



Customer Engagement Outcomes Report

Revenue Proposal 2023-24 to 2027-28

31 JANUARY 2022

Company Information

ElectraNet Pty Ltd (ElectraNet) is the principal electricity transmission network service provider (TNSP) in South Australia.

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In Memoriam

David Headberry

ElectraNet acknowledges the passing of Consumer Advisory Panel Member, Working Group Member and long-time consumer advocate David Headberry on 12 November 2021.

As the voice of the Energy Consumers' Coalition of South Australia (ECCSA) and Major Energy Users' (MEU) over many years, David was a tireless advocate for energy users in South Australia and beyond, and was widely respected for his contribution to the National Electricity Market by advancing the interests of customers.

As a founding member of ElectraNet's Consumer Advisory Panel, David also made a significant contribution to the delivery of transmission services in South Australia, including through active and deep involvement in two Revenue Proposals and major investments being delivered to benefit customers, and ElectraNet wishes to record its appreciation for his lasting contribution.

1. Introduction

The purpose of this *Customer Engagement Outcomes Report* is to summarise the customer engagement we undertook to develop our Revenue Proposal for the 2024-2028 regulatory period, and how this engagement has influenced and shaped our proposal.

Transmission is playing a growing role in ensuring the safe, reliable, and affordable supply of electricity in a rapidly transforming power system. In providing this essential service, we remain committed to keeping our customers at the heart of all we do.

With the support of our Consumer Advisory Panel (CAP) and the Australian Energy Regulator (AER), we have continued to build on our established approach of early engagement in developing our Revenue Proposal for the five-year period commencing 1 July 2023. Our engagement program has seen us work most directly with customer representative groups and organisations as the most effective way to engage on transmission issues.

The aim of our engagement on our Revenue Proposal is to develop a well-tested set of proposals that are targeted to the needs of customers, capable of support by customers and acceptance by the AER.

This approach offers benefits to all parties involved. These include improved shared understanding, more targeted expenditure plans that better reflect customer preferences, and greater trust and confidence in regulatory outcomes with 'no surprises'.

Our engagement on the development of our Revenue Proposal follows the intensive engagement around our three contingent projects, the last of which achieved final regulatory approval in mid-2021.

Importantly, the early engagement approach does not replace any aspects of the AER's formal determination process. Rather, it is designed to better inform this process by ensuring that our plans and proposals are thoroughly tested, and that stakeholders have an opportunity to influence these to ensure the needs of customers are met.

The activities set out in this document span:

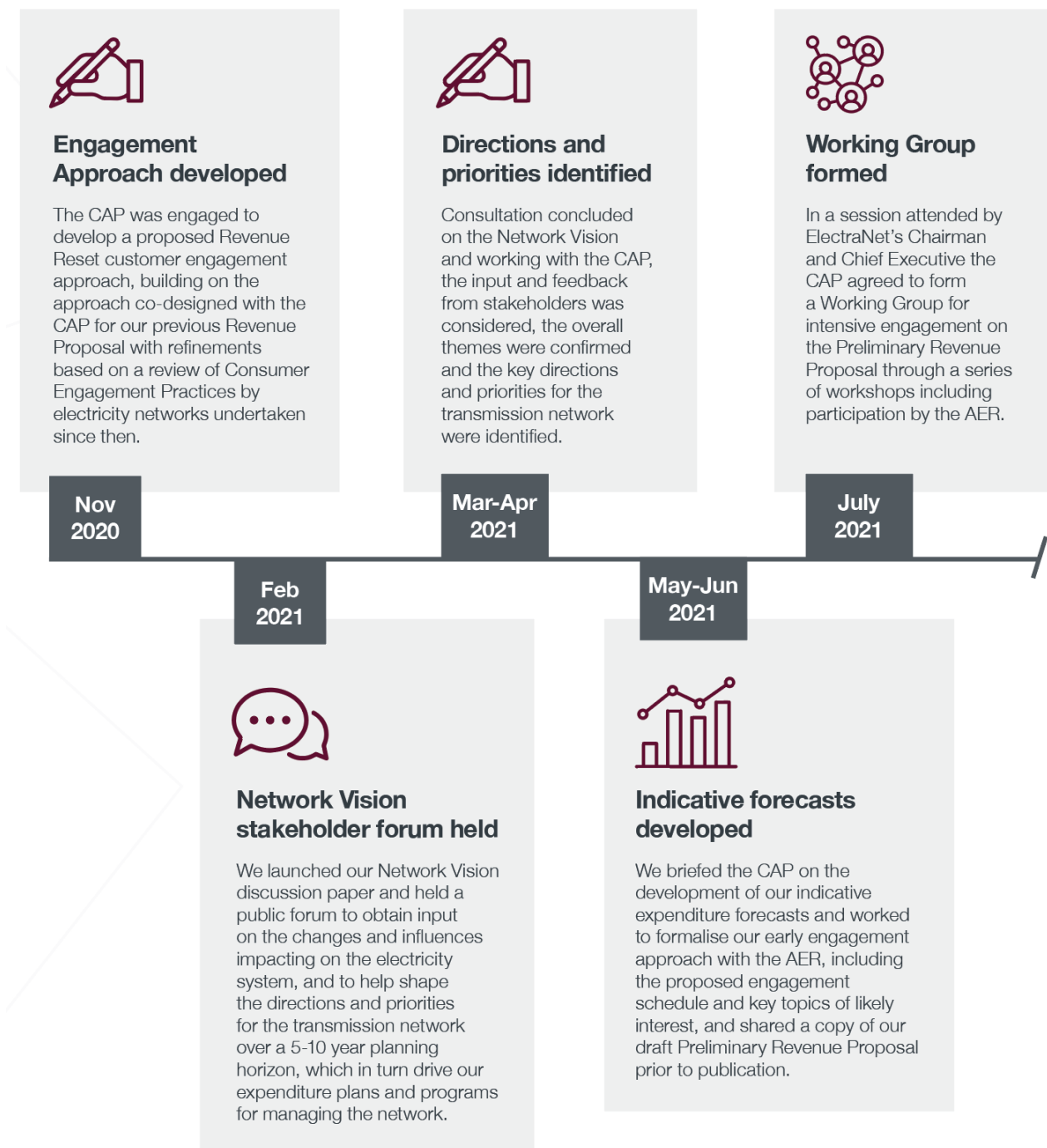
- The development of our updated Network Vision outlining directions and priorities for the transmission network;
- the release of our Preliminary Revenue Proposal setting out indicative expenditure plans and programs for 2024-2028; and
- the development of our formal Revenue Proposal putting forward our final plans for 2024-2028 shaped by customer input.

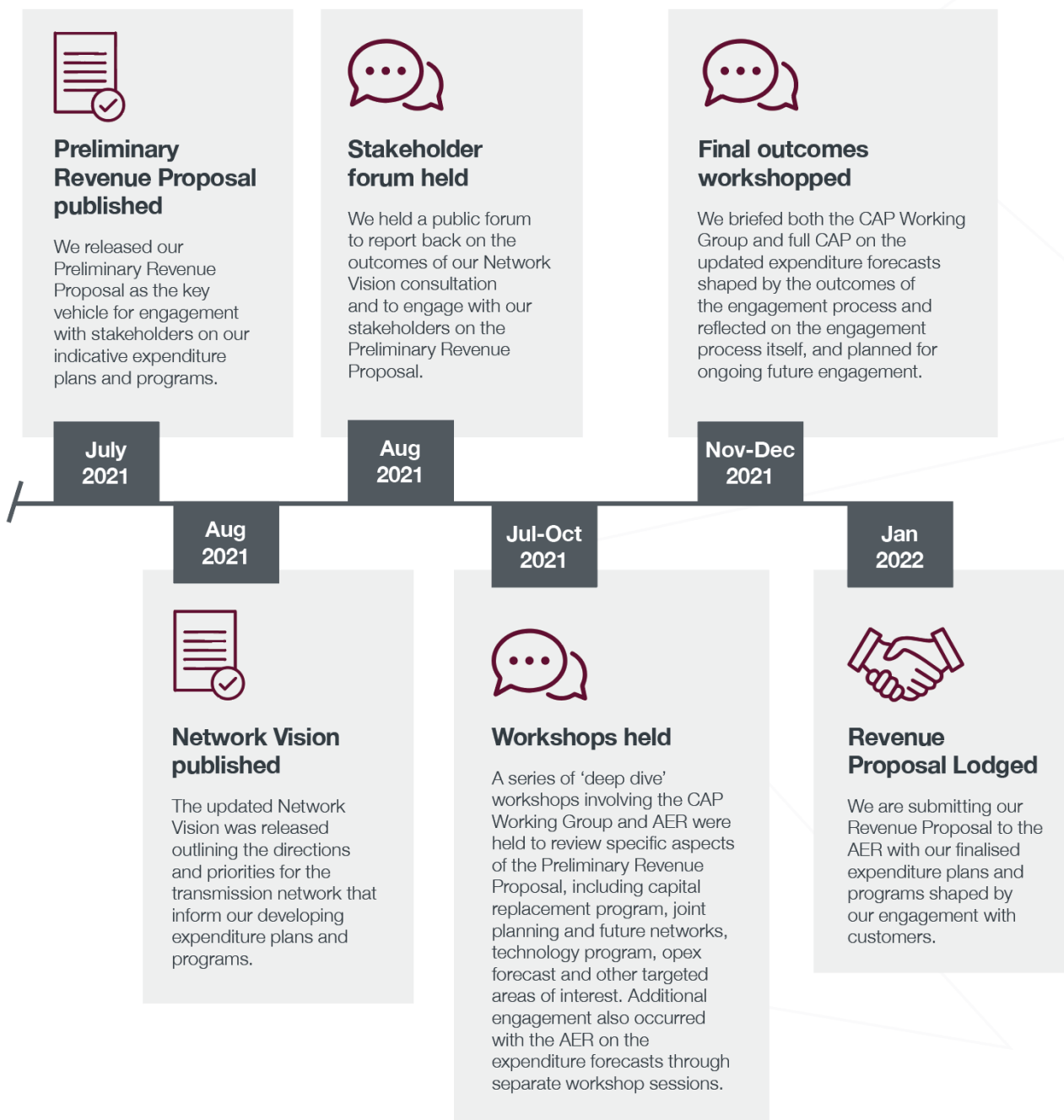
This document outlines the range of customer and stakeholder engagement activities we have undertaken, the topics of engagement, and how the outcomes of this engagement have shaped the Revenue Proposal. It also offers our reflections on the engagement process itself, and the opportunities we have identified to improve and strengthen our engagement approach moving forward.

Our engagement timeline for the 2024-2028 Revenue Proposal is summarised overleaf.

We would like to thank all those who engaged with us for their valuable contribution in helping to shape our Revenue Proposal 2024-2028, and for their ongoing commitment to working together for South Australia's energy future.

Revenue Proposal 2024-2028 Engagement Timeline





2. Engagement Approach

The objective of our ongoing engagement is to work with customers to provide meaningful opportunities for input to improve the value of electricity transmission services in South Australia.

As part of this broader objective, the aim of engagement on our Revenue Proposal is to develop a well-tested set of proposals that are targeted to the needs of customers, and capable of support by customers and acceptance by the AER.

2.1. Background

In 2016, we co-designed and developed our revenue reset early engagement approach in partnership with the CAP.

This involved the first publication of a Preliminary Revenue Proposal to support early engagement with customer representatives, the Australian Energy Regulator (AER) and other stakeholders on expenditure plans for the next regulatory period prior to commencement of the formal regulatory process with the submission of a Revenue Proposal.

Following the last revenue determination, the CAP's primary interest turned to the three major projects ElectraNet was progressing under the Regulatory Investment Test for Transmission (RIT-T) and contingent project processes, namely:

- The Main Grid System Strength (synchronous condenser) project;
- The Eyre Peninsula Reinforcement; and
- Project EnergyConnect, the new interconnector linking South Australia and NSW.

Collectively these projects represented the most significant investment in transmission infrastructure in South Australia in the last 30 years. Each of these projects was subject to a detailed public consultation process.

In 2020 we engaged regulatory experts Harding Katz to review and provide advice on best practice customer engagement by electricity networks. This built on Harding Katz' original advice in 2016 which informed the co-design of the early engagement approach with the CAP.

In 2020, Harding Katz found that customer engagement practice by electricity networks had matured since 2016, building on our early engagement approach. However, our approach remained in line with good practice.

Harding Katz recommended refinements to our approach for the current revenue reset. We worked with the CAP to help develop those refinements to our approach during the second half of 2020 based on these findings.

In partnership with the CAP, our engagement approach for the current revenue reset has been implemented on this basis.

2.2. Consumer Advisory Panel

Consistent with our ongoing engagement objective, the CAP's key role is to provide customer input to help us improve the value of electricity transmission services.

The CAP fulfils its role in two broad ways. Firstly, by providing guidance and oversight in the co-design of our customer engagement approach. Secondly, by representing the views and interests of customers and wider stakeholders.

Its members represent a broad range of customer interests, and bring together the following peak representative organisations spanning general customers, the disadvantaged, business interests, local government, industry, small business, and the mining sector:

- Business SA;
- Energy Consumers Coalition of SA (ECCSA);
- Outback Communities Authority (OCA);
- South Australian Chamber of Mines and Energy (SACOME);
- South Australian Council of Social Service (SACOSS);
- Uniting Communities; and
- University of Adelaide.

Energy Consumers Australia also participated as a member of the Panel until mid-2021.

The CAP continues to meet on a quarterly basis and otherwise as required. Its proceedings, including agenda materials and meeting notes, are published on our website.

A record of the key topics covered during meetings of the CAP is included in Appendix A.

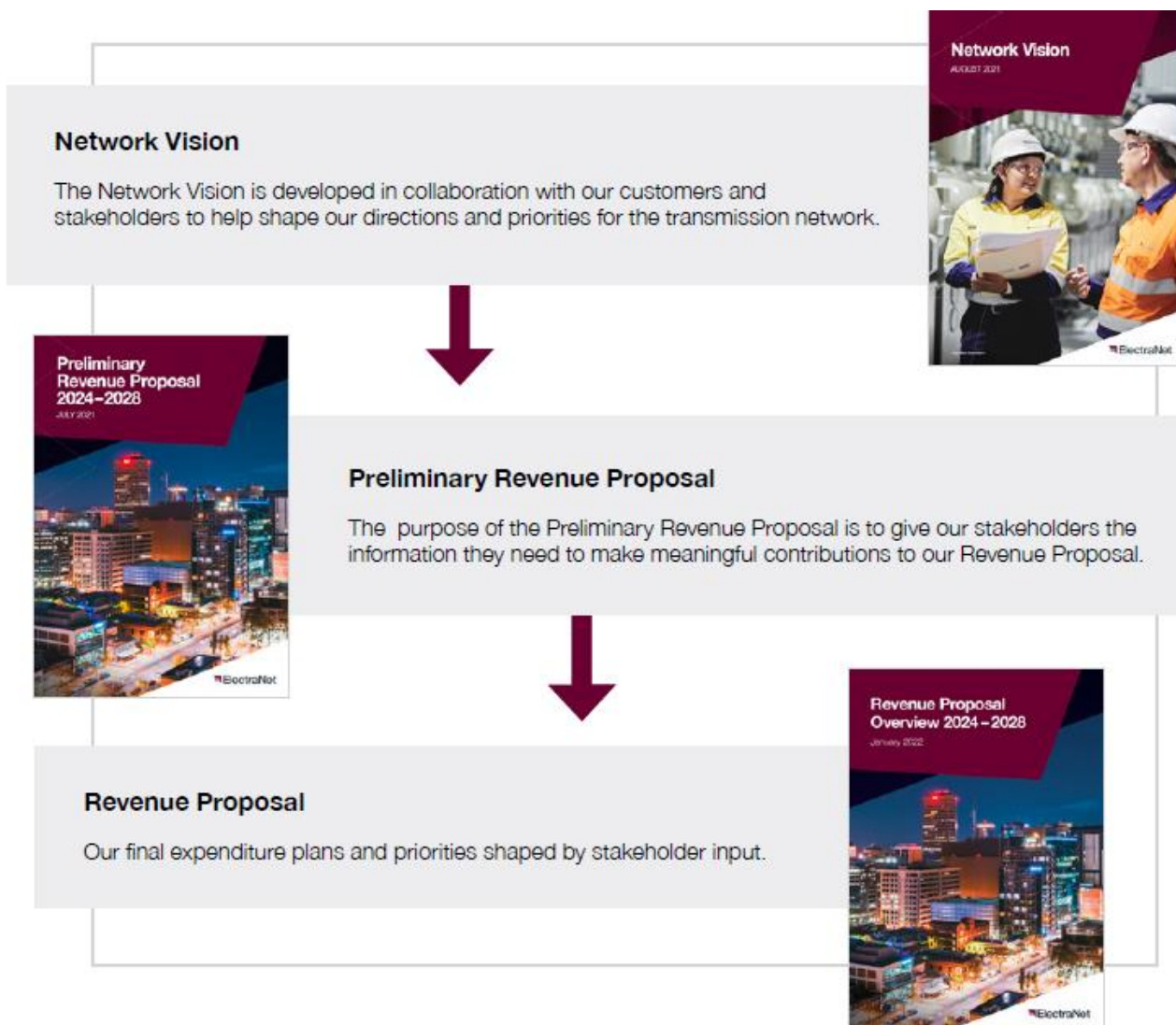
2.3. Current engagement approach

Our engagement approach is guided by the principles underpinning the International Association for Public Participation (IAP2) Spectrum to help target the appropriate level of participation at each stage of the engagement program, and the AER's *Framework for considering public engagement*. This has recently been incorporated into the AER's *Better Resets Handbook: Towards Consumer Centric Network Proposals*.

Key elements of our engagement on Revenue Proposals include:

- A partnering approach with the CAP throughout as both a sounding board on key issues and source of advice in the co-design of our engagement approach;
- A focus on engagement with organisations representing customers and with wider stakeholders. We also engage with our direct customers;
- Consultation on an updated Network Vision which identifies the key themes, directions and priorities to guide the management and operation of the transmission network and inform our expenditure plans and programs;
- The development of a Preliminary Revenue Proposal detailing the proposed expenditure programs and revenue and price path outlook for the forthcoming regulatory period, for public consultation with stakeholders; and

- Finalisation of the expenditure plans and proposals based on this consultation and submission of a formal Revenue Proposal.



Our engagement approach, illustrated above, offers benefits including:

- Improved understanding of customer perspectives and network service challenges;
- more targeted expenditure plans that better reflect customer preferences;
- greater trust and confidence in regulatory outcomes, with ‘no surprises’; and
- improved value of transmission services and enhanced trust in ElectraNet.

Importantly, our engagement approach does not replace any aspects of the AER’s formal determination process. Rather, it is designed to better inform this process by ensuring more thoroughly tested plans and proposals are developed, and in ensuring stakeholders have an opportunity to help shape these to ensure the needs of customers are met.

3. Customer Engagement on the 2024-2028 Revenue Proposal

This section explains the application of our early engagement approach in the development of our 2024-2028 Revenue Proposal.

The following table summarises the way we applied our engagement approach in developing our Revenue Proposal for 2024-2028 by reference to the AER’s *Framework for Considering Public Engagement*.

Table 3-1: AER Framework for considering public engagement

	AER - How this could be assessed	ElectraNet - What we did
Nature of engagement	Customers partner in forming the proposal rather than asked for feedback on the proposal.	A Preliminary Revenue Proposal was published as the focus for partnering with the CAP in the development of the Revenue Proposal, building on the directions and priorities of the Network Vision developed in consultation with stakeholders.
	Relevant skills and experience of the customers, representatives and advocates.	CAP Working Group was formed with diverse experience and relevant expertise for detailed engagement, with the support of the full CAP.
	Customers provided with impartial support to engage with energy sector issues.	AER staff participated in all engagement workshops. AEMO and SA Power Networks provided input on the future direction of the changing power system. CCP members were appointed by the AER at the end of the process due to timing issues.
	Sincerity of engagement with customers.	We engaged genuinely throughout, including clarity on the level of engagement possible and open sharing of updates to be taken to our Board, to ensure ‘no surprises’.
	Independence of customers and their funding.	The CAP Working Group was offered funding for independent support to review the proposal and report on outcomes. We offered sitting fees to help meet expenses.
	Multiple channels used to engage with a range of customers across ElectraNet’s customer base.	We engaged through customer meetings, public webinars, stakeholder submissions, and a series of intensive workshops with the CAP Working Group.
Breadth and Depth	Clear identification of topics for engagement and how these will feed into the Revenue Proposal.	A forward meeting schedule of topics for engagement with the CAP Working Group was developed based on areas of most interest to customers. The CAP Working Group developed a set of success criteria for assessing engagement outcomes.
	Customers consulted on broad range of topics.	Over eight Working Group meetings customer representatives were engaged on a wide range of topics identified by them.
	Customers able to influence topics for engagement.	The CAP Working Group provided input and participated in forming meeting agendas, with the level of influence on topics identified with reference to the IAP2 spectrum.
	Customers encouraged to test the assumptions and strategies underpinning the proposal.	Customers were given opportunity to test assumptions and strategies, within the time constraints of workshop sessions, with access to AER participants.
	Customers were able to access and resource independent research and engagement.	Customers were offered access to independent resources as required, as well as access to AEMO.

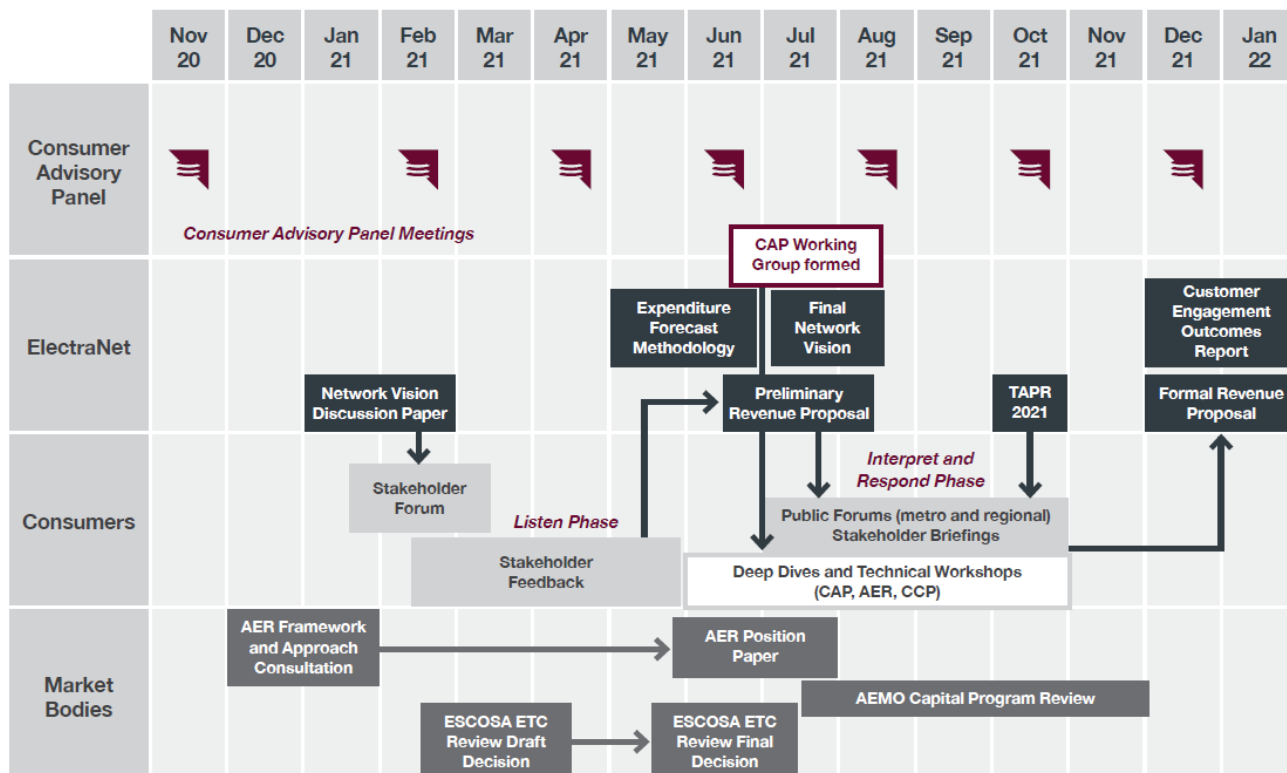
	AER - How this could be assessed	ElectraNet - What we did
Clearly evidenced impacts	Proposal clearly tied to expressed views of customers.	The CAP Working Group has successfully influenced and shaped the proposal. Both ElectraNet and the CAP Working Group briefed the full CAP on the outcomes of the engagement process, and the CAP Working Group is developing an independent report.
	High level business engagement (e.g. customers given access to ElectraNet’s Chief Executive and/ or Board).	The Executive led engagement process included participation from ElectraNet’s Chairman, Chief Executive, and other Executives.
	ElectraNet has responded to customer views rather than just recording them.	A detailed record of engagement outcomes was kept, including responses to all key issues raised by the CAP Working Group showing how customers have influenced outcomes.
	Impact of engagement can be clearly identified.	We have reflected the impact of customer engagement in the Revenue Proposal and in this Customer Engagement Outcomes Report.
	Submissions on proposal show customers feel the impact is consistent with their expectations.	ElectraNet provided drafts of its final Revenue Proposal and Customer Engagement Outcomes Report to the CAP, AER and CCP and invited feedback prior to formal submission to the AER.
Proof points	Reasonable opex and capex allowances proposed, for example: <ul style="list-style-type: none"> In line with, or lower than, historical expenditure. In line with, or lower than, the AER’s top- down analysis of appropriate expenditure. If not in line with top-down, can be explained through bottom-up category analysis. 	Capex and opex forecasts were subject to detailed review and were shaped through the engagement process. <p>Proposed capex is lower than historical expenditure in underlying terms.</p> <p>Proposed opex is based on the AER’s base step trend forecast approach and is lower than historical expenditure in underlying terms (prior to externally driven step changes).</p> <p>The CAP has been fully briefed on the final expenditure forecasts, ensuring no surprises.</p>

3.1. Engagement Program

The engagement program we have followed for the 2024-2028 Revenue Proposal is summarised below. The program was co-designed with the CAP and followed two broad phases:

1. *Listen Phase* – in which we consulted with our customers in updating our Network Vision on the trends and influences impacting on the delivery of transmission services and their implications for the directions and priorities for the management and operation of the transmission network.
2. *Interpret and Respond Phase* – in which we presented our indicative expenditure plans and programs in our Preliminary Revenue Proposal based on the updated directions and priorities identified with stakeholders in the Network Vision. We then engaged with customer representatives in detail in the further development and refinement of our expenditure proposals to reflect their preferences and input.

As shown below, this culminated in our Revenue Proposal being built on the outcomes of our engagement with customers.



3.2. Network Vision

Our Network Vision identifies the key themes, directions and priorities to guide the management and operation of the transmission network and inform our expenditure plans and programs.

In the second half of 2020 we commenced engagement on a refresh of our Network Vision. Key elements of this process were:

- In November 2020, we engaged with the CAP as we reviewed the themes, priorities and directions of the Network Vision;
- A Network Vision Discussion Paper was published on 2 February 2021 for consultation and feedback, presenting updated analysis of key change drivers impacting transmission services, and the implications for managing and operating the network;
- A stakeholder webinar was held on 2 February 2021, attended by approximately 50 participants. A detailed record of the outcomes of the forum was published, including discussions held in facilitated break-out room sessions;
- Five submissions were received from stakeholders; and
- The Network Vision was updated to reflect the outcomes of our engagement with stakeholders.

This engagement confirmed that the four central themes of the Network Vision remain relevant, and provided detailed input to revised directions and priorities that guide our management and operation of the network.

The updated draft Network Vision was presented to the CAP and published in August 2021. The key directions and priorities of the updated Network Vision are outlined in Appendix B.

3.3. CAP Working Group

A four person Working Group was formed in July 2021 for the purpose of more detailed engagement on our Revenue Proposal through a series of intensive workshops.

The CAP Working Group comprised:

- Mark Henley, Uniting Communities;
- Vikram Kenjle, University of Adelaide;
- David Headberry, ECCSA; and
- Mark Sutton, OCA.

Representatives of the AER also participated in the meetings of the Working Group.

During the establishment of the CAP Working Group, framed against ElectraNet's overall objective, success criteria were developed by the Working Group to measure the effectiveness of the engagement, as outlined below.

ElectraNet objective: To develop a well-tested set of proposals that are targeted to the needs of customers, capable of support by customers and acceptance by the AER

The engagement process will have been successful if the Working Group and CAP agree:

- The review process was collaborative, targeted and effective
- Key issues identified by ElectraNet and customers have been adequately explored from a customer perspective (sufficient breadth and depth of engagement)
- Customer representatives have been able to influence outcomes as demonstrated by a transparent public record of engagement outcomes
- The Revenue Proposal is targeted to the needs of customers
- There are no surprises – the January 2022 Revenue Proposal is as expected, and the Working Group would be satisfied if the AER were to accept it

A summary of the key engagement topics covered by the Working Group is provided in Appendix A, together with a list of information requests and responses provided to the Working Group in Appendix C.

3.4. Preliminary Revenue Proposal

As mentioned in chapter 2, engagement on our Revenue Proposal for 2024-2028 centred on our Preliminary Revenue Proposal which was published on 14 July 2021. This set out indicative capital and operating expenditure forecasts and provided an overall revenue and price path outlook for the 2024-2028 regulatory period, as the basis for further engagement with stakeholders.

Before publishing the Preliminary Revenue Proposal, we gave the CAP an overview of it and sought feedback.

Following publication of the Preliminary Revenue Proposal we worked with the CAP Working Group to identify key elements of the Preliminary Revenue Proposal for detailed engagement across a series of intensive workshops held from July to December 2021 and shown on the timeline above.

Beyond the CAP Working group our engagement included:

- On 12 August 2021, we held an online public forum on the Preliminary Revenue Proposal, attended by approximately 30 stakeholders;
- The Preliminary Revenue Proposal was open for consultation and submissions from July to September 2021, and we received two written submissions, in addition to the detailed input provided by member organisations through the CAP Working Group;
- We wrote to all of our direct customers providing a copy of the Preliminary Revenue Proposal and offering them an opportunity for individual or group meetings to discuss the Proposal; and
- Additional forums were also offered, and we held individual briefings with a number of interested stakeholders.

Customer engagement has shaped the final Revenue Proposal as outlined in Section 4.

Further information is provided in Appendix A which provides a summary of the key engagement topics covered with stakeholders, Appendix D which outlines the feedback received and how we have responded, and Appendix E which lists the key documents we published during our engagement.

3.5. Consumer Challenge Panel

At the conclusion of the engagement program in December 2021 the AER also appointed three members of its Consumer Challenge Panel (CCP) to ElectraNet's revenue determination process. The role of the CCP is to assess and advise the AER on the quality of engagement undertaken by network businesses and whether the interests of customers are adequately reflected in regulatory proposals.

Given the timing of its appointment, the CCP will focus on reviewing and assessing the engagement and outcomes delivered before it was formed to provide advice to the AER in its assessment of the Revenue Proposal. We welcome the CCP's engagement and look forward to their feedback as we continue to engage with stakeholders during the remainder of the review process.

4. Customer Engagement Outcomes

Our engagement with the CAP (and the AER) provided customer preferences and direction to help shape our expenditure plans for our 2024-2028 Revenue Proposal.

The member organisations represented on the Working Group provided their detailed feedback through that engagement. Our proposal was also informed by wider stakeholder input, such as the submission from Business SA outlined below.

Business SA submission, 10 September 2021

- Business SA is mindful of the 5% increase in real transmission prices over 2024-2028 through ElectraNet's PRP but we also recognise the forecast 20% drop in wholesale electricity prices from the new interconnector which should offset that impact into the foreseeable future.
- COVID-19 has had a profound impact on South Australian businesses over the past 18 months. This has also brought an unprecedented focus on efficiencies across industries which should be reflected in how ElectraNet apply productivity improvements forecast over the 2024-2028 regulatory period.
- Business SA has provided in principle support for the new interconnector on the proviso that everything possible is done to minimise the cost, but we are mindful of the range of new contingent projects over 2024-2028 centred around further renewable development and not wanting to see business customers more broadly shoulder additional risk of associated substantive network investments.
- Akin to the previous regulatory process, Business SA acknowledges ElectraNet's willingness to engage early on its future regulatory proposal plans which provides sufficient time for key investments to be adequately scrutinized and for ElectraNet to properly understand the needs of all its stakeholders, particularly South Australian businesses that provide the majority of revenue.

Customer engagement has shaped our Revenue Proposal as we have continued to develop and refine our plans. Some of the specific areas the engagement has directly influenced our final expenditure plans and proposals are outlined below based on the priority topics we engaged on with the CAP Working Group.

A more detailed summary of the range of specific stakeholder feedback received and the manner in which we have responded is provided in Appendix D.

4.1. Lowest Possible Costs

What we heard

The feedback from the CAP Working Group was clear:

ElectraNet should be doing everything possible to keep its costs as low as possible – ElectraNet’s high comparative operating costs compared with other Electricity Transmission Network Service Providers (TNSPs) based on AER benchmarking was highlighted. Key questions included:

- Are we keeping costs as low as possible?
- Is this a ‘nice to have’ project or a ‘must have’ project?
- Could the project be deferred or partially deferred?
- Are there lower cost solutions?

How we responded

The feedback from the CAP Working Group was directly considered in our line-by-line management review of the entire capital program resulting in a net reduction in the capex forecast from \$842m¹ in the Preliminary Revenue Proposal to \$742m (a reduction of nearly \$100m or about 12%) The review led to the following changes in the proposed capital program:

A range of project scope changes were made, including:

- Reduced scope of the tower anti-climb project (-\$14m); and
- Reduced scope of power quality management project (with remaining scope transferred to a contingent project) (-\$54m).

Several project cost reductions were made, including:

- Reductions on the Brinkworth-Waterloo bearer project (-\$12m); and
- Design improvements on the substation security program (-\$10m).

Several projects were cancelled or deferred:

- Substation strung bus insulation replacement (-\$19m);
- Local High Voltage Management (-\$14m);
- Bungama-Port Pirie line refurbishment (-\$12m);
- Digital substation design standard (-\$3m); and
- Wide area protection scheme expansion (-\$3m).

Overall, the Working Group indicated it was satisfied that our risk-based systems and processes for capital planning are robust, and that reducing capital expenditure has been a focus of our Revenue Proposal.

¹ This is expressed in June 2023 terms and is equivalent to \$832m in December 2023 terms as shown in the Preliminary Revenue Proposal.

Opportunities to reduce operating expenditure were explored during engagement but are more limited. We maintain a strong focus on reducing costs, including restrictions on recruitment, external consultancy, travel, and training costs.

This is directly reflected in the 2020-21 base year on which the forecasts are based, which is lower than the previous year and lower than forecast opex for the following year.

External factors continue to place upward pressure on opex costs, including insurance, cyber security, cloud computing and new obligations which lead to step changes. Mindful of these pressures we considered further opportunities to reduce forecast costs in response to the CAP Working Group's feedback. We reviewed risk sharing between customers and the business in areas such as insurance and cyber security, and options for cost pass-through. While the majority of these costs cannot be avoided, our final review of our insurance forecasts led to a reduction of approximately \$1m pa (or 14%) from the step change presented in the Preliminary Revenue Proposal.

Our updated opex outlook is a realistic reflection of our expected costs and remains consistent with the AER's base step trend approach. We believe the opex outlook reasonably satisfies the National Electricity Rules operating expenditure objectives and is reasonable for the purpose of establishing an efficient ex-ante opex allowance.

4.2. Customer Centric Approach

What we heard

The Working Group provided clear feedback on the need to strengthen the link between the identified need for technology projects and customer benefits. We heard that delivering a strategy is not sufficient and increasing volumes of data to be managed does not necessarily require greater investment. Customer benefits should be central to development of projects and the value to customers must be clear.

How we responded

In acknowledging the feedback from the Working Group, we reviewed our technology program and reprioritised and refocused our technology projects on the key benefits to be delivered to customers. This led to a reduction in the overall technology program of approximately 10% (or \$8m) including the cancellation of two projects and cost refinements on other projects.

4.3. Collaboration between ElectraNet, SA Power Networks and AEMO

What we heard

Customers expect close cooperation and collaboration between ElectraNet, SA Power Networks and AEMO to ensure efficient, coordinated solutions are developed in response to the challenges of South Australia's energy transition, and to avoid doubling up or overlapping solutions.

How we responded

We agree with the Working Group's feedback and we have built on our long-standing relationship with SA Power Networks through our established joint planning process and taken steps to strengthen collaboration on key matters, including the role of distributed technologies and key changes impacting on both networks. This includes an Executive level Joint Network Strategy Committee which provides oversight of joint planning across the networks, work on a staged approach to power quality management, and collaboration on voltage management issues.

We also continue to engage closely with AEMO in the development and implementation of its Integrated System Plan (ISP) and through the review it has undertaken of our proposed network development projects for the purpose of our Revenue Proposal.

4.4. Tower Anti-Climb

What we heard

We sought feedback from the CAP Working Group in relation to this project, which involves the installation of barriers to prevent unauthorised climbing of transmission towers. The CAP Working Group expressed broad support for this project and sought clarity on how the sites were chosen and the criteria used, whether the scope of the project could be reduced, and suggested input could be provided from suicide prevention experts.

How we responded

We provided the requested information to the Working Group and presented several options for the scope and prioritisation of this project.

We are adopting a lower cost option by reducing the project scope and cost from \$36m in the Preliminary Revenue Proposal to \$22m through a more targeted and staged approach to addressing the public safety risk.

Lifeline was also consulted by a member of the Working Group on the safety risk of unauthorised climbing from a suicide prevention perspective, and provided support for the protection of towers on a prioritised basis close to populated areas and for the criteria applied.

The feedback from the CAP Working Group has directly impacted on the scope of this project in the Revenue Proposal.

4.5. Northern REZ Strategic Land Acquisition

What we heard

We sought feedback from the CAP Working Group on the opportunity for a strategic land acquisition in preparation for the potential future need for the Northern Renewable Energy Zone in AEMO's Integrated System Plan.

The CAP Working Group recognised the value in avoiding more expensive future solutions and was comfortable with proceeding with the acquisition of the easements in the Revenue Proposal, recognising also that any land purchased could be sold in future if not needed.

How we responded

As a result of the feedback from the CAP Working Group, we have retained this project in the Revenue Proposal. We welcome the CAP Working Group support for the project and its recognition that the strategic acquisition is cost-effective.

4.6. Power Quality Management Project

What we heard

The CAP Working Group sought more information and asked us to consider all options on the way forward for this project, which involves measures to address power quality issues on specific parts of the network in relation to voltage distortion.

How we responded

In the Preliminary Revenue Proposal, we identified a need to take steps to maintain power quality for customers, estimated to cost \$21 million. As further information became available, the scope of these works increased to \$54 million.

In exploring all the options for this project and considering feedback from the CAP Working Group, we propose to install measuring devices to better identify the issues to be addressed and develop a more targeted and staged solution. This reduces this project to \$5m in our ex ante capex forecast, avoiding costs of \$16 million on the original forecast, and \$49 million in total.

A contingent project is proposed to respond to the potential outcomes from the monitoring and studies. Based on the feedback from the Working Group and compliance with the National Electricity Rules Schedule 5.1, this was chosen to be the best outcome, and allows all potential options to be fully considered.

4.7. Cyber Security

What we heard

The CAP Working Group highlighted the uncertainty around the timing of expected legislative obligations related to cyber security maturity levels and asked whether a cost-pass through would be more appropriate.

How we responded

The feedback from the CAP Working Group has been seriously considered in evaluating the options available to the business in the decision-making process. The legislative environment is very dynamic.

The expenditure we propose for cyber security uplift involves a full compliance solution based on the growing likelihood of firm legislative obligations in the short-term.

Separately, based on the feedback received, we will rely on a cost pass-through if cyber insurance becomes unavailable and we incur material costs as a result of a cyber incident.

4.8. Substation Security

What we heard

We discussed with the Working Group a review we were undertaking of our substation security program. The Working Group was interested to ensure a coordinated and efficient approach was being taken to these closely related projects.

How we responded

Our internal management review confirmed these projects as complementary initiatives each with a specific purpose. It also identified opportunities to reduce the cost of some of these projects through careful design and scope changes, in line with feedback from the Working Group.

These changes resulted in a reduction to the cost of these projects of around \$10m.

5. Engagement Reflections

We found our engagement with the CAP, the Working Group, and the AER valuable in helping to shape our expenditure plans for the 2024-2028 Revenue Proposal.

We remain committed to effective ongoing engagement and learning from our engagement experiences and those of others as to how we can do better.

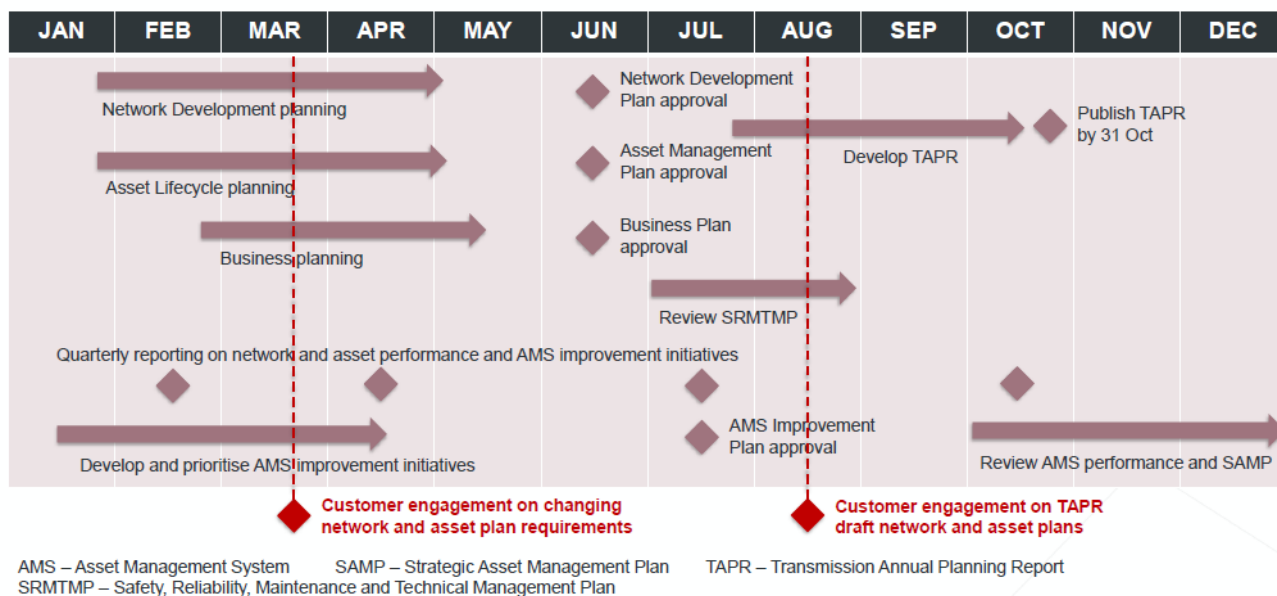
One reflection is that the ongoing impact of COVID-19 has made face to face meetings with all CAP Working Group members present impossible, and general logistics more challenging. While all participants continued to engage enthusiastically, the lack of face-to-face interaction creates a different engagement experience. Wherever possible, we would support more 'in room' engagement and discussion than online meetings.

In reflecting on the current engagement process more generally we have identified the following improvement opportunities:

- Reinststate an independent facilitator to run meetings and work with CAP members to ensure ElectraNet and consumer expectations are met during meetings and engagement and to facilitate full and open discussion.
- Meeting presentations and supporting information to be provided to participants well in advance of meetings.
- Greater involvement of the CAP (or a CAP Working Group) earlier during the development of the Preliminary Revenue Proposal.
- Ongoing engagement of the CAP in our annual planning process with the introduction of twice-yearly sessions in say March and September that would provide insight and the opportunity for input on the development of network and asset plans, including the Transmission Annual Planning Report.
- Offer to fund optional independent training for Working Group members with minimal/ no experience in understanding network proposals or network business operations to get the most from their unique experiences and expertise.
- Face-to-face meetings as much as possible for greater collaboration opportunities.
- Develop measurable success criteria that are less subjective and open to interpretation.

A summary of our proposed approach to engaging with the CAP though our annual planning cycle moving forward is shown below.

Figure 5-1: Proposed Annual Planning Calendar



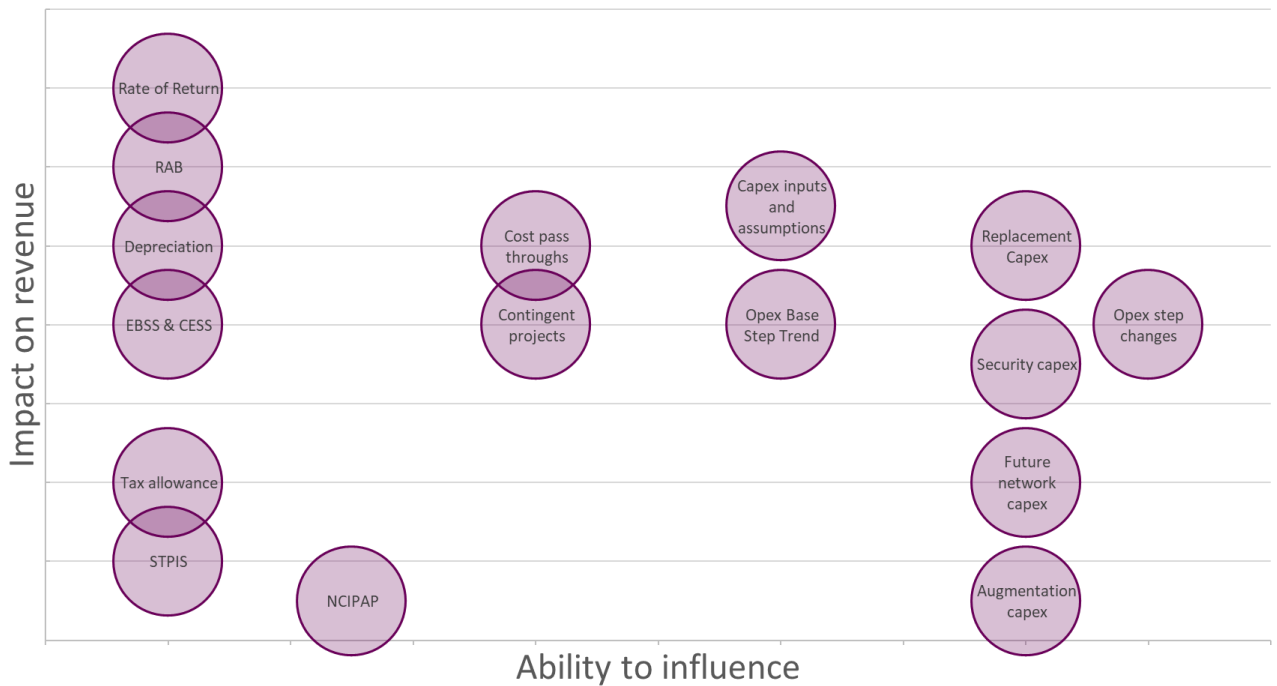
Incorporating customer engagement into our annual planning cycle, as illustrated in the timeline above, is intended to further integrate customer preferences and input as part of business as usual.

Customers will have the opportunity for ongoing participation in developing investment priorities and business plans with ElectraNet, and we look forward to this engagement moving forward beyond the Revenue Proposal.

Appendix A Engagement Topics Covered

We worked with the CAP Working Group to identify topics for engagement based on the ability of the Panel to influence outcomes and the potential impact of the topic on revenue to be funded by customers. The following themes were developed in conjunction with the CAP Working Group.

Figure 5-2: Themes for engagement



A summary record of the topics covered during engagement sessions and workshops is as follows.

Table 5-1: Summary of engagement sessions

Date	Meeting	Summary
29 Apr 2020	CAP Meeting 15	<ul style="list-style-type: none"> Overview of the Eyre Peninsula Contingent Project Application and update on regulatory approval for PEC. Indicative Revenue Reset Timetable presented to the CAP for discussion. ElectraNet’s Network Relief Package to assist customers experiencing financial stress due to COVID-19.
18 Sep 2020	CAP Meeting 16	<ul style="list-style-type: none"> Update on the PEC Contingent Project Application and economic assessment. Update on Eyre Peninsula Contingent Project Application and engagement. An indicative early engagement program for the Revenue Proposal was provided for discussion.

Date	Meeting	Summary
19 Nov 2020	CAP Meeting 17	<ul style="list-style-type: none"> A review of the CAP charter and membership was discussed PEC update, including a financeability Rule change proposal CAP was engaged to develop a proposed Revenue Reset customer engagement approach building on the approach co-designed with the CAP in 2016 with proposed refinements based on a Review of Consumer Engagement Practices by electricity networks undertaken by Harding Katz dated 15 May 2020 Feedback sought on revised Network Vision directions and priorities.
2 Feb 2021	Network Vision stakeholder forum	<ul style="list-style-type: none"> Launch of Network Vision discussion paper Engagement on the key themes and emerging directions and priorities of the updated Network Vision
23 Feb 2021	CAP Meeting 18	<ul style="list-style-type: none"> Overview of changes made to the CAP membership PEC update including financeability Rule change proposal. Key feedback themes from the Network Vision Stakeholder Forum presented. Update provided on Revenue Reset early engagement thinking.
6 Apr 2021	CAP Meeting 19	<ul style="list-style-type: none"> Update on the economic assessment for PEC following changes in the NEM. Progress report and summary of feedback following release of the Network Vision discussion paper in February 2021. Early overview of the developing Preliminary Revenue Proposal for discussion. Early engagement was discussed in terms of a proposed schedule and key topics of likely interest, and feedback was obtained on a draft letter formalising the early engagement approach with the AER.
2 Jul 2021	CAP Meeting 20	<ul style="list-style-type: none"> Update on the major projects, Eyre Peninsula, PEC, and synchronous condensers. Gordon Jardine and Steve Masters, ElectraNet Chairman and Chief Executive, shared their perspectives and commitment to genuine engagement. ElectraNet outlined its revenue reset early engagement plan for further consultation and shared the response from the AER formally committing to the early engagement approach. The CAP agreed to form a Working Group for engagement on ElectraNet's Revenue Proposal.
16 July 2021	CAP Working Group Meeting 1	<ul style="list-style-type: none"> Working Group purpose and Success Criteria Overview of Preliminary Revenue Proposal Capex forecasting and methodology approach Key topics identified for future meetings
30 July 2021	CAP Working Group Meeting 2	<ul style="list-style-type: none"> Reviewed the governance framework for capital program Reviewed five case studies in the capex replacement program

Date	Meeting	Summary
12 Aug 2021	Preliminary Revenue Proposal stakeholder forum	<ul style="list-style-type: none"> • Overview of final directions and priorities of the updated Network Vision that have informed indicative expenditure plans • Engagement on Preliminary Revenue Proposal and indicative forecasts
30 Aug 2021	CAP Working Group Meeting 3	<ul style="list-style-type: none"> • AEMO and SA Power Networks presentations on the changing power system and future network requirements • Project case studies – future network projects
10 Sep 2021	CAP Working Group Meeting 4	<ul style="list-style-type: none"> • Reviewed Technology Strategy and Program • Technology case studies • Health check on engagement to date
14 Sep 2021	CAP Meeting 21	<ul style="list-style-type: none"> • ElectraNet provided an overview of engagement activities for the Preliminary Revenue Proposal, including feedback and submissions. • The CAP Working Group provided a status update on engagement on the Preliminary Revenue Proposal, consulting on progress with the broader CAP. • ElectraNet advised the CAP of minor schedule delays for Project EnergyConnect (PEC) leading to the deferral of some expenditure to the next regulatory period.
30 Sep 2021	CAP Working Group Meeting 5	<ul style="list-style-type: none"> • Operating expenditure forecasts • Insurance step change • Cyber security step change
15 Oct 2021	CAP Working Meeting 6 (full-day workshop)	<ul style="list-style-type: none"> • Updated expenditure forecasts • Proposed Contingent Projects • Benchmarking performance • Key areas of the Revenue Proposal being settled
12 Nov 2021	CAP Working Group Meeting 7	<ul style="list-style-type: none"> • Updated expenditure and revenue forecasts • Impact of the CAP Working Group on the Revenue Proposal • Engagement Reflections from ElectraNet and response from the CAP Working Group
2 Dec 2021	CAP Working Group Meeting 8	<ul style="list-style-type: none"> • Shared engagement reflections • Future engagement beyond the Revenue Proposal
13 Dec 2021	CAP Meeting 22	<ul style="list-style-type: none"> • Final expenditure and revenue forecasts • Report from the CAP Working Group on outcomes of the engagement process

Appendix B Network Vision Directions and Priorities

South Australia's electricity transmission network will support customer choice and deliver affordable and reliable power supplies for a sustainable future.

THEME 1

The network will continue to provide an important role into the future



Maximum Demand

↑140MW

Is forecast to increase by 140 MW to 3,492 MW by 2030

THEME 2

The ongoing uptake of distributed energy resources by customers is changing the role of the network



Rooftop PV

3,950MW

Rooftop PV to exceed 3,950 MW by 2030.



Electric Vehicles

3%

Electric vehicles to consume 500GWh of energy by 2030 adding more than 3% to demand

THEME 3

The generation mix is changing creating ongoing challenges for the operation of the grid



Renewables

100% by 2030

Renewables displacing fossil fuels with SA Government targeting net 100% renewables by 2030

Grid Scale Storage

473MW

Grid scale storage projects to increase to 473 MW by 2030.

THEME 4

New technologies are creating opportunities to change the way network services can be delivered



Virtual Power Plants

397MW

Virtual power plants to reach 397 MW by 2030.

Appendix C CAP Working Group Information Requests and Responses

The CAP Working Group requested detailed information on a range of topics of interest relating to the Preliminary Revenue Proposal. ElectraNet provided detailed responses to the CAP Working Group as outlined below.

No.	Response Date	Topic
1	27 Aug 2021	Impact of proposed replacement projects on the performance under the STIPIS
2	8 Sept 2021	Scope to defer part of the instrument transformer project into the following regulatory period and NPV for this option
3	27 Aug 2021	Transmission line re-insulation program
4	27 Aug 2021	Worked example of the assessment undertaken for a replacement project
5	2 Sept 2021	A full list of the capital expenditure projects contained in the indicative forecast
6	11 Oct 2021	Tower Anti-Climb Project - selection process
7	11 Oct 2021	Dynamic Reactive Capacity Project, including VPP / distribution solutions
8	11 Oct 2021	Wide Area Monitoring Scheme Project
9	11 Oct 2021	Journey Management System project alternatives
10	28 Oct 2021	Further analysis on the projects comprising the technology program
11	11 Oct 2021	Further analysis on Network Benchmarking
12	11 Oct 2021	Cyber Security
13	11 Oct 2021	Further analysis on Network Development projects
14	11 Oct 2021	Contingent Project summary
15	11 Oct 2021	IFRS Accounting standards implications
16	28 Oct 2021	Substation Security Program
17	28 Oct 2021	Capital Project Governance Process
18	28 Oct 2021	Revenue Proposal Narrative
19	10 Nov 2021	ElectraNet Customer Engagement Journey Reflections
20	10 Nov 2021	Response to CAP Working Group key items of interest
21	10 Nov 2021	Preliminary Customer Engagement Outcomes

Appendix D Consultation Feedback Summary

The following table details the specific feedback received from stakeholders on the Preliminary Revenue Proposal and the way we responded in our Revenue Proposal.

What we heard	How we responded
Capital Expenditure Program	
<p>ElectraNet should be doing everything to keep its costs as low as possible. What lower cost options have been considered in the capital program?</p>	<p>We undertook a line-by-line Management review of the entire capital program, including the project need, scope, cost estimate and economic benefits to customers, reflecting on customer feedback received.</p> <p>This led to the cancellation or deferral of some projects, and scope reductions and cost revisions on others, yielding a total reduction of approximately 12% or \$100² million in the capital program from our Preliminary Revenue Proposal (excluding the impact of the new accounting standards).</p>
<p>What lower cost options have been considered in the replacement program?</p>	<p>Our line-by-line Management review included the replacement program, which comprises 55% of the overall capital program.</p> <p>The replacement and refurbishment program has been reduced 19% from the Preliminary Revenue Proposal, based on project cancellations and scope reductions and is 36% lower than the program in the current period. Any further reductions would involve unacceptable increases in network and asset risk.</p>
<p>What lower cost options have been considered in the IT program? Delivering a strategy is not sufficient, and increases in data does not necessarily require greater investment. The value to customers must be clear.</p>	<p>We have reduced the Business IT capex forecast from \$78³m in the PRP to \$70m (an 11% reduction) through the cancellation of two projects and cost refinements for others. We have also reprioritised and refocused our overall technology program on the key benefits to be delivered to customers.</p>

² These values are in end of year terms, so differ slightly from those presented in the PRP due to additional inflation.

³ These values are in end of year terms, so differ slightly from those presented in the PRP due to additional inflation.

What we heard	How we responded
<p>What are the cost implications of the deferral of Project EnergyConnect (PEC)? Will this deliver a benefit to ElectraNet under the CESS?</p>	<p>Estimated cost savings now expected for PEC and delay into the coming regulatory period result in revenue and prices being lower than otherwise due to lower costs and later capitalisation of the assets.</p> <p>Given this delay we have also rebalanced our capital program and workload through offsetting project timing movements into the current period, minimising any net increase in the capex forecast for the coming period.</p> <p>The PEC deferral has no impact on CESS outcomes because major project timing movements are removed from the CESS calculations. However, the rebalancing mentioned above produces adverse CESS outcomes as our expenditure in the current period is higher than would otherwise be the case.</p>
<p>Proposed mining developments continue to progress on the Eyre Peninsula, with the possibility of major loads connecting to the network in the coming regulatory period.</p>	<p>We have proposed a contingent project to enable the upgrade of the new Eyre Peninsula line (as provided for in its design) if new mining loads trigger the need for additional capacity in the forthcoming period.</p>
<p>The probability and potential cost impact of the contingent projects should be carefully considered, and customers should not bear any undue risks.</p>	<p>We have reviewed the five contingent projects identified in the Preliminary Revenue Proposal, which comprised an indicative total capital expenditure of \$660 million. We are now proposing three contingent projects, totalling an estimated \$360 million.</p> <p>Three of the originally proposed projects have been removed from our final list on the basis that if required by AEMO in future, these will automatically become contingent projects under the Rules. A further contingent project has been added (Power Quality Management), following customer feedback that it should be removed from our ex ante capital expenditure forecast.</p> <p>The contingent project mechanism helps manage risk and reduce costs because customers only pay for the project if it is required. Updated capital expenditure forecasts will be prepared if the projects proceed.</p>

What we heard	How we responded
<p>How will the trend of increasing transmission costs be managed?</p>	<p>To some extent, recent increases in transmission costs reflect improved understanding of the costs of major line projects. Updated costs are now reflected in AEMO's Integrated System Plan.</p> <p>The costs of other projects have also exceeded initial estimates in recent years, reflecting market price pressures and resource constraints.</p> <p>In response we have implemented improvements in our scoping and estimating approach to provide higher confidence in our estimates for the purpose of the Revenue Proposal. Ongoing prioritisation of the capital program will also ensure we manage risk and maintain service levels. The incentives of the CESS will also drive us to manage our capital program efficiently and avoid any overspend that is not essential.</p>
<p>Specific feedback was provided on a range of projects in the capital program, together with the following overall guidance:</p> <ul style="list-style-type: none"> • Are we keeping costs as low as possible? • Is this a 'nice to have' or 'must have' project? • Could the project be deferred or partially deferred? • Are there lower cost solutions? 	<ul style="list-style-type: none"> • Tower anti-climb – we sought feedback on this project and concluded by adopting a more staged approach focusing initially on the highest risk areas, with input and support from Lifeline from a suicide prevention perspective. This resulted in a reduction in cost from approximately \$36 million to \$22 million. • Northern REZ strategic land acquisition – feedback supported the value of this project as a low regrets investment to avoid more expensive future solutions, and we have retained this project in our program. • Power Quality Management – we have considered feedback on this project and propose to install measurement devices to better identify the issues and consider the options, with any specific solutions to be pursued separately as a contingent project, reducing the upfront cost of this project by approximately \$54 million. • Substation security projects – our further review of these related projects based on feedback received identified cost savings through careful design and scope changes, resulting in a cost reduction of approximately \$10 million.

What we heard	How we responded
Operating Expenditure Program	
<p>ElectraNet should be doing everything to keep its costs as low as possible. What actions is ElectraNet taking to improve efficiency and drive down operating costs?</p>	<p>ElectraNet has stringent controls in place to manage its operating expenditure including restraints on recruitment, consultancy, travel, and training costs, in the face of growing external cost pressures which have required ElectraNet to overspend its allowances in the current period in order to meet our service obligations. This is not sustainable in the long term.</p> <p>We have finalised our operating expenditure forecast with the input received and it has reduced approximately \$19m or 3% from the Preliminary Revenue Proposal.</p> <p>Our updated opex outlook is a realistic reflection of our expected costs, remains consistent with the AER's base step trend approach, satisfies the operating expenditure objectives of the Rules, and is reasonable for the purpose of establishing an efficient ex-ante opex allowance.</p>
<p>ElectraNet benchmarks poorly in opex terms based on AER benchmarking.</p>	<p>Overall productivity is what matters most to the total cost of service to customers. Despite the unique challenges of our network, ElectraNet has benchmarked as the most efficient mainland TNSP in total productivity terms since the AER's measures began in 2006.</p> <p>Notwithstanding the limitations of transmission benchmarking, in partial terms ElectraNet benchmarks well in capex productivity but less so in opex productivity. This is to be expected given the age of the network and ongoing cost of maintaining it, and our lack of scale efficiencies relative to larger networks.</p> <p>Our strong productivity performance overall gives confidence our total costs are efficient.</p>
<p>In relation to insurance ElectraNet should consider all options to balance the appropriate sharing of risk between customers, ElectraNet and others.</p>	<p>We agree risk should be shared appropriately between ElectraNet, customers and others including Governments. Given our legal obligations to maintain various levels of insurance cover, our practical ability to share risks is limited.</p> <p>Our final review of the insurance forecasts has resulted in a reduction of approximately \$1m pa (or 14%) from the step change presented in the Preliminary Revenue Proposal.</p>

What we heard	How we responded
<p>The timing of expected legislative obligations related to cyber security remains uncertain and a cost pass-through may be more appropriate.</p>	<p>We have carefully considered this feedback in evaluating options available to the business. Our proposed expenditure for cyber security uplift reflects a full compliance solution based on the growing likelihood of firm legislative obligations in the short-term.</p> <p>Based on the feedback received, we will rely on a cost pass-through if cyber insurance becomes unavailable and we incur material costs as a result of a cyber incident.</p>
<p>A suitable productivity improvement factor should be considered, recognising the cost pressures being applied across businesses in the current COVID-19 environment.</p>	<p>We have applied a productivity factor to our operating expenditure forecast of 0.3% reflecting the average weighted productivity gain across transmission networks, consistent with the AER's benchmarking analysis and base step trend forecast methodology.</p>
<p>2020-21 is supported as a reasonable base year for the operating expenditure forecast.</p>	<p>We have continued to base our operating expenditure forecast on 2020-21 as a representative and efficient base year for the purposes of the opex forecast.</p>
<p>Other Elements</p>	
<p>The 5% real increase in transmission prices in 2024 in the Preliminary Revenue Proposal is noted, while also recognising the forecast 20% drop in wholesale electricity prices from the new interconnector should offset that impact into the foreseeable future.</p>	<p>We remain mindful of the impact of transmission costs and overall energy prices on customers. Our reduced expenditure forecasts and the latest market movement in the regulated rate of return have resulted in a significantly reduced real price increase of 0.8% in 2024 in our Revenue Proposal.</p>
<p>The revenue and price outlook for customers remains sensitive to movements such as interest rates and this should be considered</p>	<p>We note that our forward revenue requirements will vary based on annual adjustments required to our cost of debt, inflation movements and incentive scheme payments.</p> <p>For transparency for customers, we have presented information to show the potential impact of an increase in interest rates on our forward revenue under a high scenario based on current market data.</p>
<p>It is important to consider the growth in the Regulated Asset Base (RAB) which is a major driver of revenue funded by customers</p>	<p>We are mindful of the impact of the recent growth in the RAB driven by the investments identified in AEMO's ISP which led to higher transmission costs but help drive down total prices.</p> <p>We have presented information to show the overall trend, noting that the RAB is now declining in real terms over the coming period based on our reduced capital expenditure forecast.</p>
<p>Customers support ElectraNet participating in the new Demand Management Innovation Allowance Mechanism (DMIAM)</p>	<p>We are proposing to participate in this incentive, including a role for our CAP in identifying initiatives to be funded under this mechanism.</p>

What we heard	How we responded
<p>Regional stakeholder engagement should be considered.</p>	<p>The Preliminary Revenue Proposal was published and promoted widely through our mailing lists, inviting consumers and other stakeholders to express their views on our forthcoming regulatory proposal. The option of regional forums was also offered. It also received State press coverage.</p> <p>We have also been very active in regional areas with our customer and stakeholder engagement in connection with the Eyre Peninsula upgrade, Project EnergyConnect and, to lesser extent, the synchronous condenser project.</p> <p>The participation of a regional representative on the CAP and Working Group has also provided a valuable perspective.</p>

Appendix E Key Documents Published by ElectraNet

We published a number of key documents during the course of our engagement as outlined below.

Date		Document
2 Feb 2021	Network Vision Discussion Paper	To present an updated analysis of the key change drivers impacting on transmission services, and the implications for the directions and priorities for managing and operating the network, for consultation and feedback. This provides stakeholders a key opportunity to engage on the directions and priorities that will drive our expenditure plans and proposals.
30 Jun 2021	Expenditure Forecast Methodology	To describe how ElectraNet is developing its expenditure forecasts for its capital and operating expenditure programs for the 2024-2028 regulatory period.
14 Jul 2021	Preliminary Revenue Proposal	To detail preliminary capital and operating expenditure forecasts and provide an overall revenue and price path outlook for the 2024-2028 regulatory period, as the basis for detailed engagement with stakeholders.
23 Aug 2021	Network Vision	Developed with stakeholders, the updated Network Vision outlines the key themes, directions and priorities that drive our expenditure plans and proposals.
31 Oct 2021	Transmission Annual Planning Report	Provide information on the outlook for South Australia's electricity transmission network over a ten-year planning horizon, including demand projections, current capacity and emerging limitations and current and proposed network developments.
31 Jan 2022	Customer Engagement Outcomes Report	Provide an overview of the outcomes of the engagement process, including a detailed summary of the issues raised and the manner in which ElectraNet has responded to those issues.
31 Jan 2022	Revenue Proposal	Our formal Revenue Proposal under the Rules shaped by customer engagement, outlining our expenditure plans and programs for the 2024-2028 regulatory period.

