

National Consumer Roundtable on Energy:
IMPACT REPORT 2019



SACOSS

*South Australian Council
of Social Service*

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National Consumer Roundtable on Energy: Impact Report 2019
SACOSS Report

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About SACOSS

The South Australian Council of Social Service is the peak non-government representative body for health and community services in South Australia, and has a vision of Justice, Opportunity and Shared Wealth for all South Australians.

SACOSS does not accept poverty, inequity or injustice. Our mission is to be a powerful and representative voice that leads and supports our community to take actions that achieve our vision, and to hold to account governments, business, and communities for actions that disadvantage vulnerable South Australians.

SACOSS' purpose is to influence public policy in a way that promotes fair and just access to the goods and services required to live a decent life. We undertake policy and advocacy work in areas that specifically affect disadvantaged and low income consumers in South Australia.

SACOSS has a long-standing interest in the delivery of essential services. Our research shows that the cost of basic necessities like electricity impacts greatly and disproportionately on vulnerable and disadvantaged people.

Members of our organisation span both small and large agencies, peak bodies, service providers, individuals, and some government departments. SACOSS is part of a national network, consisting of ACOSS and other State and Territory Councils of Social Service.

The National Consumer Roundtable on Energy Project has been running for 14 years as a primary vehicle for energy consumer collaborative advocacy. SACOSS has been funded to be the convenor since 2013. The recently revised outcome of the National Consumer Roundtable on Energy is to better enable participant organisations to deliver outcomes at national and state levels that are in the long term interests of small energy consumers, with a focus on the consumption and production of electricity and gas.

Acknowledgements

SACOSS would like to thank all the Roundtable participants who shared their experiences and insights for this report.

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The views expressed in this document do not necessarily reflect the views of Energy Consumers Australia or any other stakeholder.

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Introduction

The National Consumer Roundtable on Energy (Roundtable) 2018 – 2021 is an informal coalition of national and jurisdictional energy consumer advocates primarily focussed on policy dialogue and strategic collaboration.

This Impact Assessment is intended to provide a preliminary evaluation of the Roundtable for the 10 month period November 2018 to September 2019 and contains the following:

- An outline of the evidence base built through the first 10 months of work.
- A preliminary evaluation of the Roundtable, including its benefits to consumers and its impact.
- A strategic assessment to review its direction and planned outcomes.
- A review of the budget to ensure that the resources committed are fit for purpose.

Background

The Roundtable origins date to 2004. An initial meeting was hosted by the Energy Action Group, in collaboration with the Consumer Utilities Advocacy Centre (CUAC)¹ and the Consumer Action Law Centre (CALC). This meeting provided a national forum for consumer advocates to discuss the implications of the Ministerial Council on Energy's (MCE)² proposal for a national retail and distribution regulatory regime. The following year saw the formal creation of the Roundtable, establishing a vehicle for consumer advocates with a 'collective and active interest in providing consumer advocacy in the National Energy Market (NEM) reform processes to meet.

From 2006 the Roundtable, as convened by CUAC and CALC, developed into a two day face-to-face meeting held three times per year. In 2007 Roundtable participants created a Charter of Principles for Energy Supply for the purpose of shaping joint advocacy in areas of common interest.

In its 15 years of operation the Roundtable has been convened by a number of consumer advocate organisations including:

- Consumer Utilities Advocacy Centre (CUAC) and the Consumer Action Law Centre (CALC) from 2006 - 2010
- The Australian Council of Social Service (ACOSS) in 2011
- The Queensland Council of Social Service (QCOSS) in 2012
- The South Australian Council of Social Service (SACOSS) from 2013 until the present day.

Current Roundtable

The current Roundtable builds on the previous ECA funded Roundtable project and has the following vision and mission:

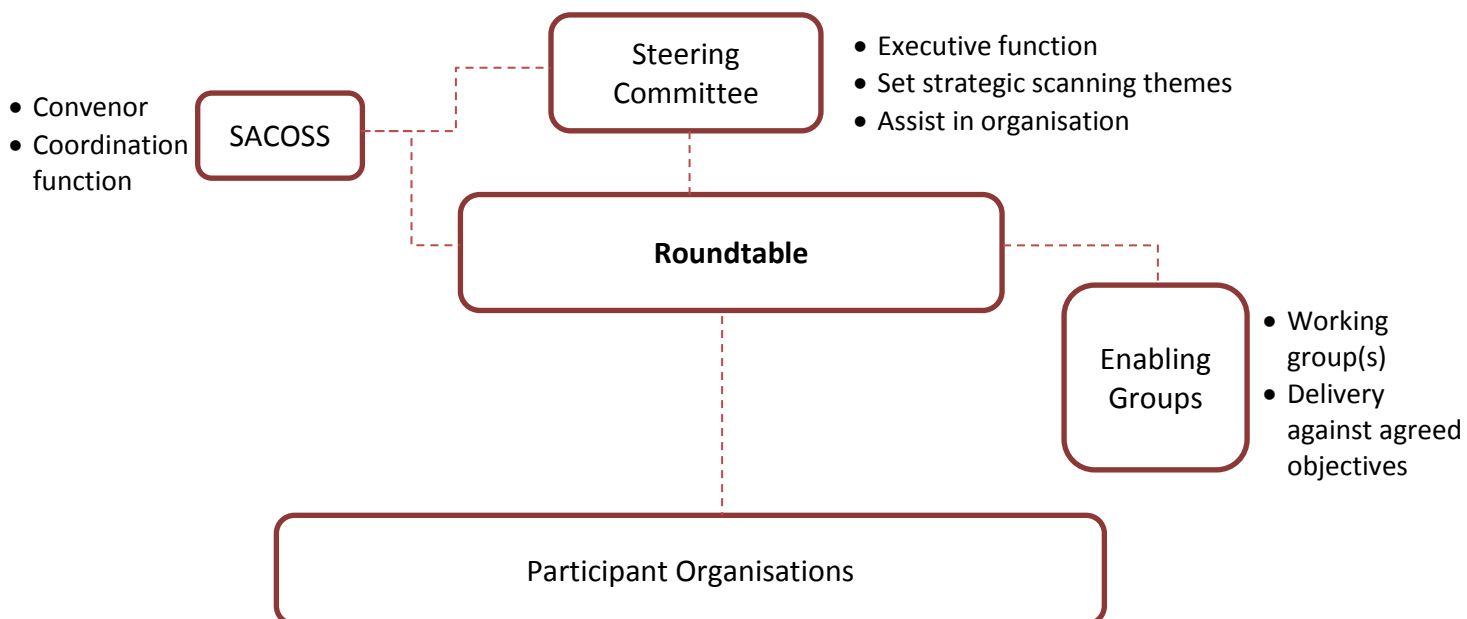
¹ Now the Consumer Policy Research Centre (CPRC)

² Now the COAG Energy Council

Vision: Small energy consumers in Australia are well served when decisions are made which take account of consumer interests.

Mission: To better enable participant organisations to deliver outcomes at national and state levels that are in the long term interests of small energy consumers, with a focus on the consumption and production of electricity and gas.

The Roundtable governance and operational structure is summarised in the following diagram:



The Roundtable is convened and co-ordinated by SACOSS and governed by a Steering Committee. It meets twice per year in various capital cities of the NEM. These meetings provide consumer advocates with the opportunity to consider, collaborate and strategise about contemporary energy policy.

The Roundtable also involves the establishment of up to 4 - 6 Enabling Groups each year which will operate to progress collective action on a set of agreed issues. Currently there are two Enabling Groups, Payment Difficulties and Distributed Energy Resources (DER). The Enabling Groups will promote collective action to be coordinated and monitored with a focus on influencing policy and practice. There is also increased transparency and co-ordination of reporting through this model.

The Roundtable will achieve its mission and vision by:

- Agreeing specific focus areas for the Roundtable via an internal prioritisation and governance process. This recognises that the Roundtable and participating organisations have limited resources and it is important to focus work effort on priority areas.
- Enabling collaboration, open dialogue, strategising and information sharing across participating organisations via means such as face to face meetings, online forums and teleconferences.
- Developing Enabling Groups to co-ordinate and share work effort on agreed priority areas to enable improved effectiveness and efficiency by leveraging access to the resources of participating organisations.
- Leveraging access to the communications channels and networks of participating organisations to better and more widely disseminate shared messaging of:
 - key outcomes and successes of the Roundtable and participating organisations
 - issues impacting consumers and desired changes to address these issues.

The Roundtable also aims to achieve the following key outcomes:

- Embed consumer perspectives
- Impact the regulatory framework
- Leverage influence through collaborative action
- Achieve policy change
- Develop integrated/holistic perspectives
- Enhance capacity of participants
- Support innovation and lateral thinking
- Ensure sustainable participation.

Roundtable participation

Appendix A to this Report contains the names of the 21 organisations currently participating in Roundtable, as well as the names of the Steering Committee and Enabling Group members.

Actions and Achievements to Date

This section briefly outlines the key actions and achievements to date of the Roundtable for the initial 10 month period, noting that given the relatively limited operation of the new Roundtable approach some of the achievements to date are a work in progress.

Overview of actions

In the initial 10 months of operation the Roundtable has:

- Updated key operational and governance requirements consistent with the new structure including updating the terms of reference for its Steering Committee and Enabling Groups, identifying key success criteria to report to ECA and preparing a reporting template for the Enabling Groups.

- Held two meetings, the first in Hobart (28 Feb – 1 Mar 2019) and the second in Brisbane (27 – 28 June 2019).
- Held one masterclass (on Co-ordination of Generation and Transmission Investment; COGATI) to assist in building capacity and knowledge transfer amongst the participating organisations.
- Invited key external stakeholders to attend and present at the Roundtable meetings including the AEMC, AER, AEMO and the Energy Charter.
- Published and distributed key meeting information including post meeting Communique, jurisdictional updates and relevant presentations / papers.
 - All meeting papers and presentations are uploaded on the SACOSS website at - <https://www.sacoss.org.au/roundtable-meetings-and-outcomes>
- Established two Enabling Groups (DER and Payment Difficulties) which have:
 - Enabling Group leads to co-ordinate and manage the enabling group activities.
 - Active and engaged members: approximately 7 for DER and 9 for payment difficulties.
 - Clear goals and objectives for each Enabling Group, including:
 - DER
 - To develop principles on how the transition to a high penetration of DER should be paid for and the approach to treating split incentives.
 - Greater consumer input into the Open Energy Networks consultation.
 - Greater consumer engagement with other key DER related work in particular ARENA’s Distributed Energy Integration Program (DEIP).
 - Payment Difficulties
 - To develop a common, co-ordinated understanding on support and assistance for people experiencing payment difficulty.
 - Identifying the key issues surrounding payment difficulties, key problems to overcome, key barriers in accessing assistance.
 - Developing a common framework of language and terminology in expressing and responding to payment difficulty.
 - Developing a common understanding regarding how best to respond to payment difficulties and provide support more sustainably.
 - Providing a co-ordinated response to reform and policy processes which present an opportunity to implement agreed principles and recommendations for improved support for payment difficulty.
 - Held at least two meetings / teleconferences each to discuss and progress issues.
 - Worked outside of these meetings to progress the development of principles, submissions and other activities.
- Working towards developing one or two further Enabling Groups – possibly on the Energy Security Board’s Post 2025 review and AEMO’s Integrated System Plan / Coordinated Generation and Transmission Investment (COGATI).

Key achievements and benefits to date

As a result of the actions of the Roundtable, the following are examples of the key achievements to date against some of the success criteria:

Communique is circulated to 50% more senior stakeholders

Communique and presentations circulated to AEMO, AEMC, and AER.

Emailed by Roundtable members to over 100 energy market stakeholders and colleagues.

Shared on SACOSS social media.

The increased awareness of the Roundtable will only improve the ability to provide benefits to consumers and assist in the achievement of the mission and vision.

At least one recommendation from Roundtable is provided for in the regulatory framework

The payment difficulties Enabling Group developed coordinated submissions to the AER's Draft Hardship Guidelines. These submissions and other engagement by the Enabling Group members have resulted in some of the recommendations being explicitly referenced and either partially or fully adopted by the AER in their Notice of Final Instrument, with other recommendations to be reviewed in the near to medium term for consideration of inclusion.

The recognition and inclusion of the recommendations from the Enabling Group submission is direct evidence of the benefit of the Enabling Groups for participants, and ultimately for consumers.

The ability to work in the Enabling Group significantly improved the quality and 'weight' of the eventual PIAC response that served as a proxy for the agreed positions of the group.

At least 3 enabling groups are convened each year

This has been partially achieved.

Two Enabling Groups have been formally established with another two Enabling Groups identified and aiming to be established by the end of the year.

At least two recommendations from two Enabling Groups are referenced by a decision making body;

At least one recommendation from an enabling group is adopted by a decision making body.

Recommendations from the Payment Difficulties Enabling Group's coordinated submissions to the AER's Draft Hardship Guideline were considered in the AER's Notice of Final Instrument, with two recommendations included in the Final Guideline and three recommendations influencing the content of the Guideline. The AER has also committed to a review of the ESC Vic's PDF and possible future amendments to the Guideline.

The DER Enabling Group has worked closely with the ARENA DEIP program to arrange a series of workshops explicitly set up to enable ARENA to engage with consumers on their program. It is too early to understand if there are explicit recommendations from the Enabling Group that have been adopted by ARENA but the engagement and involvement is a significant achievement to ensure consumer perspectives are at least understood and included in the decision making process.

Stakeholder Perspectives

The success and impact of the Roundtable can also be gauged through the feedback and perspectives of stakeholders. This Section summarises perspectives from four areas:

- Feedback received post the two Roundtable meetings from attendees
- Comments and feedback from Roundtable members more generally
- Comments from Enabling Group leads, and
- Comments from informal and brief discussions with key external stakeholders in particular AER, AEMO, AEMC and the Energy Charter.

Post Roundtable Meeting Feedback

At the conclusion of each Roundtable attendees are asked to complete a simple survey to understand their views of the effectiveness of the Roundtable and any other comments. These survey responses are used to inform the planning for subsequent Roundtable meetings. Some key comments from the feedback forms are provided below:

- Good to have multiple jurisdictional presenters
- New Roundtable structure is beneficial
- Enabling Groups are good
- Plenty of time allowed for networking and informal discussions
- Catching up with everyone face to face
- Opportunity to discuss a broad range of issues and ask questions
- Exposure to topics otherwise not necessarily on my organisation's radar
- Listen to other perspectives
- Collaborative and friendly environment
- Helps capacity building and knowledge sharing
- The Roundtable has the potential to build coalitions and deliver better customer outcomes.

Roundtable Member Feedback

Roundtable members were asked to provide perspectives on how the Roundtable has benefited them and / or consumers. The following provides a perspective of five responses from members. It is evident from the responses that there is significant benefit from attendance at the Roundtable for members and customers more generally.

Rob Law, Central Victorian Greenhouse Alliances

'I have been involved with Roundtable for nearly 4 years now and it has been invaluable. Working for an organisation representing local governments on climate and energy advocacy, roundtable has enabled me to stay up to date and develop a much deeper understanding of the myriad of energy market reforms, processes and consultations. Being exposed to a range of different consumer advocate groups has been fantastic and often challenged me to look at issues from many different angles. I have often found after each roundtable that I have a much greater appreciation and awareness of different perspectives towards big energy and climate policy issues. The roundtable enables groups from all shades of consumer advocacy to come together, share views and find common ground. Long live roundtable!'

Miyuru Ediriweera, PIAC

'I found attending the Roundtable extremely useful and productive. Given the breadth of energy-related issues and the number of process ongoing, it's impossible for one person to be on top of everything. The Roundtable allows advocates to meet face to face and share experiences and knowledge. Further, meeting at the Roundtable provides much needed time to think, plan and collaborate more strategically that then translates into better advocacy throughout the year.'

Mark Byrne, Total Environment Centre

'Through the RT I am exposed to consumer perspectives that I might otherwise not be—and an arena to work through differences.'

Peter Appelman, Uniting Kildonan (Uniting Vic.Tas)

'Electricity and gas are simple products, but wrapped up in a complicated and fragmented system with multiple players and conflicting interests. As an advocate for consumers who works directly with industry participants, Energy Roundtables are essential to keeping across all that is happening (and on the way) right around the country in a sector that is rapidly changing (and needs to).'

Jake Lilley, Consumer Action Law Centre

'Roundtable has really helped by saving me hours of work getting up to speed on a new issue. It is great to have presentations from other advocates or decision makers and immediately hear the range of core concerns from the NEM's most experienced consumer advocates in the discussions that follow.'

Enabling Group Leader Feedback

The Enabling Group leaders were asked to provide feedback and perspectives on the effectiveness of the new structure and benefits to themselves, the Group and consumers. It is appreciated that there is some possible bias in their perspectives, however it is important nonetheless to understand perspectives directly from key Enabling Group members.

Feedback from Douglas McCloskey, Payment Difficulty Enabling Group

“My very blunt commentary on the impact of the RT enabling group structure (being in one and convening the other) is that it’s incredibly valuable in every sense, and it’s something the RT should have been doing from the start. If you want me to sell it to the ECA or anyone else, they can call me directly.”

- The payment difficulty enabling group was incredibly beneficial not only for the group members, but also for immediate and longer term impact (or increased likelihood thereof) upon consumers:
 - Enabled the initiation of a targeted discussion.
 - Provided a framework to direct the co-ordinated work of members.
 - Assisted to meet the very shortened timeframes of these processes.
 - Provided an opportunity to focus discussion, identification of issues, harmonisation of ideas and co-ordination of language and response.
 - Enabled direct participation in the AER workshop by all members of the group, something which would have been impossible without the Enabling Group and which would have left consumers largely unrepresented in this process.
 - Allowed continuity between the groups response to this short term process, and work to develop a longer term, co-ordinated understanding of payment difficulty.
- The benefit more directly has been in:
 - Providing a structure and a framework to access the experience and perspective of other advocates and service providers.
 - This has directly benefitted PIACs input to the AER process.
 - Enabled an ability to garner direct support for PIAC positions in a number of processes, bolstering the likelihood of positive response/impact on behalf of consumers.
 - Has provided the basis foundation for an ongoing workstream that, in the medium term, could develop a common understanding and language in relation to payment difficulty.

Feedback from Kellie Caught, Mark Byrne and others, DER Enabling Group

- All members of the DER enabling Group reported finding it beneficial. We have liked the ability to:
 - Have deep dives on issues.

- Share new and emerging information.
- Have frank discussions.
- Test ideas and positions against diverse perspectives.
- Receive presentations for external organisations working on DER issues and solutions.
- Develop joint principles and positions.
- The RT DER enabling group has been really helpful in guiding and adding value to the work of enabling group members:
 - DER is a rapidly changing space, the enabling group has helped keep individual members abreast of critical issues – risks and opportunities.
 - Provided a forum to explore the implications of different approaches for dealing with DER integration, enablement and equity.
 - Helped in the development of strategies and principles for contemporary consumer protections.
 - Helped members prioritise own work areas.
 - Helped connect members with processes being run by market and energy bodies.
 - Improved working relations between advocates.
- It's probably early days to see direct benefits to consumers, but it would be fair to say that:
 - The DER enabling group has strengthened and sharpened our respective advocacy work on DER. This has been evident in our engagement and advocacy with energy bodies such as AEMC, AEMO, ESB, energy companies, other advocates and policy makers, which is informing their positions and policies. Which in turn should be beneficial to consumers.
 - Contributed to the development of a work program being led by two DER enabling group members (ACOSS and TEC) that that will bring together energy user groups, network operators, retailers, energy market bodies and other key stakeholders to develop a holistic suite of equitable and efficient network access and pricing solutions, underpinned by clearly defined end-user centric design principles, to inform policy, regulatory & rule changes.
- We think the enabling group structure is working well, because it enables a deeper dive into issues where there is limited capacity to explore fully in the broader roundtable, but still enable a strong connection to the roundtable as a whole.
- The funding for the enabling group can help improve the capacity of enabling group members to dedicate face to face time to working on the enabling group work plan and/or emerging critical issues.

External perspectives

Brief discussions were held with representatives from AER, AEMO, AEMC and the Energy Charter. These representatives and organisations were chosen as they have each attended one or more Roundtable in the new structure.

It is important to note that the views summarised below are anecdotal and paraphrased perspectives, they are not intended to represent specific views of any one or more of these organisations.

It is evident from the discussions that there are generally positive and consistent views of a strong benefit from the Roundtable. The discussions focussed on two key questions:

1. How has attending and / or engaging with RT benefited you or your organisation?

- There were very consistent themes indicating a strong benefit (both personal and organisational) from attending meeting(s).
- Examples of benefits include:
 - The Roundtable offers unique opportunities to share updates with and engage with multiple consumer advocates at the same time who have limited time and resourcing.
 - Enables a conversation and the ability to hear multiple points of view at one time, hearing points of difference can be very valuable.
 - Helps build trust and relationships - in particular the informal discussions.
 - Allows people to prioritise efforts with others in the room.
 - Allows reporting back within our organisation of consumer advocate perspectives.
 - Helps build bridges and linkages within and across industry.

2. How do you think has RT benefited consumers?

- Most acknowledged that it was 'Too early to tell' with the new approach and structure.
- It is however obvious that there is improved focus and direction amongst advocate which should have some benefit to consumers, albeit not something that is quantifiable at this stage.
- Jurisdictional mapping highlights common issues and impacts on consumers. This in the long run should benefit consumers.
- The attendance of the AEMC at the Roundtable helped with framing of AEMC consumer priorities to be in consumer language.
- The DER work and the input on consumer frameworks has influenced our thinking.
- If you can get efficiencies then there should be benefits to consumers. The Roundtable can assist with representing consumers as a group. That frees up time and money for some other issue to be addressed.

Forward Priorities

The work to date for the Roundtable has been beneficial, but recognises that it is still relatively early in the new structure to fully assess the benefits and effectiveness. However, it is evident from stakeholder perspectives and other information outlined earlier in this report that there is great support for the new focus and structure, in particular the Enabling Groups.

The broad strategic direction and forward work program for the Roundtable will evolve as the market and consumer priorities change, however it is most likely that in the nearer term the following Enabling Groups will likely drive much of the strategic output from the Roundtable:

- Distributed Energy Resources – it is likely that this Enabling Group will continue to work on their identified objectives.
- Payment Difficulties – this Enabling Group is also likely to continue to work on their identified priorities and objectives.
- Energy Security Board Post 2025 Review – it is likely that a new Enabling Group will be established to focus on this important reform program.
- AEMO's ISP and COGATI – it is likely that a new Enabling Group will be established to focus on this important work.

Given the large volume of activity in the sector, there are clearly other areas the Roundtable will be involved in, however these areas are more likely to be through a more reactive process and via the twice yearly Roundtable meetings as opposed to a formal Enabling Group.

A role of the Steering Committee is to assist the Roundtable in identifying priority areas and set the strategic direction. This will continue to be the case going forward through the Steering Committee's regular meetings.

Appendix A. Roundtable Participation

Roundtable Steering Committee

- Craig Memery, Public Interest Advocacy Centre (PIAC)
- Dean Lombard, Renew (Alternative Technology Association)
- Gavin Dufty, St Vincent de Paul Victoria
- Iain Maitland, Ethnic Communities Council of NSW
- Mark Henley, Uniting Communities
- Robyn Robinson, COTA QLD
- Jo De Silva / Rebecca Law, SACOSS

Roundtable Participant Organisations

- ACT Council of Social Service (ACTCOSS)
- Anglicare Tasmania
- Australian Council of Social Service (ACOSS)
- Brotherhood of St Laurence (BSL)
- Central Victorian Greenhouse Alliance (CVGA)
- Consumer Action Law Centre (CALC)
- Consumer Policy Research Centre (CPRC)
- Council on the Ageing (COTA)
- Energy Consumers Australia (as an observer)
- Ethnic Communities Council of NSW (ECCNSW)
- Kildonan UnitingCare
- Public Interest Advocacy Centre Ltd (PIAC)
- Queensland Council of Social Service (QCOSS)
- Renew (formerly Alternative Technology Association)
- South Australian Council of Social Service (SACOSS)
- St Vincent de Paul Society Victoria (SvDP)
- Tasmanian Council of Social Service (TasCOSS)
- Total Environment Centre (TEC)
- Uniting Communities
- Victorian Council of Social Service (VCOSS)
- Western Australian Council of Social Service (WACOSS)

Roundtable Enabling Groups

Payment difficulty / hardship enabling group

- Douglas McCloskey (PIAC, lead)
- Robyn Robinson (COTA)
- Mark Henley (Uniting Communities)
- Fiona Hawthorne / Rose McGrath (QCOSS)
- Georgie Morris (SACOSS)
- Iain Maitland (ECC)
- Jake Lilley (CALC)
- Bernadette Jago (TasCOSS)
- Kellie Caught (ACOSS)

The Distributed Energy Resources (DER) Enabling Group

- Mark Byrne (TEC, Co-lead)
- Kellie Caught (ACOSS, Co-lead)
- Luke Reade (QCOSS)
- Craig Memery (PIAC)
- Douglas McCloskey (PIAC)
- Dean Lombard (ATA)
- Rob Law (CVGA)
- Gavin Dufty (SvDP)
- Mark Henley (Uniting Communities)