Consumer
Challenge
Panel

Submission to the Australian Energy Regulator

Preliminary framework and approach

Energex and Ergon Energy

Regulatory control period commencing 1 July 2020

Consumer Challenge Panel Sub-Panel 14

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1. Summary

This submission presents CCP 14's views on the matters raised in the AER's Preliminary Framework and Approach for Energex and Ergon Energy Networks (collectively referred to as EQ) for the regulatory period commencing 1 July 2020.

In general, CCP 14 is supportive of the proposals. We note minimal changes to classifications. Three key issues are highlighted for consideration:

1. Given EQ's somewhat unique organisational structure and related businesses, as well as the fact that the companies are undergoing significant organisational change, we believe that a high level of scrutiny is required in assessing efficiency of the base year and current performance in relation to the incentive schemes.
2. The allocation of public lighting as an Alternative Control Service (ACS) is supported, based on the complexities that exist in considering public lighting as contestable. The AER should encourage the distributors to work with Councils, the AER and other stakeholders to remove any impediments to public lighting - particularly in greenfield situations - from being a more contestable service; with a view of reviewing the classification in the next period.
3. The allocation of the new distribution services - emergency recoverable works and mutual field support - as distribution services is supported. We believe that the distributors need to ensure measures in place to ensure transparency and accountability that reasonable actions to recover the costs from the causer or beneficiary are taken.

The following table summarises our views of the proposal:

Preliminary F&A	CCP 14 Submission
1. Classification of distribution services	We note the proposed classification follows the AEMC rule change in December 2017 that gives more flexibility to the AER in its classification process. We agree with the proposed classifications throughout section 1 of the Preliminary framework and approach, and the benefits of consistency across jurisdictions. We support the initiatives noted in the proposal, including: - a 'service grouping' approach to allow greater flexibility as services change; - the adoption of the term 'common distribution service'; and - the inclusion of the new activities 'support for another distributor' and 'emergency recoverable works' as standard control services. We note the concerns generally regarding the role of distributors as largely monopoly providers of public lighting to local councils, and acknowledge the steps taken by EQ in improving the relationship between local councils and the utilities. Whilst a light level of regulation is preferable in an area where markets are emerging, especially in new lighting technology, the inefficiencies and nuances commensurate with maintaining the classification for public

	lighting as negotiated or unregulated are recognised. Against this background, the classification of public lighting as an ACS is supported, with the rider that EQ should be encouraged to address any technical and commercial barriers that preclude the transition of public lighting to a lighter form of regulation in the future.
2. Form of control	We agree with the proposed forms of control. We look forward to the current review of the Rate of Return guideline appropriately considering the impact of consumers bearing demand risk. At a broader level, in light of new energy use patterns, consumer empowerment and tariff reform, we submit that the AER should consider a more complete review of the appropriate form of control in time for the next cycle of reviews in 2024/2025.
3. Incentive schemes	We support the application of all incentive schemes as proposed, providing that they start with an efficient base. Whilst supporting the application of the EBSS and CESS, we express caution in their application depending on the circumstances of Ergon and Energex, which are undergoing significant change at a time when a base year is being considered. In reviewing the performance of the utilities in the areas of STPIS assessment, we would strongly support the application of the maximum factor of 5%. The current review of the GSL scheme in Queensland is noted. As with other states, we would encourage EQ to proactively adopt internal performance measures that enhance the intent of STPIS and to report this performance to energy customers. We would also encourage the AER to emphasise the importance of the recently updated DMIA and DMIS incentive schemes to the Energex and Ergon proposals.
4. Application of Expenditure Forecast Assessment Guideline	We agree with the AER's application of the Guideline.
5. Depreciation	We agree with the AER's proposed approach.
6. Consumer engagement	We recommend the AER reinforce to EQ the importance of a greater focus on the continuity and effectiveness of its consumer engagement (CE) in the lead-up to submitting its proposal in January 2019. CE for both Ergon and Energex has been disrupted by staff and role changes from their consolidation into EQ and subsequent restructuring, and their CE programme is running behind that of other networks currently undertaking their reset process.

Apart from these specific matters, CCP 14 would encourage the AER to consider the following:

A. Reviewing the use of revenue caps rather than price caps for standard control services

Grid power demand is undergoing dramatic changes as the level of distributed generation expands. The changing demand patterns influence the level of risk around the demand forecasts the revenue proposal is based on. Revenue cap regulation puts all the demand risk on to consumers. We hope that the full impact of consumers bearing this risk is reflected in the revised rate of return guideline currently being considered.

Nevertheless, we would encourage the AER to consider undertaking a review of whether the revenue cap is the best form of control to meet the NEO in this changing demand environment – and whether a price cap could be designed to prevent gaming. This review should be complete in time to take its conclusions into account for the next round of revenue resets from 2025.

B. Providing more specific incentives around the effectiveness of a network's consumer engagement

The recent moves by networks to engage in much earlier and more effective consumer engagement are certainly welcome. However, whether this engagement is good or not, does not result in any different decision-making process by the AER as it considers the network's revenue proposal.

C. Close scrutiny of the corporate operating arrangements of Energy Queensland during the assessment of base year performance and cost allocation

The CCP notes the close working relationship across somewhat unique corporate structures that exist within Energy Queensland, including the establishment of a wide-ranging commercial business, and, in the case of Ergon Energy, a close relationship with a largely monopoly retailer and shared retail branding. This corporate arrangement warrants close scrutiny in a range of areas, including cost allocation, sharing of resources and intellectual property, emergency support arrangements and shared services arrangements.

Based on previous experience in other states regarding industrial agreements and their impact on labour efficiency and flexibility of management of resources, the CCP will take a particular interest in the ability of Energy Queensland to demonstrate the efficient operation of the business in the nominated base year.

2. Service Classification

CCP 14 supports the proposed classification as set out in Figure 1 on page 10 of the Preliminary Framework & Approach document. The CCP further supports the AER's objective to provide improved clarity, consistency across jurisdictions as far as practicable, predictability in how new distribution services might be classified and service descriptions that better align with the services being provided.

Emergency Works

The CCP agrees that emergency recoverable works should be classified as common distribution services as these services are inherently part of the safe and reliable electricity supply to customers.

We believe some risks exist around the incentive, processes and systems needed to ensure all reasonable efforts are taken to recover the costs from the causer or recipient of the services.

Currently, distributors aggressively pursue the recovery of what can be significant cost from a known or unknown debtor. A strong incentive exists for the recovery as the alternative is for the repair to be funded by the utility itself. The same incentive to recover the cost may not exist if the expense is recoverable through a more generic mechanism such as SCS. Also, the CCP would be concerned if the network distributors could recover twice for the provision of this service: once from consumers and again from the third party who caused the damage.

We suggest further information be requested from EQ on the incentives and process for cost recovery to be pursued in relation to third party damage and emergency works.

Mutual Support

The adoption of the proposal that costs to support other distributors in times of need as a as common distribution service is also supported. Initial thinking is that such a facility would apply for significant definable events, such as major emergencies, floods or cyclones. It is conceivable however that mutual aid could apply to meet 'business as usual' workload peaks across distributors' borders. We can see this as assisting the efficient use of resources, much like contractors.

In a manner similar to the issue raised in the section 'emergency works' above, consumers must be confident that there is no 'cross subsidy', and that fair and appropriate costs are appropriately and transparently recovered by the distributor providing the service from the receiver of the service. Provided the AER can have confidence that the recovery of fair and reasonable costs by the service provider will occur, then allocation of this service as a Common Distribution Service is supported.

The CCP agrees with the AER's proposal to adopt this approach across all NEM jurisdictions.

Public Lighting

Public lighting in Queensland is currently classified as a Distribution Service, under Alternative Control Service regulation. There is a case to consider public lighting as a negotiated service on the basis that the allocation as a distribution service is largely consequential to the fact that the utilities own the pole to which the light is attached. Joint use facilities access agreements exist for other pole-mounted services, and public lights can be considered in a similar way.

Therefore, the CCP supports the view of public lighting being classified as *negotiated* as a goal in the classification of public lighting in the regulatory framework. However, we acknowledge that there are several impediments to such a classification in the short term, and as such support the current proposal to maintain the ACS classification.

The CCP is aware that there is a degree of frustration among local Councils on three main aspects of public lighting. Firstly, the general nature of public lighting agreements tends to lead to inconsistent performance levels given to some customers. This generates a level of dissatisfaction with the performance of the utilities regarding price, billing accuracy and maintenance priority. This is exacerbated by public lighting being outside the STPIS and formal GSL framework.

Secondly, due to monopoly ownership of most support structures (poles) and exclusions from standard wiring codes, contestability for the operation, maintenance and upgrade of existing lights and the provision of new suburban lighting in areas supplied by overhead lines is unlikely in the current regulatory environment.

Finally, most councils approach public lighting as 'non-core business' and are keen to outsource the responsibility for the lighting. With this approach comes a responsibility to ratepayers of fair, accurate and transparent pricing, efficient service and the progressive and cost-effective adoption of new technology. Ensuring such a regime when the supplier is viewed as a monopoly is not optimum.

We do however acknowledge the steps being taken by EQ in improving the relationship between local councils and the utilities, and the existence of 'Rate 3' customer-owned public lighting.

It is also clear that efficiencies that exist in the installation, operation and maintenance of a significant proportion of public lighting when it remains a regulated distribution service and outside the constraints of ring-fencing.

The CCP believes that the approach by the AER to regulate the price being charged by distributors for public lighting as an Alternative Control Service is a necessary but ultimately insufficient response to this issue. A 'light' level of regulation is preferable in this area where markets are emerging, especially in new lighting technology, however the issues noted above highlight the requirement to implement a level of oversight that will address the many aspects of public lighting that are not clearly contestable.

Against this background, the continued classification of public lighting as an ACS is supported as an interim position for this upcoming period, with the rider that EQ should be encouraged to address any technical and commercial barriers that preclude the transition of public lighting to a lighter form of regulation in the future.

Unregulated Services

Given the complexity of the Energy Queensland structure, discussed further below, it will be important to ensure the ring-fencing guidelines are rigorously followed, exemptions strictly administered and cost allocation methodology fully transparent and accountable. There should be no perception of Energy Queensland competing for negotiated and unregulated services on an unfair basis with private sector providers of these services.

3. Form of Control

The AER propose to apply the following forms of control:

- standard control services— revenue cap
- alternative control services— caps on the prices of individual services.

CCP 14 supports these proposed forms of control. At a broader level we encourage the AER to consider undertaking a review of whether a revenue cap form of control is the best form of control in the changing demand environment in the National Electricity Market for the next cycle of resets in 2025-30.

We would make some particular comments regarding the discussion on Major Customer Connections. The AER states (pp28-9):

> *We propose that network extensions for major customers can be separated into two categories:*

1. "where the network extension will be dedicated to the exclusive use of the major customer at the time of installation and energisation and there is no reasonable likelihood that the network extension will be used to supply another customer or customers within the time period set out in the distributor's Connection Policy." These would continue to be classified Alternative Control as indicated above.

2. "where the distributor considers there is a reasonable likelihood that the network extension will be used to supply another customer or customers within the time period set out in the distributor's Connection Policy (i.e. will form part of the shared network)." These services would be classified as standard control.

Likewise, our preliminary position is to classify augmentations for major customers, which are a part of the shared network, as standard control. We seek stakeholder input on these views.

We believe that the cost of connections for this category of customers should, as much as possible, be causer/user pays. It should not be an opportunity for a network to make a capital contribution that increases the RAB for all consumers. It should not be an opportunity for a large consumer seeking a specialised connection to have that connection cross-subsidised by all users.

We will be closely examining Ergon and Energex's connection policies to ensure that:

- For 1 - the regulated prices charged by Ergon/Energex mean that the full costs i.e. capex and opex are recovered from the major customer over the life of the asset. This should also take account of the credit risk of that large customer so that consumers in general do not take the large customer's bankruptcy risk if they go out of business before paying the full cost of the connection e.g. where the stranded asset value goes back into the RAB
- For 2 – the original large customer picks up the full capex and opex costs if another customer or customers do not turn up "within the time period set out in the distributor's Connection Policy"; it is not reasonable that all consumers should pick up the costs from having it as a standard control service if new consumers using the specific connection facilities do not eventuate.

4. Incentive schemes

Incentive schemes encourage network businesses to manage their networks in a safe, reliable manner that serves the long term interests of consumers. They provide network businesses with incentives to only incur efficient costs and to meet or exceed service quality targets.

The AER's proposed position is to apply each of the available incentive schemes:

- Service Target Performance Incentive Scheme (STPIS)
- Efficiency Benefit Sharing Scheme (EBSS)
- Capital Expenditure Sharing Scheme (CESS)
- Demand Management Incentive Scheme (DMIS) and Innovation Allowance Mechanism (DMIA).

to both Energex and Ergon. We support in principle the application of all the incentive schemes if the network is showing it is efficient. In particular we look forward to Ergon and Energex proposals for both DMIS and DMIA, and adoption of the capital/operating cost trade-offs considered in the new

DMIS. Given the distributed resources potential of Queensland and the demand management measures already initiated by both networks, we see a great opportunity for non-network solutions and the application of the revised schemes. We make the following comments on EBSS and CESS.

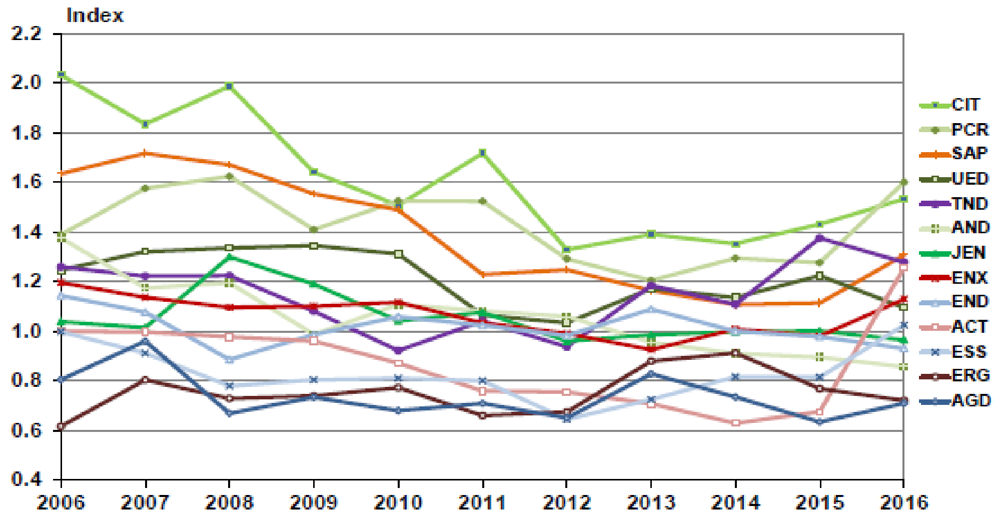
Efficiency Benefit Sharing Scheme (EBSS)

The AER notes (p.57):

> *"We intend to apply the EBSS to the Qld distributors in the 2020–25 regulatory control period if we are satisfied the scheme will fairly share efficiency gains and losses between the distributors and consumers. This will occur only if the opex forecast for the following period is based on the distributors' revealed costs."*

CCP 14 supports the application of EBSS when the revealed costs in the Energex and Ergon proposed base year (2017/18 or 2018/19) are shown to be "efficient". The latest productivity data for 2015/16 show that Ergon had the second lowest opex MPFP of all distribution networks in the NEM and their performance in 2015/16 was worse than 14/15. Energex has been slightly better – generally around the middle of the pack – but a long way from the best. Looking at performance over the 2006-16 period Ergon has consistently been in the 4th quartile and Energex around the middle. Both have improved little over the 10 year period.[1]

Figure 17 Opex multilateral partial factor productivity (MPFP), 2006–16



So we would suggest an amendment to the above sentence with the underlined words added:

> "We intend to apply the EBSS to the Qld distributors in the 2020–25 regulatory control period if we are satisfied the scheme will fairly share efficiency gains and losses between the

[1] AER Annual Benchmarking Report Electricity distribution network service providers November 2017 p. 37 https://www.aer.gov.au/system/files/AER%202017%20distribution%20network%20service%20provider%20benchmarking%20report.pdf

> distributors and consumers. This will occur only if the *approved/efficient* opex forecast for the following period is based on the distributors' revealed costs",

Further we would question the AER's assumption of a zero productivity change over the reset period. While this is based on a view that a zero assumption is an improvement on the general fall in network productivity over the last 10 years, in the current environment network business customers are under continual pressure to improve their productivity. Most residential consumers, particularly vulnerable consumers, are not receiving real increases in their income. We see no reason why networks should be treated any differently from their customers. This means that the efficiency frontier at the end of the reset period is higher than the base year.

What this history and expected future indicates is that the AER should exercise caution in accepting revealed costs in any year of the current period as an acceptable base year for 2020-24. It is only when Energex/Ergon have achieved what is regarded as an efficient level of costs should the EBSS apply. Consumers should not share 30% of the costs savings with Energex/Ergon as they navigate a pathway for inefficient to efficient. EBSS should not be used to fund EQ's "transition" to further efficiency through the amalgamation of Ergon and Energex into the one structure. EBSS should only apply once they get to an efficient level to provide an incentive to continue improving their efficiency.

Capital Efficiency Sharing Scheme (CESS)

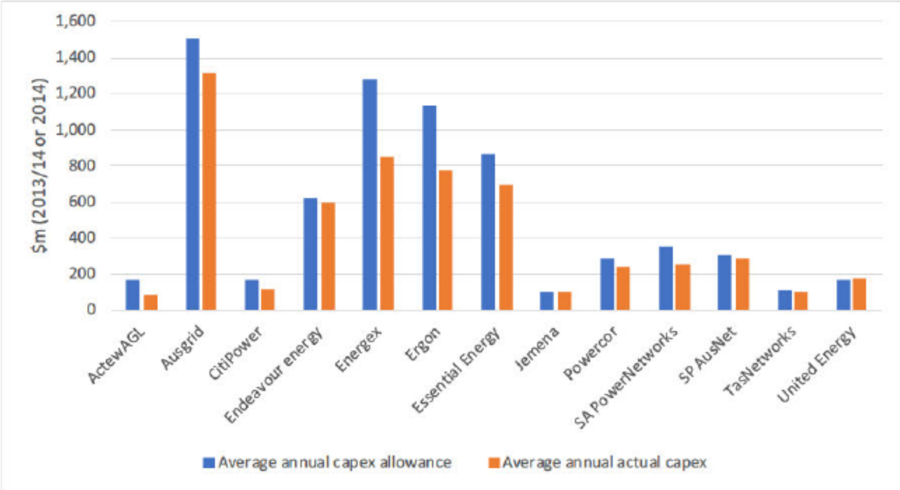
The intention of CESS is to provide an incentive to networks to improve their capex efficiency. In our view this means capex underspend because the networks capital evaluation process concluded either that:

- It is more efficient to defer a capital project to the next period, or
- A lower cost capex solution or non-network solution was found

The recent analysis by the Centre for Efficiency and Productivity Analysis (CEPA) of periods prior to CESS's introduction showed, apart from Jemena and United, consistent underspend of allowed capex, particularly form Energex and Ergon.[2]

[2] CEPA "Incentives Faced by Network Service Providers" Report to AEMC 16 April 2018 Draft Report pp34-5 https://www.aemc.gov.au/sites/default/files/2018-04/CEPA%20AEMC%20CapexBias%20Report%20DRAFT.pdf

Figure 3.1: DNSP total average annual real allowed and actual net capex[52]



Source: CEPA analysis of AER determinations and annual RINs

CEPA cited three reasons for this underspend:

- Lower actual demand than forecast, therefore augmentation projects were deferred or avoided
- DNSP's actively seeking to reduce the need for capex
- Improvements in risk management that led to a reduced volume of works

CCP14 members work with several DNSPs has also shown other reasons for underspending capital allowances, including:

1. Inefficient allocation of the network's resources due to being diverted by other activities; for example, NSW DNSPs were distracted by privatisation considerations. A question arises as to whether Queensland DNSPs actual capex expenditure will continue to be lower due to diversion of management on Energy Queensland amalgamation activities,
2. Continued over-forecasting of demand growth or network needs in a rapidly changing environment, driven by a traditional conservative approach to risk, and
3. Simply not devoting sufficient resources to evaluation.

CCP 14 does not see these reasons or the failure of forecast demand to materialise as legitimate reasons for the network to share in the CESS benefits:

- Consumers should not pay for networks failing to properly resource their capex evaluation and implementation activities as claimed at the time of submitting their proposal, and
- While consumers take demand risk once an asset is built, we do not see why consumers should share 30% of the demand risk with networks when an asset is not built because of lack of forecast demand growth.

So, rather than an automatic application of CESS to Energex and Ergon we would encourage the AER to carefully examine the reasons for the capital underspend to assess whether there should be an adjustment for deferral of capex as provided for in the CESS Guideline[3].

[3] See AER 'Capital Expenditure Incentive Guideline for Electricity Network Service Providers" Section 2.5 p.9 https://www.aer.gov.au/system/files/AER%20capital%20expenditure%20incentive%20guideline%20-%20November%202013.pdf

Service Target Performance Incentive Scheme (STPIS)

We support the application of all incentive schemes as proposed. In reviewing the performance of the utilities in the areas of STPIS assessment, we would strongly support the application of the maximum factor of 5%. The current review of the GSL scheme in Queensland is noted.

The work being undertaken by the AER in the proposed amendment to the Service Target Performance Incentive Scheme is noted, and incorporation of an enhanced scheme into the Queensland regulatory reset is to be encouraged. In addition, customer service aspects of the STPIS should be enhanced to reflect new and high-impact ways that utilities interact with customers and communities.

As with other states, we would encourage EQ to proactively adopt internal performance measures that enhance the intent of STPIS and to report this performance to energy customers.

Demand Management Incentive Scheme (DMIS)

We note the application of the previous DMIS regime by Energex leading to in their PeakSmart and Positive Payback schemes. In contrast, we note the significant decline in the attractiveness of off-peak controlled-load tariffs in Queensland and the impact of metering charges on the amenity of controlled load in the state.

As with other states, the CCP is keen to support strong action by distributors to seek non-network solutions to the emerging challenges of falling network utilisation factors, changing energy use and aging assets. In addition, we would expect to see the impact of tariff reform initiatives being considered in moderating or otherwise changing demand growth.

We support the application of the DMIS.

We would also encourage the AER to emphasise the importance of the recently updated DMIA and DMIA incentive schemes to the Energex and Ergon proposals, in particular the opportunity for operating cost trade-offs to capital investment in long-lived assets.

5. Application of Expenditure Forecast Assessment Guideline

We agree with the AER's proposed application of the Expenditure Forecast Assessment Guideline.

Ergon and Energex are part of the most complex company structure of any network in Australia. Energy Queensland has regulated networks, a regulated retailer, competitive service providers and a shared services function, all part of the one corporate structure.

This has important implications for the cost allocation methodology and ringfencing obligations and these will be examined closely in evaluation of their proposals. When announcing the creation of Energy Queensland, the Queensland Treasurer said that:

> "…this merger will save around $680 million over the 2019-20 period."[4]

We look forward to understanding the proportion of these benefits which will accrue to the network customers as both networks seek to improve their relative efficiency as a base for the application of incentive schemes.

We believe that the application of this guideline, particularly around the use of benchmarking (within the context of the Tribunal and Federal Court decisions on the NSW distributors) and the recent enhancements in the repex modelling to take account of different scenarios around unit costs and asset lives must underpin a comprehensive evaluation of Energex and Ergon proposals.

We would encourage the AER, in its discretion, to use a broad a suite of measures to ascertain if a network's revealed costs are in fact an indication that it is operating at the level of a benchmark efficient entity. This is particularly the case for Ergon Energy where, the latest benchmarking results for 2015/16 indicated that it was the second worst performing DNSP based on MTFP and, as noted above, the second worst opex MPFP.

We look forward to reviewing the demand forecasts. In particular we look forward to understanding how both network's Tariff Structure Statements, and their progress towards costs reflective pricing, is incorporated into the demand forecasts – noting the impact of regulated prices in the Ergon retail market.

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[4] Media Statement Treasurer, Minister for Aboriginal and Torres Strait Islander Partnerships and Minister for Sport The Honourable Curtis Pitt Tuesday, December 15, 2015 http://statements.qld.gov.au/Statement/2015/12/15/electricity-company-mergers-save-680-million-and-drive-regional-jobs

We understand that both Energex and Ergon have yet to receive formal advice from the Queensland government on the reliability and minimum service standards that are to apply to the 2020-25 period.

6. Depreciation

The AER's preliminary position is to use depreciation based on forecast capex (or forecast depreciation) to establish the opening RABs as at 1 July 2020. In combination with the AER's proposed application of the CESS, this approach will maintain incentives for the distributors to pursue capex efficiencies. These improved efficiencies will benefit consumers through lower regulated prices.

We note that some networks are seeking to have the AER apply accelerated depreciation to some assets e.g. legacy metering assets subsequent to the implementation of the Power of Choice reforms form December 2017. If Energex and Ergon propose to take this approach they will need to persuade both the AER and their customers that any change to a straight-line depreciation methodology is in the long-term interests of consumers.

7. Consumer Engagement

The AER rightly highlights the growing importance of consumer engagement in the development of network proposals. However, there is still wide variation in the approach among networks. The engagement process in Queensland appears to be clouded by issues specific to that state, including a co-branded retailer and network business outside the south-east corner making a consumer's understanding of network and retail issues difficult. The engagement approach appears to date to be common across both the Energex and Ergon Network footprints, despite the different retail and brand awareness arrangements.
EQ does highlight the important consumer feedback that it has from its BAU consumer engagement activities. We acknowledge that this will be a useful input. However, this engagement covers the whole range of EQ activities including its unregulated and retail businesses, not just that associated with the reset process.

Energy Queensland's current position is considerably behind that shown recently by other networks at the same stage in their reset timetable.

- Following the start of their engagement with a Customer Xchange forum in December, the newly formed, combined EQ Customer Council met for the first time in January with its second meeting due on 9th May; the first meeting covered the reset process only very briefly
- A specific Reset Working Group was established in early 2018 and has recently held its third of six planned meetings; the short period for this group's engagement will limit its ability to input into the Draft Proposal due to be released in August/September
    - Meetings are limited to 4 hours and pre-read commitments are very high
    - To date no indicative capex, opex or total revenue numbers have been discussed with consumers

- Regional Town Hall style meetings in Cairns, Townsville, Rockhampton, Toowoomba and the Sunshine coast are scheduled over the next 6 weeks
- Publication of a Draft Proposal in August

Other networks currently going through their reset process began their consumer engagement 9-12 months earlier in their timetable. This has given them both the opportunity for significant education of consumers on the reset process and how they can best contribute, which has facilitated deep and specific engagement on reset related matters.

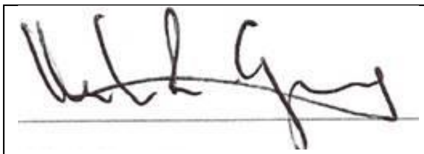
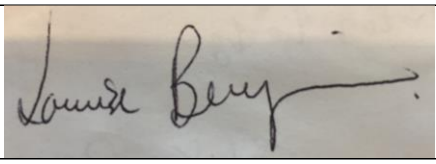
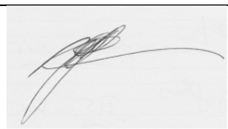
With the combination of the previous Ergon and Energex Consumer Committees there is a mix of knowledge levels among members on the reset process and their ability to contribute. Members are best able to react to information provided, rather than have to generate original proposals themselves. This requires a level of knowledge that is not uniformly available over the existing membership. However, CCP 14 stresses that the purpose of effective and early CE is to enable consumers to influence the content of a regulatory proposal and not merely to understand it.

CCP 14 has observed other networks using CE methods including:

- Single and multiple day long deep dives on specific aspects of their developing proposals e.g. capex and opex and tariff structure statements with both consumer and AER representatives participating
- Focussed day long forums on the network of the future and how they might utilise the DMIS incentives
- One-on-one discussions with their major customers in addition to the general reset meetings
- Provision of numbers for key parts of their proposal (numbers or at least ranges for capex/opex/price path/RAB) prior to the publication of the Draft Proposal to inform discussion
- Deep engagement with stakeholders following their Draft Proposal publication and prior to their AER submission

We understand that Energy Queensland's management resources have been involved in the complex process of amalgamating the Energex and Ergon entities together into Energy Queensland. We would hope that with this now substantially completed that this would provide the opportunity for renewed focus on effective and transparent consumer engagement in the now limited time available. CCP 14 look forward to supporting EQ in this process.

Signed

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