$5.74	\$0.55	-\$5.20
Option 2	\$7.41	\$8.37	\$0.96
Option 3	\$11.99	\$8.85	-\$3.13

We have identified benefits in three categories for this program:

- Compliance benefits from simplifying processes, better data quality, improved auditability of artifacts and documents required by regulatory obligations
- Operational benefits associated with increased effectiveness of customer service and contact centre operations
- Customer outcome benefits associated with the experience of customers and their satisfaction with Gas services
- Safety benefits associated with the ability to ensure customers are better informed regarding their gas service.

We consider that as Option 1 continues business-as-usual work, there should be no additional quantifiable benefits captured by our NPV model. We consider that Option 2 will result in total benefits of \$8.37 million and Option 3 will \$8.85 million across FY24-28.

Operational benefits are associated with the increased productivity of contact centre staff through greater automation of customer management processes, including the surfacing of specific information during customer interactions. It is also expected that context specific scripts and workflow management will also improve the effectiveness of agents. Furthermore, the provision of automated messages to customers (e.g., regarding planned outages) will reduce the number of inbound calls to the contact centre.

Customer outcome benefits are associated with improved CSAT by supporting more informative communications e.g., planned outage notifications, restoration notifications, self-service rectification of some faults, and greater auditability of customer interactions. Additionally, the investment in options 2 and 3 also support the future use of digital channels to accommodate customers' communication preferences.

Safety benefits are associated with the ability to provide automated safety warnings and messages for customers. Based on our NPV analysis, Option 2 is the only option with a positive NPV and therefore is our recommended option.

Program Brief

5.2 Recommended option

Based on our analysis, Option 2 is the recommended option for AusNet for the CIS program of work. This option provides a Gas-specific CIS, which ensures all customer data resides in a single platform and provides greater automation and data to enhance customer and compliance outcomes.

Program Brief

6 Attachment 1 – Risk level matrix

The figure below shows the risk level matrix to which we have assessed each of risks within the options. Risks of highest concern are rated red, whereas those of lowest concern are rated blue.

Figure 6-1

		Consequence				
		1	2	3	4	5
L i k e l i h o o d	Almost Certain	C	C	B	A	A
	Likely	D	C	B	B	A
	Possible	E	D	C	B	A
	Unlikely	E	D	D	C	B
	Rare	E	E	D	C	C

Consequence Rating	
5	Catastrophic
4	Major
3	Moderate
2	Minor
1	Insignificant

Overall Risk Rating	
A	Extreme
B	High
C	Medium
D	Low
E	Very Low