

ENA/CSIRO Engagement Handbook – Final Feedback Summary

1. Comments from first workshop with external stakeholders

Issue	Comment/suggestion	Response
Planning Engagement	<ul style="list-style-type: none"> • start earlier so that engagement isn't rushed and there is enough time to meet internal and external deadlines • Combine engagement efforts with other groups who are attempting to engage the same customers and/or advocates • Consider starting engagement efforts from within existing community groups • Engage with other relevant businesses more to learn from *their* engagement efforts • Try to use consistent language across businesses/groups 	Added this material in a breakout box; subsequently moved into body of text in response to later feedback.
Identifying stakeholders	<ul style="list-style-type: none"> • Include more customers rather than just advocates • Make an effort to understand representatives that can't attend/weren't invited • Make more effort to ensure stakeholders are representative, including elderly, rural, people with a disability, culturally and linguistically diverse communities, etc. • - include and accept people with strong views • be more careful about identifying all relevant stakeholders • take more care and effort with ethnic communities, who can have language barriers • potentially relevant groups: CALD, Rural, Aged, Young, Indigenous, Low income, People with a disability, Large customers, renters versus owners, customers of exempt/embedded networks, community organisations, solar PV customers, single versus dual income households, new customers, local councils, early adopters of emerging technology. 	Added this material in a breakout box; subsequently moved into body of text in response to later feedback.

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Engagement content	<ul style="list-style-type: none"> • - for every piece of engagement, show the overall engagement plan and show where this fits. • be clearer about what the goals of engagement are, and what the performance measures are, and where on the spectrum the specific process lies • be clear about the "wiggle room" on an issue before you start engaging • Ask customers what topics *they* are interested in / what *they* want to understand • conduct engagement to build capacity for further engagement • be braver about sharing specific information with customers • don't start engagement with the regulatory proposal • use case studies to explain how people might be affected by proposed changes 	Added this material in a breakout box; subsequently moved into body of text in response to later feedback.
Engagement topics	<ul style="list-style-type: none"> • - More engagement on tariff reform, price versus reliability trade-offs, future plans, customer service options/channels, new/emerging technology, base level understanding of what NSPs do (capacity building) • Less engagement (with the general public) on aesthetics/vegetation/undergrounding, financial underpinnings of WACC, the nitty gritty of capex/opex, highly technical issues that require advanced knowledge, service performance improvements 	Added this material in a breakout box –later feedback suggested this be moved to the body text, but we have left it in a breakout box to highlight it, because it relates to content rather than engagement process.
Engagement methods	<ul style="list-style-type: none"> • use the "inform" end where capacity needs to be built, and for topics where there is no room for negotiation, and for things that do not cost much. E.g. legal obligations, safety. • move further towards the "empower" end of the spectrum where networks have more options, and for things that cost more or have variable impacts. E.g. tariffs 	Added these points in the main text

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Key performance indicators:	<ul style="list-style-type: none"> • ensure that feedback/outcomes/explanations/conclusions are fed back to engagement participants • matching engaged stakeholder demographics with customer base demographics • demonstrated evidence of how engagement feedback has been integrated into decision-making • measure internal engagement with rest of company • proportion of business decisions that were the subject of visible public engagement processes • AER acceptance of proposals that incorporated engagement outputs. • measure the quality of engagement processes (not just outcomes) • do stakeholders support the outcome, or at least understand it? 	Added this material in a breakout box
Other content suggestions	<ul style="list-style-type: none"> • material that addresses whether and how to pay participants to attend? • case studies/examples of what has worked • glossary of language and terms • guidelines for respectful consultation with CALD (Culturally and Linguistically Diverse) communities. 	<p>Payment of participants is an important issue, but we feel it is outside the scope of the handbook. This has been identified as a question to be further considered in the <i>Sharing Customer Engagement Practice</i> document.</p> <p>Case studies have been added.</p> <p>Glossary was considered, but we judged that the terms that could be included were already clearly defined in the text where introduced; no separate glossary has been provided.</p> <p>References for engagement with CALD communities have been added.</p>

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Other suggestions outside the handbook content	<ul style="list-style-type: none"> • a co-ordinated engagement conference / national workshops on common issues • handbook content should be freely available online • handbook should show change over time as engagement processes develop and deepen 	For further discussion/outside scope of the handbook itself. This material has been built into the document, <i>Sharing Customer Engagement Practice</i> .

2. Comments received between external stakeholder workshops

Issue	Comment/suggestion	Response
Overall and general feedback	<p>There does seem to be a gap between theory and practice in particular there's limited information on how these methods might be implemented or how NSPs can choose the most effective method or a multiple range of methods depending on the topic. It would be beneficial to have included a case study that use as an example an NSPs strategic and operational objectives and then provide suggestions as to which method would be best depending on which type of objectives, as these objectives assist in defining which engagement method to apply.</p> <p>It's unclear who the handbook has been written for, other than a broad statement that it's for NSPs. For people unfamiliar with engagement theory, it's a good resource. However for those who are familiar with engagement theory it may not add value to their knowledge base. For these readers a lessons learnt would be more useful to share experiences and knowledge among practitioners. The case study could be a way to incorporate the lessons learnt in practical manner.</p>	<p>Added further guidance on helping businesses choose specific methods, including details on pros and cons of various common methods.</p> <p>Case studies have been included, which explicitly describe lessons learned from engagement processes.</p>
	<p>some sections of the document refer to gas and electricity together; only electricity in other parts; energy in other parts. I am of the belief that this handbook needs to be universal to all energy network providers.</p>	<p>We have corrected the language to more generally reflect energy rather than electricity or gas in particular.</p>

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	potential confusion in the use of both "customer" and "consumer" throughout the document.	Originally moved to "consumer" everywhere, but later feedback led us to change to "customer" everywhere except where "consumer" was the more appropriate term.
	Currently the document is high level (not a bad thing but might annoy people looking for more granular detail).	Feedback on this issue has been divided. Later feedback suggested the document was too detailed. We have tried to strike a moderate position on detail versus brevity.
	Advocates will want to see what is important to them. Consider targeted engagement with ECA and other groups as part of the handbook drafting process?	Further targeted engagement has been undertaken including detailed interaction with ENA
	I have identified a few things that I feel would improve it and be more inclusive of transmission instead of just referencing distribution	These comments have been addressed, including a redrawing of the energy supply chain figure. This figure is now a more forward-looking presentation of the supply chain.
	We should include actual feedback from external advocates - perhaps in breakout boxes in some cases, built into existing material in other cases.	This material has been added, originally in breakout boxes, but later on most was moved to the body text in response to other feedback.
	The document refers to five year pricing proposals by distributors, this should be five year revenue proposals.	This has been corrected.
Handbook goals	Why do we engage? We should be up front about: good engagement -> action -> better outcomes.	Added an early section that clarifies why engagement is important

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	<p>(better business outcomes and better customer outcomes).</p> <p>Also aligns with the AER guidelines - they agree that this is important, especially in the context of unprecedented change in the energy industry and the growth of consumers wanting to have more say.</p>	<p>and acknowledges both internal business drivers as well as customer benefits and alignment with regulator's requirements.</p>
	<p>On the explicit handbook goal of leveraging and expanding the role of networks: perhaps we should rephrase it to say something about information sharing, innovation and continuous improvement (covered in the point immediately above) – another point to call out might be opportunities to engage in clusters, rather than as individual businesses, recognising resource constraints on key stakeholders.</p>	<p>Added detail about feedback to other network businesses has been added. Some suggestions about capitalising on existing engagement and/or sharing engagement activities has been added.</p>
<p>The IAP2 Spectrum</p>	<p>It might be worth giving more information and potentially practical scenarios of IAP2 levels. IAP2 is a spectrum, businesses will/could/should make an informed, deliberate decision about where they want to sit on the spectrum on any given issue. A business might be legitimately prepared to collaborate and empower on some issues, but remain at consult on others. There is benefit on both sides for there to be a clear understanding, to effectively set expectations from the start.</p>	<p>This comment has been addressed - it is now clearer that the level of engagement on a topic is itself a negotiated issue, because both stakeholders and network businesses might have different impressions about how "shared" the influence should be on a given area.</p>
	<p>The document needs to recognise that the International Association of Public Participation (IAP2) engagement framework is only one of many that can be used. The handbook provides the impression this is the framework that all network businesses should be using for all engagement programs. IAP2 is a commercial entity and whilst the framework they have developed is effective and one we use, it is one of many valid engagement frameworks. That said this isn't a significant concern and one that we are happy to address when the handbook is sent to working group members to provide feedback.</p>	<p>So far, added one sentence to clarify that the IAP2 is only one of a number of ways of framing engagement. We did discuss this issue specifically with the DWG in both prior workshops – since the AER uses the IAP2 framework, we considered it important to include as the "baseline".</p>

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	<p>The purpose of the IAP2 Spectrum is often misunderstood. Many see that it is about having more engagement towards the ‘empower’ end of the Spectrum. This is incorrect. The Spectrum is about identifying the ‘most appropriate’ level of engagement (which could be inform). I think this message can be highlighted further throughout.</p> <p>It’s also questionable whether it will support meaningful and effective customer engagement as it doesn’t demonstrate the limitations of the IAP2 in a practical sense and wouldn’t sufficiently support the development of an engagement skill set for those without existing skills. For example, the inform level when applied to engagement best practice shouldn’t be a distinct engagement activity. Inform by itself is a communication technique to be considered as part of a comms plan or strategy. When applied to an engagement process, inform should be the starting point for any of the other methods, i.e. consumers need to have the right information in order to be consulted and involved. The Handbook doesn’t pick up on these nuances and for those with limited engagement experience, these nuances can mean the difference between implementing effective engagement and disengaging stakeholders.</p>	<p>Have clarified this issue in the text.</p> <p>We have tried to give a fairly light treatment to the IAP2 spectrum itself, showing it as a guiding framework only, and noting in a number of places that best practice engagement will move beyond the forms of the spectrum to a more nuanced and deliberate approach, rather than a “box-ticking” exercise. We note that the existing level of engagement expertise amongst network businesses is quite varied – the handbook is trying to find a middle ground where it can provide more guidance to network businesses with less expertise, and can still provide some additional “extension” resources and ideas to those with more expertise.</p>
KPIs and Metrics	<p>For me there is one overarching KPI which needs to be lifted above all others – “did stakeholders have an appropriate level of influence on decision-making”. An engagement process could score quite well at an input, outcome and process level, but if the final decision wasn’t appropriately influenced by stakeholders nothing else really matters. This KPI is tied directly to IAP2 Spectrum.</p> <ul style="list-style-type: none"> <li data-bbox="375 1809 989 2016">Informal vs formal evaluation – obviously we need to have comprehensive formal metrics to measure the effectiveness of engagement. But don’t underestimate the value that informal evaluation can play. Regular phone calls, emails and general chats with key stakeholders 	<p>Added a point on this, also more discussion about generalised KPIs for the industry as a whole identified in <i>Sharing Customer Engagement Practice</i>.</p> <p>Added a point on informal evaluation, and on evaluation during the process.</p>

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	<p>can be vital to evaluating how an engagement process is going. I think this concept can be reinforced.</p> <ul style="list-style-type: none"> • Don't wait till the end of an engagement process to evaluate its success. Evaluation must occur throughout an engagement process, otherwise you don't have the ability to change tack. 	
	<p>On measuring engagement with rest of the network business: Potentially an unrealistic expectation, more sensible to focus on senior management and Boards</p>	<p>Adjusted the language here to reflect this point.</p>
	<p>Metrics and KPIs appear to be useful guide in the absence of anything tangible. However, generally we may want to try and make this shorter and less wordy when we publish.</p>	<p>Streamlined the metrics material.</p>
<p>Other specific content</p>	<p>Make sure some specific mechanisms are included: customer consultative committees, deliberative forums.</p>	<p>Currently we are listing consumer panels (equivalent to "customer consultative committees"), and community forums (equivalent to "deliberative forums").</p>
	<p>Clarify that early engagement should be about identifying what topics the stakeholders are interested in (but don't go in with a blank piece of paper).</p>	<p>Added a note about this point.</p>
	<p>One thing the current draft appears to overlook is the education piece (capacity building) that needs to take place as part of the community consultation. If we are to expand the current pool of stakeholders who have the capacity to provide an informed, constructive view on regulatory matters, building capacity within 'new entrants' is important. If not, we eventually get to a point down the track where there will be claims that the most heavily engaged stakeholders are 'captured', this is an issue that has already been flagged in some contexts, though it is without foundation.</p>	<p>This issue has been addressed with additional depth on capacity building.</p>

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	<p>Stakeholder education:</p> <ul style="list-style-type: none"> • Ensures minimum level of knowledge about the business/topic is held by all participants. The education process provides the opportunity to create context which important as people need to understand why and how their comments fit into the puzzle • Education and context will be different to each stakeholder group but results in more enriched conversations proving outcomes are engaged in the process. 	
	<p>On feedback loops section: In addition to the regulator, there can be an interface with government stakeholders, who might not be participants in the stakeholder consultation. This is likely to be the case where the guideline is applied outside a regulatory reset scenario, to inform business or government policy, e.g. tariff reform. If the guideline is to be useful in scenarios outside reg. resets, this might be worth adding.</p>	<p>Have added further detail on this issue.</p>
	<p>On engaging with diverse groups of stakeholders: Agree, though can be difficult in practice to source an effective representative group for some cohorts. Maybe these difficulties need to be called out. Also, some of these groups will have representatives; some will be better accessed through targeted recruitment for focus groups.</p>	<p>Have added further text and resources on identifying and accessing stakeholders.</p>
	<p>On engaging with other businesses: Shared learning is important, partially covered in the Introduction section of current draft</p>	<p>Added more detail about this.</p>

3. Comments from second workshop with external stakeholders

Issue	Comment/suggestion	Response
<p>Overall impressions and major actions</p>	<p>Tone: the handbook is currently viewed as being based too strongly in “network” language, and needed to more directly take customer concerns/issues/perspectives into account.</p>	<p>Have removed/adjusted the more network-oriented text to address this, but we also note that the handbook is written for</p>

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		networks, so some network orientation is inevitable. We have added more depth on (and suggestions about) customer perspectives.
	<p>Content: the handbook needed additional detail on material relating to:</p> <ul style="list-style-type: none"> • Case studies that showed learnings gained from previous positive and negative engagement activities • Key performance indicator detail that was less academic and more oriented on practical application • Recommendations about what network business <u>should</u> be doing, rather than just presenting a range of options showing what they <u>could</u> do. 	<p>Case studies now added.</p> <p>We agree that KPI detail should ideally be more practical, but such content is not yet available; network businesses are still building their own KPIs in relation to engagement. At the moment, we are not able to make this section more practical.</p> <p>We have added notes about best practice engagement in several places, so drive towards a more “ambitious” orientation to engagement. But it has been noted that specifying “what should be done” leads to the risk of empty compliance, and so this sort of language has not been used.</p>
	<p>Logistics and other issues:</p> <ul style="list-style-type: none"> • Our planned timeline for consultation was unrealistic: participants strongly encouraged us to provide more time for the external stakeholders to give feedback, and to therefore push out the planned date for the document to be released for public comment. • Consideration given to additional content made available online, and ongoing discussion forums created online that allowed network 	<p>Additional time for feedback was provided.</p> <p>Further online content and discussion is on the agenda for this process, but the handbook itself will be finalised first, before the ENA looks at how to implement these other suggestions, which has been identified in</p>

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	businesses to learn from each other and directly engage with advocates.	<i>Sharing Customer Engagement Practice.</i>
Comments on specific sections/issues/ideas.	Not confident that the document supported any of the goals – closest to the performance measurement one.	No change possible but presume that more specific feedback later might help to address this concern.
	Didn't find a goal that had been met – but more concerned about KPIs – this was theoretical but not practical for networks – needs clearly to draw on network past experiences with what has / has not worked (wrt goal 4).	As above, it's difficult to make this section more practical in the absence of more specific examples of content from the network businesses about what they measure. No change possible – but pursuing examples of actual metrics from network businesses.
	KPIs content is academic and detailed – didn't actually get to the point of how to measure that the engagement is delivering better customer/business outcomes.	As above. Added more material on the overall point of assessment.
	Advocates submissions previously are not well covered – with respect to engaging with vulnerable groups. Need to add references and resources that relate to this area – need to provide more specific advice.	Noted we were short on a specific content area. Added more references/resources for engaging with vulnerable groups.
	The document does not “push the frontier” – this document should more clearly push for best practice - currently doc is about “talking to advocates/consumers; should be about “building relationships with them”	Added material on best practice engagement to attempt to at least partially address this issue.
	First goal: to be best practice you have to make recommendations – currently it is a toolkit that lists what could be done. E.g. best practice engagement will be owned by the CEO- currently it reads like engagement is a bolt-on.	Added notes on best practice engagement, and on CEO/board involvement
	Currently too informed by engagement and licence to operate – needs to recognise that the consumer is the ultimate source of paying for all the planned changes.	Tried to acknowledge this central point, and to reorient the handbook more around customers

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		and less around networks, but license to operate is still present.
	Not very practical – more specific advice about what is the best practice method of addressing different specific issues – e.g. small case study examples relating to issues and segments. Consider both planned/strategic engagement and engagement on emergent issues.	Added best practice advice. Added case studies. Added notes on strategic and emergent engagement.
	Need for NSPs to have an appropriate cultural approach (as per other comments about the orientation being the key difference between good and bad engagement)	Added material on principles of engagement that relate to this point.
	Consider internal survey of each business to assess attitudes/culture within the business about their engagement.	Whilst a good idea, this is outside the scope of the handbook.
	Needs expansion in the online engagement space – chat rooms, facebook, other methods of digital two-way communication. (Not just tools for providing information).	Social media material is covered in some detail, but additional depth is outside the scope of the handbook.
	As well as detailed case studies- consider providing an online forum for businesses to engage with each other about what worked and what didn't – and allow consumers to be involved in providing feedback about their experiences – help businesses to learn from each other in real time, as well as case study examples in the document. This addresses goal 4 and goal 5.	Online forum idea is going to be considered by ENA after the handbook is completed. Outside scope of handbook itself.
	Can't have a static list of things to do – needs to adapt and learn. So cannot be too prescriptive – needs to acknowledge that engagement needs to be planned on a case-by-case basis.	This point is made several times in the handbook – lots of pointers to “fit-for-purpose” engagement.
	The manual only identifies two potential activities that involve empowering. Action research should be dropped. The manual needs to more directly address the detail of an empowered panel that provides overview of all engagement - e.g. Scottish Water.	There is a case study from a network business that covers such a process in detail. Action research has not been dropped, it still provides a legitimate option.

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	Engage about engagement – involve consumers in conversations about planning engagement.	This point has been clearly added.
	Support consumer groups to be able to be involved in engagement – given their limited resources.	The issue of financial support has not been included; it's judged to be outside scope for the handbook – the notion of more co-ordinated and combined engagement processes has been added and highlighted.
	There should be a State-based common language and approach for engagement across all NSPs in that state on specific issues.	See above notes on co-ordination.
	Consider rejigging the blobby diagram – different axes? Different diagram? And make sure this is sourced properly.	Diagram has been adjusted.
	The focus of the document at the moment is project-based engagement, there needs rather to be a primary focus on BAU engagement.	Both forms of engagement are discussed in the document.
	Page 5 – “industry endorsed” vs “consumer endorsed” or “industry and consumer endorsed”- other examples of failure to incorporate consumer feedback. Better reflection that the consumer advocates have buy-in, if not “endorsement”.	We judged it would be premature to describe the handbook as though it had been endorsed by anyone outside the industry – this is pre-empting responses.
	Current focus is getting feedback from consumers, rather than running consumer-led engagement that is more overtly 2-directional communication. Needs to be more attention given to involving consumers in setting the goals and agenda and priorities for engagement activities (currently content is skewed towards getting simple feedback).	More content on involving consumers in setting goals and choosing engagement topics has been added.
	Feedback from workshop put into text boxes is a self-referential failure - this material should be embedded in the main body of the text – currently it reads as though these points are “optional”.	Most text boxes with feedback from prior workshop have been reverted to main text.

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	The handbook should be more clearly making recommendations rather than just presenting all the options.	As noted elsewhere, recommendations already exist from AER, and more detailed recommendations risk an “empty compliance” outcome rather than a more comprehensive evolution and deepening of engagement over time.
	Introductory content about “industry-endorsed” could just be removed – note (the work?) that people other than NSPs have done on engagement.	Added more references for engagement outside the industry. This was designed as an industry-endorsed document though – this description has been added.
	Page 13 – why do engagement – very superficial and not helpful for businesses trying to get better buy-in internally. Needs a better diagram (needs to go beyond SLO, to incorporate further benefits). Needs lived examples (cases) of business benefits of consumer engagement as so important to any/all businesses. Needs earlier and more extensive reference to the benefits. Note a collective of several individual reasons for doing engagement, priority may vary between businesses.	Added more detail on this, and added case studies.
	Page 11 – engagement environment is changing (including digital environment and social expectations) – this shift needs to be emphasised and given more space // the KPI “tin tacks” material could be reduced or held elsewhere. // not at the expense of the regulatory commitments.	Added notes on evolution of engagement environment.
	Page 13. This material is too academic and not practical enough – one way to improve this is to overtly take perspectives of different stakeholders (e.g. AER’s impression that attitude/culture is the key difference), other material from perspectives of other advocacy groups???	Have added case studies which hopefully address the practicality component. Also note we have also had feedback that the material is insufficiently academic. We are trying to balance these considerations.

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		It's outside the scope of the handbook to include detailed written material from stakeholder agencies about their perspectives. We are trying to incorporate these ideas as and where we can, but we note that those other agencies have their own reports to present their perspectives – we have now referenced many such reports as resources in the handbook.
	Document has no process for deciding and communicating areas of non-negotiable issues.	Added notes on the importance of network businesses clarifying what is in and outside scope of engagement.
	Reflection/review/feedback is missing	Added more detail.
	Current feedback loop table is not clear.	Added more detail.
	Stakeholder scan, mapping, issues analysis, identifying what is important and using this material to inform the overall engagement plan is under-detailed – need also to acknowledge the time and effort required for this section.	Added notes on engagement about engagement topics.
	Cf. COTA framework on “engagement with consumers about engagement”- validating engagement plans requires access to a pool of engaged consumers – this can either be an existing consumer panel or a new group of engaged consumers.	Added notes on engagement about engagement topics.
	Non-residential small energy users – handbook is currently silent on them. Different segments within this group will have different needs/levels of engagement – handbook should more clearly cover all customer types. Cf. diversity of case studies from different segments.	Some notes on small businesses are present in the background material, and they are noted as a likely stakeholder group in several places.

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	Make it clear that the whole spectrum of end-users (should be engaged?).	Added more content on identifying and engaging stakeholders.
	More structure around the referencing – provide more guidance about what references are valuable for what topics/issues.	References and resources have been structured to address this.
	Missing information about what tools do what things, for more tools, presented more briefly.	Outside scope because of length considerations, but more resources have been added that provide this sort of information.
	More focus on representativeness, and the importance of this.	Added more content on this point.
	Too long – becomes less accessible	Difficult to respond to other feedback for more content as well as keeping document length from growing. We have tried to balance these two issues.
	Issue with the use of language: currently it frames consumers as the “problem to be solved” /consider shifting (in the diagram) confusion to confusing / distrust to untrustworthy / disinterested to boring.	Dropped this diagram, since it was being interpreted in this manner.
	Principles need to be set (by each NSP) – provide some guidance on what they should consider, how they can be developed, links to case study examples.	Case studies added; all NSPs already have engagement principles cited on their own websites.
	(see board notes on IAP2 spectrum positioning – drivers do not include business maturity or capacity/interest – there are ways to position on the whole spectrum that draw on representative measures of much larger groups. Drivers do include context of engagement topics, advances over time in the issue/engagement, other business requirements and limits. Choosing not to engage at a particular level is a legitimate choice, as long as it is a conscious choice.)	Added more detail on the multiple drivers of engagement positioning.

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	Specific tools do not necessarily align with discrete positions on the IAP2 spectrum.	Added a point about this issue.
	Planning – important to note the requirements for sufficient resources within the business to do engagement / also assess the resources of the agencies that you are engaging with, and consider providing assistance in a manner that targets existing gaps in representativeness / advice about getting better access to hard to reach groups, etc...	Added content on access and identifying stakeholders. Added a point on resourcing engagement.
	Better highlight the limitations of self-reported responsiveness (e.g. willingness to pay) versus actual econometric data.	Added a note on this issue.
The “most important thing to fix”	“The “workshop feedback” box on page 15 needs to be incorporated as a key engagement element (i.e. engaging with specific groups of stakeholders). However, amend (1) in that box so engagement is with end users <u>in addition to</u> consumer advocates. Advocates don’t purport to represent people in a constituent sense, but we are charged with representing their interests – and are informed in doing so. Also – resource us to engage! OK, that’s three points, but whatever.	Amended as suggested – it is clear that we suggest both end-users and advocates. Also there’s more content about engaging with different types of stakeholders. Resourcing advocates is outside the scope of the handbook, except insofar as we add advice that it needs to be considered.
	Capture learnings from multiple perspectives of participants in consumer engagement to date (i.e. regulator, NSPs, consumer advocates) and use this as the basis for defining what is “effective” consumer engagement and engagement methods. In doing so, the handbook will move from an academic piece to a practical piece. This may not reflect best practice yet, but at least it will document “practice” which is a step closer to documenting best practice.	It’s difficult to action this request directly as a specific change. The handbook does draw on substantial written work from a variety of sources (and the recent iteration has incorporated more of such references). It may also be argued that the addition of case studies from networks, and incorporation of comments from advocates will move us in the direction suggested by this comment.

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	<p>The handbook is primarily focused towards industry-led engagement. This is evident throughout the book. E.g. engagement methods begin with “informing” the consumer of particular issue/change to address. There is no room where the consumer can raise their priorities or are seen to have value to the network from a pro-active approach, rather than a reactive one. It assumes the consumer is incompetent in deciphering issues, or that their issue is not “high-level” enough. All issues can be collaborated on.</p>	<p>Various material has been added that clarifies engagement as a dialog, including material specifically relating to identifying and targeting end-user-led engagement topics.</p>
	<p>Revisit goals of handbook: first three refer to application and success of consumer engagement whereas the last two are more relationship/networking for peers (not necessarily a goal). My concern is that the document may become further diluted if we try to satisfy all views raised today. Let’s go back to basics:</p> <ul style="list-style-type: none"> • Understand what we (NSPs) are looking for • Modify handbook to address • Address additional requirements into other processes - online hub, quarterly networking opportunities, case studies. 	<p>Logistical/balance issue between what content is incorporated in the handbook itself and what other content is made available through other mechanisms.</p> <p>Had further discussions about reifying the goals of the handbook. Upshot was no change made to the goals – they remain the best reflection of the majority opinion.</p>
	<p>There needs to be some information included about “the <u>attitude</u> of the business” being the most crucial aspect of the consumer engagement.</p>	<p>Attempted to address this in various sections relating to meaningful and honest engagement.</p>
	<p>1) The tools place too much emphasis on digital solutions and do not give adequate recognition to the large number of consumers who are excluded from these processes. 2) The current document does not contemplate situations where engagement is initiated by consumers.</p>	<p>Content added on access issues to disadvantaged consumers as part of the new content on engaging with different types of stakeholders.</p> <p>Content added on end-user-initiated engagement.</p>
	<p>Contain main document to concise discussion of best practice:</p>	<p>Logistical issue about how content is split – to be</p>

Issue	Comment/suggestion	Response
	<ul style="list-style-type: none"> • Mapping • Tools • Measurement and metrics • ...and leave the rest to a “resources resource” that is housed online. 	<p>discussed further with DWG.</p> <p>No change implied to content at the moment.</p>
	<p>What I need to support internal engagement:</p> <ul style="list-style-type: none"> • Consumer engagement requirement for endorsement: expectations are not going away • Investment needed in issue/stakeholder assessment process • Need to be brave and explore new ways of engaging/new areas of engagement. • More detail and examples of the business benefits and embedding consumer engagement into culture of daily practice to all levels of management. 	<p>Four points:</p> <ul style="list-style-type: none"> • No change implied • Resourcing is already covered – no change • Content has been added on engagement as iterative process, learning from problems, trying alternatives. • Case studies have been added.
	<p>Consumer engagement is not an end in itself. It is a tool to be a more sustainable business</p> <ul style="list-style-type: none"> • Don't speak physically to people if there is a better way to get the info. E.g. data analysis. • The outcome of any engagement must be incorporated into the business (even if it doesn't change anything immediately). 	<p>Added material on secondary data analysis where sources of information are available.</p> <p>Already covered the issue of demonstrating how and where the engagement outcomes are incorporated.</p>
	<p>Don't waste the energy/commitment/processes etc. that have been already put in place by energy businesses who have taken the engagement process to heart and not seen it as just ticking boxes for compliance. This can be advanced by:</p> <ul style="list-style-type: none"> • Case studies based on successful (and not so much) approaches based on real strategies and approaches, suitably de-identified • An ongoing and regularly updated 'library' of (digital?) resources that is linked to the document and readily available 	<p>Case studies have been added.</p> <p>Library of resources is a logistic issue outside the handbook itself and beyond the scope of the current draft iteration. Additional resources have been incorporated into the handbook, and the more general issue of shared resources has been</p>

Issue	Comment/suggestion	Response
	<ul style="list-style-type: none"> A full search of the available resources (Australia and elsewhere) on consumer engagement which is then added to the 'library'. 	addressed as a major point in the document, <i>Sharing Customer Engagement Practice</i> .

4. Comments received since the second workshop

Issue	Comment/suggestion	Response
160224 stakeholder engagement framework	<p>This is about impact and influence – it counteracts the notion of always pushing engagement towards the right of the IAP2 spectrum.</p> <p>Might be copyrighted, from a consultant. Perhaps use indirectly.</p>	Noted, and have added general text about the need to choosing an appropriate level of engagement for the specific issue.
Attached report, and see text	<p>“Here’s a report, on a recent deliberative process, which I hear from many reports went very well. The internal impact was considerable and constructive too, or so I hear.</p> <p>Anyway, I haven’t read this yet, just received a short briefing by someone who has managed the process internally, but thought I’d circulate before reading. The DNA (Deliberate, Negotiate, Agree) paper that Uniting Care Australia released last year was a driver for this process.</p> <p>An exciting aspect of this report is that there is now a network-lead example of a (genuine) deliberative process experience to be shared. I also opine that it has helped move the business to a better understanding of consumer engagement too.”</p> <p>Other comment I was going to make, to really muddy the waters, it to refer to Thinking, Fast and Slow by Daniel Kahneman, I’m sure you are familiar with it.</p> <p>But some thinking about which energy decisions and made ‘fast’ and which ones ‘slow’ would significantly inform the processes for engagement too, and provide a useful perspective for energy businesses about how (and when) consumers think about energy.</p>	<p>The report referenced has been used to provide one of the case studies.</p> <p>Added reference to the DNA report.</p> <p>Added some content about energy usage being largely habitual and unconscious, which makes it difficult to monitor and adjust.</p>

Issue	Comment/suggestion	Response
	<p>I've had a relatively quick look at the draft handbook as circulated, but not time for a detailed review, the following comments are in this context.</p> <p>I was going to recommend structuring the 'how to' options or 'tools' on the IAP2 spectrum, which you have done and I think this is the right structure, so I think that this framing is spot on.</p> <p>I think a key aspect of the IAP2 spectrum that can be beefed up in the handbook is "the promise to the public". I think the measurement metrics are more readily understood against a clear understanding by all parties of the 'promise' that is being made, and that there are different promises for different situations and consumer / stakeholder interests. Once a business is clear about the promise to a public that it is making, strategy, technique and measurement become much easier to define. I'd also stress that making the 'promise' clear and achievable is of critical importance, better to under promise, over deliver than have a business feel that it must promise the world and then undermine trust when it doesn't deliver.</p> <p>I think that the 'promise' from IAP2 for "collaborate" is where we should be aiming at the moment, (Empowerment is next): see text on collaborate promise from spectrum.</p> <p>I think that a clearer disaggregation of 'consumers' would be helpful, with probably a table of techniques more suitable for different segments. The segments I'd be looking at would be something like large business, small/medium business and household consumers. Then to consider consumer representative groups for both household and small/medium business as well as recognising specific interest groups, rural/regional, poor and disadvantaged etc. I often hear "consumer don't engage" meaning that end consumers don't respond immediately to a particular course of action that a business would like them to, while consumers are responding loud and clear through talkback radio, complaints, inability to pay. I observe that energy consumers are highly engaged, just not with the messages and direction that businesses want.</p>	<p>Added more detail about the promise implicit in each broad type of engagement, and referenced this again later in the metrics section.</p> <p>Added more content on types of stakeholders</p>

Issue	Comment/suggestion	Response
	<p>There would be value in a small number of high level messages to repeat through the Handbook: “don’t panic” comes to mind, courtesy Hitchhikers Guide to the galaxy. Highlight that learning new approaches is a bit of trial and error, encourage businesses to not be upset by criticism or getting it wrong, as long as there is learning and progress</p> <p>Maybe there is a place for a statement about engagement being a 2 way (or more) process with all sides needing show goodwill and needing to learn to trust each other, with a table summarising reasonable expectations of consumer advocacy groups and businesses as well as end consumers in constructive engagement.</p> <p>A couple of other sources of ‘how to do it’ info that I refer too, that might be useful are:</p> <p>http://bankofideas.com.au/ (Australian, Peter Kenyon is the driving force)</p> <p>http://tamarackcommunity.ca/ (Canadian Paul Born is the driving force)</p>	<p>Added notes on refinement of engagement.</p> <p>Added these references.</p>
See text.	<p>The summary feedback on the consumer engagement handbook following the meeting in Sydney on 22 Feb is helpful. I share similar concerns that were articulated by consumer groups at the Sydney meeting. Much of that feedback articulates concerns consumer groups had raised to inform the development/design of the handbook at the initial meeting in Melbourne. It is unfortunate that the draft handbook did not cover these concerns adequately. It would be good to see these concerns addressed in the public consultation version of the handbook that will be circulated for consultation.</p>	Refers to feedback recorded elsewhere.
See text	<p>Thank you for your email update. From our point of view, issues with the draft Consumer Engagement Handbook were the subject of detailed discourse at the stakeholder workshop and significant areas for improvement were identified, including structural and content changes. At this stage we have no additional feedback.</p> <p>As was said at the workshop, we consider it important that the revised document is reviewed by</p>	<p>Refers to feedback recorded elsewhere.</p> <p>Refers to logistics of review/feedback process.</p>

Issue	Comment/suggestion	Response
	<p>this group again before it goes out for public comment. I note your advice that there will be an opportunity for this to occur.</p>	
<p>See text</p>	<p>That is a constructive and useful decision and I will endeavour to provide even more comments in the intervening period.</p> <p>Your e-mail however doesn't address a threshold issue of how you propose to deal with the comments received prior to the circulation of the Public Consultation Draft. The commitment needs to be that a decision will have been taken on how to deal with each comment (amend text, augment text, not accept with reasons) before the Public Consultation Draft.</p>	<p>This document outlines what feedback we have received and what response we have made.</p> <p>Moved most of boxed material into main text, except where it needed to be specifically highlighted.</p>
	<p>Also as noted at the workshop most of the incorporation of workshop 1 feedback by boxed text is inappropriate.</p>	<p>Removed reference to boxes referring to workshop feedback.</p> <p>Asked for more specific feedback as suggested might be forthcoming.</p>
<p>CALD guideline: cultural connections</p>	<p>Not sure whether you have the final copy of the CALD guidelines.....I keep referring to them in these forums and I'm never sure if people have the final version....I have attached it anyway</p> <p>This should be cited in the new version as a tool to expand skills in the CALD area.</p>	<p>Added reference to CALD guidelines.</p>
<p>See text</p>	<p>I think the handbook is looking great!</p> <p>The only thing I was looking for was something on the recommended frequency for the engagement. It would vary depending on the engagement topic and approach, so perhaps this is why it isn't mentioned. I felt it could be mentioned in each of the engagement method sections (provide info, consult & involve, collaborate & empower). Or, it may be better situated in the "what is effective consumer engagement" section, where it could be discussed that effective engagement is done regularly in a manner suited to the engagement topic/method etc.</p> <p>I also felt like the "what is effective consumer engagement" could maybe have done with a section</p>	<p>Added new content</p>

Issue	Comment/suggestion	Response
	<p>on developing understanding of customer needs, e.g. “effective consumer engagement aims to understand the consumer’s point of view”. It might be implicit in the existing sections, like the “mutual trust” section, but I think this line of thinking could either be incorporated more explicitly into the existing sections or be outlined more fully in its own section.</p> <p>I thought it was a comprehensive guide that would really help in planning engagement strategies, striking a nice balance between being informative without being prescriptive.</p>	

5. Comments received since the public consultation document was released

Issue	Comment/suggestion	Response
Feedback received during and after the formal consultation period		
<p>Handbook should be viewed as an ongoing process.</p>	<p>Handbook is best viewed as a start of an ongoing process.</p> <p>Seems to be solving a “regulatory process” problem that networks have. Has a flavour of being a “network document”.</p> <p>The work is provoking discussion but there’s more advanced practice on the ground than is apparent in the handbook.</p> <p>Suggest a collaborative workspace where networks continue to contribute expertise.</p> <p>Consider providing case studies where things went off the rails, and how we got them back on track would be good. A living document on a website where people can continue to contribute their experiences.</p> <p>Suggest creation of a place to allow this ongoing conversation can continue.</p> <p>Needs to be a recognition that skills need to be built by all stakeholders continuously.</p>	<p>Left handbook as a standalone guideline.</p> <p><i>Sharing Customer Engagement Practice</i> identifies what further actions may be taken to continue to improve engagement between all stakeholders, stakeholder advocates, etc.</p> <p>Handbook updated to better reflect that engagement is an ongoing process.</p>
	<p>Hoping to see more of the CSIRO’s expertise on behavioural expertise and engagement in the handbook.</p> <p>Stakeholders are looking for recommendations, wanting to see more research expertise on bodies of knowledge and recommendations on how to approach engagement problems.</p> <p>Reference to Social License to Operate (SLO) potentially not helpful as engagement should move towards more of a commercial negotiation between customers and networks where a range of options are available, not well reflected in the SLO concept.</p>	<p>More general background literature and review of that literature was deliberately not included, both because:</p> <ul style="list-style-type: none"> • Much of this material is available elsewhere and has been referenced • It would have made the handbook unworkably large

Issue	Comment/suggestion	Response
		We have removed SLO material as not sufficiently relevant.
Terminology	I have some feedback in relation to the use of Customer or Consumer. The use of Customer should be fine. However, as a transmission business we regard customers and consumers differently, as we may have directly connected customers and end user consumers (who may be residential customers of a distribution network). I recognise you have examined the different energy customers in the section <i>Exploring customer diversity</i> (page 11) and in <i>Identifying Stakeholders for Engagement</i> (page 22). But is it possible to also recognise that the level of engagement with particular groups may differ because of where the business is positioned in the supply chain of the network?	Added some points about transmission businesses to clarify their position in the network.
Intent of document confused by reference to regulator. Preferred KPIs and metrics.	Document is flawed as implicit intent: "It starts with the regulator and it should start with the customer". Could KPIs be reframed within the NTR process, as a "here is what we need to change". Distinguish between "must do's, should do's, could do's" Perhaps an "independent advisory committee or governing body" is the key missing component... A "governing body" should agree that the business plan has appropriately included the outcomes of all the network business engagement outcomes.	Have changed order of document to begin with customer. Added a new section highlighting dynamic and changing nature of industry and challenges for regulation / engagement. <i>Separate Sharing Customer Engagement Practice</i> .document identifies opportunity for a forum for ongoing engagement.
Attitude of engagement	Attitude is key. Can have the same activity on paper but different outcome, due to attitude to business and senior buy-in. Needs to the link between engagement and other parts of the business. Don't tell half the story – people need all the information to make their decision.	Strengthened need for cultural and corporate support as a marker of best practice engagement.

Issue	Comment/suggestion	Response
<p>Reference to collaboration too strong</p>	<p>Executive summary:</p> <p>“Developed in collaboration” words are too strong – this is an ENA/CSIRO process – where consumer representatives have contributed from time to time, have given input. So should be “developed with input from” rather than “developed in collaboration”</p> <p>Does not provide “Best practice guidance”</p> <p>The goals are “one-way”</p> <p>Add “<u>consumers</u>” to the continuous learning goal. Better to capture the shared nature of the journey.</p>	<p>Adjusted wording in response.</p> <p>Note that the phrase “best practice guidance” was not changed, as this is still the key objective of the Handbook.</p>
<p>Background</p>	<p>The Background doesn’t capture the dynamism of the market context in which we are trying to learn to work together.</p> <p>No reflection of the distributed generation market into which we are going, and some elements of the future grid scenarios. Enhance this to reflect the future (as per the NTR)</p>	<p>Added a new section reflecting changing nature of industry and increased customer choice and challenges for networks.</p>
<p>Regulatory Environment</p>	<p>The regulatory environment: this emphasises engagement as a regulatory process – engagement process should be a <u>more general process</u>. New section that brings out engagement to manage a changing environment. Be explicit that regulator is source of an additional <u>reward</u> for good engagement, not the central point.</p> <p>New and existing service providers: where were they in the consultation? They should have been included</p>	<p>The handbook already emphasises that the regulator is not the driver or central point of engagement, but extra content has been added to address the changing environment and impact on engagement, and emphasis on regulatory environment amended.</p> <p>Not actionable at this stage: new energy service providers were not specifically identified or pursued as part of the consultation process focus remains on end-customer.</p>

Issue	Comment/suggestion	Response
Culture of organisation key	<p>Engagement environment: add culture and organisation focus stuff here? This reflects consumers and consumer advocates which goes to the point that I was expecting more behavioural insights work – this whole section should be reframed about what we know about how consumers process information, and make decisions. So what do we have to do to achieve change?</p> <p>“Specific challenges” doesn’t mean that other domains don’t have specific challenges as well.</p>	<p>Organisational culture is important and new text has been added reflecting this.</p> <p>While behavioural insights are critical to engagement they are outside of the practical objectives of this handbook and being addressed in another work package within the Electricity Network Transformation Roadmap.</p>
Implementing engagement	<p>Implementing engagement</p> <p>Definition is too engineering/network oriented. Engagement should be a proxy for a competitive market to reflect preferences of consumers in the decision of the businesses which results in differences in how the businesses plan. Two elements to engagement: Preferences and persuasion.</p> <p>SLO is uncomfortable. What we are trying to do here is capture consumer preferences in the context of a commercial relationship, rather than a social licence for mining.</p> <p>You only get effective engagement when you have trust. This needs to be noted.</p> <p>Page 14 – purposive and planned: businesses should develop their own strategy “with their customers” should be added here and elsewhere where there are “should” statements in the document.</p> <p>Engagement “is a dialogue” – make sure that both parties are participating and learning – make sure this is reflected in the whole document.</p>	<p>Added a version of this definition as a contextually-specific elaboration.</p> <p>As noted above, SLO material has been removed.</p> <p>These points noted in the best practice section(s)</p> <p>Have highlighted this in document and added text around ongoing nature of engagement.</p>
Engagement methods	<p>Methods for engagement</p>	<p>Done</p>

Issue	Comment/suggestion	Response
	<p>Sentence starting methods towards needs tweaking – move the parentheses section after the word “negotiation”.</p> <p>Culturally, I am uncomfortable because there was a tendency towards the inform end, and no possibility of the “empower end”.</p> <p>Move the “conversely” sentence to the beginning of the paragraph.</p> <p>Customers need to know why some things are not negotiable.</p> <p>Page 22. This reads like a “hose down expectations”</p> <p>Engagement toolboxes and guides: useful but – there’s a table prepared by CCP to AER (15 July 2014) – catalogues 20 different mechanisms used by networks. There’s room for at least reproducing this table, or ideally commenting on the technique’s suitability.</p> <p>Does action research count? Can we give a practical example of each technique?</p> <p>Can we ground these example in a “question to be answered” format?</p> <p>Page 33 – this info is key: “you said, we heard, we did.”</p> <p>Table 1:</p> <ul style="list-style-type: none"> • Add retailers explicitly for this table? • Change “engagement staff” to “staff directly involved in engagement” <p>Can we see how the feedback is reflected in the proposal?</p> <p>Page 34:</p>	<p>Added more nuance around what’s appropriate and likely as engagement relationships develop.</p> <p>Some content added to relevant engagement method section.</p> <p>Have added this list as example of engagement methods currently applied by networks (as a non-exhaustive list provided as an example)</p> <p>Have added notes on action research and application on page 39</p> <p>Have selected from a few relevant industry examples to provide more information on how this feedback loop can be applied.</p> <p>Fixed.</p> <p>Added a note on this in the regulatory section</p> <p>Identified as opportunity for future</p>

Issue	Comment/suggestion	Response
	<p>Idea: Some sort of industry-developed self-reflection benchmark of how we did in engagement? At the end of every year? Something to prompt industry to reflect and discuss.</p> <p>Idea: ask other stakeholders how they thought the industry went this year. Ask consumers who have been engaged: “do you feel you have been properly consulted?”</p> <p>Make sure page 14-15 is consistent with later points about planning.</p> <p>Page 40 – this is implicitly “by the network for the regulator”. Should we drop the referencing to the regulator?</p> <ul style="list-style-type: none"> • Add “businesses and consumer’s goals” 	<p>work in <i>Sharing Customer Engagement Practice</i>.</p> <p>Confirmed, adjusted where needed.</p> <p>This referred to us citing the specific regulatory requirements in text at the beginning of the section. Have removed the direct citations.</p>
Metrics	<p>Metrics: incentives for engagement? Do we add this somehow? Concept of a “league table”</p> <p>Page 50: last sentence – should apply equally to the business as the consumer. Can we ask the author to tweak this point?</p>	<p>Identified as an options for consideration in <i>Sharing Customer Engagement Practice</i> document.</p> <p>Done</p>
Case Study 2	<p>Case study 2 should not be used – is a community engagement case study, not a customer engagement case study. It jars in the context of consumer payment influences. However other feedback indicates this is relevant to the breadth of engagement.</p> <p>Final point – encourage businesses to spend time and effort in <u>developing the skills</u> of their consumer participants – e.g. expand the range of voices that businesses hear in these processes, to include the diversity of customers.</p>	<p>Consensus decision to leave in as community engagement relevant in the customer context.</p> <p>This point is made clearly in the “dialogue” section.</p>
Tone of language used	<p>Too academic, not practical</p> <p>First 10 pages very information heavy</p>	<p>Tried to simplify language further.</p> <p>Have left customer type / segmentation information in the</p>

Issue	Comment/suggestion	Response
Inconsistent language	<p>Executive summary is very research academic-based. All the research methodology content is too academic.</p> <p>The way customers are represented and described changes half-way through.</p> <ul style="list-style-type: none"> - E.g. “end-user” “customer” <p>Page 2 – best practice guidelines badly worded</p> <p>Background about network environment is unnecessary. Rehashing the AER stuff is not necessary?</p>	<p>Handbook as this is relevant to designing effective engagement targeted to customer groups.</p> <p>Removed end-user where it appears, except in some sections where context is important.</p> <p>Adjusted the term and wording around “best practice”</p> <p>These have been left in as they provide important background context for the Handbook but have amended how they are prioritised in the document</p> <p>Adjusted.</p>
Reference to AER engagement frameworks	<p>Explanations around graphs can be simplified.</p> <p>Segmentation material from NTR should be simplified.</p> <p>More templates, tips, tools should be included.</p> <p>Case studies:</p> <ul style="list-style-type: none"> - Broken down to be read more easily? - Less like an academic paper? 	<p>They are different – have clarified in text.</p> <p>Not changed – case studies were provided by networks and are presented essentially as they were received.</p> <p>Clarified</p>
Potential simplification of content and language	<p>Page 14: customer engagement strategy or plan? Or are they different?</p> <p>Page 17: box should be removed or moved to end...</p>	<p>Removed.</p>
Reference to retailers in engagement	<p>In regards to including retailers more into the handbook, there are a number of case studies on Ombudsman's' websites (e.g. http://www.ewon.com.au/index.cfm/ewon-case-</p>	<p>Added this website as a reference.</p>

Issue	Comment/suggestion	Response
	<p>study-library/) which may be useful. They focus on the consumers experience rather than the retailer or network. Those relevant may be in sections 'disconnection and restrictions', and 'supply' where there are links between networks, retailers to consumer.</p> <p>I believe it would be worth providing an example that reflects a consumer who may be greatly affected by disruption or disconnection, whether a planned or unplanned outage, and perhaps even another case study where a customer can experience damages to property or electronic items from outage.</p> <p>For example, a case study about a consumer who is on life support. How would effective communication protect these consumers, either to avoid disconnection, and in being reconnected? This could involve retailers, networks, emergency services, councils etc. This could be in a situation that ranges from a natural disaster to a customer not being able to afford a bill. What kind of information can be given to the customer to ensure they are safe from these practices, and at what stage would third parties be involved? I would also include the method of communication that would most benefit the consumer. I.e. do they require translation services, would a carer or representative need to be involved etc. If a third party is involved, how will a network and retailer obtain and use this information? It might also be worth mentioning the types of emotions a customer may be experiencing as well.</p> <p>In regards to the process indicators - (input, outcome and process). Can I suggest that further emphasis be placed on providing positive outcomes for the consumer?</p>	<p>Cannot add a new case study at this late stage – the development of more case studies is identified as an option in the <i>Sharing Customer Engagement Practice</i> document.</p> <p>Done.</p>
Application of Engagement theory and tone of document, including examples used.	<p>What I was looking for in the handbook however was the recommended 'settings' for the engagement, providing guidance and consistency as to how the actual engagement theory would be applied specifically to further the outcomes from the Roadmap,</p> <p>Such specific settings would include:</p>	<p>Opportunity to progress additional work on how engagement should be applied and monitored is identified in the <i>Sharing Customer Engagement Practice</i> document.</p>

Issue	Comment/suggestion	Response
	<ul style="list-style-type: none"> • Providing experience and insights into what works and what doesn't in the environment of energy (the case studies do help there, but the conclusions could be clearer); • Set a common 'flavour' of engagement that all DBs would work towards - jargon, justification, goal – as most lobby bodies are national and transcend DB geography, so singing to the same song sheet is critical; • Identify common resources that would reduce the cost and enhance the impact of an industry engagement campaign; • Provide a guide as to the investment in the engagement that is needed to be effective, perhaps to the point of discussing costs and benchmarking engagement investment; <p>The second comment is really around the objective of the engagement process. I know that engagement is an 'obligation' under the Rules, with the prime objective of satisfying the AER and the challenge panels that a DB has not acted unilaterally in formulating strategy.</p> <p>The real game is delivering effective and transparent tariff reform for an efficient and versatile energy network of the future. Therefore, I would expect an engagement plan to include the wider picture – engaging retailers as the prime customers of distribution and transmission services and having the primary relationship with energy customers, state governments as the arbiters of customer vulnerability, and engaging emerging 3rd parties to support the best long-term interests of energy consumers.</p> <p>'Relevance' and 'Deliverability of the outcome' are critical aspects of engagement for our industry. The handbook would benefit from some specific guidance on how to make the engagement relevant to energy customers, and also consider the environmental requirements (e.g. governments) on how to actually deliver the objectives.</p> <p>Finally, I think one of the reasons 4 of the 5 case studies are not particularly good stories is that the</p>	<p>Identified in <i>Sharing Customer Engagement Practice</i> document.</p> <p>Added as consideration in <i>Sharing Customer Engagement Practice</i> document.</p> <p>Have changed wording to better emphasise importance of engagement in terms of customer outcomes not regulatory process.</p> <p>Added notes on importance of these stakeholders but key focus of documents remains on end customer engagement.</p> <p>Concepts of "Relevance and delivery" will benefit from future discussion with stakeholders.</p>


Issue	Comment/suggestion	Response
	<p>actual purpose of the engagement was, at least initially, to ‘win the customers over to our way of thinking’. Engagement creates an expectation of demonstrated compromise, so the scope of the ‘freedom to act’ and the variables that can be changed must be articulated and set in the initial context of the interaction. This approach is clearer in case study 5.</p> <p>Perhaps the learning from this case study could be more powerfully expressed through the Handbook. I would be keen, however, to have seen some feedback from the process from someone other than the author who appears to be from the utility.</p>	<p><i>Sharing Customer Engagement Practice</i>, identifies the potential for further work in shared access to case studies, which could be from multiple view points</p>
Purpose of engagement	<p>The use of a roadmap is to identify the path to a destination. In this case, I expect that the purpose of the consultation and engagement related to the ENT roadmap will be to either (or both):</p> <ul style="list-style-type: none"> • Bring the customer along the journey, to engender trust the industry that change is necessary to ensure a cost-effective, efficient and nimble distribution industry of the future; and/or • Seek information in order to adjust the utilities’ view of what that industry of the future (i.e. the destination) actually looks like, so that strategies and plans can be refocused. The idea of ‘compromise’ features here – not a word used widely in a utility’s vernacular. 	<p>These points are valuable, but outside scope of the handbook itself. This is an objective of the broader Network Transformation Roadmap project.</p> <p>Have added content reflecting the dynamic and changing industry environment and the need for engagement to likewise change with transformation.</p>
Objectives of the Handbook (Objectives of engagement)	<p>From the Electricity Network Transformation Roadmap docs it appears that the ultimate outcome is to engender trust and acceptance by the customer - for fair price, for transparent and reasonable access and for empowerment as the energy environment changes – leading to permission for DBs to make the changes necessary to continue to deliver an efficient and appropriate energy transport capability.</p> <p>Page 5 - Discusses what the handbook will achieve in the journey (plan the engagement activities, work on the relationship, track engagement performance, learnings and collaboration), but I can’t find the razor-</p>	<p>Taken as comment. As above this is not a goal of the Handbook, which is focused on best practice engagement</p> <p>This clear purpose has been clarified.</p> <p>Handbook designed to relate to all types of</p>

Issue	Comment/suggestion	Response
	<p>sharp purpose or outcome that the engagement is actually meant to deliver.</p> <p>This opportunity to guide the ENA businesses would benefit greatly from clarity as to the objective of the engagement itself, such as ‘the fundamental change that the engagement will deliver is the acceptance and approval of X’, where X is expressed in terms of the outcome to the engagee (is that a word?) (customer) – price, amenity, reliability, empowerment,</p>	<p>network engagement, which may have variety of outcomes and objectives. General objective of handbook is to support better engagement with <u>customers</u>.</p>
<p>Other points at specific pages. Page 7</p>	<p>I understand that the 4 points of best practice and the 4 principles are taken from other references, however in the energy customer’s context the principles of ‘Relevance’, ‘Deliverability’ and ‘Level of Compromise’ have been shown as significant and often-overlooked points, as highlighted in the case studies. The handbook would benefit from some discussion on the importance of these aspects of engagement.</p>	<p>We agree that these principals are important, both we deliberately chose to not try to synthesise all possible principals of engagement in the handbook, since networks businesses already have identified these. We also believe that the sense of these issues (relevance, deliverability) has been incorporated in the handbook sections relating to implementing engagement.</p>
<p>Page 10 and Page 11</p>	<p>The commentary on the customer segmentation is interesting, however I would have expected the handbook to provide a number of specific engagement strategies that experience has shown are effective for each type of customer.</p> <p>The elephant in the room is ... where are the retailers in the picture? The influence that the retailers have on customers is immense, and there is no mention of them in figure 4. I presume they are ‘other energy businesses’, but their influence in passing on pricing signals, representing network’s interests, metering, 3rd party products cannot be ignored. I am sure that distributors will work with retailers, however such</p>	<p>Noted that there is value in sharing experience and strategies for customer segments and that this should be considered as part of future work</p> <p>Added as important stakeholders, but CEH is focused on end customers</p> <p>Adjusted industry diagram to make</p>

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	<p>interaction with retailers will benefit from a full and consistent engagement process.</p> <p>The figure 'engagement environment' must include retailers.</p> <p>Similarly, state governments have a big influence on a customer's position re energy price, empowerment and the like. Again, figure 4 does not seem to reference the state governments as a significant entity in the environment. I suppose it could be argued that so long as the vulnerable end of the market is looked after then state jurisdictions will come along, but again that could be dangerous.</p>	<p>critical role of retailer clearer</p> <p>As above</p> <p>As above with retailers, have noted key role of government in energy engagement with customers, but this is not a key focus of the customer Handbook.</p>
Page 12	<p>The features of the energy context are supported. I would expect that all DBs would be well aware of this information from their previous rounds of engagement. Continuing my theme of looking for specific guidance for distributors to make the engagement on the NTR as effective as possible, this section would benefit with some specific and common themes based on previous findings.</p> <p>For instance:</p> <ul style="list-style-type: none"> • For the vast majority of customers, the adage 'if I use less power, I will save money' is more or less set in concrete. It's the same for petrol, and food, and so many more basics. Shifting from costs based on consumption to capacity is a very big task. What has already been gleaned from tariff engagement in this area, and what are the common issues? • Relative costs vary across the country, but that argument is wearing thin with customers. The Electricity Network Transformation Roadmap does not make a big issue of geographical boundaries, nor development history, nor voltage, so DBs should be guided to not use geography as a crutch for points of difference. 	<p>Again, this handbook is not intended or able to cover off all the Electricity Network Transformation Roadmap goals, or content – other parts of the NTR project are dealing with these issues in much more detail.</p>
Page 13	<p>As mentioned earlier, and without trying to trump the World Business Council on Sustainable Development, the five points of principles for engagement needs to include two more – relevance and deliverability (or</p>	<p>As above, agree that these principals are important, but we deliberately chose to</p>

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	<p>willingness to compromise). It is critical for good engagement for those who are being engaged to clearly understand the relevance of their involvement – is it the threat of higher prices? Is it about power will be interrupted unless we spend more? Is it about the fact that I will be disempowered unless something happens? Setting the context and outcomes of the engagement is critical to good results.</p>	<p>not try to synthesise all possible principals of engagement in the handbook, since networks businesses already have identified these. We also believe that the sense of these issues has been incorporated in the handbook sections relating to implementing engagement.</p>
<p>Pages 14 – 42</p>	<p>This section tends to recap the general engagement theory. I can't see much specific relevance to the Electricity Network Transformation Roadmap objectives other than bring together the hallmarks of good engagement. One would expect that all the DBs have hired people well-versed in IAP2 and other engagement skills who would be well aware of the information in this section.</p> <p>What would be of real benefit is a peg in the sand from CSIRO / ENA presenting recent findings and experience of:</p> <ul style="list-style-type: none"> • the extent of application and interpretation of the engagement guidelines, • in terms of the roadmap, what opportunities are on the table for compromise, and what are 'givens' • the expected level of investment in in time, resources (benchmark \$ / customer?) • the required visibility in the marketplace to get the messages out • the role of specialist interest and lobby groups and how to weight their position • how 'vulnerable' is defined and responded to – it's businesses on the line as much as financially-stressed households. • is 12 people at a workshop (as had happened often) a real example of 'engagement' 	<p>As noted earlier – goals of ENTR are not the same as the goals of this handbook. They are compatible, but the handbook has narrower scope.</p> <p>Much of this material should be considered as part of future work which requires further collaboration between networks and customers and advocates to identify and share.</p> <p>In specific contexts a small representative workgroup can be effective engagement, but not in all contexts and the handbook highlights this.</p> <p>Specific issues that need engagement, but not addressed in the Handbook as these</p>

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	<ul style="list-style-type: none"> • where do the new technology industries come into the frame as allies, communication channels or risks to consider • who are the 3rd party agents for engagement, beyond lobby groups 	<p>issues may related to specific engagement activities by networks with customers.</p>
<p>Page 40</p>	<p>Social licence to operate metrics are certainly useful, but in my experience the application of the distribution industry it's a hard thing to make then effective by removing the many extraneous variables.</p> <p>For utilities, quality of the engagement process itself is interesting, but the real issue is the ability to deliver the outcome that is the purpose of the engagement. The vast majority of utilities have little brand presence, and for non-asset related discussions the 'impact on me directly' is unclear. In the case of tariffs, the response by retailers and governments can completely change any discussion.</p> <p>Its price, reliability and empowerment. Given this handbook is specifically targeted at the matters associated with the Electricity Network Transformation Roadmap, perhaps some guidance into establishing more specific metrics that provide an insight into the understanding, acceptance, trust and support of the roadmap would be more useful.</p> <p>Similarly for the measures for assessing engagement. For a utility with, say, 1.2M customers, how many website visits is considered effective? How many attendees to a workshop is a quorum? Perhaps this handbook may be able to provide some guidance into these metrics.</p> <p>Page 43</p> <p>There are some very good bits here in the case studies that go to addressing the points above.</p>	<p>SLO content removed – the metrics remain as examples only. The opportunity for further work evaluation and metrics is identified in a complementary document, <i>Sharing Customer Engagement Practice</i>.</p> <p>Further work may be required here but outside of objectives of the handbook.</p> <p>As noted above, the Handbook focuses on customers and notes the need for additional engagement with new market actors as they emerge. These are specific issues that individual network businesses may choose to address differently in their engagement activities.</p> <p>Noted that this is an ongoing process, specific timelines may vary depending on individual network business context and objectives.</p>



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	Finally, what timeframe does the goals of 'guidance, relationships, learning and collaboration' cover?	