



Gas



Consultation paper

Australian Gas Networks Regulatory Framework Review 2021-2026

July 2019

Request for submissions

The Essential Services Commission (**Commission**) invites written submissions from members of the community on this paper. Written comments should be provided by **Friday, 26 July 2019**.

It is the Commission's policy to make all submissions publicly available via its website (www.escosa.sa.gov.au), except where a submission either wholly or partly contains confidential or commercially sensitive information provided on a confidential basis and appropriate prior notice has been given.

The Commission may also exercise its discretion not to publish any submission based on length or content (for example containing material that is defamatory, offensive or in breach of any law).

Responses to this paper should be directed to: Australian Gas Networks Regulatory Framework Review 2021-2026

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Table of Contents

- Request for submissions i
- Glossary of terms ii
- Executive summary iii
- 1 Introduction 6
 - 1.1 Purpose and scope of this Review 6
 - 1.2 Review process 7
 - 1.3 Review evaluation process 8
- 2 Proposals for consideration 9
 - 2.1 Broader regulatory framework 9
 - 2.2 Jurisdictional service reliability standards 10
 - 2.3 Monitoring and reporting regime 12
- 3 AGN's current performance 15
 - 3.1 Responsiveness to the leaks and emergencies telephone number 15
 - 3.2 Responsiveness to public reporting of gas leaks 16
 - 3.3 Long-term trends in unplanned interruptions 17
 - 3.4 Complaints data 18
- 4 Next steps and timetable for this Review 20
- Appendix 1: The legal and regulatory framework 21
- Appendix 2: AGN annual operational performance information 26
- Appendix 3: EWOSA AGN complaints data dashboard 29

Glossary of terms

Term	Explanation
AGN	Australian Gas Networks
AER	Australian Energy Regulator
AEMA	Australian Energy Market Agreement
Commission	Essential Services Commission, established under the Essential Services Commission Act 2002
ESC Act	Essential Services Commission Act 2002
EWOSA	Energy and Water Ombudsman SA
Gas Act	Gas Act 1997
GDC/06	Gas Distribution Code
GIG 1.7	Gas Industry Guideline No.1
GMC/04	Gas Metering Code
GSL	Guaranteed Service Level
NECF	National Energy Consumer Framework (consists of the NERL and the NERR)
NERL	National Energy Retail Law
NERR	National Energy Retail Rules
NGL	National Gas Law
NGR	National Gas Rules
Review	Australian Gas Networks Regulatory Framework Review 2021-2026
SRMTMP	Safety, Reliability, Maintenance and Technical Management Plan
UAFG	Unaccounted for Gas

Executive summary

The Australian Gas Networks Regulatory Framework Review 2021-2026 (**Review**) will consider the effectiveness of the Essential Services Commission's (**Commission**) regulatory framework that currently applies to Australian Gas Networks (**AGN**). This will include an assessment of:

- ▶ the ongoing need for any South Australian specific requirements that are in addition to the national regulatory framework (currently contained in the Gas Distribution Code and the Gas Metering Code)
- ▶ the need to introduce jurisdictional service reliability standards to ensure network security and reliability, and
- ▶ the appropriate performance monitoring and reporting framework required to allow the Commission to evaluate the ongoing effectiveness of the regulatory framework in the 2021-2026 regulatory period.

In reviewing AGN's regulatory framework, the Commission's primary objective is to protect the long-term interests of South Australian consumers with respect to the quality and reliability of the distribution services AGN provides.

AGN is one of Australia's largest natural gas distribution companies.¹ In South Australia, AGN supplies natural gas through distribution networks of over 8000 km to more than 448,000 customers.²

As the owner of a monopoly natural gas distribution network in South Australia, AGN is subject to economic regulation by the Commission and the Australian Energy Regulator (**AER**).

The majority of the economic regulatory requirements placed on AGN are administered by the AER and contained in the national gas legislation and the national energy consumer framework (**NECF**), which provide mechanisms for the regulation of prices and for consumer protections.

However, the Commission has retained powers and functions under the Gas Act 1997 (**Gas Act**) and the Essential Services Commission Act 2002 (**ESC Act**), which operate alongside the national gas legislation and NECF. The Commission regulates AGN's gas distribution operations in South Australia through the provision, administration and enforcement of a licensing regime, which is supported by industry codes that contain South Australian specific requirements that are in addition to the national regulatory framework.

The Commission and the Technical Regulator both provide regulatory oversight of the security and reliability of AGN's network in South Australia.

The Commission reviews whether jurisdictional service reliability standards are needed to ensure that AGN is providing gas distribution services at the quality and reliability levels valued by customers. It undertakes these reviews every five years, to align with AGN's revenue regulation periods as administered by the AER.³

¹ Australian Gas Networks has operations in South Australia, Victoria, Queensland, New South Wales, and the Northern Territory. It is part of the Australian Gas Infrastructure Group, which also includes Multinet and the Dampier Bunbury Pipeline. Further information is available at <https://www.australiangasnetworks.com.au/our-business/about-us> and <https://www.agig.com.au/>

² Essential Services Commission (SA), Australian Gas Networks Regulatory Performance Report 2017-18, available at <https://www.escosa.sa.gov.au/ArticleDocuments/553/20181220-Gas-AGN-RegulatoryPerformanceReport2017-18-Factsheet.pdf.aspx?Embed=Y>

³ Under the national gas legislation, AGN is required to submit a revenue proposal to the AER every five years; its next revenue proposal is due by June 2020 for the 2021-2026 regulatory period. AGN's revenue proposal for the 2021-2026 regulatory period must include any expenditure required to deliver on any prescribed jurisdictional service reliability standards, some of which are set by the Commission. Refer National Gas Rules, rule 79.

It is the role of the Technical Regulator to set safety and technical obligations and ensure AGN meets these requirements to provide the safety and reliability outcomes expected of the gas industry by the community.

This Review will aim to ensure that the regulatory instruments established by the Commission are clear and do not duplicate, or contain inconsistencies with, regulatory requirements made under the national gas legislation and the NECF.

It will also consider whether AGN's current performance suggests that jurisdictional service reliability standards will be necessary to ensure that AGN will continue to provide gas distribution services at the price, quality and reliability levels valued by customers.

Preliminary proposals

Gas industry codes

The Commission is proposing some minor amendments to the South Australian specific requirements currently contained in the Gas Distribution Code and the Gas Metering Code to reflect changes in the legislative and regulatory frameworks that have occurred since the last review.

An initial assessment suggests that the following clauses should be removed from the Gas Distribution Code:

- ▶ Clauses 2.1.1 (e)(i) and (ii) which specify unaccounted for gas targets for AGN to achieve in the 2011-2016 regulatory period, which were achieved by AGN and are thus now redundant, and
- ▶ Clauses 2.3.1(e)(i)-(iv) which duplicate clauses contained in the National Energy Retail Rules (NERR) model terms and conditions for deemed standard connection contracts.

The Gas Metering Code will also need to be amended to reflect recent legislative changes to the Gas Act that now require technical and safety related matters to be approved directly by the Technical Regulator, rather than the Commission.⁴ This is likely to mean that some of the more prescriptive and technical requirements for metering installations currently contained in the Gas Metering Code may be undertaken by the Technical Regulator in the future, rather than the Commission.

The Commission will continue to work closely with the AER, AGN and the Technical Regulator throughout this Review to remove redundant or duplicate requirements from the Commission's regulatory framework for AGN for the 2021-2026 regulatory period.

Jurisdictional service reliability standards

The Commission is not proposing to introduce any jurisdictional service reliability standards on AGN for the 2021-2026 regulatory period, unless evidence of a change in customer satisfaction or expectations arises through this Review process.

Currently, the Commission has not identified the need to introduce jurisdictional service reliability standards for AGN. A key factor in the Commission's previous decision was that the gas leakage management requirements set by the Technical Regulator were sufficient to deliver the reliability outcomes valued by AGN's customers. However, the Commission determined that there was a benefit in requiring AGN to report to its customers on its gas leakage management performance.

An initial review of AGN's performance for the current regulatory period suggests that its service and reliability levels continue to remain satisfactory and no additional jurisdictional service reliability standards are required.

⁴ Refer section 8 of the Gas Act.

In reaching this initial position, the Commission has drawn on early consultation with key stakeholders, (including AGN's South Australian Customer Reference Group), a review of AGN's performance data and an assessment of complaints directed to AGN and escalated to the Energy and Water Ombudsman SA.

However, the Commission acknowledges that AGN is in the early stages of its stakeholder engagement program. Accordingly, this Review has been designed to allow for any issues that arise from that process to be incorporated and considered prior to the Commission making its Draft Decision on this matter.

Questions for consultation

This paper provides background, context and data to assist stakeholders to contribute to this Review.

The Commission is seeking feedback on its preliminary positions. The following consultation questions are a guide to particular areas where the Commission is seeking feedback or additional evidence. However, stakeholders are invited to provide feedback on the Commission's preliminary proposals, and raise any matters that will assist the Commission with this Review, by **Friday, 26 July 2019**.

The Commission also welcomes discussions with stakeholders on the matters raised in the paper or on any related matters.

Consultation questions

1. Do the Commission's proposed amendments to the Gas Distribution Code and Gas Metering Code seem appropriate? Are there other amendments that should be considered?
2. Is there any other duplication of, or inconsistency with, regulatory requirements made under the national gas legislation that the Commission needs to consider?
3. Does AGN's current performance support the Commission's proposal to not introduce jurisdictional service reliability standards to achieve the reliability outcomes valued by AGN's customers?
4. Is there any evidence that customers' expectations are not being met by AGN?
5. Are the Commission's current performance reporting indicators appropriate and sufficient to monitor AGN's reliability outcomes?
6. Does AGN currently provide its customers with the right type of information to allow them to assess its performance? If not, what would you propose and why?

The Commission will release a Draft Decision for further public consultation in October 2019, prior to releasing a Final Decision in January 2020.

1 Introduction

The Essential Services Commission (**Commission**), established under the Essential Services Commission Act 2002 (**ESC Act**), is the independent economic regulator of essential services in South Australia. In undertaking its regulatory functions, the Commission's primary objective is the protection of the long-term interests of South Australian consumers with respect to the price, quality and reliability of essential services.⁵

This Consultation Paper outlines the Commission's preliminary proposals for consideration in its Australian Gas Networks Regulatory Framework Review 2021-2026 (**Review**). The Commission invites submissions on this Consultation Paper by **Friday, 26 July 2019**. It also welcomes discussions with stakeholders on the matters raised in the paper or on any related matters that will assist the Commission with this review.

1.1 Purpose and scope of this Review

Australian Gas Networks (**AGN**) is the owner of natural gas distribution networks in South Australia that provides gas distribution services to over 448,000 customers.⁶ The purpose of this Review is to assess the effectiveness of the Commission's current regulatory framework for AGN.

In undertaking this Review, the Commission will be:

- ▶ examining the regulatory instruments established by the Commission that currently apply to AGN to ensure they are clear and free of redundancy and duplication, and are harmonised with regulatory requirements under the national gas legislation (National Gas Rules and National Gas Law) and the National Energy Consumer Framework (**NECF**) (National Energy Retail Rules and National Energy Retail Law) that provide mechanisms for consumer protection.
- ▶ determining whether AGN's customers are experiencing material service or reliability issues and, if they are, considering whether establishing jurisdictional service reliability standards is the appropriate regulatory response by the Commission to address these issues.

AGN's gas distribution services are subject to economic regulation by both the Commission and the Australian Energy Regulator (**AER**).

The Commission has retained powers and functions that operate alongside the main price regulation and consumer protections provided under the national gas legislation and NECF administered by the AER. The Commission's powers and functions in relation to AGN are contained in the Gas Act 1997 (**Gas Act**) and the ESC Act.

Pursuant to these Acts, the Commission regulates AGN's gas distribution operations in South Australia through the provision, administration and enforcement of a licensing regime, which is supported by industry codes. This Commission-established regulatory framework contains South Australian specific requirements that are in addition to the national regulatory framework. The Commission monitors and publicly reports on AGN's performance against the South Australian specific requirements.

⁵ Essential Services Commission Act 2002, section 6(a).

⁶ Essential Services Commission (SA), Australian Gas Networks Regulatory Performance Report 2017-18, available at <https://www.escosa.sa.gov.au/ArticleDocuments/553/20181220-Gas-AGN-RegulatoryPerformanceReport2017-18-Factsheet.pdf.aspx?Embed=Y>

Through this Review, the Commission will seek to ensure that its South Australian specific regulatory requirements for AGN are clear, consistent and prudent. The Commission will also consider its regulatory instruments in light of section 6A(4) of the Gas Act, which requires the Commission to have regard to the provisions of the National Gas Rules (NGR) and National Energy Retail Rules (NERR) and the need to avoid duplication of, or inconsistency with, regulatory requirements under those Rules.⁷

This Review will also determine whether there is a need for AGN to be subject to jurisdictional service reliability standards. The Australian Energy Market Agreement (AEMA)⁸ provides for State and Territory Governments to retain responsibility for developing jurisdictional service reliability standards to ensure network security and reliability.

The Commission and the Technical Regulator both provide regulatory oversight of the security and reliability of AGN's network in South Australia.

The Commission reviews whether jurisdictional service reliability standards are needed to ensure that AGN is providing gas distribution services at the quality and reliability levels valued by customers. It undertakes these reviews every five years, to align with AGN's revenue regulation periods as administered by the AER.

It is the role of the Technical Regulator to set safety and technical obligations and ensure AGN meets these requirements to provide the safety and reliability outcomes expected of the gas industry by the community.

The Commission's current regulatory requirements around the reliability of AGN's network build on the Technical Regulator's broader technical and safety requirements by providing a public-facing and customer-focused perspective, through reporting customer experience. This balance of responsibilities ensures AGN's customers continue to get the gas distribution services at the quality and reliability levels they value, while ensuring that public safety requirements are met.

This Review will consider whether this current approach to regulating AGN's distribution services remains appropriate, or if amendments are required.

1.2 Review process

There are three main stages to the review process, and two primary stages (Stage 1 and Stage 2) where stakeholders can contribute to this Review:

- ▶ **Stage 1:** July 2019 - Public consultation on a Consultation Paper.
- ▶ **Stage 2:** October 2019 - Public consultation on a Draft Decision (including any amendments to regulatory instruments or proposed jurisdictional service reliability standards).
- ▶ **Stage 3:** January 2020 - Informing the public about the Commission's Final Decision on the Review.

AGN's stakeholder engagement program has informed the timing and scope of this Review.

AGN has primary responsibility for engaging directly with its customers on service and reliability levels and is conducting a customer engagement program to understand the expectations, views and priorities of its customers to inform its 2021-2026 revenue proposal for the AER. The scope of the AGN's stakeholder engagement program is broad and goes beyond the focus of this Review. The

⁷ Gas Act 1997, section 6A(4).

⁸ The Australian Energy Market Agreement provides for State and Territory Governments to retain responsibility for developing service reliability standards to ensure network security and reliability. The Commission has a role in developing, implementing and administering the jurisdictional service standards for Australian Gas Networks.

Commission will provide feedback to AGN on the elements of its stakeholder engagement program relevant to this Review.

The Commission has observed the early stages of this engagement program and has insight into AGN’s overarching engagement strategy, which consists of:

Table 1: AGN stakeholder engagement timeframe

Stage 1 Feb to May 2019	Stage 2 June to Nov 2019	Stage 3 Jan 2020	Stage 4 1 st half 2020
Draft Engagement Plan. Strategy and research.	Engagement to inform development of the Draft Plan. Stage 2 Engagement Report.	Consultation on the Draft Plan.	Finalisation of the Draft Plan informed by consultation feedback.

Early feedback from Stage 1 of AGN’s stakeholder engagement program has directly informed the scope and timing of this Consultation Paper. Indications from two AGN SA Reference Group meetings undertaken during Stage 1 suggest there are no material concerns with current service reliability levels. Stage 2 of AGN’s stakeholder engagement program will, along with this Consultation Paper, help to surface any issues, priorities and customer expectations that the Commission (and AGN) are not currently aware of. This process will further inform the scope and timing of this Review.

The Commission expects that the most relevant feedback for this Review will be obtained in Stage 1 (now complete) and Stage 2 of AGN’s stakeholder engagement program. As such, it is anticipated that the Commission’s Final Decision will be published in January 2020.

Further details on AGN’s stakeholder engagement program is publicly available on its website at <https://www.australiangasnetworks.com.au/our-business/have-your-say>.

1.3 Review evaluation process

Stakeholders will be invited to provide feedback on their experience and satisfaction with this review process once the Commission has published the Final Decision in January 2020.

There will also be opportunity to comment on AGN’s performance outcomes as publicly reported by the Commission, AGN and other regulators throughout the 2021-2026 regulatory period.

2 Proposals for consideration

The following proposals are based on the Commission's initial analysis of the evidence it has on AGN's performance and reliability over previous regulatory periods, and the current regulatory period so far (see Chapter 3 – AGN's current performance).

The Commission is seeking feedback from stakeholders, including any relevant evidence that the Commission should consider, on these preliminary proposals.

The Commission's Draft Decision (to be published in October) will be informed by submissions on these proposals, the results of AGN's stakeholder engagement program, and other consultation with the Technical Regulator and the AER.

2.1 Broader regulatory framework

The Commission's regulatory framework for AGN is established through the following instruments:

- ▶ AGN's gas distribution licence
- ▶ Gas Distribution Code (**GDC/06**)
- ▶ Gas Metering Code (**GMC/04**), and
- ▶ Gas Industry Guideline No.1 (**GIG 1.7**).

Consistent with requirements under section 6A(4) of the Gas Act, the Commission will review these instruments to ensure they are clear and free of redundancy and duplication, and are harmonised with regulatory requirements under the national gas legislation (National Gas Rules and National Gas Law) and the NECF (National Energy Retail Rules and National Energy Retail Law) that provide mechanisms for consumer protection.

2.1.1 Proposals

2.1.1.1 Gas Distribution Code (GDC/06)

The Commission is proposing to remove the following clauses from the Gas Distribution Code:

- ▶ Clause 2.1.1(e) and its subclauses to reflect the final decision of the Commission in its previous jurisdictional service reliability standards review.⁹ In its final decision for the 2016-2021 regulatory period, the Commission decided to remove prescribed Unaccounted for Gas (**UAFG**) performance requirements from the Gas Distribution Code. Clauses 2.1.1 (e)(i) and (ii) specify UAFG targets for AGN for the previous regulatory period, which were achieved by AGN, and are now ineffective and redundant.
- ▶ The removal of clause 2.3.1(e) and its subclauses, as these duplicate clauses contained in the NERR model terms and conditions for deemed standard connection contracts, which stipulate minimum requirements for AGN.

⁹ Refer Essential Services Commission (SA) AGN Review 2016-2021 Final Decision <https://www.escosa.sa.gov.au/ArticleDocuments/562/20150604-Gas-AGN-JSS-2016-2021-FinalDecision.pdf.aspx?Embed=Y>

2.1.1.2 Gas Metering Code (GMC/04)

There is an opportunity to clarify the respective roles of the Technical Regulator and the Commission in respect of approvals of various technical matters currently required under the Gas Metering Code. The Commission proposes that technical approvals required under several clauses of the Gas Metering Code be regulated by the Technical Regulator rather than the Commission.

Clauses in the Gas Metering Code which this preliminary proposal applies to are:

- ▶ clause 3.6.1(b) relating to non-compliant meters
- ▶ clauses 3.4.1, 3.4.2 and 3.4.6(b) relating to meter classes, and
- ▶ clauses 5.1.1, 5.1.3, 5.1.5 relating to the Gas Measurement Management Plan.

This proposal is in line with the purpose of recent legislative changes to the Gas Act, amending the requirement for the Commission to approve Safety, Reliability, Maintenance and Technical Management Plans (SRMTMPs) in favour of requiring the approval of the Technical Regulator. These proposed amendments reflect the Technical Regulator's statutory functions under section 8 of the Gas Act.

The Commission is also proposing to use this opportunity to clarify that the Gas Metering Code is not intended to apply to small-scale reticulated LPG operations.¹⁰

Questions for consultation

1. Do the Commission's proposed amendments to the Gas Distribution Code and Gas Metering Code seem appropriate? Are there other amendments that should be considered?
2. Is there any other duplication of, or inconsistency with, regulatory requirements made under the national gas legislation that the Commission needs to consider?

2.2 Jurisdictional service reliability standards

The level of reliability AGN delivers influences its costs. Higher reliability levels may provide extra benefits to customers, but might also raise costs and prices. Lower reliability levels may reduce costs, but might also result in poor outcomes for customers. Assessing the trade-off between price and reliability means answering the question: what level of reliability do customers' value?

In competitive markets, the price-service mix is optimised by consumers choosing the service they prefer, given the price. As monopolies, gas distributors such as AGN are not subject to competitive forces in relation to the price and quality of the gas distribution services they provide. Regulation of reliability standards for monopolies, when coupled with revenue regulation, serves to determine efficient service levels, given the absence of a competitive market.

With respect to the trade-off between price and reliability, it is important to acknowledge that the reliability experienced by customers is not driven solely by the reliability of the distribution network. It is also determined by the reliability of the transmission network, and the reliability of upstream gas production. The distribution network transports gas from exit points on the transmission network to end use customers. AGN's contribution to reliability is to have the distribution network in operating order so this can occur. Nor are distribution costs the sole component of gas prices, or gas price

¹⁰ The Commission has developed a separate stand-alone regulatory framework that applies to small-scale reticulated LPG operations. Refer https://www.escosa.sa.gov.au/ArticleDocuments/653/130404-ReticulatedLPGIndustryCode_RLIC-01.pdf.aspx?Embed=Y

increases. Gas distribution costs represent approximately 38 percent of the average residential customer bill.¹¹

An optimal price-service mix can be identified by conducting an economic assessment of the costs of delivering alternative reliability outcomes against customers' willingness to pay for those outcomes. The Commission used this approach in its recent review of its reliability standards for SA Power Networks.¹² The Commission's preliminary position is that an economic assessment of this type is not required to assess whether the Commission needs to introduce jurisdictional service reliability standards to ensure that AGN is providing distribution services at the levels valued by its customers.

This preliminary position is based on the assumption that the factors supporting the Commission's previous decision remain valid. Principally, that the technical and safety requirements prescribed by the Technical Regulator are sufficient to deliver the reliability outcomes valued by AGN's customers.

However, the Commission's previous decision did determine that there was a benefit in requiring AGN to report to its customers on its gas leakage management performance. As such, AGN is currently required to monitor and report on three performance measures:

- ▶ responsiveness to the leaks and emergencies telephone number
- ▶ responsiveness to public reporting of gas leaks, and
- ▶ long-term trends in unplanned interruptions.

The reporting regime is designed to improve transparency around AGN's leakage management and response performance, identify any poorly performing segments of AGN's network, and gather data to enable future benchmarking of AGN's historical performance.

The current level of regulatory oversight appears to be sufficient at this point in time. AGN's network is performing reliably, it is providing timely response to public reports of gas leaks, and its customers have not expressed concern with current reliability levels (see chapter 3 for further analysis of AGN's performance).

Previous reviews have determined that customers are satisfied with AGN's service and reliability levels.¹³ Data gathered so far on unplanned interruptions illustrates AGN's service continues to be reliable and consistent,¹⁴ and early feedback from the AGN SA Reference Group suggests there are no material issues with AGN's service reliability. Considering service and reliability levels remain consistent, the Commission anticipates there is a low likelihood that previous satisfaction levels of AGN customers have changed. This assumption will be tested in Stage 2 of AGN's stakeholder engagement program, which will help to surface any issues, priorities and customer expectations that the Commission (and AGN) are not currently aware of.

Further, given that the key regulatory driver for AGN's current reliability outcomes is the need to meet the Technical Regulator's public safety requirements, there is limited scope for the Commission to require AGN to deliver lower reliability levels, even if this could result in a slight reduction in costs.

¹¹ Australian Energy Regulator, State of the Energy Market 2018, available at https://www.aer.gov.au/system/files/State%20of%20the%20Energy%20Market%202018%20-%20Full%20report%20A3%20spread_2.pdf

¹² Essential Services Commission (SA), SA Power Networks 2020 Reliability Standards Review, 2019, available at <https://www.escosa.sa.gov.au/projects-and-publications/projects/electricity/sa-power-networks-2020-reliability-standards-review>

¹³ Essential Services Commission (SA), Australian Gas Networks Jurisdictional Service Standards for the 2016-2021 Regulatory Period - Final Decision, available at <https://www.escosa.sa.gov.au/ArticleDocuments/562/20150604-Gas-AGN-JSS-2016-2021-FinalDecision.pdf.aspx?Embed=Y>

¹⁴ Refer to paragraph 3.3 Long-term trends in unplanned interruptions.

Further, the Commission's current performance reporting requirements add a low marginal cost with the resulting benefit of publicly available data on AGN's performance.

In reaching this position, the Commission has drawn on early consultation with key stakeholders, (including AGN's SA Reference Group and the Technical Regulator), a review of AGN's performance data and an assessment of complaints directed to AGN and escalated to the Energy and Water Ombudsman SA (EWOSA).

However, the Commission acknowledges that AGN is in the early stages of its stakeholder engagement program. Accordingly, this Review has been designed to allow for any issues that arise from that process to be incorporated and considered prior to the Commission making its Draft Decision on this matter.

2.2.1 Proposals

The Commission is not proposing to introduce jurisdictional service reliability standards in the form of performance targets as current evidence suggests AGN is delivering the reliability outcomes that customers value through continuing to meet its leakage management requirements set by the Technical Regulator.

Questions for consultation

3. Does AGN's current performance support the Commission's proposal to not introduce jurisdictional service reliability standards to achieve the reliability outcomes valued by AGN's customers?
4. Is there any evidence that customers' expectations are not being met by AGN?

2.3 Monitoring and reporting regime

The Commission's current monitoring and reporting regime applies to two performance areas and requires AGN to provide data on three performance indicators.¹⁵

- ▶ Performance area one: AGN's responsiveness to public reports of potential gas leaks.

This was prescribed in response to customer feedback AGN obtained to inform its 2016 regulatory proposal to the AER. The feedback revealed that a majority of customers (61 percent) were willing to pay \$1.50 per year to increase AGN's average leak response rate to 98 percent of reported gas leaks attended within AGN's Leakage Management Plan timeframes.

Instead of changing the response rate, AGN committed to providing further information on its leakage management procedures and response performance via its website, as further research identified that stakeholders were primarily concerned with understanding how leak reports are managed.

The Commission supported this approach, and included two areas within the regime to monitor AGN's responsiveness to potential gas leaks to improve transparency around performance:

- **Performance indicator one: AGN's responsiveness to the leaks and emergencies telephone number, and**
- **Performance indicator two: AGN's responsiveness to public reports of potential gas leaks.**

¹⁵ AGN publishes its performance against these indicators in its Annual General Report, available at: <https://www.australiangasnetworks.com.au/our-business/about-us/annual-reports>

- ▶ Performance area two: AGN customers experiencing poor reliability outcomes.

AGN's network is reliable, as discussed in section 3.3 of this paper. Nevertheless, it is important to identify whether any customers are experiencing poor reliability relative to AGN's average performance. Therefore, the Commission chose to include the following reliability criteria within the monitoring and reporting regime to identify any poorly performing segments of AGN's network. Gathering this information was a necessary pre-condition to the possibility of introducing an appropriately targeted guaranteed service level (GSL)¹⁶ scheme in the future:

- **Performance indicator three: AGN customers experiencing multiple and/or long duration interruptions.**

AGN reports to the Commission on these performance areas on a quarterly basis, in the manner and form stipulated in the Gas Industry Guideline No.1. The Commission publishes this performance data on its website annually in its AGN Regulatory Performance Report.¹⁷

The data collected enables the Commission to develop performance baselines, so that AGN's performance across these criteria can be measured against its average historical performance.

The Commission is also considering whether AGN's current public reporting is sufficient and appropriate to allow its customers to understand its performance. In the first instance, this will include consideration of the internal monitoring and reporting AGN already undertakes, and whether it would be valuable for AGN to share more of this information with its customers.

2.3.1 Proposals

The Commission's preliminary proposal is for AGN to continue monitoring and reporting on the existing three performance indicators for the 2021-26 regulatory period:

1. AGN's responsiveness to the leaks and emergencies telephone number
2. AGN's responsiveness to public reporting of gas leaks, and
3. AGN's long-term trends in unplanned interruptions.

This proposal is made on the basis that:

- ▶ the reporting regime fills a gap in public knowledge that was identified during the public consultation process undertaken for the previous review of AGN's jurisdictional service reliability standards, and
- ▶ the current performance monitoring and reporting regime provides the Commission with the data necessary to continue to monitor the long-term trends in reliability outcomes that would enable the establishment of benchmarks for AGN's future performance, if necessary, for a minimal marginal cost.

¹⁶ A GSL scheme would require Australian Gas Networks to make automatic payments to customers where a specified service level was not met.

¹⁷ Essential Services Commission (SA), Australian Gas Networks Performance Report 2017-18, available at <https://www.escosa.sa.gov.au/ArticleDocuments/553/20181220-Gas-AGN-RegulatoryPerformanceReport2017-18-Factsheet.pdf.aspx?Embed=Y>

Questions for consultation

5. Are the Commission's current performance reporting indicators appropriate and sufficient to monitor AGN's reliability outcomes?
6. Does AGN currently provide its customers with the right type of information to allow them to assess its performance? If not, what would you propose and why?

3 AGN's current performance

AGN reports to the Commission quarterly on three performance areas. Data for the three performance areas are captured via 10 indicators, as prescribed by the Commission in Gas Industry Guideline No. 1.

This section provides an illustration of outcomes across the performance areas, and provides some broader context on AGN's performance. A table of AGN's Annual Operational Performance Information for the monitoring and reporting regime over the regulatory period so far is provided at Appendix 2.

3.1 Responsiveness to the leaks and emergencies telephone number

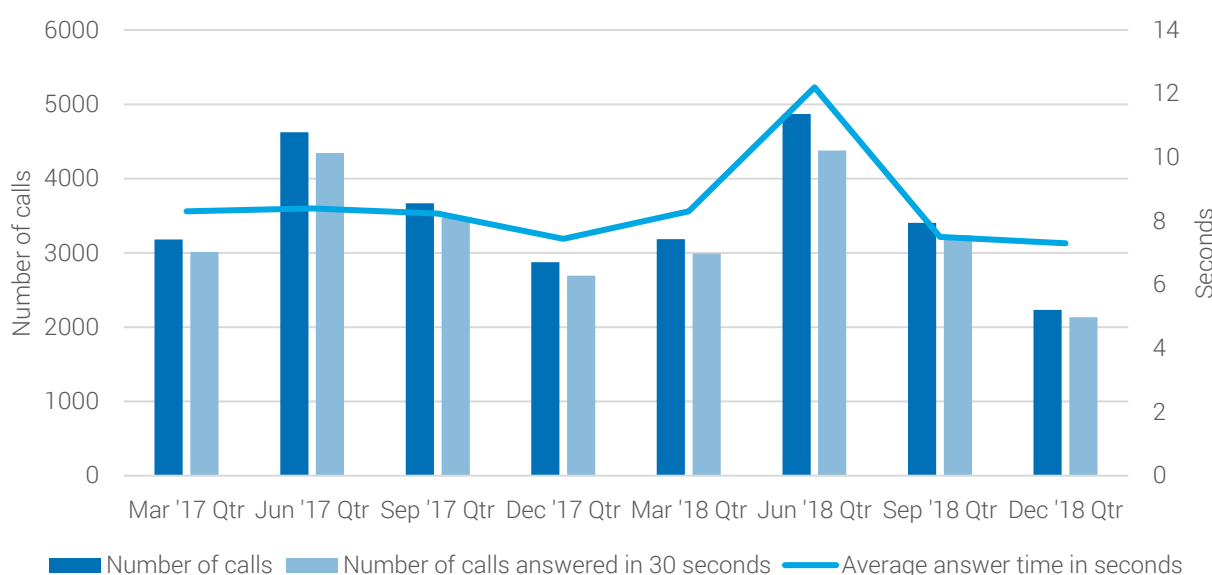
Under the NERR, AGN is required to maintain a 24 hour fault information and reporting telephone number.¹⁸ However, the AER does not set performance standards or request performance data on AGN's responsiveness to answering phone calls made to this telephone number. The Commission has this power under the function of prescribing and reviewing jurisdictional service reliability standards.

The Commission has decided to not set jurisdictional service reliability standards, instead it requires AGN to report to the Commission quarterly on the following three performance indicators:

- ▶ total number of telephone calls received on the leaks and emergencies number
- ▶ total number (and percentage) of telephone calls to the leaks and emergencies number answered within 30 seconds, and
- ▶ average answer time (in seconds) for calls to the leaks and emergencies number.

AGN's leaks and emergencies telephone service received an average of 14,020 calls per annum across the 2017 and 2018 calendar years. AGN has consistently answered around 94.5 percent of these calls within 30 seconds, with an average response time of 8.4 seconds.

Figure 1: Average answer time by call volume



¹⁸ Refer National Energy Retail Rules, rule 85, available at <https://www.aemc.gov.au/regulation/energy-rules/national-energy-retail-rules>

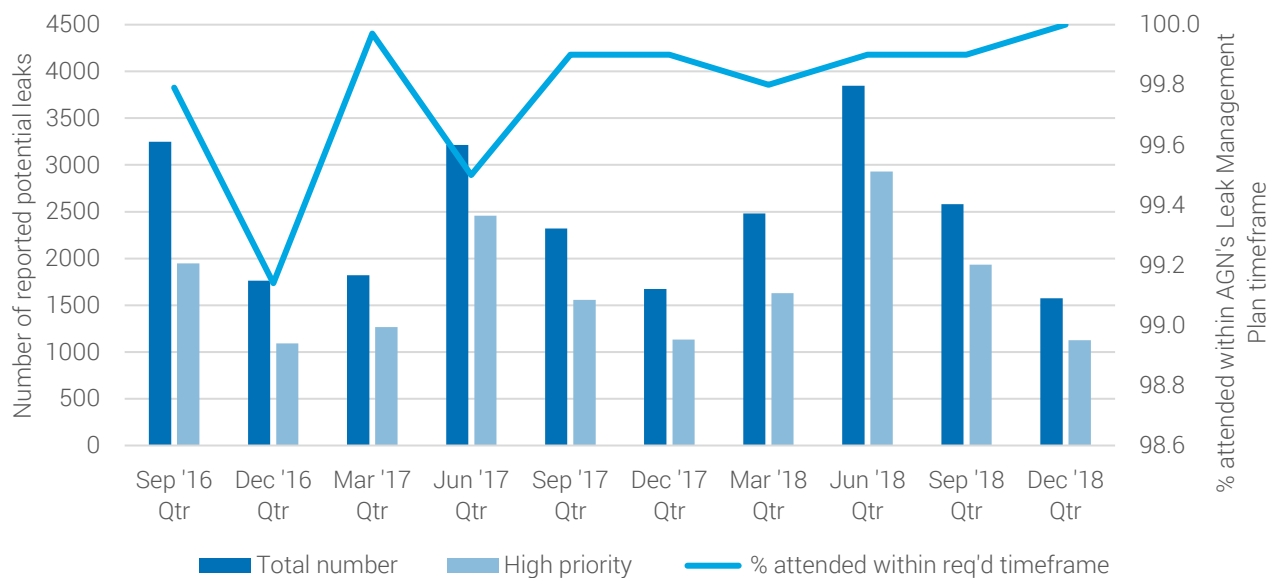
3.2 Responsiveness to public reporting of gas leaks

AGN is required to report to the Commission quarterly on the following five performance indicators:

- ▶ total number of potential gas leaks reported by the public
- ▶ total number of high priority gas leaks reported by the public
- ▶ total number of other gas leaks reported by the public
- ▶ percentage of gas leak reports by the public attended within the timeframes in AGN's Leakage Management Plan, and
- ▶ total number of publicly reported potential gas leaks where no leak was found.

Following investigation by AGN of the reports, an average of 14 percent of initial reports resulted in no identification of a leak.

Figure 2: Publicly reported gas leaks – total leak reports, high priority leaks & attendance timeframe

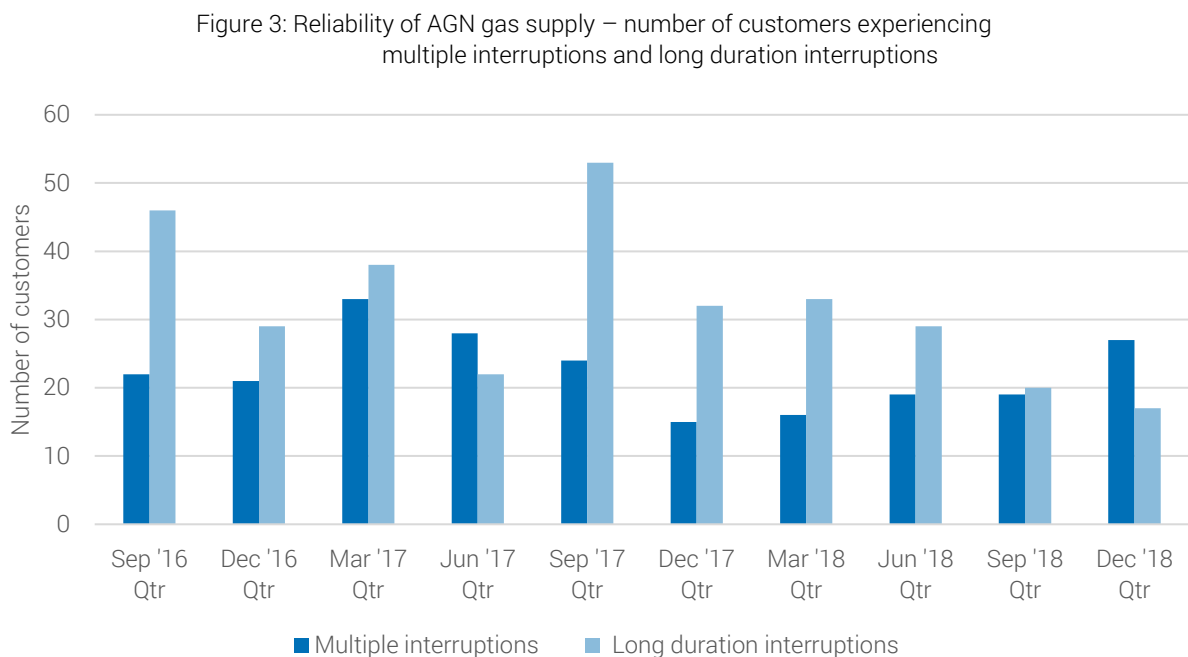


3.3 Long-term trends in unplanned interruptions

AGN is required to report to the Commission quarterly on the following two performance indicators:

- ▶ Customers experiencing multiple interruptions – the number of customers that have two or more interruptions within a year where the interruption is unplanned and caused by operator actions, third party damage or asset condition.
- ▶ Customers experiencing long duration interruptions – the number of events within a year where a gas supply is not restored within 12 hours and where the interruption is unplanned and caused by operator actions, third party damage or asset condition.

Figure 3 illustrates that, while there has been some variation in the numbers of customers experiencing multiple interruptions or long interruptions, the total number of either type of interruption has remained low.



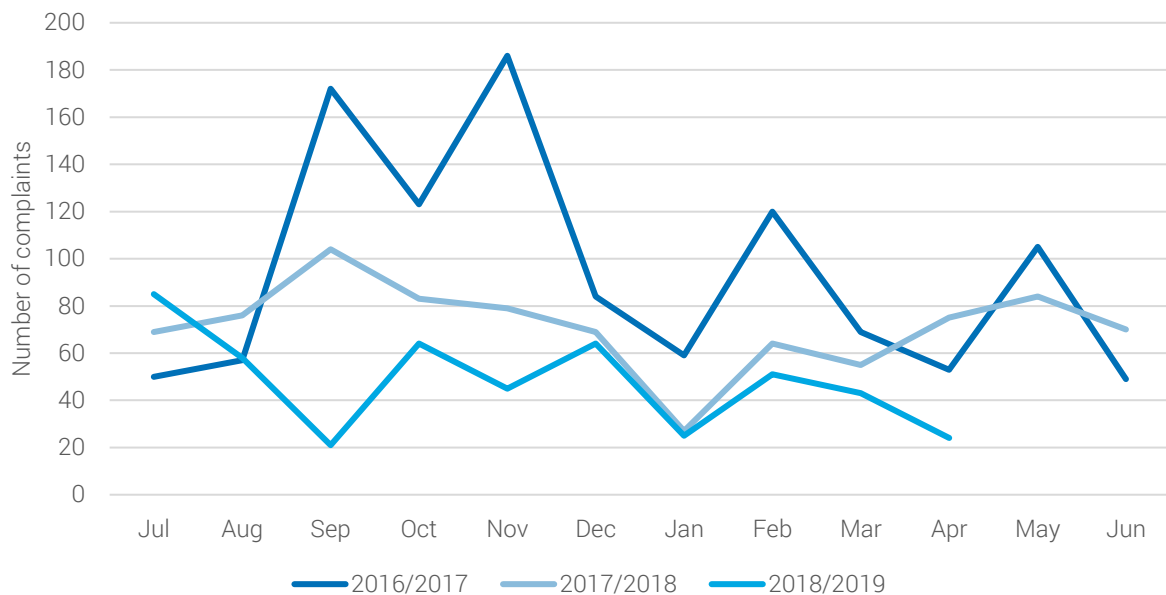
3.4 Complaints data

3.4.1 AGN customer complaints

Figure 4 illustrates that customer complaints made directly to AGN over the current regulatory period follow a generally downward trend.

Over the 2016-17 period, 1,127 complaints were made directly to AGN, 855 were made over the 2017-18 period and 480 have been recorded for the 2018-19 period so far.

Figure 4: Complaints made directly to AGN by month



When considered in aggregate across the current regulatory period so far, AGN has recorded two key areas of complaint: the category 'other' has captured approximately 45 percent of complaints, and the category 'Reinstatement of property (inadequate or delayed)', which captured approximately 44 percent of complaints.

AGN has advised it cannot provide any further detail on cases it has categorised as 'other' without reviewing each complaint manually. Given that a lot of complaints are captured under this category, the Commission will continue to work with AGN to determine an appropriate and proportionate way to better understand any meaningful trends or drivers in this category.

3.4.2 EWOSA complaints data

Under Part 4 of the NERL, AGN is required to have standard complaints and dispute resolution procedures, which are administered by the AER.¹⁹ Under the procedures, if a small customer is not happy with the outcome of their complaint, they are directed to make a complaint to EWOSA.

The Commission works with EWOSA to review complaints escalated to it and identify any potential systemic issues that may need a regulatory response, such as increased monitoring of market behaviour. The number and type of complaints escalated to EWOSA is also demonstrative of the effectiveness of AGN's internal complaints handling procedures.

¹⁹ AGN's complaint and dispute handling procedures are available at http://www.maketheconnection.com.au/_r2350/media/system/attrib/file/628/Complaints%20Procedure.pdf

Initial AGN complaints data provided to the Commission by EWOSA show a low number of complaints have been escalated to it about AGN's service levels and performance.

A 'data dashboard' of all EWOSA cases relating to AGN, including enquiries and complaints, is attached at Appendix 3.

However, in summary, EWOSA's data reveals that:²⁰

- ▶ during the 2016-17 financial year, EWOSA received 346 AGN related cases,²¹ including 90 complaints, and
- ▶ during the 2017-18 financial year, 267 AGN related cases were received by EWOSA, including 39 complaints.

EWOSA received eight AGN cases per 10,000 AGN customers in the 2016-17 financial year, and six AGN cases per 10,000 AGN customers in the 2017-18 financial year.²²

Up to a third of AGN's case numbers relate to customers telephoning EWOSA, rather than AGN, in error. These cases were the result of an AGN notice distributed to customers which prominently displayed the EWOSA phone number. EWOSA has categorised these cases as 'Rang EWOSA number in error' in the 'data dashboard' at Appendix 3.

²⁰ EWOSA AGN data, available at Appendix 3.

²¹ EWOSA registers and categorises contacts with it as a 'case'. A 'case' includes both enquiries and complaints.

²² EWOSA Annual Report 2017-2018, available at <https://ewosa.com.au/assets/volumes/general-downloads/annual-reports/EWOSA-Annual-Report-2017-2018.pdf>

4 Next steps and timetable for this Review

The Commission invites submissions on the Commission's proposed positions presented in this paper by **Friday, 26 July 2019**. The Commission also invites submissions or discussions on any other issues considered relevant to the review of AGN's regulatory framework.

Following consideration of submissions and any issues raised, the Commission will release a Draft Decision for further consultation on AGN's jurisdictional service standards for the 2021-2026 regulatory period in October 2019, and a Final Decision in January 2020.

Stage	Timing
Consultation paper released for public submissions	July 2019
Draft Decision released for consultation	October 2019
Final Decision	January 2020

Appendix 1: The legal and regulatory framework

The national framework operates in conjunction with jurisdictional requirements. AGN is subject to the requirements of the Gas Act 1997 (**Gas Act**), National Gas Law (**NGL**), National Gas Rules (**NGR**), National Energy Consumer Framework (**NECF**) and the Australian Energy Market Agreement (**AEMA**),²³ which establish the regulatory framework for the gas industry in South Australia.

Table 5: Regulatory powers and functions that apply to AGN

Australian Energy Market Agreement
<p>The AEMA is a Council of Australian Governments Agreement that establishes the Australian Energy Market Commission, the Australian Energy Market Operator and the Australian Energy Regulator.</p> <p>Under the AEMA, the responsibility for developing standards to ensure network security and reliability (jurisdictional service reliability standards) is retained by the South Australian State Government, and non-exclusively delegated to the Commission.</p>
Australian Energy Regulator
<p>The Australian Energy Regulator (AER) regulates the electricity and gas industries in all jurisdictions except Western Australia, by enforcing the:</p> <ul style="list-style-type: none"> ▶ National Gas Rules ▶ National Electricity Rules, and ▶ National Energy Customer Framework, consisting of the: National Energy Retail Law, National Energy Retail Rules, and National Energy Retail Regulations.²⁴ <p>The AER is responsible for making a revenue determination for each AGN regulatory period as part of AGN's Access Arrangement. In making each determination, the AER must assess the efficient level of expenditure for AGN. In doing so, the AER has regard to AGN's regulatory requirements, including jurisdictional service reliability standards.²⁵</p>
Essential Services Commission Act 2002
<p>The Essential Services Commission Act 2002 (ESC Act) establishes the Commission's power to perform licensing and, make, monitor and enforce industry codes, rules and guidelines.</p>
Gas Act 1997
<p>Establishes the Commission's responsibility to administer the licensing regime that applies to gas entities, including AGN as the distribution network operator. The Commission is vested with the following powers and functions under section 6A of the Gas Act:</p> <ul style="list-style-type: none"> ▶ the licensing, price regulation²⁶ and other functions and powers conferred by this Act; and ▶ any other functions and powers conferred by regulation under this Act. <p>If regulated entities are required (whether by licence condition or otherwise) to participate in an ombudsman scheme, the Commission must, in performing licensing functions under the Gas Act, liaise with the ombudsman appointed under the scheme.</p> <p>The Governor may, by regulation, confer functions and powers on the Commission, or vary the functions and powers of the Commission, as the Governor considers necessary or expedient for the purposes of the National</p>

²³ The Australian Energy Market Agreement provides for State and Territory Governments to retain responsibility for developing service reliability standards to ensure network security and reliability. The Commission is responsible for developing, implementing and administering the jurisdictional service standards for Australian Gas Networks.

²⁴ The NECF does not currently apply in Western Australia, Victoria and the Northern Territory. For more information visit: <https://www.aemc.gov.au/regulation/legislation>

²⁵ National Gas Rules, rule 79(2)(c)(iii).

²⁶ The Commission no longer undertakes price regulation for AGN, this power was varied by the Governor under s 6(a)(3). This role is now undertaken by the Australian Energy Regulator.

Gas (South Australia) Act 2008, National Gas Rules, National Energy Retail Law (South Australia) and National Energy Retail Rules.

In performing functions under the Gas Act, the Commission must also have regard to the provisions of the National Gas Rules and National Energy Retail Rules and the need to avoid duplication of, or inconsistency with, regulatory requirements under those Rules.

AGN's gas distribution licence

Sets out conditions upon which AGN is able to operate its various gas distribution networks, including requirements to:

- ▶ Monitor and report to the Commission on compliance with local and national regulatory instruments.
- ▶ Comply with good gas industry practice.
- ▶ Undertake periodic audits of its operations and compliance with its regulatory obligations.
- ▶ Provide financial, technical and other information relevant to its ability to continue operations.
- ▶ Prepare, submit and annually review a safety, reliability, maintenance and technical management plan (SRMTMP) and an unaccounted for gas (UAFG) plan, including a Leakage Management Plan, Asset Management Plan and a Mains Replacement Plan.
- ▶ Comply with concession and community service obligations approved and funded by the Minister.
- ▶ Comply with rules regarding the retention, use and disclosure of customer information.

Gas Distribution Code, Gas Metering Code & Gas industry Guideline No. 1

The Gas Distribution Code (GDC/06) establishes standards requiring AGN to:

- ▶ Annually report on performance against service standards.
- ▶ Meet distributor obligations, including: operational and security standards; maintaining appropriate levels of gas pressure; delivering gas in accordance terms and conditions.
- ▶ Maintain the capability of its distribution system.
- ▶ Comply with connection and reconnection after disconnection requirements.

The Gas Metering Code (GMC/04) establishes standards and obligations on AGN in regard to:

- ▶ The provision of metering installations.
- ▶ Metering installation testing.
- ▶ Meter reading and data collection.
- ▶ The annual preparation, submission and review of a Gas Measurement Management Plan.

Gas Industry Guideline No.1 (GIG 1.7) sets out manner and form, as well as timing, requirements for the:

- ▶ collection, allocation, recording and reporting of business data (including performance indicators) by AGN with respect to the operation of the distribution system authorised in its distribution licence.

Technical Regulator

The Technical Regulator's primary objective is ensuring the safety of workers, consumers and property as well as compliance with legislation and applicable technical standards in the electricity, gas and water industries.

The position of the Technical Regulator is established under the following Acts:

- ▶ Electricity Act 1996.
- ▶ Gas Act 1997.
- ▶ Energy Products (Safety and Efficiency) Act 2000.
- ▶ Water Industry Act 2012.

The Technical Regulator has the following responsibilities pursuant to section 8 of the Gas Act:

- ▶ Monitoring and regulation of safety and technical standards in the gas supply industry.
- ▶ Monitoring and regulation of safety and technical standards relating to gas installations.
- ▶ Providing advice in relation to safety or technical standards in the gas supply industry to the Commission at its request.
- ▶ Fulfilling any other function assigned to the Technical Regulator under the Act.

A Licensing

The Commission's powers and functions in relation to AGN are contained in the Gas Act and the ESC Act. Under the Gas Act, AGN is required to hold a licence authorising it to operate the gas distribution system in South Australia; the Commission is the licencing authority for this purposes. Sections 25 and 26 of the Gas Act mandate certain licence terms and conditions, while providing the Commission with the discretionary power to include additional licence terms and conditions.

In addition to the mandated conditions listed in Table 1, the Commission has made AGN's gas distribution licence subject to two further conditions:

- ▶ **Good gas industry practice:** AGN's gas distribution licence requires it to use its best endeavours to conduct the operation of its gas distribution network in accordance with 'good gas industry practice'²⁷, including to conduct its operations so as to: prevent death or injury to persons or damage to property; minimise leakage of gas; and, account for the total amount of gas lost from the distribution system from leakage or an activity referred to in section 82(1) of the Gas Act.²⁸
- ▶ **Unaccounted for Gas Plan:** The level of UAFG is the difference between the measured quantities of gas entering AGN's distribution network and the measured quantities of gas billed to end use customers. AGN is required to operate its gas distribution network so as to minimise the leakage of gas and to account for the total amount of gas lost from the distribution system as a result of leakage.²⁹ AGN is also required to use its best endeavours to reduce the levels of UAFG in each year of the current regulatory period.³⁰

B Industry codes and guidelines

Under section 28 of the ESC Act, the Commission is empowered to make codes or rules relating to the conduct or operations of a regulated industry or regulated entities. The Commission has exercised this power in regard to the gas industry, and made the Gas Distribution Code and the Gas Metering Code. Under section 8 of the ESC Act the Commission has also made the Gas Industry Guideline No. 1.

Gas Industry Guideline No.1 sets out the manner, form and timing requirements for the reporting of AGN's performance against those requirements set by the Commission under AGN's Gas distribution licence, and the Gas Metering and Gas Distribution Codes. Gas Industry Guideline No.1 also partially captures the information required from AGN by the Technical Regulator.

Under section 6A(4) of the Gas Act, the Commission has a statutory responsibility to have regard to the provisions of the NGR and NERR, and the need to avoid duplication of, or inconsistency with, regulatory requirements under those Rules.

²⁷ Good gas industry practice is defined in AGN's gas distribution licence. It 'means the exercise of that degree of skill, diligence, prudence and foresight that reasonably would be expected from a significant proportion of operators of gas distribution systems forming part of the Australian gas supply industry under conditions comparable to those applicable to the distribution system operated by the licensee consistent with applicable regulatory instruments, reliability, safety and environmental factors', see <https://www.escosa.sa.gov.au/ArticleDocuments/907/20161005-Gas-DistributionLicence-AustralianGasNetworks.pdf.aspx?Embed=Y>.

²⁸ Australian Gas Networks' Gas distribution licence, clause 5.

²⁹ Australian Gas Networks' Gas distribution licence, clause 5.1(b) and (c).

³⁰ Australian Gas Networks' current Access Arrangement, available at <https://www.aer.gov.au/networks-pipelines/determinations-access-arrangements/australian-gas-networks-sa-access-arrangement-2016-21>

C Technical regulation

The Gas Act vests the Technical Regulator with powers, functions and obligations in respect of the gas industry. Under section 8(1) of the Gas Act, the statutory functions of Technical Regulator are:

*'... (b) the monitoring and regulation of safety and technical standards in the gas supply industry; and
(c) the monitoring and regulation of safety and technical standards with respect to gas installations; and
(da) the provision of advice in relation to safety or technical standards in the gas supply industry to the Commission at the Commission's request; and
(e) any other functions prescribed by regulation or assigned to the Technical Regulator by or under this or any other Act.'*

It is the role of the Technical Regulator to set safety and technical obligations and ensure AGN meets these requirements to provide the safety and reliability outcomes expected of the gas industry by the community.

Pursuant to section 28 of the Gas Act, the Commission must make a licence authorising the operation of a distribution system subject to conditions, including requiring the gas entity: 'to prepare, maintain and periodically revise a safety, reliability, maintenance and technical management plan dealing with matters prescribed by regulation.'³¹

It is the responsibility of the Technical Regulator to approve AGN's SRMTMP, any revisions of the plan, and the results of AGN's audits of its compliance with the plan.³²

D Jurisdictional customer protection requirements

The national gas legislation and the NECF establish the comprehensive suite of consumer protections for residential and small business gas customers.³³

As part of the national framework, individual jurisdictions, including South Australia, have retained the power to prescribe two specific obligations, referred to in the national framework as 'distributor service standards':³⁴

- ▶ **Preconditions to connection:** AGN must connect a customer to its distribution system on fair and reasonable terms, provided various preconditions have been satisfied. The national framework allows the South Australian Government to define these preconditions, a responsibility delegated to the Commission. The Commission defines the preconditions in the Gas Distribution Code. As the national framework requires, these preconditions are in turn included in AGN's Standing Offer for Basic Connection Services which is approved by the AER.³⁵
- ▶ **Reconnection after disconnection:** AGN is required to use its best endeavours to reconnect a disconnected customer's supply address within sufficient time for a retailer to meet its contractual obligations to the customer as set out in the NERL. The national framework allows the South Australian Government to define 'sufficient time'. However, the Gas Distribution Code does not currently establish specific timeframes for reconnections. AGN currently performs reconnections within two business days unless the customer requests a later date.

³¹ Gas Act 1997, section 26(1)(a)(i).

³² Gas Act 1997, section 26(1)(a)(iii)-(iv).

³³ The consumer protections apply only to small customers consuming less than 1 TJ of gas per annum.

³⁴ AGN's summary of the distributor service standards applicable to its South Australian network are available at <https://www.australiangasnetworks.com.au/gas-connections/the-process/contract-information>

³⁵ AGN's 'Model Standing Offer for a Basic Connection Service', available at <https://www.australiangasnetworks.com.au/gas-connections/the-process/contract-information>

In addition to the customer protections in the national regulatory framework (referred to as 'distributor service standards'), individual State and Territory Governments have retained the responsibility for developing service reliability standards to ensure network security and reliability (jurisdictional service reliability standards) under the AEMA.³⁶

The Commission and the Technical Regulator each play a role in setting and monitoring the reliability of AGN's networks. The Commission focuses on assessing whether AGN is providing the reliability outcomes for gas distribution services that its customers value. The Technical Regulator focuses on establishing and monitoring the technical and public safety outcomes AGN is expected to deliver.

³⁶ Australian Energy Market Agreement, Annexure 2 clause 19, available at http://www.coagenergycouncil.gov.au/sites/prod.energycouncil/files/publications/documents/Australian%20Energy%20Market%20Agreement%20-%20Dec%202013_1.pdf

Appendix 2: AGN annual operational performance information

OP 1- Responsiveness of the Leaks and Emergencies telephone number				
Q1.1 Total number of calls received on the Leaks and Emergencies number	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2016			4630	3133
2017	3179	4625	3669	2874
2018	3186	4869	3405	2233
Q1.2 Total number of calls to the Leaks and Emergencies number answered within 30 seconds ³⁷	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2017	3012	4343	3467	2694
2018	2992	4378	3236	2135
Q1.3 Percentage of calls to the Leaks and Emergencies number answered within 30 seconds	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2017	95%	94%	95%	94%
2018	94%	90%	95%	96%
Q1.4 Average answer time for call to the Leaks and Emergencies number	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2017	8.3	8.4	8.2	7.4
2018	8.3	12.2	7.5	7.3

³⁷ No data was collected on performance indicator 1.2, 1.3 and 1.4 for 2016. AGN proactively advised the Commission that it was unable to provide state specific data on this performance indicator and took appropriate steps to remedy the issue.

OP 2 - Responsiveness to public reporting of gas leaks

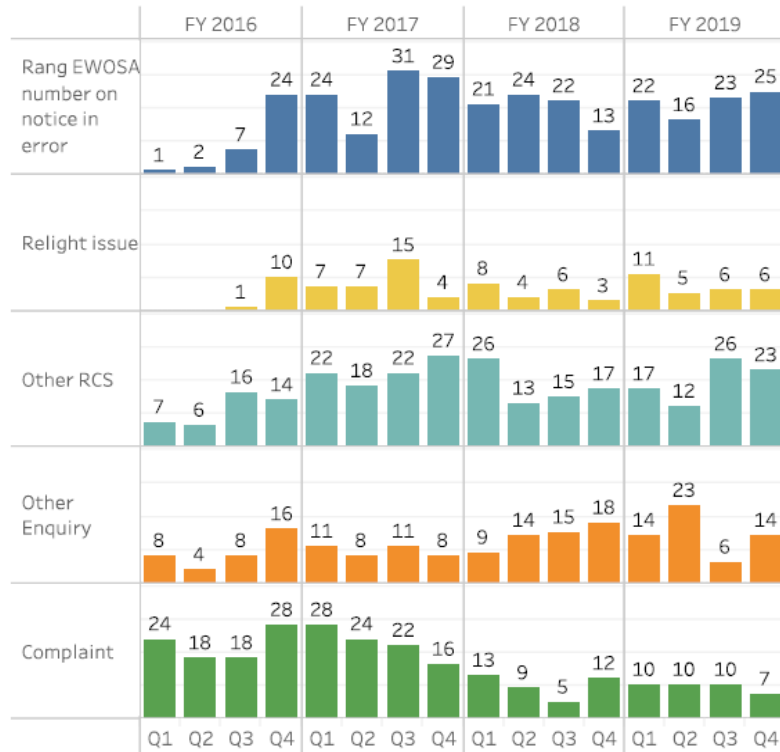
Q2.1 Total number of potential gas leaks reported by the public	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2016			3248	1764
2017	1820	3213	2322	1672
2018	2480	3847	2579	1574
Q2.2. Total number of high priority gas leaks reported by the public	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2016			2339	1093
2017	1268	2458	1557	1133
2018	1629	2930	1932	1127
Q2.3 Total number of other gas leaks reported by the public	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2016			528	401
2017	266	395	480	305
2018	282	463	342	202
Q2.4 Percentage of gas leaks reports by the public repaired within timeframes in AGN's Leakage Management Plan	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2016			99.79	99.14
2017	99.97	99.5	99.9	99.9
2018	99.8	99.9	99.9	100
Q2.5 Total number of publicly reported potential gas leaks where no leak was found	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2016			387	270
2017	286	360	285	234
2018	569	454	305	245

OP 3 - Customer interruptions

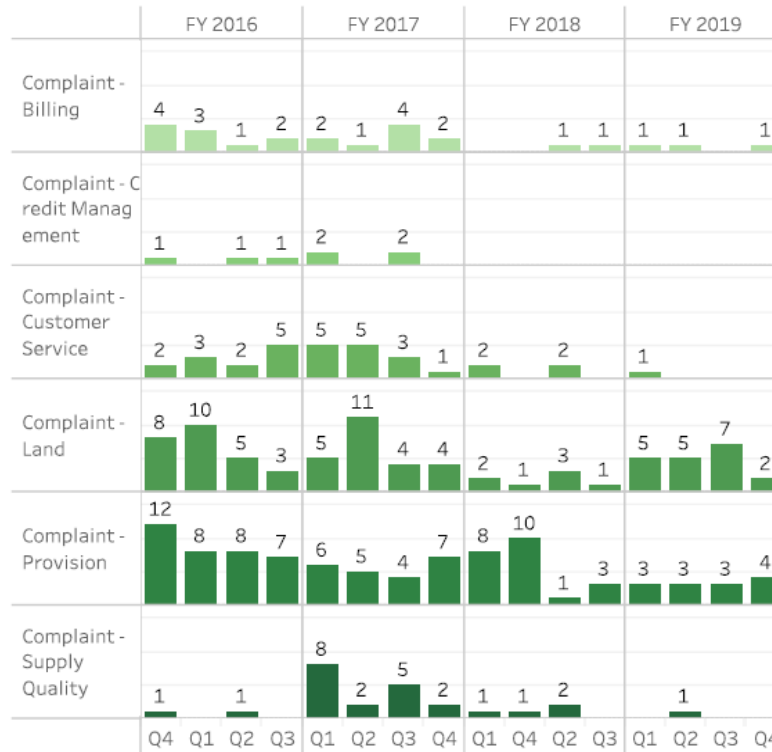
Q3.1 Number of customers experiencing multiple interruptions within a year	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2016			22	21
2017	33	28	24	15
2018	16	19	19	27
Q3.2 Number of customers experiencing long duration interruptions	MAR QTR	JUN QTR	SEP QTR	DEC QTR
2016			46	29
2017	38	22	53	32
2018	33	29	20	17

Appendix 3: EWOSA AGN complaints data dashboard

AGN case breakdown



AGN complaint breakdown



AGN case breakdown (table)

	FY 2016				FY 2017				FY 2018				FY 2019				Grand Total
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Rang EWOSA number on notice in error	1	2	7	24	24	12	31	29	21	24	22	13	22	16	23	25	296
Relight issue			1	10	7	7	15	4	8	4	6	3	11	5	6	6	93
Other RCS	7	6	16	14	22	18	22	27	26	13	15	17	17	12	26	23	281
Other Enquiry	8	4	8	16	11	8	11	8	9	14	15	18	14	23	6	14	187
Complaint - Billing	3	1	2	4	2	1	4	2		1	1		1	1		1	24
Complaint - Credit Management		1	1	1	2		2										7
Complaint - Customer Service	3	2	5	2	5	5	3	1	2	2			1				31
Complaint - Land	10	5	3	8	5	11	4	4	2	3	1	1	5	5	7	2	76
Complaint - Provision	8	8	7	12	6	5	4	7	8	1	3	10	3	3	3	4	92
Complaint - Supply Quality		1		1	8	2	5	2	1	2		1		1			24
Grand Total	40	30	50	92	92	69	101	84	77	64	63	63	74	66	71	75	1,111

