

15 August 2013

consumerengagement@aer.gov.au



Mr Warwick Anderson
General Manager – Network Regulation
Australian Energy Regulator
Canberra ACT 2601

Jemena Limited
ABN 95 052 167 405

321 Ferntree Gully Road
Mount Waverley VIC 3149
Locked Bag 7000
Mount Waverley VIC 3149
T +61 3 8544 9000
F +61 3 8544 9888
www.jemena.com.au

Dear Mr Anderson

Draft Consumer Engagement Guideline for Network Service Providers – July 2013

Jemena Limited (**Jemena**) owns and operates the Jemena Gas Networks (NSW) (**JGN**) and the Jemena Electricity Networks (VIC) (**JEN**). Jemena also owns and operates gas transmission assets which are not covered by regulation, including the Eastern Gas Pipeline and the Queensland Gas Pipeline.

Jemena appreciates the opportunity to respond to the Australian Energy Regulator's (**AER**) draft consumer engagement guideline for network service providers (**the guideline**). Jemena is pleased with the consultation process the AER took in developing the guideline, particularly the numerous forums and workshops held with consumer groups and network service providers (**NSPs**).

Jemena welcomes the release of the guideline. In particular, Jemena is supportive of the principles-based, non-prescriptive nature of the guideline, as it gives NSPs the flexibility to undertake innovative, meaningful and cost-effective engagement activities. We believe central to this engagement process is to determine how stakeholders wish to be engaged and on what topics and how their feedback will be reflected in the service provider's decision-making process. JEN and JGN are committed to undertaking effective consumer engagement, both during the preparation of expenditure proposals and on an ongoing basis, and is appreciative of the direction provided by the guideline.

Constructive engagement with consumers and other stakeholders is important to Jemena and we recognise that it will be increasingly critical to the provision of services which meet both their current and long-term interests. Jemena engages on a range of issues with various stakeholders, and is currently in the process of implementing a proactive, whole-of-business approach to consumer and stakeholder engagement. Activities to date include:

- JEN holds regular Stakeholder Consultative Committee meetings. This process is considered business-as-usual for JEN, as the meetings cover a range of issues including (but not limited to) EDPR submissions, service delivery, customer service improvement strategies and community support initiatives. Committee members include representatives from consumer advocacy groups and local councils. The committee is currently being reviewed and enhanced, in order to broaden its reach with JEN's stakeholders.

- JGN has a well-established stakeholder management program that seeks feedback from large customers, market participants and key interest groups on commercial and service delivery issues. JGN is in the process of establishing a Customer Council to more broadly engage with the representatives of end customers on an ongoing basis.
- Jemena has also recently undertaken a strategic review of its external relations approach, which included a significant research component involving both interviews with stakeholders (including consumer advocacy groups, retailers, regulators, government and industry associations) and online surveying of end users. The results of this research are influencing the development of Jemena's consumer engagement strategy and future plans.

If you wish to discuss this further, please contact Siva Moorthy on (03) 8544 9442 or at siva.moorthy@jemena.com.au.

Yours sincerely



Robert McMillan
General Manager Regulation