

Energy Consumers Australia

Grants Review
Issues Paper: DRAFT

September 2015

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Executive Summary

Energy Consumers Australia (ECA) was established to advocate on National Energy Market matters of strategic importance and material consequence for energy consumers, in particular household and small business consumers.

ECA undertakes and funds research to promote the long-term interests of consumers in the National Energy Market. ECA is seeking to fund projects that are high-quality, innovative and offer tangible benefits to consumers.

To achieve that, ECA is reviewing the grants program principles, policies and procedures, in accordance with good grants practice.

This Issues Paper outlines ECA's constitutional functions and canvasses the issues the Board will consider in deciding the principles and features of its grants program eligibility criteria and structure.

ECA is seeking comment on its proposed approach, and welcomes input from all stakeholders on the questions raised in this Paper, or on other issues of relevance to the Grants Program.

Any questions about the review should first be directed to Kerry Connors, Manager Grants.

Submissions should be sent to kerry.connors@energyconsumersaustralia.com.au by close of business 30 October 2015.

Introduction

Energy Consumers Australia (ECA) was established on 30 January 2015. Its objects and functions are laid out in its Constitution¹. Its formation was part of a suite of COAG Energy Council reforms to restore the focus of the National Electricity and National Gas Markets on serving the long-term interests of consumers.

The grant-making function of the Consumer Advocacy Panel was transferred to ECA on its establishment, and the Panel ceased operations. The legislative amendment facilitating that transfer enabled ECA to use the Panel's eligibility criteria and grant guidelines in the transition period.

ECA is now consulting stakeholders as it develops the ECA Grant Program structure and eligibility criteria.

ECA is funded by National Energy Market consumers², collected through a levy on market participants³. ECA is therefore keen to ensure that its grants program is achieving the best possible outcomes for consumers, and is in line with best grants management practice.

¹ ECA Constitution can be downloaded from its website [here](#)

² The ECA Constitution refers to the National Energy Market, meaning the National Electricity and National Gas Markets established under national energy law.

³ ECA is therefore unable to fund projects where benefits accrue solely to West Australian and/or Northern Territory consumers.

ECA intends to fund projects that are **high-quality, collaborative, innovative, and delivering an evidence base to support tangible benefits for consumers**. To achieve that, ECA is reviewing the grants program principles, policies and procedures.

The following outlines ECA's grant functions, and highlights a range of issues on which ECA is seeking stakeholder feedback.

ECA Research and Grants

ECA is charged with undertaking and funding research to promote the long term interests of consumers. Its constitutional functions relevant to research and grants are

4.2 (c) Building national and jurisdictional expertise and capacity through research, knowledge development and consultation to advance the interests of Australian Energy Consumers (residential and small business)

4.2 (d) Undertaking robust research to build knowledge, engage and influence policy development and educate consumers in the energy markets

4.2 (e) Funding and managing grants to build knowledge and sectoral capacity supporting policy development and consumer education in the National Energy Market.

ECA must also be mindful of the facilitating directions in its constitutional object to:

- Provide and enable advocacy that is:
 - Strong
 - Coordinated
 - Collegiate, and
 - Evidence-based
- On matters of strategic importance or material consequence to consumers
 - Particularly residential and small business consumers.

The purpose of this review is therefore to ensure that the ECA grants program delivers projects that will benefit the long-term interests of consumers, and aligns appropriately with the ECA activities and approach.

Defining effective advocacy

ECA intends to use the following definition of energy advocacy:

Energy advocacy is an activity designed to influence or create change that improves the long-term interests of electricity and gas consumers.

The NEM is a dynamic market in a process of transition driven primarily by technological change in energy and communications. Advocates must be able to adapt to a fast changing environment, working with consumers, other advocates, industry, government, regulators and ombudsmen to identify effective ways to empower consumers through representation, information and action.

Effective advocacy requires organisational capability: "it is built on an infrastructure of knowledge, consumer involvement and partnerships with other advocates, industry and government. Each effective advocacy project or campaign uses the existing infrastructure but

also contributes to that infrastructure through increased knowledge, reputation, networks and so on”.⁴

While no definition is perfect, does the proposed definition – within the context of the National Energy Market and the requirements of effective advocacy - provide a workable basis for ECA grants?

Grants Program Structure

The following outlines features of the program on which ECA would welcome input from stakeholders.

Advocacy / Research

We see benefit in continuing with a program structure that distinguishes between advocacy and research grants.

Advocacy projects include activities and strategies to bring about the desired change in the market. That may build on research undertaken through the project. Examples of advocacy tools and strategies include engagement with regulators and policy-makers, building consensus among advocates on the project recommendations, media campaigns, etc.

Advocacy projects are often tied to policy or regulatory reviews, the timing of which may not easily be anticipated. ECA grants are currently considered quarterly, with the capacity to consider urgent applications at the next available Board meeting. That approach has so far proved sufficiently flexible to accommodate unexpected processes.

Advocacy grants are also used for projects that support advocacy and build sectoral capacity.

Demand for ECA grants has been strong, reflecting the level of interest in energy consumer issues. A recent example of ECA’s capacity to support advocacy was the \$275,000 grant to the Public Interest Advocacy Centre’s intervention in the Australian Competition Tribunal consideration of the AER NSW network determination, a process that has significant implications for future regulatory decisions, and which ECA viewed as a critical intervention in the market. Funding projects on that scale however may mean funding will not be available for all projects.

ECA recognises that not all projects fit neatly within a 12 month timeline. We would be interested in stakeholder views on how to manage those projects.

Research projects are expected to address strategic, longer-term or emerging consumer issues. Project proponents will also include organisations who are not advocates, such as academic institutions.

⁴ A Model for Effective Energy Advocacy, RobertsBrown 2011, p.1 which can be downloaded from the Consumer Advocacy Panel website [here](#)

Given ECA's intention to encourage innovative research, it expects research grants to be strategic and future-focused, for example investigating the experience of other countries or economic sectors to identify market developments benefiting consumers.

Research projects should always include a communications strategy to ensure relevant decision-makers and other stakeholders are aware of the report findings.

ECA may seek research grant applications pertaining to a particular theme – e.g. projects focusing on the role of innovation in supporting and promoting competition.

CEO Grants Program

To streamline the administrative burden on applicants and facilitate decision-making for grants to support consumer input to policy and regulatory decisions, the Board has decided to establish a CEO Grants program to provide the facility to make small grants quickly.

Examples of these grants would be to provide resources to gather evidence to make a written submission, or for travel costs to participate in a regulatory or policy forum that impacts on the advocacy organisation's members.

CEO Grants would be capped (e.g. at \$10,000), with the aim of more substantive projects being put to the quarterly advocacy grants round.

Consumer Education

The ECA Constitution identifies consumer education as a focus of the grants program. ECA will consider consumer education in line with its other constitutional function to engage and communicate with residential and small business “consumers and consumer advocates ... on the National Energy Market and policies, reforms, issues and general news.”

Projects aimed at consumer education should therefore be able to demonstrate a relevance to National Energy Market advocacy and research, and the building of knowledge and/or sectoral capacity.

The ECA Board has determined that it will not prioritise funding to public education and awareness campaigns that are the responsibility of regulators and government, or projects targeted at informing and educating individual consumers.

Do stakeholders have feedback on the grants program structure - Advocacy, Research and CEO Grants?

Grants Program Design

The following discussion is framed within the seven key principles for grants administration identified by the Australian National Audit Office *Implementing Better Practice Grant Administration*.

These principles are interrelated and relevant to each element of grants management, but provide a useful framework through which to canvass stakeholder views on the features of ECA's program.

Principle 1: Robust planning and design

Underpins efficient, effective, economical and ethical grants administration, including through the establishment of effective risk management processes.

The ECA Board decided not to continue the Consumer Advocacy Panel's capability-building or global advocacy funding grant structures. The rationale for that approach remains persuasive for two reasons.

First is that while the ECA Constitution requirement to build sectorial capacity is clearly a critical component of the ECA grants program it is not an end in itself. Grants that build sectorial capacity must support national energy market policy development and/or consumer education.

Second, ECA is not inclined to prescribe any one methodology for a project. The definitive test of a project will remain its potential benefit to consumers, and the project's proposed outcome will be a critical consideration in deciding whether or not to approve a grant. (The outcome is the change benefitting consumers in the national energy market achieved through the proposed project.) It is therefore at the discretion of the applicant to propose the most effective methodology to achieve that outcome. In deciding the grant, ECA will make an assessment of the methodology's viability, but would not usually prescribe any particular approach.

The ECA Constitution provides the framework setting the overarching objectives of organisation and its grants program. The following outlines some key features of the grants program design on which ECA would welcome feedback.

Alignment with ECA strategic priorities

ECA's strategic priorities align with its constitutional function to promote the long term interests of consumers in the national energy market, and so will focus on the interests of greatest significance / materiality to those consumers. These will change from time to time.

At present ECA's strategic priorities are:

1. New technologies - their effect on traditional business models and impact on consumers
2. Effectiveness of competition across the whole supply chain, and the ability of consumers to drive competition (see also 3 below).
3. Reasonableness and affordability of energy prices, including how understandable pricing structures are to consumers
4. Contributing to review of governance arrangements for the market bodies, and the impact of these on consumers.

ECA’s strategic priorities will be a consideration in the development of grants program priorities, and applicants will be asked to demonstrate how their proposed project will fit within those priorities.

If a project does not align with ECA’s strategic priorities, the applicant will be asked to demonstrate why the work is a consumer priority, and its material impact on consumers.

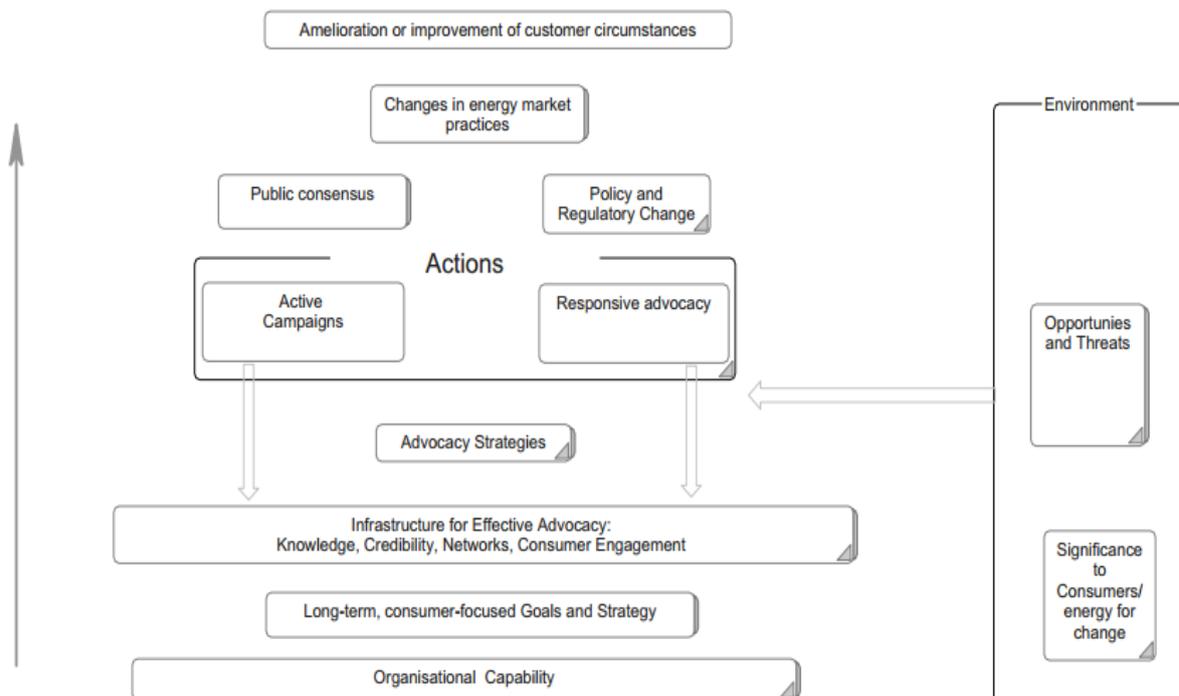
Building sectoral capacity

The constitutional requirement to build sectoral capacity is clearly a critical component for the ECA grants program.

We have identified two forms of capacity-building within the energy advocacy sector:

- Projects aimed at building knowledge and skills for advocates, to inform and improve their advocacy activities
 - examples of these include activities/events to inform advocates, such as a masterclass to inform advocates on a technically complex issue
- Projects that enhance the capability of an advocacy organisation, improving its advocacy infrastructure (as depicted in Fig.1)
 - examples of these projects could be building a coalition of advocacy organisations which will strengthen networks, or seeking funding for a staff member to attend a forum or course that would strengthen their understanding of an energy issue.

Fig. 1: Effective Advocacy Model



Source: A Model for Effective Energy Advocacy – Issues Paper, RobertsBrown, 2013

Bringing jurisdictional experience to the national debate

Developing the national energy market remains a work in progress, with policy and regulatory differences at the jurisdictional level.

Building a competitive and national market will therefore rely on jurisdictional grassroots experience and expertise, in order to identify current and emerging consumer issues, and to provide consumers with appropriately targeted and effective information.

The grants program will continue to fund jurisdictionally-focused work, albeit with the important requirement that the work should have relevance to the continuing development of the national energy market.

ECA welcomes feedback on the features of the ECA Grants program design:

- *Aligning with ECA Strategic Priorities*
 - *Building sectoral capacity*
 - *Bringing jurisdictional expertise to the national debate*
-

Principle 2: Collaboration and partnership

Effective consultation and a constructive and cooperative relationship between the administering agency, grant recipients and other relevant stakeholders contribute to achieving more efficient, effective and equitable grants administration.

ECA promotes consumer interests on National Energy Market matters of strategic importance and material consequence, particularly residential and small business consumers.

In line with its constitutional mandate to support coordinated and collegiate advocacy, the ECA grants program will encourage applicants to identify and take advantage of opportunities for collaboration and partnership.

In the context of its grants program, ECA has identified three areas where ECA can enhance the impact of its grants funding, leveraging work to help achieve nationally-focused consumer outcomes.

The first is where ECA and the grant recipient see value in collaborating on a particular project, to leverage national benefits from the work – e.g. ECA could take research findings to decision-makers to facilitate national solutions. At this stage, ECA envisages this would be decided on a case by case basis, where we would approach an applicant to alert them to synergies in their project and ECA’s work program.

The second is where ECA will take opportunities to maximise the impact of its grants funding, and facilitate collaboration between organisations seeking similar advocacy outcomes - e.g. ECA may require that organisations engaging in the same regulatory reviews will consult with each other in developing their advocacy strategies. We emphasise that such an approach would be aimed at sharing information and expertise, not requiring that those organisations must adopt the same policy positions.

Third, ECA may require grant recipients to coordinate with important stakeholders, such as governments, industry, and research institutions, where the participation of those organisations will facilitate better outcomes for consumers – e.g. encouraging good industry practice, or building a broader coalition around the need for and shape of change.

ECA welcomes input from stakeholders on potential measures to foster collaboration and partnership with ECA or with other advocates / researchers.

Principle 3: Proportionality

Key program design features and related administrative processes are commensurate with the scale, nature, complexity and risks involved in the granting activity.

Currently ECA uses the same policies and procedures for all grants.

As outlined above in relation to the CEO grants program, there is value in developing processes that are tailored more directly to the size and purpose of the grant, to:

- Minimise the administrative burden on applicants; and
- Facilitate information relevant to the grant type (e.g. an advocacy application may seek more detail on the proposed advocacy tactics to be undertaken, while a research application may focus on the methodology).

In addition, ECA intends to develop its website as a platform to proactively share the results of its advocacy and research funding, to share information with and build capacity among advocates, as well as educate consumers.

We propose to ask all advocacy and research grant recipients to prepare an end-of-project 2-3 minute podcast or video, outlining the key findings or lessons learnt from the work. Those would be posted on ECA's website.

This approach would result in application forms and reporting processes and templates tailored to different grant types.

The following outlines how a grant recipient's obligations may differ according to the grant type.

Table 1: Application and Reporting processes for each proposed grant type

GRANT TYPE	APPLICATION PROCESS	REPORTING PROCESS
CEO grant	Short form outlining project outcomes, budget, methodology and outputs	Progress template form completed, with any public documents (submissions, reports etc) attached for publication on ECA website.
Advocacy grant	Form seeking information on the project outcome and theory of change, outputs, budget, methodology and outputs	<p>Progress reports for each milestone, with any public documents (submissions, reports etc) attached for publication on ECA website</p> <p>End of project report in podcast/video form highlighting outcome and/or lessons learnt (to build capacity) for publication on ECA website</p> <p>Presentation of results in ECA forums</p>
Research grant	Form seeking information on the research purpose and outcome (potential benefits to consumers), methodology, budget, and outputs	<p>Progress reports for each milestone, with any public documents (submissions, reports etc) attached for publication on ECA website</p> <p>End of project report in podcast/video form highlighting outcome and/or lessons learnt (to build capacity) for publication on ECA website</p> <p>Presentation of results in ECA forums</p>

ECA would welcome stakeholders’ advice on other mechanisms to streamline grant applications and management.

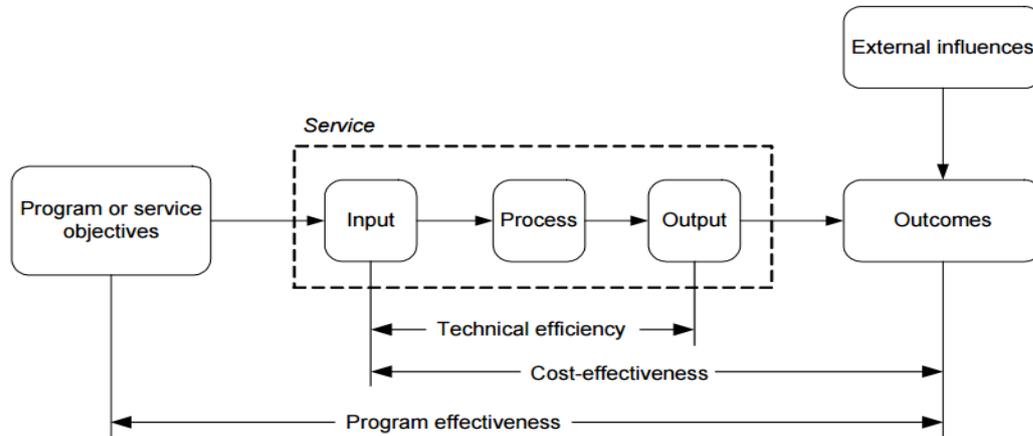
Principle 4: Outcomes orientation

Grants administration focuses on maximising the benefits achieved through grant funding.

In line with good grant-making practice, ECA will focus on the project outcome – essentially the change in the market that will benefit consumers as a result of the project – in making a decision on an application.

Outcomes may be short or longer term. The Report of Government Services framework (see Figure 2, below) provides a useful conception of that process in relation to a grant, where measures of outputs can be used, in part, as proxies to measure its outcome.

Fig. 2: Report of Government Services Framework⁵



Effective advocates have a clear understanding of how their actions link to their objective – not only can they describe what they are trying to achieve, they should be able to tell the story about how their activity will contribute, what else must happen to bring about the change, and what impact their project has had on their constituency.⁶

A grant application must therefore be able to:

- Describe the project outcomes and outputs, and how the applicant will measure their success against their progress
- Explain the benefits to consumers arising from the project.

These will be used by ECA to assess the application and measure what has been achieved through a grant.

ECA is minded to introduce a new requirement on grant recipients, asking them to report back to ECA once or twice in the 12 or so months following the completion of their funded project on the progress toward achieving their intended outcome, and using the success indicators identified in their application. That means grant applicants should be able to identify:

- Impact benefitting consumers achieved as a direct result of the funded work
- Contribution of the funded work to a longer term outcome.

⁵ Source: *On efficiency and effectiveness: some definitions*, Productivity Commission Staff Research Note, May 2013

⁶ Adapted from *A Model for Effective Energy Advocacy*, Roberts Brown 2011 - the paper can be downloaded from the CAP website [here](#)

ECA intends to encourage applicants to use the following backward mapping planning process, asking applicants to test that their proposed approach will create the change they want to achieve:

1. Focus on the outcome/s (that is, the decision or change you want to achieve through your advocacy and state that outcome (or outcomes) clearly
2. Determine the outputs which are likely to achieve the outcome/s you want
3. Determine the inputs required to deliver those outputs.



ECA provides a level of guidance to potential applicants as they develop their project, through the Guideline, factsheets and direct advice. As noted above, ECA will also seek to leverage grant projects to build national outcomes.

ECA would appreciate feedback on how ECA grant administration processes could further assist potential applicants to achieve outcomes.

Principle 5: Achieving value with public money

A prime consideration in all aspects of grant administration, involving the careful consideration of costs, benefits, options and risks.

ECA is conscious that its activities, including its grants program, are funded through an impost that is passed through to consumers by energy market participants. Value for money is therefore a critical consideration in assessing a project.

Project costs

Consumers should be confident that projects funded through ECA:

- Will produce benefits that outweigh the project costs, and
- Minimise project costs, including in the engagement of external consultants
 - Administrative costs would normally be capped at no more than 10% of the total project cost.

ECA will assess the project on those criteria, using the information provided by the applicant.

Capacity to pay and the grant co-contribution

Value for money is typically assessed by comparing the relative merits of all eligible, compliant proposals.

Given these are consumer monies, the ability of the organisation – or its members - to fund the project or make a contribution will be a consideration in making a grant.

In general, ECA will require a co-contribution, to identify the resources – and so, the level of commitment - the organisation is bringing to the project.

In deciding what would be a reasonable amount for the co-contribution, there are a number of issues to consider, including:

- The organisation's capacity to pay – given the demand on the program, ECA is unlikely to fund projects that can be resourced through alternative sources, including member contributions
- How to measure capacity to pay
- Setting an appropriate level for a co-contribution.

In assessing capacity to pay, relevant information includes the organisation's member base, revenue and resources, as well as possible alternate sources of funding for the project.

ECA would appreciate input from stakeholders on the approach, including

- a) how to assess and take into account an organisation's capacity to pay*
 - b) how a co-contribution could be measured more effectively and consistently.*
-

Evaluating the impact of grant funding

As a grant-maker, ECA must make best endeavours to ensure that the grant monies are used effectively and efficiently.

There are three forms of grants evaluation:

1. The evaluation of the grant recipient on the project's impact, conveyed through the acquittal report, and the follow-up reports outlined earlier
2. An evaluation of a grant undertaken by ECA or its nominated consultant
3. A broader review of the grants program structure and design, to ensure that it is delivering outcomes for consumers.

Evaluating the impact of funding is therefore a critical component of the grant program. A good evaluation program will be able to:

- Demonstrate to consumers the benefit of the grant
- Provide specific feedback to grant recipients on the impact of their work, to guide their future advocacy activities
- Inform future ECA decisions on the allocation of grants, and the structure of the grants program
- Build capacity in the sector by alerting them to which advocacy / research approaches have proved most successful - and, importantly, those which did not work as intended.

The starting point of an evaluation will begin with the project proposal outlined in the grant application, and the project outcome and success indicators included in the project proposal.

To assess the effectiveness of the funding in achieving the outcome, each project should ideally include indicators that can help identify what change has occurred. Output measures may be used – but should not be solely relied on – to identify progress toward an outcome.

ECA notes - as indicated in Figure 1 – that outcomes may also be influenced by factors outside the control of the advocate, where their work is only one contributing element.

ECA welcomes guidance from advocacy organisations on the forms of evaluation and feedback they would find most useful.

Evaluation methodologies

Evaluating the impact and success of an organisation’s advocacy is not straightforward – not only is it difficult to elicit candid feedback from decision-makers, but there are usually different timings to the end of a grant, the end of an advocacy strategy and the change in the market.

Largely because of that time lag, most evaluation strategies focus on the tangible ‘results’ of an advocacy project (quantifiable measures such as the number of media mentions, submissions, meeting attendees) when the value of those actions should be assessed in their broader context. The grant may have also been provided to contribute one component to a longer campaign to bring about the desired change, and it can be hard to assess the impact of the contribution of one input to the overall result.

ECA is interested in stakeholders’ experience of evaluation approaches and how well they have measured impact. Decision-makers may have some insight into what advocacy has been effective, and how that insight might shape an evaluation program. Government, Ombudsmen and industry also engage in regulatory decisions, and ECA would be interested in how they measure the effectiveness of their input, and what methodologies they use.

ECA would appreciate input from stakeholders on their experience of relevant evaluation methodologies and approaches. ECA is particularly interested in hearing how government, regulators and industry measure the effectiveness of their engagement.

Principle 6: Governance and accountability

A robust governance framework is established that clearly defines: the roles and responsibilities of relevant parties; establishes the policies, procedures and guidelines necessary for defensible grant recipient selection and administration processes that comply

with all relevant legal and policy requirements; and supports public accountability for decision-making, grant administration and performance monitoring.

Grant eligibility criteria

The eligibility criteria should provide potential applicants with the information they need to ensure their projects are able to be funded.

Grants would be assessed against the criteria, and unsuccessful applicants provided with feedback on their application.

The criteria have been developed building on the principles outlined in this Issues Paper – a draft is provided below, as well as in full at Appendix 1 as a stand-alone document.

The following criteria will be used to assess whether the proposed project will:

1. Build knowledge and/or sectoral capacity supporting policy development and consumer education in the National Energy Market
2. Align with ECA strategic priorities and functions
 - a. If not, outline A) why the work is a priority and B) its material impact on consumers
3. Build capacity for future advocacy
 - a. Demonstrating value to the organisation
 - b. Demonstrating value to the sector
4. Be relevant to a national energy market
5. Offer value for money: the benefits should outweigh the costs, and costs should be prudent and minimised
6. Offer partnership opportunities where possible with ECA other organisations
7. Provide a co-contribution, and a rationale for the provision of ECA funding (ECA will consider the organisation's or its members' ability to meet the project costs)
8. Provide a viable project plan, outlining the intended outcomes and success indicators.

Stakeholder comments on the draft eligibility criteria are welcome.

Principle 7: Probity and transparency

Program administration reflects: ethical behaviour, incorporates appropriate internal and fraud control measures, ensures that decisions relating to grants are impartial, appropriately documented and publicly defensible, and complies with reporting requirements.

ECA will require recipient organisations to maintain appropriate processes and policies to ensure the funds are appropriately managed and accounted for. To demonstrate its capacity to do so, ECA will request the organisation's most recent annual report or audited financial statements.

ECA's funding agreement outlines the grant recipient's obligations to keep accurate records and to make those available to ECA for the purposes of audit and evaluation.

ECA reporting on grants

ECA will report publicly on its grant program

- ECA will publish its grant program guidelines
- Applications received and all decisions made will be listed on the ECA website
- ECA's Annual Report will provide information on the types and amount of funding provided for grants
- All public outputs will be published on the ECA website (noting that its development is currently underway).
- ECA will report on the outcomes achieved for customers through its grants program.

Are there other ways of enhancing accountability? Or any other reporting mechanisms or information ECA could use?

Publication and communication of grant outputs

As noted above, ECA intends to publish the reports produced through its funding on the website.

This is intended to complement, not replace, a grant recipient's publication and dissemination of its report to relevant stakeholders, particularly decision-makers.

To help build capacity in the sector, ECA will provide additional mechanism for advocates to promote the findings/recommendations of their project:

- ECA proposes to seek from all grant recipients a brief report by video or podcast highlighting the research findings, and/or any lessons for the sector arising from the research, to be posted on the ECA website
- ECA is considering convening regular (i.e. annual or biannual) forums to showcase funded research, at which selected grant recipients could present their work.
- ECA would welcome opportunities for grant recipients to present their work in policy and industry forums, and will be working with government and industry to identify those.

ECA welcomes stakeholder feedback on maximising opportunities to promote research findings.

Review timing and ECA contact details

Stakeholders are invited to comment on the issues identified above, or on other issues of relevance to the ECA grants program.

Any questions should be directed to Kerry Connors, ECA Grants Manager, by email at kerry.connors@energyconsumersaustralia.com.au or by phone on 02 9220 5511.

ECA is keen to begin the new program early in the New Year, so is seeking that any submissions be lodged **no later than 30 October 2015**. Submissions will be published on the ECA website.

Appendix 1: ECA Eligibility criteria

An application for funding will be assessed against the following criteria.

The proposed project will:

1. Build knowledge and/or sectoral capacity supporting policy development and consumer education in the National Energy Market
2. Align with ECA strategic priorities and functions
 - a. If not, outline why A) the work is a priority and B) its material impact on consumers
3. Build capacity for future advocacy
 - a. Demonstrating value to the organisation
 - b. Demonstrating value to the sector
4. Be relevant to a national energy market
5. Offer value for money: the benefits should outweigh the costs, and costs should be prudent and minimised
6. Offer partnership opportunities where possible with ECA other organisations
7. Provide a co-contribution, and a rationale for the provision of ECA funding (ECA will consider the organisation's or its members' ability to meet the project costs)
8. Provide a viable project plan, outlining the intended outcomes and success indicators.

Appendix 2: Consultation questions

Page	Section Heading	Questions for stakeholders
5	Defining Effective Advocacy	While no definition is perfect, does the proposed definition – within the context of the National Energy Market and the requirements of effective advocacy - provide a workable basis for ECA grants?
6	Grants Program Structure	Do stakeholders have feedback on the grants program structure - Advocacy, Research and CEO Grants?
	Grants Program Design	
9	Principle 1: Robust Planning and Design	ECA welcomes feedback on the features of the ECA Grants program design: <ul style="list-style-type: none"> • Aligning with ECA strategic priorities • Building sectoral capacity • Bringing jurisdictional expertise to the national debate
10	Principle 2: Collaboration and partnership	ECA welcomes input from stakeholders on potential measures to foster collaboration and partnership with ECA or with other advocates / researchers.
11	Principle 3: Proportionality	ECA would welcome stakeholders' advice on other mechanisms to streamline grant applications and management.
13	Principle 4: Outcomes orientation	ECA would appreciate feedback on how ECA grant administration processes could further assist potential applicants to achieve outcomes.
14 - 15	Principle 5 Achieving value with public money <ul style="list-style-type: none"> • Capacity to pay and co-contribution • Evaluating the impact • Evaluation methodologies 	<p>ECA would appreciate input from stakeholders on the approach, including</p> <ol style="list-style-type: none"> a) how to assess and take into account an organisation's capacity to pay b) how a co-contribution could be measured more effectively and consistently. <p>ECA welcomes guidance from advocacy organisations on the forms of evaluation feedback they would find most useful.</p> <p>ECA would appreciate input from stakeholders on their experience of relevant evaluation methodologies and approaches. ECA is particularly interested in hearing how government, regulators and industry measure the effectiveness of their engagement.</p>
16	Principle 6: Governance and accountability	Stakeholder comments on the draft eligibility criteria are welcome.
17	Principle 7: Probity and transparency	Are there other ways of enhancing accountability? Or reporting mechanisms or information ECA could use? ECA welcomes stakeholder feedback on maximising opportunities to promote research findings.