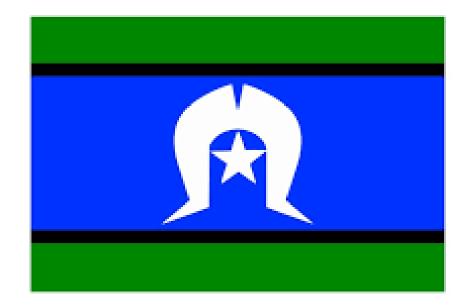
Consumer Challenge Panel

# NSW Regulatory Proposals 2019-24 CCP10 Initial response

In presentation order: Mark Henley, Eric Groom, Mike Swanston, Louise Benjamin Sydney 3<sup>rd</sup> July 2018

# We recognise the traditional owners of the land we meet on: The Gadigal people of the Eora Nation.





## Introducing the CCP

- Set up under the Better Regulation Reforms
- CCP10 is part of the 'second iteration' of the CCP for NSW / ACT
- We assist the AER to make better regulatory determinations by providing input on issues of importance to consumers

Represent a consumer 'real world' perspective – the 'person in the street'

real world perspective – the 'person in the street' Focus: consumer outcomes Price, performance, service, corporate responsibility

> service, corporate responsibility

Fair outcomes for all A well-performing utility is of best value to the community

community

of best value to the

Consume Challenge Panel

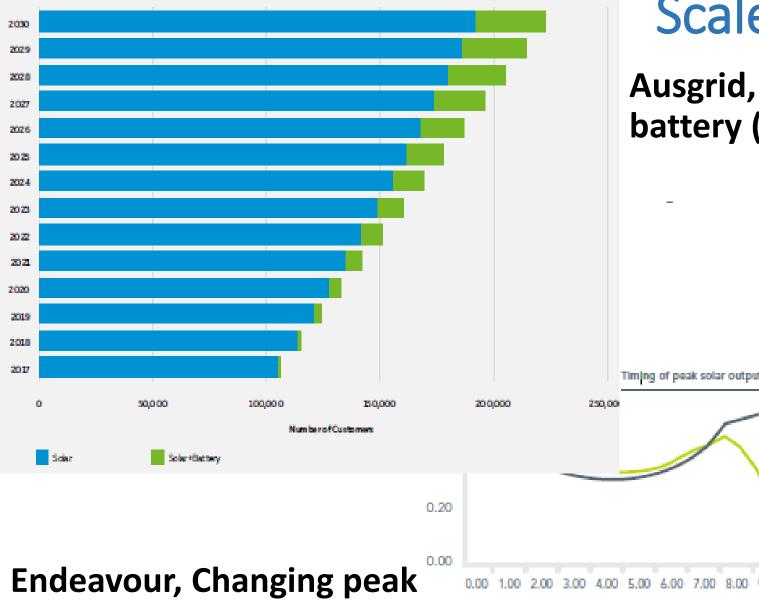
## This Presentation - approach

- Present laterally, (thematically)
- Raise issues of most interest /concern on businesses by business basis
- We've developed a "heatmap" to try and summarise, visually, the '000s of pages of submission
- Speaking order Mike, Eric, Louise

## Context of these proposals is significant

- 2014-19 determination not resolved before 2019-24 lodged
- Rapid changes: particularly in technology: for example solar, batteries, "Smart Network"
- 2012 rule changes and "Better Regulation" now embedded last time they were 'brand new'
- New ownership for Ausgrid and Endeavour
- NSW Businesses on transition from inefficient to efficient
- New binding Rate of Return guideline being developed by the AER
- Benchmarking now better established, compared to 2015
- Major developments in Consumer Engagement intent and approaches
- All 3 NSW DBs considered together, start with overview "Heatmap"

Number of customers with small-scale solar+battery systems (2016/17-2029/30)



## Change Example: Small Scale Solar and Battery

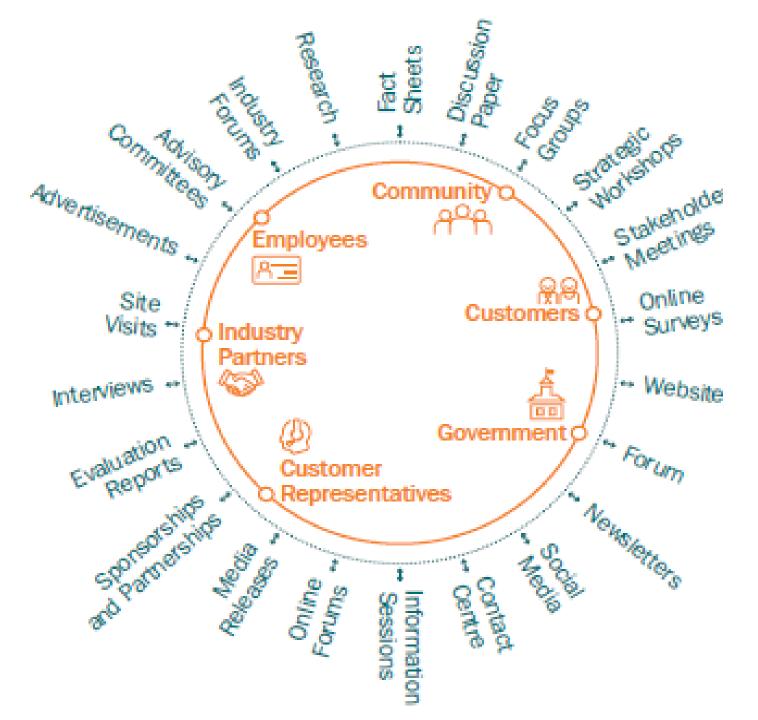
# Ausgrid, growing solar and battery (green) penetration

Residential Customer with Net PV

Residential Customer (kW)

Likely timing of network peak demand

- A significant change from last time has been improvements in Consumer Engagement by all 3 NSW DBs– well done.
- (but not "there" yet.)
- Example, from Essential.



## Proposal Summaries - some key numbers

19-24 Summary	Ausgrid	Endeavour	Essential
Total Bid (\$18/19m, unsmoothed)	7,971.9	4,335	5,137
Total Opex (\$m)	2,402	1,504	1,698
Total Capex (\$m)	3,083.7	2,165	2,100
IT Spend (\$m)	215	91.2	164
RAB June 19 (real \$m)	15,716	6,512	8215
RAB June 24 (real, \$m)	16,127	7,294	8,684
% change	+ 2.6%	+12.0%	+5.7%

### **Price Matters:** Changes in Real Average Distribution Charges – "X factors"

		2019-20	2020-21	2021-22	2022-23	2023-24
Ausgrid	Without Remittal	-5.7%	0	0	0	0
	With Remittal	N.A.	N.A.	N.A.	N.A.	N.A.
Endeavour*	Without Remittal	+0.8%	+0.8%	+0.8%	+0.8%	+0.8%
	With Remittal	-1.0%	-1.0%	-1.0%	-1.0%	-1.0%
Essential	Without Remittal	+1.59%	+1.59%	+1.59%	+1.59%	+1.59%
	With Remittal	+1.43%	+1.43%	+1.43%	+1.43%	+1.43%

\* Endeavour Energy has estimated that if both the effect of the remittal and the EBSS were removed the annual real change in prices would be -1.0%. CCP 10 considers that EBSS was an integral part of the 2014-19 determination, so the effect of the EBSS should not be removed in comparing the proposed price path with prices under the remitted 2014-19 decision.

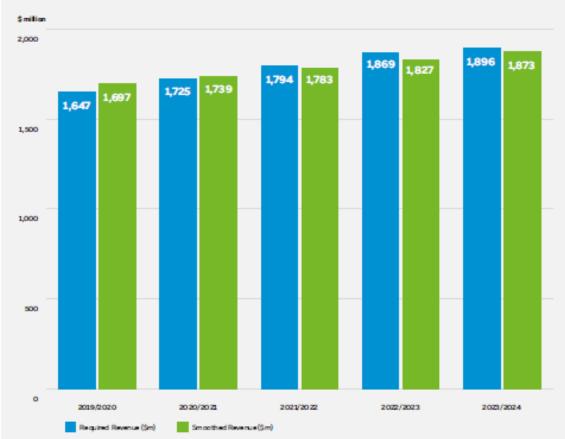
## **Price Paths - Examples**

#### **Essential Energy**



#### Ausgrid

#### Ausgrid's forecast required revenue versus smoothed revenue 2019/20–2023/24 (\$ million, nominal)



## Heatmap chart– Top Line Summary



Level 1 Heat Map				
Category	Ausgrid	Endeavour	Essential	
LITC 1 Responsiveness to Consumer Environment				
LTIC 2 Business Operations Efficiency				
LTIC 3 Efficient planning & Management of Assets				
LTIC 4 Effective use of information to Support Business Operation & Decision Making				
LTIC 5 Efficient approach to corporate commercial issues				
LTIC 6 Service Delivery - value for money				
LTIC 7 Network of the Future				

Level 1 Heat Map					
Category	Ausgri	d	Endeavour	Essential	
TSS Tariff Structure Statement					
Engagement 1 Quality (What was tried?)					
Engagement 2 Effectiveness (What was heard?)					
Engagement 3. Timeliness. (Including: was extension utilised effectively?					
Engagement 4. Impact 'What was applied?'					
Engagement 5. Delivery of the key objectives					

### Heatmap: Strategic Awareness of Consumer Focus

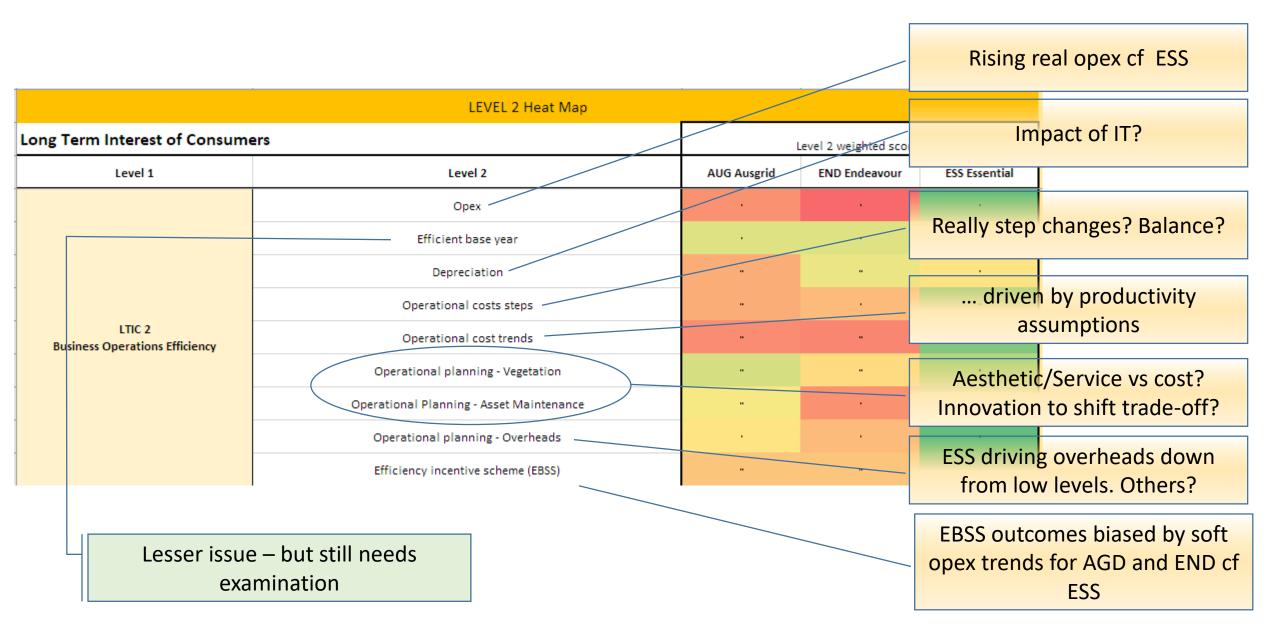
Performance Categories		Performance Attributes			
Level 1	Level 2		Attribute Weight		
		Plan achieves price reduction	3.0		
	Price path	Affordability is considered	2.0		
		Value for money underpins planning (would you do this with your money ?)	0 1.0		
		Is the RAB decreasing over the reset period ?	• 3.0		
	Regulatory Asset Base	Was the concern of RAB growth raised and discussed in the public forums and in plans ?	0 1.0		
	Regulatory Asset Dase	Is there a measured approach to delivering the plan ? (when ?)	0 1.0		
LITC 1 Responsiveness to Consumer		Minimise network investment through innovation and use of new technology (how)	2.0		
Environment	Market	Sensitive to the needs of the broader community of stakeholders	0 1.0		
		Application of 'causer pays' in planning and pricing	2.0		
		Sustainability is effectively integrated (environmental)	0 1.0		
		Business planning reflects consumer needs (customer focussed)	<b>)</b> 2.0		
	Business Strategy	Risk Management reflects changing consumer needs (adaptive)	2.0		
	E	Business approach with suppliers to draw out synergies by sharing cost & risk	0 1.0		
		Business Continuity Plans includes consumer needs (customer risks considered)	0 1.0		

## Opex; Level 1's from Heatmap:

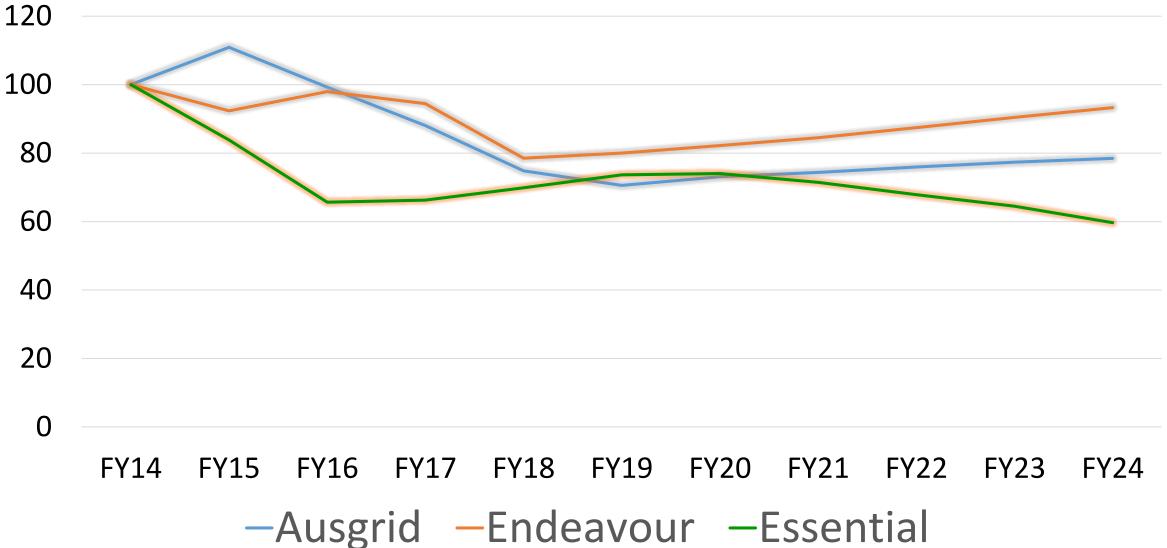
### Eric

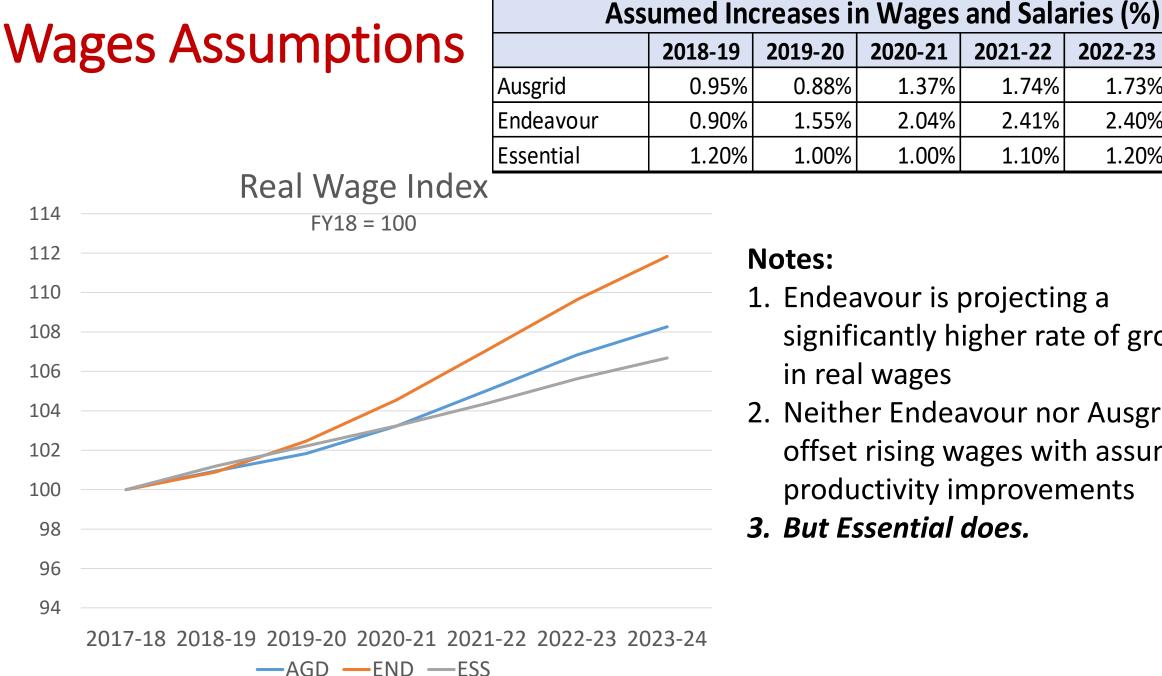
- Business Operations
- Efficiency
- Commercial Issues

### LTIC 2 - Business operations efficiency - Overview



## Real OPEX Index = 100 FY 2015





#### **Notes:**

0.88%

1.55%

1.00%

1. Endeavour is projecting a

2020-21

1.37%

2.04%

1.00%

significantly higher rate of growth in real wages

2021-22

1.74%

2.41%

1.10%

2022-23

1.73%

2.40%

1.20%

2023-24

1.33%

2.00%

1.00%

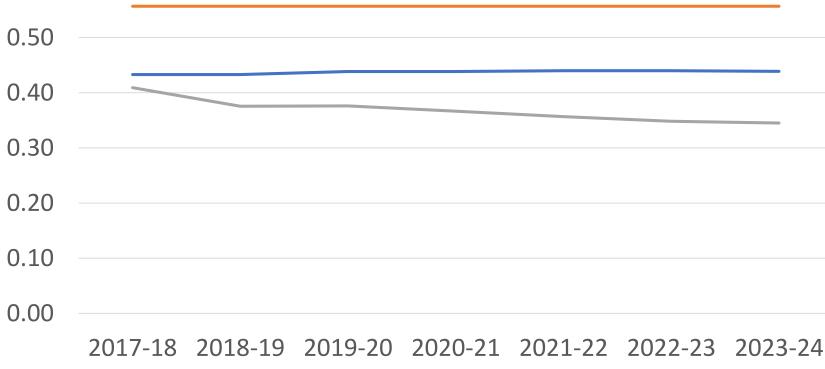
- 2. Neither Endeavour nor Ausgrid offset rising wages with assumed productivity improvements
- 3. But Essential does.

# Overheads

0.60

### **Opex Overhead Ratios**

	Overhead ratio									
	(proj	(proportion of Opex for Standard Control Services)								
	2017-	2018-	2019-	2020-	2021-	2022-	2023-			
	18	19	20	21	22	23	24			
Ausgrid	0.43	0.43	0.44	0.44	0.44	0.44	0.44			
Endeavour	0.56	0.56	0.56	0.56	0.56	0.56	0.56			
Essential	0.41	0.38	0.38	0.37	0.36	0.35	0.35			



#### Notes:

- Overheads are a very large proportion of Opex
- Is it reasonable to expect a reduction in overheads given:
  - Expectation of ongoing efficiency improvements
  - Objectives of improving affordability while maintain service standards

-Ausgrid -Endeavour -Essential

## EBSS

- Assessment of EBSS linked to assessment of proposed cost path
- Under incentive regulation
  - The regulator sets a 'tough but fair' price path
  - Utility has incentive to improve efficiency
  - Some do better, some worse than target
  - Expected value of EBSS should be zero
  - If not, positive expected value should be built into cash flows
- EBSS was intended to equalise incentives over time not create a bonus
- "Soft" assumptions on productivity mean that the expected value is positive and inconsistent with LTIC

## LTIC 5 - Commercial issues

#### Acceptance of 2013 approach and parameters? Acceptance of 2018 RORG?

		LEV	/EL 2 Heat Map			
ong Term Interest of Consume	ers				Level 2 weighted score	25
Level 1		Level 2	/	AUG Ausgrid	END Endeavour	ESS Essential
		Capitalisation of c	overheads	•		
LTIC 5		Weighted Average Cost of	f Capital (WACC)			
Efficient approach to corporate commercial issues	Value from previous investments					
	Capital Contributions policy					
Consistency with princ equity and efficiency pays)? Acceptance/su	(causer					Clear der enefits from Clearly refle

nstration of ast investment? d in projected ts?

# WACC

- ESS has clearly:
  - Used current approach and parameter values
  - Accepted application of 2018 guideline
- Endeavour has clearly:
  - Used current approach and parameter values
  - Argued against application of 2018 guideline
- Ausgrid's position is less clear
  - Used current approach and parameter values but reserve right to challenge
  - Unclear re 2018 guideline

# **Capital Contributions**

- Ausgrid and Essential are not proposing changes
  - Current policy broadly accepted
- Endeavour proposes change shifts costs from new customers to existing customers
  - Is it an improvement? Preliminary view: No.
  - Inconsistent with causer pays principle? We consider causer pays:
    - Is consistent with efficiency and efficient development
    - Is equitable and supported by community
      - Idea that new customers contribute according to costs caused seems well accepted
      - Highly uncertain who will benefit from change. Homebuyers? Developers? Sellers of undeveloped land?
  - Not clear change is accepted by broader customer base (not just developers)

## *Capex; Level 1's from Heatmap:* Mike

- LTIC 3 Efficient Planning and Management of Assets
- LTIC 4 Effective use of Information to support Business Planning
- LTIC 6 Service Delivery
- LTIC 7 Network of the Future

	LEVEL 2 Heat Map			
Long Term Interest of Consume	ers		Level 2 weighted score	s
Level 1	Level 2	AUG Ausgrid	END Endeavour	ESS Essential
-	Replacement capital			
	Augmentation Capital	п		
	Non-system capital ( other than ICT)			
LTIC 3	Capitalised Overheads			
Efficient planning & Management of Assets	Incentive scheme (CESS)			
	Contingent projects	•		
	Bushfire and environmental considerations			
	Asset Productivity & utilisation	•		

Contemporary risk management approach

Resource management (unit costs)

Planning & Strategy (programming and timing)

Operations management (efficient use of resources)

Non-network approach

Replacement Capital:

- Ausgrid: oil cables, very high project & unit costs
- Endeavour: Increased cost overall, transformers
- Endeavour: Underspent this period, more next
- Essential: Enhanced approach to risk, needs evidence

#### Overall:

- Still very high, almost unsustainable. Sensitivity N/A
- Operate to fail & Non-asset solutions rare
- Outage data and impact history is not detailed

	LEVEL 2 Heat Map			
ong Term Interest of Consume	ers		Level 2 weighted score	s
Level 1	Level 2	AUG Ausgrid	END Endeavour	ESS Essential
	Replacement capital			
	Augmentation Capital			
	Non-system capital ( other than ICT)			
LTIC 3	Capitalised Overheads		•	•
Efficient planning & Management of Assets	Incentive scheme (CESS)			
	Contingent projects	•		
	Bushfire and environmental considerations		•	•
	Asset Productivity & utilisation	•	•	•

Augmentation:

- Steady national trend down as the impact of relaxing network security standards take effect
- We recognise the impact of 'spot load growth' as the new primary driver of investment
- Expect strong tie-in with demand management.
- Impact of new tariffs is very 'soft'
- END does not show dividends from 2009 2014 investment

	LEVEL 2 Heat Map			
Long Term Interest of Consume	irs		Level 2 weighted score	S
Level 1	Level 2	AUG Ausgrid	END Endeavour	ESS Essential
	Replacement capital			
	Augmentation Capital			
	Non-system capital ( other than ICT)			
LTIC 3	Capitalised Overheads			
Efficient planning & Management of Assets	Incentive scheme (CESS)			
	Contingent projects	•		•
	Bushfire and environmental considerations		•	•
	Asset Productivity & utilisation	•	•	

Contemporary approach

Aggressive cost reduction strategies

Value from past investments

Non-system Capital :

Ausgrid: Fleet, property, plant all increasing (+ (90M) unit allocation data not evident

	LEVEL 2 Heat Map			
Long Term Interest of Consume	ers	I	Level 2 weighted score	S
Level 1	Level 2	AUG Ausgrid	END Endeavour	ESS Essential
	Replacement capital			
	Augmentation Capital			
	Non-system capital ( other than ICT)			
LTIC 3	Capitalised Overheads		•	
Efficient planning & Management of Assets	Incentive scheme (CESS)			
-	Contingent projects	•		
	Bushfire and environmental considerations		•	
	Asset Productivity & utilisation	•	•	

Other:

- CESS Essential has fewer projects that appear to be 'carried over'
- Contingent projects used by Endeavour
- More detail needs on fleet plans
- Bushfire important, but less profile in Ausgrid's proposal
- Asset utilisation mentioned by Endeavour as a goal
- Capitalised overheads appear higher than peers in AUG & ESS require further investigation

LEVEL 2 Heat Map						
Long Term Interest of Consumers			5			
Level 2	AUG Ausgrid END Endeavour ESS Essential					
Information Technology	•	•	•			
Cybersecurity						
Digital Transformation for efficiency		•	n			
s	Level 2 Information Technology Cybersecurity	Level 2 AUG Ausgrid Information Technology Cybersecurity	Level 2 weighted scores Level 2 weighted scores AUG Ausgrid END Endeavour Information Technology Cybersecurity			

Risk management for costs , delivery and outcomes (on time on budget)

Well articulated business plan with benefits arriving early and articulated

IT benefits evident in the various line items of the overall business plan (e.g. Opex)

Essential –

- strong linkage between IT spend, improved business performance and lower business costs
- Requires strong KPIs to avoid future costs or degraded performance

LEVEL 2 Heat Map					
Long Term Interest of Consumers		Level 2 weighted scores			
Level 1	Level 2	AUG Ausgrid END Endeavour ESS Essen		ESS Essential	
LTIC 6 Service Delivery - value for money	Better meeting consumer needs				
	Network Performance Planning				
	Performance Incentive scheme (STPIS)				

Business plans are linked to customer needs and validated preferences

Use of technology to provide better, more flexible service

Supporting and contributing to industry best practice (effective, efficient)

Changes are seen as value for money by customers (use statistics, feedback)

Better meeting consumer needs:

- Ausgrid: Network performance falling, not identified by customers as a major issue as yet
- Endeavour: Stable performance & risk, disregarding capital contribution approach
- Essential: Stable performance, need to watch the impact of changes to opex and vegetation

Long Term Interest of Consumers		Level 2 weighted scores			
Level 1	Level 2	AUG Ausgrid END Endeavour ESS Essentia			
	Network of the Future planning				
LTIC 7 Network of the Future	Narrative				
	Demand Management Incentive System				

DMIS principles embraced on business investments - inherent in asset planning

Effective long term non-network strategy

Non-network market entities effectively engaged

Proposal includes effective capex - opex trade-offs

Demand Management Incentive Schemes:

 Essential & Endeavour: some discussion about DM and innovation, not inherent in some planning documents

## TSS and Consumer Engagement; Level 1's from Heatmap: Louise

- TSS
- What was Tried?
- What was Heard?
- Timeliness value of extensions

## Tariff Structures Statement (TSS)

TARIFF STRUCTURE STATEMENT	Level 2		END	ESS
	Effective analysis of customer needs (planning)			
TSS	TSS proposal content (expressing)			
Tariff Structure Statement	Implementation (delivery)			
	Innovative and effective engagement (bringing customers along)			

## TSS – cost reflective tariffs are in the LTIC

- Each network has a unique problem to solve:
  - Critical peak problem: aim of cost reflective tariffs is to defer investment by incentivising consumers to lower their consumption at the network peak
  - Energy flow problem: aim is to incentivise customers to self consume or not export energy at time of excess energy reverse flow (DER)
- to date reform has been slow and fragmented
- no single consumer perspective
- *Pricing Directions* is to provide cohesive consumer perspective to assist networks, retailers and AER to accelerate reform
- We look forward to working with retailers on the design of network tariffs and passthrough prices to customers
- CCP advocates a faster transition to demand tariffs with a mid period review and greater integration with DM

## TSS – network proposals

- ESS has the slowest progress to cost reflective tariffs:
  - increased attractiveness of new demand charge with ToU but only for new customers
  - more fixed costs being recovered from existing flat tariffs
- End has responded the most to feedback:
  - introduction of demand charge based on average of 5 days default but optional
- Ausgrid indicated preference for energy tariffs and increased fixed charges:
  - placeholder in TSS for a demand tariff with no customers assigned to it
  - formation of Tariff Working group pending further research is a positive step

## Engagement 1 - 3

ENGAGEMENT	Level 2	AUG	END	ESS
Engagement 1	Discovery phase (Scoping)			
Quality	Methodology Effectiveness (information)			
(What was tried?)	Engagement activities (effectiveness)			
	All contentious issues identified (completeness)			
Engagement 2	Long term Strategy for engagement (embedding)			
Effectiveness (What was heard?)	Inclusiveness			
	Government & Legislation			
Engagement 3.	Prepare and set up early			
Timeliness. (Including: was extension utilised	Draft plan			
effectively?	Extension			
Engagement 4.	Engaging the wider business to issues			
Impact 'What was applied?'	Responsiveness to what was heard			
Engagement 5. Delivery of the key objectives	Best possible proposal, first time			

# What was tried?

- **ESS** benefited from starting early:
  - engagement embedded as part of business planning
  - tried a variety of methods
  - open to feedback and responsive
- End started from a position lacking credibility in the Discussion paper:
  - provided a lot of information but narrative lacking
  - not as open to change in the difficult conversations
- Ausgrid started behind from withdrawal of discussion paper and late and struggled to catch up:
  - consumers not given enough time to consider material
  - hard to have full deep dive program as engagement calendar already full

## What was heard?

- ESS heard from a broad range of consumers as part of its integrated engagement framework:
  - articulated trends and offered productivity dividends
  - demonstrated how affordability has informed its business KPIs
- End appeared to persuade more than listen:
  - narrative for increased spend not justified
  - influenced by developers and reliance on growth to justify increased spending not clear
  - plans for ongoing engagement unclear
- **Ausgrid** undid its good early engagement work by withdrawing the proposal and through staff turnover:
  - consumer engagement not integrated into business planning and not appearing to influence proposal
  - proposal consistent with historical trends but consumers seeking greater share of efficiencies

## Extensions: value for time?

- Extensions unique and will never happen again
- Huge investment for consumer advocates and AER staff
- Long term value will be effective pre lodgement engagement and triage approach
- Ess: remittal was very valuable
  - engagement on 19-24 was presentation rather than responding to feedback
  - main issue is RAB growth and sustainability of forecast expenditure
- End: heard issues but stopped responding and closed off difficult issues until post lodgement
  - consumers expecting proposal capable of acceptance but Endeavour expecting draft capable of acceptance – this was not the deal
  - remittal resolution positive
- Ausgrid: started so far behind and with all new staff that it was too hard to catch up
  - consumers still lack confidence in genuine commitment to the LTIC
  - lack of resolution of 14-19 disappointing

## Engagement 4 - What was Applied?

ENGAGEMENT	Level 2	AUG	END	ESS
Engagement 1	Discovery phase (Scoping)			
Quality	Methodology Effectiveness (information)			
(What was tried?)	Engagement activities (effectiveness)			
	All contentious issues identified (completeness)			
Engagement 2	Long term Strategy for engagement (embedding)			
Effectiveness (What was heard?)	Inclusiveness			
	Government & Legislation			
Engagement 3.	Prepare and set up early			
Timeliness. (Including: was extension utilised	Draft plan			
effectively?	Extension			
Engagement 4.	Engaging the wider business to issues			
Impact 'What was applied?'	Responsiveness to what was heard			
Engagement 5. Delivery of the key objectives	Best possible proposal, first time			

## **Consumer Engagement approaches**

#### **Endeavour Energy**

#### 5.3.3 What we heard from our customers and how we intend to respond

What customers and stakeholders said:	What we will do in response:
Affordability Affordability is the number one concern for many of our customers, but not at the sacrifice of safety or reliability. Electricity is valued because it provides security and lifestyle benefits to residential customers and communities, and because it connects new homes and underpins prosperous businesses and regions. There's a clear expectation that Endeavour Energy's plans should reflect measures to continue downward pressure on our part of electricity bills by containing capital investment, without compromising safety.	<ul> <li>Deliver a decrease in network charges of one percent each year, in today's dollars, for the period 2019-24. This figure includes our proposed remittal.</li> <li>Deliver these decreases while implementing pricing reforms that will provide increased opportunities for customers to control their bills.</li> <li>Lock in and maintain our real price decreases throughout the next regulatory period building on our demonstrated history of responding to incentive regulation.</li> <li>Return \$240m (FY19 dollars) to our customers through these reduced charges during the next regulatory period.</li> <li>Continue to reduce underlying costs which will continue to reduce prices for customers.</li> </ul>

#### we will do in response:

- liver a decrease in network charges of one percent each year, today's dollars, for the period 2019-24. This figure includes our posed remittal.
- liver these decreases while implementing pricing reforms that will ovide increased opportunities for customers to control their bills.
- ck in and maintain our real price decreases throughout the xt regulatory period building on our demonstrated history responding to incentive regulation.
- turn \$240m (FY19 dollars) to our customers through these duced charges during the next regulatory period.
- ntinue to reduce underlying costs which will continue to reduce ces for customers.
- Deliver real price decreases for our public lighting customers.
- Encourage greater efficiency in the way our network is used by Introducing an opt-out seasonal demand tariff for new customer connections.

#### Ausgrid

#### Customer and stakeholder and input into our Proposal

GROUP	CHANNEL	DESCRIPTION	INPUTINTO OUR PROPOSAL		
Reset Working Group	Workshops Individual meetings	Customer advocates Highly informed on regulatory and energy issues	Tested details of the Proposal, capital expenditure (capex) program, operating expenditure (opex) forecasts and Tariff Structure Statement		
Customer Consultative Committee	Workshops Individual meetings	Customer advocates Informed on energy policy and regulatory issues	Tested key components of the Proposal and Tariff Structure Statement at a high level		
Retail energy businesses	Workshops Individual meetings	Part of the energy ecosystem Highly informed on regulatory and energy issues	Discussed how we plan to structure our prices and how our Proposal might impact businesses and their customers		
Local council representatives	Workshops Individual meetings	Customers Informed on local regulations	Vegetation management, street lighting and planning		
Forums Equipp		General population Equipped with unique insights on customer	Explored customer expectations, long-term needs and attitudes to pricing and managing network peaks		
	Surveys	issues and preference	Explored customer expectations and preference		
	-		Tested key issues identified in qualitative researc		

## Key issues for immediate consideration

- Price paths: are they the best that consumers could expect?
- Productivity: Is zero productivity over 5 years acceptable?
- IT expenses are large, do they constitute good value for money for consumers?
- Capital Contributions
- Lack of DM and constant investment in capex for network solutions
- Capex, are some capex proposals larger than necessary?

### Where to now for engagement?

We'd expected Regulatory Proposals that could be accepted, not the case, though Essential closest. A fair bit of "engagement capital" has been cashed in, to what avail?

"Boards need to lead and engagement needs to go through the organisation – like a golden thread"

**Sharon D'Arcy**, CEO SustainAbility (UK) Speaking at Gill Owen Memorial Lecture, Melbourne – 7/2/18

## Heatmap chart– Summary

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