



Jemena Electricity Networks (Vic) Ltd

2021-26 Electricity Distribution Price Review Regulatory Proposal

Attachment 02-06

Customer Council's feedback on Jemena's 2021-25 EDPR



Customer Council's Feedback on Jemena's 2021-25 Electricity Distribution Price Review

March 2019

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1. Introduction

1.1. Purpose of Report

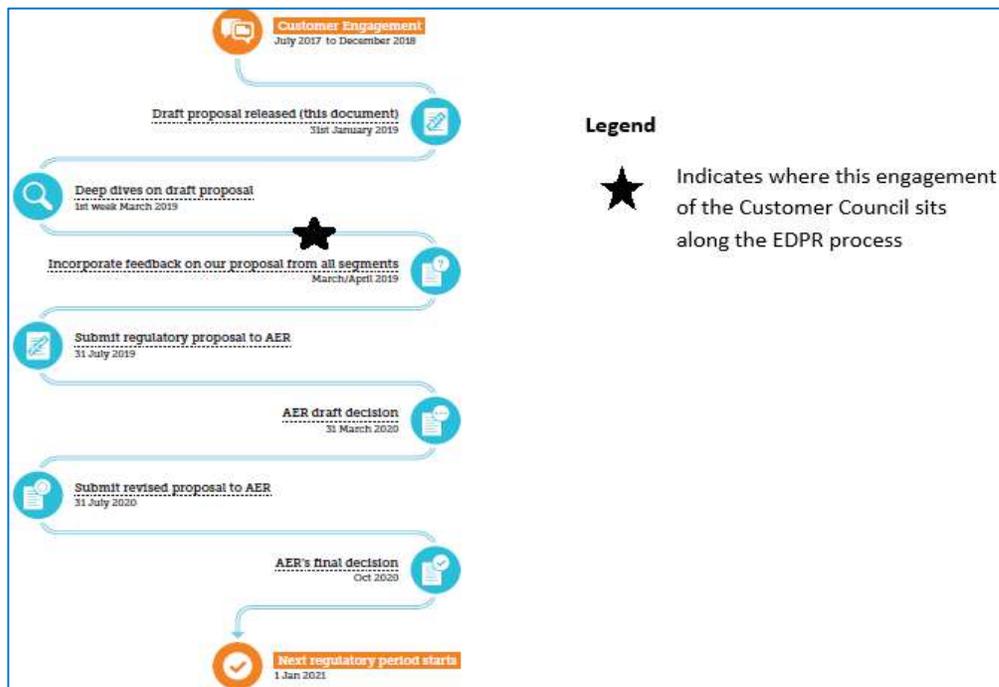
In March 2019, engagement with the Jemena Customer Council was undertaken to enable feedback on Jemena’s 2021-25 Electricity Distribution Price Review (EDPR) in line with regulatory provisions for public consultation. This report provides a summary of the work performed to engage the Customer Council and outcomes from that process.

1.2. Background and Context

The EDPR is the process through which the Australian Energy Regulator (AER) reviews Jemena’s proposed revenue for the next five years and the planned activities that this will fund for the 2021-25 regulatory period. The AER requires electricity networks, such as Jemena, to review and submit a new customer electricity pricing and services plan for approval every five years. To inform this review process, Jemena has been engaging with a range of stakeholders and stakeholder group representatives, including customers, to understand their needs and expectations.

Jemena appointed Moreland Energy Foundation (MEFL) to engage members of its Customer Council (described below in Section 1.3) to seek comments to Jemena’s 2021-25 Electricity Distribution Price Review (“draft Plan”). This engagement approach was adopted to provide an opportunity for Customer Council members to provide their views through a transparent and independent process. Figure 1 below provides the overall process undertaken by Jemena to engage its customers and where this independent engagement activity of the Customer Council occurs.

Figure 1: Jemena’s Customer Engagement Journey



(Source: Adopted from Jemena’s draft Plan)

1.3. Customer Council representation

The Jemena Customer Council is a group of representatives of stakeholder groups within the Jemena Energy Network area comprising of several peak organisations representing northern and western Melbourne in the community services, primary industry and business sectors. Participation in the Customer Council provides an opportunity for members to participate and contribute to Jemena’s decision-making processes, facilitate wider community consultation and communicate information back to their members. Further to this, the Customer Council meets quarterly to discuss (amongst other things) Jemena’s performance against core commitments to customers. Table 1 below shows the current Customer Council representation.

Table 1: Customer Council representation

<i>Representation</i>	<i>Organisations</i>
Residential & Vulnerable Customers	<ul style="list-style-type: none"> ● Energy Consumers Australia ● St Vincent de Paul ● Kildonan Uniting Care ● Brotherhood of St Laurence ● Council of the Ageing VIC (COTA) ● Renew
Large Customers	<ul style="list-style-type: none"> ● Energy Users Association of Australia ● Ai Group ● CSL Behring
Small Business Customers	<ul style="list-style-type: none"> ● Victorian Chamber of Commerce and Industry
Retailers	<ul style="list-style-type: none"> ● Australian Energy Council (Retailer Rep Body)
Other	<ul style="list-style-type: none"> ● Moreland Energy Foundation* ● Energy & Water Ombudsman Vic ● Northern Alliance for Greenhouse Action ● Western Alliance for Greenhouse Action ● RMIT ● Clean Energy Council

*Great care was taken at the project outset to define and distinguish the role of MEFL’s representative on the Customer Council and that of the MEFL team administering the surveys. The project team administering the surveys could not provide their feedback on behalf of MEFL and the MEFL representative on the Customer Council could not administer surveys. This delineation and distinction was necessary to ensure the transparency and independence of the engagement work.

2. Overview of Engagement Process

2.1. Purpose of Engagement

The purpose of the engagement process was to obtain feedback from the Customer Council on the draft Plan. A secondary objective of the engagement was to solicit stakeholder views on Jemena's engagement process.

2.2. Engagement Approach

The diverse range of stakeholder groups represented on the Customer Council means that there is a breadth of issues and needs that the draft Plan needs to address, and similarly many components of the draft Plan will be of lesser importance to some members. Surveys and interviews were administered to provide an opportunity for the Customer Council members to participate through their preferred engagement medium. In designing the interviews, it was important to modify certain questions to capture their different perspectives on the subject matter that was unique and relevant to their interests. However, it was also important to capture the coherence and reception of the document as a whole.

The engagement was conducted in a two-step process.

2.2.1. Initial surveys

- An online survey was sent out to all Customer Council members which was designed to identify the key areas of interest or relevance for the stakeholder and any further limitations of the draft Plan in addressing their needs. The survey also addressed the broad reception of the draft Plan and their views on the engagement process.
- The online survey comprised a mix of closed- and open-ended questions allowing the participants to provide their individual experience and feedback.
- The survey was open from 12 March to 29 March 2019. The survey can be found in the Appendix section.
- Seventeen (17) Customer Council members were invited to participate in the survey. Six (6) completed the survey, with five of these agreeing to participate in follow up phone interviews to discuss their responses in more detail.

2.2.2. In-depth interviews

- Engagement needs and priorities are specific to stakeholder groups, and in many cases, to individual stakeholders. The responses from the online surveys were used in designing targeted interview questionnaires that would solicit in-depth and considered responses on issues that were relevant to each Customer Council member.

- On average, the interviews were completed over 30 minutes.
- Six (6) interviews were conducted, including one with a Customer Council member who had not completed the online survey.

3. Customer Council’s Feedback

3.1. Overview

Seven (7) Customer Council members (“respondents”) provided their feedback through surveys and/or interviews. This translates to a 42% response rate which is well above typical survey engagement return rates (i.e. 10-15%). Three (3) respondents who did not participate in the engagement indicated that they would be doing so through alternative channels. In addition, another three (3) respondents indicated they could not participate within the limited timeframes available to provide comments. These findings indicate that most Customer Council members want to participate in a public consultation process and provide their feedback to Jemena.

Views from the following customer groups were not captured as their representatives did not provide feedback through this engagement process:

- Large customers (Business and Local Councils); and
- Retailers.

Table 2 below provides a summary of the engagement activities undertaken with each Customer Council member.

Table 2: Summary of engagement activities

Council Member Representation	Engagement activities	Additional comment
1. Clean Energy Council (CEC)	<ul style="list-style-type: none"> • Invited to participate • Survey Completed • Interview Completed 	Level of prior engagement: <ul style="list-style-type: none"> • Attended meetings and workshops • Received consultation papers • Wrote submissions and consulted with CEC members
2. Moreland Energy Foundation (MEFL)	<ul style="list-style-type: none"> • Invited to participate • Survey Completed • Interview Completed 	Level of prior engagement: <ul style="list-style-type: none"> • Attended meetings and workshops
3. St Vincent de Paul	<ul style="list-style-type: none"> • Invited to participate • Survey Completed • Interview Completed 	Level of prior engagement here: <ul style="list-style-type: none"> • Formal consultation and informal conversations through the various engagement channels
4. Kildonan Uniting Care	<ul style="list-style-type: none"> • Invited to participate • Survey Completed 	Level of prior engagement: <ul style="list-style-type: none"> • Attended People’s Panel workshops

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Council Member Representation	Engagement activities	Additional comment
	<ul style="list-style-type: none"> ● Interview Completed 	
5. Council of the Ageing Vic (COTA)	<ul style="list-style-type: none"> ● Invited to participate ● Interview Completed 	Level of prior engagement: <ul style="list-style-type: none"> ● Attended People's Panel workshops and other forums
6. Brotherhood of St Laurence (BSL)	<ul style="list-style-type: none"> ● Invited to participate ● Survey Completed ● Interview Completed 	Level of prior engagement: <ul style="list-style-type: none"> ● Attended meetings and workshops
7. Victorian Chamber of Commerce	<ul style="list-style-type: none"> ● Invited to participate ● Survey Completed 	<ul style="list-style-type: none"> ● Could not participate further within the limited timeframe available
8. Northern Alliance for Greenhouse Action (NAGA)	<ul style="list-style-type: none"> ● Invited to participate ● Declined to Participate 	<ul style="list-style-type: none"> ● Are providing comments through another channel
9. Western Alliance for Greenhouse Action (WAGA)	<ul style="list-style-type: none"> ● Invited to participate ● Declined to Participate 	<ul style="list-style-type: none"> ● Are providing comments through another channel
10. Energy Consumers Australia (ECA)	<ul style="list-style-type: none"> ● Invited to participate ● Unable to be reached 	<ul style="list-style-type: none"> ● Are providing comments through another channel
11. Energy & Water Ombudsman Victoria (EWOV)	<ul style="list-style-type: none"> ● Invited to participate ● Declined to Participate 	<ul style="list-style-type: none"> ● EWOV does not comment on Distribution Networks' business plans
12. RMIT	<ul style="list-style-type: none"> ● Invited to participate ● Declined to Participate 	<ul style="list-style-type: none"> ● Could not participate further within the limited timeframe available
13. Renew	<ul style="list-style-type: none"> ● Invited to participate ● Declined to Participate 	<ul style="list-style-type: none"> ● Could not participate further within the limited timeframe available
14. Australian Energy Council (AEC)	<ul style="list-style-type: none"> ● Invited to participate ● Declined to Participate 	<ul style="list-style-type: none"> ● Had no feedback to provide
15. Ai Group	<ul style="list-style-type: none"> ● Invited to participate ● Unable to be reached 	<ul style="list-style-type: none"> ● N/A
16. Energy Users Association of Australia (EUAA)	<ul style="list-style-type: none"> ● Invited to participate ● Unable to be reached 	<ul style="list-style-type: none"> ● N/A
17. CSL Behring	<ul style="list-style-type: none"> ● Invited to participate ● Unable to be reached 	<ul style="list-style-type: none"> ● N/A

The main themes of discussion that emerged from the interviews held were:

- a) Key highlights from the draft Plan and any identified shortcomings.
- b) Views on Jemena's existing services.
- c) Views on Jemena's engagement process.
- d) The proposed changes to network tariffs and impacts on customers.
- e) Views on the services of the broader industry.

The following section provides greater detail on the feedback provided by the respondents. In particular, it addresses themes **a) to c)** which specifically relate to discussions held in relation to the EDPR draft Plan. Whilst the broader commentary on tariff reform and the broader industry isn't directly related to the AER submission subject matter, it was important to capture these responses and communicate these to Jemena. The Customer Council responses to themes **d) to e)** are included within **Appendix A**.

3.2. Jemena's draft Plan

3.2.1. Important takeaways from the draft Plan

Takeaways regarding the draft Plan content:

- Most respondents believed that the draft Plan adequately addresses the energy trilemma of balancing affordability, reliability and sustainability.
- From the six surveys completed, key takeaways and observations by the respondents regarding the draft Plan included:
 - Pricing and tariff reform and the impact on consumers.
 - Peak demand growth minimal to 2025.
 - There will be a small decline in network prices (in real terms).
 - 70 megawatts (MW) increased capacity for renewable energy generation and 50 MW of new battery storage.
 - Electric vehicle (EV) uptake expected after 2025.

"Jemena was able to clearly outline their thinking and their approach".

"Key takeaways? Seems to be there"

- Generally, most respondents were interested in the impacts on vulnerable consumers. Some felt that the draft Plan will not put downward pressure on costs for vulnerable households.
- Respondents felt that the AER 5 year review process didn't appear to provide enough flexibility for things to change.

Takeaways regarding the draft Plan process:

- Regarding the People's Panel process, respondents felt that:
 - The People's Panel recommendations were very strong and significant, in particular, recommendations for:
 - Supporting vulnerable, non-English speaking customers and improving energy literacy.

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- Working with retailers to simplify pricing rates (particularly as understanding pricing is going to be one of the biggest challenges going forward).
- General increased customer communication.
- Although it was noted that Jemena has adopted the People's Panel recommendations, one respondent thought that Jemena seemed to be implementing the 'lighter-touch' recommendations, whereas the more tangible recommendations they would advocate for in the industry.
- Respondents felt that Jemena did well to engage 'real people', or a more representative sample of people within its network.
- One respondent felt that the information provided on the details of engagement with various stakeholder groups was good.
- Jemena seemed to have largely addressed the needs and opinions raised by its stakeholders.

"It is clear they have done a depth of community consultation and taken on their feedback".
- Respondents felt that Jemena succeeded in delivering a more customer-centric submission and had their timing right when it came to engaging their customers.

3.2.2. Views on Jemena services

- Respondents believe that Jemena knows their industry well and have come a long way in understanding their customers, as demonstrated through the engagement process for this draft Plan.
 - What respondents felt Jemena probably didn't know as well, and need to improve, was their understanding of how their business decisions impact people experiencing housing stress and energy poverty.
- Affordability is the most important aspect of Jemena's services for vulnerable customers. Respondents thought that the draft Plan gives the impression that Jemena has heard this message raised by the People's Panel.
- Jemena's outage management plans, in particular their process to communicate with customers, was well received by respondents and demonstrated that the People's Panel process and recommendations were taken seriously within the business.
- As the needs of consumers change (e.g. as a result of bushfire incidences, adverse weather, etc.) Jemena will need to be responsive to that in order to deliver value for its customers.

"It is important to make sure energy costs and value are allocated proportionally to the cost that people put on the network (energy equity)".

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Jemena's network needs to be able to respond to these needs and any other that may arise in real-time, or close to.

- Respondents indicated that Jemena seems to have worked well with other Distribution Network Service Providers (DNSPs) to get “commonality” of tariff reform approach across the customer base across Victoria.
- Jemena (and other DNSPs) need to address the challenge of poor energy literacy among consumers in order to make it easier for people to understand the decisions they must make around electricity.
- It is the role Jemena to come to a performance agreement with their customers, and not necessarily with interest groups. Therefore consultation with customers, such as through the People's Panel process, is encouraged.
- One respondent was of the view that the more Jemena continues to focus on their customers and their needs (e.g. through People's Panel process) rather than those of specific interest groups (e.g. Customer Council), the better they will become.

“If they are able to continue to do that, my organisation and hopefully everyone else will be comfortable because at the end of the day it is about what the community wants”.

3.2.3. Perceived gaps in the draft Plan?

- Respondents were of the view that it was unclear how Jemena plans to balance the present challenges that the energy sector is facing with what is coming up in the regulatory period and beyond. Respondents admitted that this could be because it's difficult for Jemena to plan so far ahead in this space as they don't know how fast the rate of uptake of technologies such as EV and battery storage will be.
 - Whilst it is noted that the draft Plan suggests that EVs in the context of tariff reforms will not be addressed in the next regulatory period, respondents suggest that there is a lot that can be done in the interim to put us in a position to be quicker in the sectors' response when the uptake of EV accelerates.
 - For example, this includes setting minimum standards for EV chargers such as having cloud enabled and smart features to be able to respond to signals from the grid and be interoperable.
 - Although the increase in renewable energy generation and storage is welcomed, a deliberate approach to new technologies, e.g. microgrids, to further support a faster transition to a decentralised grid would improve this further.

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- Respondents would like to better understand Jemena's plans to connect more solar-generating households to the grid, whilst maintaining safety and reliability. This was one concern that wasn't fully addressed in the Plan.
- In line with sustainability objectives, it is important to transition customers to all-electric homes, which will see an increase in electricity consumption. Respondents would like to see how Jemena can work with other stakeholders to enable this to happen (i.e. within the "Future Grid" context).
- Some respondents felt that there wasn't enough presented about the step changes needed to put downward pressure on costs for vulnerable households.
 - The draft Plan seemed to be presenting a 'hold steady' type of an approach which is not necessarily going to make things easier for people.
 - There might have been a lot of work that went into balancing the different objectives to come up with that result where Jemena is able to hold the expenditure at current levels, but energy costs are still a substantial part of a household expenditure bill for those facing hardships.
 - Transition efforts and actions for vulnerable households affected by tariff reform should be presented.
- Some respondents were concerned about the dispersion between price and services, i.e. what consumers pay and what they get for what they have paid for.
 - How the behind-the-meter energy services such as solar, batteries, electric vehicles, may change the nature of pricing for customers? What is the impact on non-solar households for example, the service they get and the cost allocations?
 - Stakeholders had concerns about how long consumers would continue to pay for advanced metering infrastructure (AMI) as they have been paying for this for a long time. Stakeholders were not convinced with some statements in the draft Plan that the consumers are receiving the benefits of the AMI which they are paying for.
 - Jemena mentioned that the AMI expenditure will assist them to better manage the infrastructure and understand it. Respondents were unclear whether that meant that Jemena was behind other DNSPs – in their view, other DNSPs have been saying for a while that AMI/smart meters are already helping them to understand where demand is and how it fluctuates and predict where they need to make further investment.
- Why options that would have further reduced network costs have not been pursued? (The survey respondent did not provide further information on this question.)
- Respondents felt that the pricing and design of distributed energy resources (DER) (i.e. beyond resets and how the various reset periods will link together - where possible) was not discussed. However, respondents admitted that it was possible that the absence of this issue

is evidence of the function of the regulatory process and the challenges this creates for Jemena.

- Jemena's plans to streamline customer experience, provision of energy data, and enhanced security were well received. However, it would be good to understand how these three aspects will work together.

3.3. Jemena's Engagement Process

3.3.1. What was done well?

- Respondents felt that Jemena's process of engaging with stakeholders allowed their needs and opinions to be heard. They created opportunities for active involvement through formal and informal channels.
- Some respondents indicated that when the engagement process started they were initially sceptical of Jemena's commitment but have been impressed with Jemena's level of commitment and follow through.
- Respondents generally thought the People's Panel was a good initiative, well thought out and well executed. It was a smart way to reach out to people. From conversations that some Customer Council members had with members of the People's Panel, they felt that their views had been heard and they were happy they were given the platform to participate.

"They were not combative, were incredibly open, transparent and showed genuineness on their part".

"Jemena should continue to do this again, build on this success, and find other ways to reach out to people to keep in touch with them".

"I would give them a 9 out of 10 score".

- Respondents who attended the People's Panel workshops thought that Jemena was very respectful of their Panel and the fact that Board members attended some of these workshops showed how this process was valued by the business.
- Jemena took their time to focus on and understand their customers and their needs instead of only listening to specific interest groups as it is ultimately about the views of the people on Jemena's network that they need to address.

- Jemena's engagement with stakeholders (including the People's Panel) was seen to be well timed and allowed customers to be brought along the process earlier and have meaningful engagement.

"Jemena has developed an effective model of engagement with its customers that could be adopted by others in the industry".

- Some respondents mentioned that they would have wanted to participate in all the events they were invited to as part of the engagement on the draft Plan, but sometimes could not due to lack of time. However, they were happy to provide their feedback through the

interview process as an alternative solution, as they could find time to accommodate this type of engagement.

3.3.2. What could be better?

- Some respondents raised that they do not have specialist resources available to them (e.g. economists and energy experts) and indicated they find it difficult to fully interrogate proposals tabled by Jemena.
 - Several respondents indicated that a more regular feedback process would be beneficial due to the rapidly evolving nature of the energy system
 - One respondent suggested Jemena could consider appointing independent consultants who are skilled and experienced in the industry to participate in the Customer Council forums to communicate concepts in clear and understandable terms (as is the practice with other DNSPs).
 - Jemena could also consider funding for an independent audit of the finances.
- All Customer Council members interviewed indicated that they would participate through this process to provide comments in future. However, adequate notice of this type of engagement should be provided because some Customer Council members lack the time to engage at short notice. Jemena needs to be mindful of the time commitment and on the impact that has on people's ability to participate.
 - Customer Council members encourage Jemena to be creative about using forums and face-to-face conversations and giving them plenty of notice on the timing for those conversations or engagements.

4. Summary of feedback

- Most respondents believed that the draft Plan adequately addresses the energy trilemma of balancing affordability, reliability and sustainability. The general consensus from the interviews was that the Jemena had put forward a customer-centric submission.
- However, respondents were of the view that there were some shortcomings in Jemena's response to the expected changes in the electricity market.
- Respondents generally felt that Jemena's process of engaging with them allowed their needs and opinions to be heard.

Appendix A

The following commentary captures the respondents' views on tariff reform and the broader industry.

Views on proposed tariff structure / reforms

- The approach adopted by Victorian DNSPs to electricity tariff reforms was generally well received by respondents, including how the consultation on these reforms was handled. Respondents appreciated the logical approach adopted and presented by the DNSPs, especially given the context of how politicised energy policy has become. The joint presentation by the DNSPs was well balanced and was commended by respondents, in particular:
 - The framing of the problem that the DNSPs need to address.
 - Presentation and analysis of key information.
 - Conclusions and decisions put forward based on this analysis.
- However, one respondent was of the view that the DNSPs did not present a clear and concise analysis to justify their recommendations for tariff reform proposals.
- Concerns were raised on the impacts of tariff reforms on affordability for vulnerable residential customers, and the respondents identified a need to:
 - Ensure consumer behaviour responds to these reforms in the way they are intended to.
 - Implement measures to assist households in adapting to tariff reform - this includes energy efficiency measures.
- Tariff reform is also important to businesses as it affects the business case for solar. Respondents' interests were to advocate strongly on behalf of their members against DNSPs raising connection charges as they implement tariff reform. One respondent said this is because there are no alternative options for consumers to mitigate this risk as they can't change their consumption or peak demand.
- Pricing reform and behaviour change are not the only solutions to managing network prices - technology and standards matter to pricing as well. Some Customer Council members actively advocate for technology as a response as much as they can and that this be considered alongside pricing as pricing isn't the "be all and end all".
- Regarding the implementation of tariff reform, respondents raised that:
 - The successful implementation of tariff reform is important to their members, given the learnings from the poor roll-out of smart meter technology in Victoria. For

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example, respondents felt that bringing the customers along the journey was important to successful implementation.

- It is important to ensure tariff reform is done in a way that does not disrupt the whole network and “put us backwards” in network efficiency. In the context of tariff reform, Victoria has the capability to do things that other states may not as easily be able to due to the high level of smart meter penetration.

Views on the industry

- There is a general consensus from the respondents of the challenges the regulatory process presents for Jemena and other DNSPs. The draft Plan and the 5 year regulatory period it addresses is essentially a “snapshot” in time, but the life of Jemena’s assets and the price that people will pay for those assets are for 20+ years. Despite this, respondents appreciated that this was a regulated requirement of the AER process.
- Beyond the proposed network tariff reforms, some respondents’ primary concerns for how the EDPR regulatory process proceeded included:
 - Tariff structure statements.
 - The need for AER to approve expenditure to enable the integration of distributed energy resources (DER) at the distribution level.
- Many business customers voiced complaints about grid connection processes to their representatives on the Customer Council. This applies to DNSPs in general and not specifically about Jemena. For example, some DNSPs are refusing connection of new solar systems because there is too much solar on their networks or they require no exporting of excess solar generation to the network.
- Respondents were concerned about the variations in the connection rules across the DNSPs, including where to find information about these rules. Standardisation and accessibility of this information needs to be addressed.
- High voltage levels on the network is a concern for some solar customers as it makes it harder to commission new solar systems due to frequent system trips. The respondent suggested this can be addressed through setting better inverter standards and fixing substation transformer issues.
- One respondent questioned how downward pressure on prices would occur without a shift in the generation or retailer space.

Appendix B

ONLINE SURVEY

Jemena EDPR - Customer Council engagement

To Jemena's Customer Council members,

As you may be aware, Moreland Energy Foundation (MEFL) has been appointed by Jemena to engage members of their Customer Council to seek comments to the Electricity Distribution Price Review ("draft Plan"). MEFL will be engaging with Customer Council members through self-completed questionnaires and telephone interviews. Through this independently-facilitated process, MEFL will obtain:

- Council members' feedback on the draft Plan;
- Feedback on whether Jemena's draft Plan addresses Council members' needs and concerns; and
- Views on the process followed to develop the draft Plan.

Following this survey, MEFL will then administer telephone interviews to discuss Council members' feedback in more detail and collate Council members' comments into a report. The report will be submitted to Jemena on 30 March 2019. Given the short timeframes, MEFL will be in touch shortly to arrange telephone interviews with Council members during the week of 18-22 March. Your cooperation in this regard will be greatly appreciated.

Thanking you in advance for your participation.

Moreland Energy Foundation

Q1 Which organisation do you represent?

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Q2 What were the main areas of Jemena’s Price Review document (“draft Plan”) which have significant relevance to you?

Q3 What are the most important takeaways for you from the draft Plan?

Q4 What are your views, if any, of the People’s Panel recommendations which informed the draft Plan?

Q5 How well did Jemena’s process of engaging with you allow your needs and opinions to be heard?

Extremely well Very well Somewhat well Not so well Not well at all

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Q6 How well do you think the draft Plan responded to your needs and opinions raised?

Extremely well Very well Somewhat well Not so well Not well at all

Additional prompts:
Why?

Q7 Are there other needs that you haven’t previously raised that you feel are not addressed by the draft Plan.

If yes, what are they?

Q8 Do you think the draft Plan adequately addresses the energy trilemma of balancing affordability, reliability and sustainability?

Q9 Will you participate in a follow-up telephone interview to discuss your feedback in more detail?

If no, please provide reason.
