

5 July 2019

Adam Wilson
Chief Executive Officer
Essential Services of Commission of South Australia (ESCOSA)
By online submission

Dear Adam

ESCOSA Draft Charter of Consultation and Regulatory Practice

I am writing in response to the review of the ESCOSA Charter of Consultation and Regulatory Practice (the ESCOSA Charter).

Australian Gas Infrastructure Group (AGIG) is one of Australia's largest energy utility business. Our assets are in all mainland states of Australia and the Northern Territory, and include gas distribution networks, gas transmission pipelines and storage facilities. In South Australia we serve over 450,000 customers, with over 8,000km of pipelines.

The draft changes to the ESCOSA Charter are a welcome reflection on how best to engage with stakeholders and to consult on specific issues. This is consistent with increased industry focus to ensure that our customers are involved in and understand the reasons for decisions that impact the price and services we deliver. We therefore support your focus on promoting better regulation, a principles based approach to stakeholder engagement and ensuring fit-for-purpose engagement.

We particularly note ESCOSA's commitment to engaging genuinely with all stakeholders which we see in our interactions with ESCOSA to date. We look forward to continuing to work with ESCOSA in this spirit in the future to ensure that we continue to deliver for our over 450,000 customers in South Australia.

To this end, we are about to release our Final Engagement Plan which outlines how we will ensure we engage with customers and stakeholders in developing our plans for our revised South Australian Access Arrangement proposal. We have adopted the following key principles to guide how we intend to engage with our customers and stakeholders, which include:

- Genuine and committed – which means we listen and respond to the needs of our customers and stakeholders, driving a culture of delivering value for our customers;
- Clear, accurate and timely communication – which means we provide information that is clear, accurate, relevant and timely;
- Accessible and inclusive – which means we involve customers and stakeholders on an ongoing basis in a meaningful way, to ensure that our plans deliver for our customers;
- Transparent – which means we clearly identify and explain the role of customers and stakeholders in the engagement process, and consult with customers and stakeholders on information and feedback processes; and
- Measurable – which means we measure the success, or otherwise, of our engagement activities.

We consider these principles to be consistent with those set in the ESCOSA Charter.

Other key elements of our approach for engagement include:

- Repeat engagement activities: to better understand customer and stakeholder need and expectations;
- Developing our Draft Plan: which is a key step in testing whether our plans are consistent with customer interest; and
- Further consultation on our Draft Plan: further customer and stakeholder engagement before finalising our plans.

This is key to meeting our objective of ensuring that our business plans are underpinned by effective stakeholder engagement, deliver for our customers and are capable of being accepted by our customers and stakeholders.

Should you have any queries about the information provided in this letter please contact myself (0403 309 940, craig.delaine@agiq.com.au) or Drew Pearman, Manager Policy and Government Relations (0417 544 731, drew.pearman@agiq.com.au).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Craig de Laine', written over a light blue horizontal line.

Craig de Laine
General Manager People and Strategy