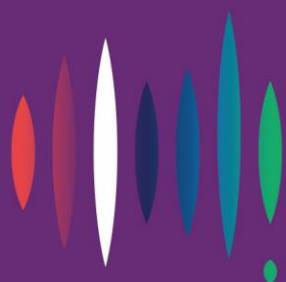


# Jemena Gas Networks

## Draft 2020 Plan

Submission

March 2019



**ENERGY  
CONSUMERS  
AUSTRALIA**

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## Version history

VERSION	DATE	COMMENTS
1	25 March 2019	Final

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## Introduction

The long-term interests of consumers are served when current and future consumers pay no more than they need for the quality of service they require.

Understanding what is in the long-term interests of energy consumers (particularly pricing and service quality) is one thing. Ensuring that the price of energy and the quality of energy services provided to energy consumers are set at levels that are in their long-term interests is another.

### **Jemena Gas Networks (JGN) has followed an exemplary consumer engagement process to help it understand the long-term interests of consumers**

Energy Consumers Australia acknowledges and appreciates the mature approach that JGN has followed to understand the long-term interests of consumers; and how it has applied these learnings to its *Jemena Gas Networks Draft 2020 Plan* (the Draft Plan). JGN has undertaken an extensive consultation process over the last 18 months (and which is ongoing), which we recognise represents a big commitment from the staff who have spent many weekends engaging with consumers. It has involved information being shared through a combination of face to face forums with consumers, websites and one on one meetings with larger customers. In our view, JGN is “leading the way” amongst its peers in the energy networks businesses in the evolution of the consumer engagement journey (both for gas and electricity distribution).

We also note that JGN’s gas market strategy has consumer interests at its centrepiece – maximising value for customers, establishing a long-term sustainable cost structure and driving continuous improvements in the customer experience. This demonstrates JGN’s intention to use all means possible to understand what is in the long-term interests of consumers, and should help ensure that the pricing proposals and the quality of gas services outlined in the Draft Plan are in the long-term interests of consumers.

### **What consumers are telling us**

Extensive consumer engagement is one “piece of the puzzle” in ensuring that the long-term interests of consumers is being understood. Another way of understanding their interests is through our six-monthly Energy Consumer Sentiment Surveys.

Our [December 2018 Energy Consumer Sentiment Survey](#) indicates that there are ongoing opportunities for organisations to better understand the long-term interests of consumers. When it comes to gas, the survey revealed that:

- only 32% of NSW consumers are confident that the overall energy market is working in their long-term interests (this was an 11% increase in confidence levels since the survey conducted in December 2017<sup>1</sup>);
- while 58% of NSW based consumers surveyed were satisfied with the value for money they get for gas (which was a 7% improvement since the survey conducted in December 2017)<sup>2</sup>, these levels of satisfaction were the second lowest out of all types of utilities and services provided to households, with electricity being the lowest. The other types of utilities were water, mobile phone, banking, internet and insurance<sup>3</sup>; and
- NSW consumers are confident in their own ability to make choices and resolve issues with their energy services, but fewer consumers are confident in the information and tools available to help them with their decisions. Confidence in the overall market has increased off a low base<sup>4</sup>.

These survey results suggest that a long-term strategy needs to be developed by organisations such as JGN to partner with consumers and consumer organisations such as ECA on an ongoing basis to ensure energy networks are:

- continually hearing from consumers;
- better equipped to understand the long-term interests of consumers; and
- implementing proposals to meet the consumers' long-term interests.

We recognise Jemena's positive contribution as a foundation member of the [Energy Charter](#) and we support JGN's initiatives in the Draft Plan to incorporate the spirit of some of the key principles from the Charter.

There are more opportunities for JGN to better align its Draft Plan with the principles in the Charter. For example:

- outline a clearer case for changing the asset lives for future investments to be made, noting the upward pressure it is expected to place on NSW network costs (\$21m);
- building a more convincing case that the risk of asset stranding as a result of the NSW Government's 2050 net-zero carbon aspiration is real; that all options for addressing this risk have been considered; and demonstrating that the risk is being shared between current and future customers together with JGN;
- provide a clearer outline of initiatives being considered that will improve the customer experience. In particular, initiatives that provide consumers with access to more real time information;
- further exploring tariff structuring options that incentivise ongoing use of the network;
- we would like to better understand JGN's risk management approach to capital expenditure (capex), so that consumers can have more confidence in the capex forecasting process for 2020-25. We raise this

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<sup>1</sup> [December 2017 Energy Consumer Sentiment Survey](#), page 55

<sup>2</sup> *Ibid*, page 56

<sup>3</sup> *Ibid*, page 57

<sup>4</sup> *Ibid*, page 58

given the significant divergences between 2015-20 capex line item allowances and the actual levels of expenditure JGN incurred (or will have incurred) for each line item during that period;

- indicate how JGN will pursue productivity improvements in its capital expenditure program; and
- indicate how JGN will provide certainty that the revenue handback from the current regulatory period will result in price reductions for consumers in their retail gas bills during the 2020-25 period.

The challenge for JGN, like other networks, is to further evolve its strategy. We are looking to network businesses to understand and respond to the direction consumers are taking the market, empower consumers and deliver affordable solutions.

To do this, JGN, like the gas sector more generally, will need to move beyond the 'trilemma' framing that tends to focus organisations on big capital-intensive solutions to reliability challenges where a cheaper, more modular, risk-based solution may have emerged.

We have alternative framing that prioritises three objectives – a framing that has informed our assessment of JGN's Draft Plan:

- *Affordability* must be a constraint on investment and decisions about energy – an explicit criterion in decision making up and down the supply chain.
- Energy services must be built around *individuals* to reflect their unique circumstances, enabling people to easily manage their own use and costs – whether that is innovating and engaged consumers, the majority of consumers who are focused on affordability and costs, and consumers with vulnerabilities.
- Investment in the energy system – networks, generation and retail – must be *optimised* based on consumers' demands that not a dollar more is spent a day earlier than is necessary.

### Focus on Affordability

The affordability of gas has been one of four central themes that has helped shaped JGN's Draft Plan for 2020-25. Energy affordability (that is, what consumers can afford) is a prominent current issue in Australia's east coast gas markets.

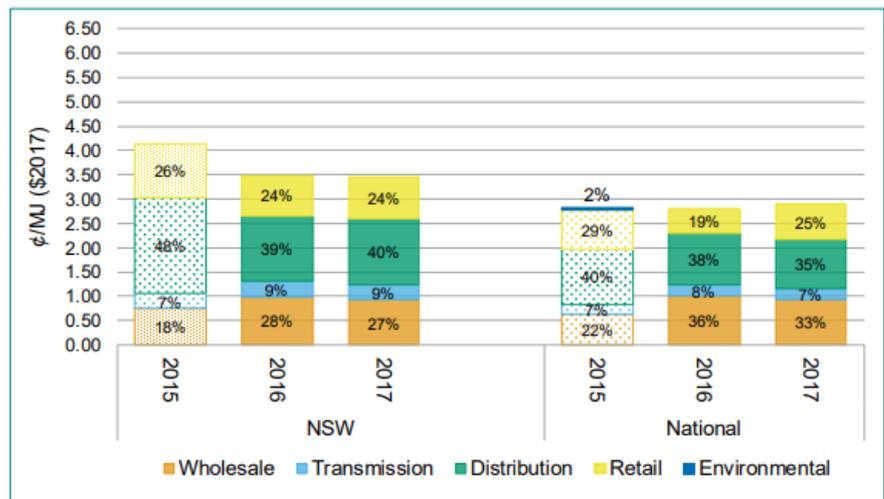
Affordability of gas is an even more prominent issue in NSW (compared to other jurisdictions) when residential gas prices are compared nationally and state by state. Not only has NSW's residential gas prices trended significantly higher than the national average for the period 2015-2017 (by more than 15%), the proportion that distribution charges make-up of the average total NSW residential gas bill has been higher than the national average during that same period, as shown in Figure 1<sup>5</sup>. Therefore, changes in network charges will have a greater impact on the affordability of gas for

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<sup>5</sup> 'Gas Price Trends Review 2017', Commonwealth of Australia 2017 - [https://www.energy.gov.au/sites/default/files/gas\\_price\\_trends\\_review\\_2017.pdf](https://www.energy.gov.au/sites/default/files/gas_price_trends_review_2017.pdf)

residential consumers than will changes in the costs for other inputs to that price.

**Figure 1: NSW residential gas price trend 2015 to 2017**



Source: Gas Price Trends Review 2017

We appreciate that JGN is proposing several measures in the Draft Plan to address affordability concerns, such as:

- a 12% reduction in network charges for all customers;
- continuing with an operating cost productivity improvement factor each year during the Plan period (0.5% pa);
- adopting a medium-term approach to certain capital expenditure initiatives, so as to reduce the growth in the asset base and therefore keep prices down over the longer term; and
- balancing network charges across the period of the Plan to counter expected movements in other areas of the supply chain, with the goal of achieving a smooth retail gas bill.

However, we believe that there are some other opportunities that could be pursued by JGN in the Draft Plan that gets submitted to the AER. For example:

- consider what scope there is to modify the tariff/charging arrangements for residential and small commercial customers to incentivise greater and continued usage of the network, while meeting consumers key need of affordable gas. For example, more tiering of the tariff arrangements or rebate scheme on gas appliances. As JGN acknowledges, growth in customers lowers the unit cost for each customer, thereby improving the affordability of gas.
- whether or not the introduction of a capital expenditure incentive scheme would align the interests of consumers and JGN. We note that JGN intends to do this and we are committed to continue working with JGN in

the development of the scheme via an upcoming deep dive and any following dialogue.

### **Ensuring energy services are built around individuals to reflect their unique circumstances**

The Draft Plan does not propose to include any capex to be incurred on identifying opportunities that either improve the use of gas or prolong the use of the network.

In this regard, we would like more information on whether JGN has:

- explored alternative tariff arrangement options to encourage ongoing use of network. For example, better tiering of usage charges as network utilisation increases. But any options would need to be balanced against the desire of customers to simplify energy bills; and
- considered how it will engage with consumers to identify research opportunities. For example, research could be undertaken into gas solutions for decentralised electricity generation opportunities and into smart metering of gas meters. This research could help identify how consumers could access information to enable informed choices to be made and opportunities for utilising government subsidies to run a trial program. We note that JGN's consumer engagement indicated that some consumers do not want to pay for innovation activities. We suggest that these activities could be considered in other non-consumer funded activities, and with a focus on how to optimise the outcomes so that not a dollar more is spent a day earlier than necessary.

### **Meeting the long-term consumer interests**

As mentioned at the outset of this submission, understanding what is in the long-term interests of consumers in relation to energy (particularly pricing and service quality) is one thing. Ensuring that the Draft Plan meets the long-term interest of consumers in another.

We acknowledge and appreciate the mature approach to consumer consultation and engagement that JGN has adopted in the development of the draft plan for 2020-25. This gives us more confidence that the long-term interests of consumers are at the forefront of JGN's strategic plan.

The outcomes of this engagement provides an additional source of evidence of consumer expectations. When combined with other established evidence bases, JGN has provided valuable information into the discussion about how to meet the long-term interests of consumers with respect to price, service quality and service safety.

Broadly speaking, we believe that the long-term interests of consumers are served when current and future consumers pay no more than they need to for the quality of service they require, not one dollar more than necessary; not one day earlier than needed. We are of the view that the following factors should be considered when assessing the long-term interests of consumers:

- what JGN has heard directly from consumers in its own engagement;

- what consumer organisations, such as Energy Consumers Australia, has heard from consumers directly through our Energy Consumer Sentiment Surveys and our advocate colleagues such as the Public Interest Advocacy Centre;
- what experts engaged by consumer organisations (such as Energy Consumers Australia) have said in relation to the Draft Plan and proposal that JGN submits to the AER in June 2019. We have engaged gas pipeline and regulatory experts, TRAC Partners, to assist us assess JGN's Draft Plan. We have included TRAC Partners' report at Attachment A. TRAC Partners' assessment focuses on both the strategic initiatives that underpin JGN's Draft Plan and all of the building blocks used to set the revenue and charges proposed in that Draft Plan;
- detailed analysis undertaken by the Australian Energy Regulator (AER) of the formal proposal that JGN will submit to the AER in June 2019. Not only does the AER have the resources and skills to undertake detailed analysis, it has a statutory responsibility to ensure that it assesses what is in the long-term interests of consumers (being the national gas objective). What we have observed is that the AER continues to give weight to consumer needs and how these needs have been taken into account in regulated revenue processes.

## Key Issues in our Response

The AER is responsible for setting the charges that gas distribution businesses can recover from consumers for key services, based on an allowed revenue stream for a five-year regulatory period. We understand that the AER must base its assessment on efficient costs and an informed view of expected demand in the network and must ensure that any proposal is achieving the national gas objective set out in the National Gas Law.

The Draft Plan is a new, informal first step in the regulatory approvals process, reflecting and gathering stakeholder feedback to inform JGN's proposal for the 2020-25 period that must be submitted to the AER by 30 June 2019.

Through five-yearly determination processes, the AER authorises the transfer of dollars from the consumer's pocket to the owner of the distribution network. This is money that the consumer would otherwise have been able to spend at their own discretion.

This means that consumers and the AER need to be absolutely confident that the decisions driving network investment and expenditure, service quality and service safety are in the consumers' long-term interests.

### Engaging with consumers

As outlined in the outset of this submission, we recognise that JGN has consulted extensively with customer groups, published information on its website, shared the Draft Plans ahead of the formal revenue setting process and undertaken deep dive sessions with key stakeholders. JGN has also addressed a number of our written questions and engaged with us directly on areas of interest. In our view, JGN is "leading the way" amongst its peers

in the energy networks businesses in the evolution of the consumer engagement journey (for both gas and electricity distribution). But there is always room for improvement as outlined earlier in this submission.

Through our involvement in the engagement process to date and, is acknowledged by JGN in the draft plan itself, four key themes arose from this engagement:

1. Affordability is a key issue for customers and network businesses have a key role in keeping prices down.
2. Gas is a valued product and customers therefore expect a safe and reliable service.
3. Customers want JGN to consider fairness both in the context of existing and future customers and in the context of the diverse types of customers served by the network.
4. JGN will be expected to innovate and plan for the future so that customers can continue to use gas in the longer term, particularly as we move to a net-zero carbon future.

Below, we will respond to some of the key initiatives being proposed by JGN in the Draft Plan to address each of these themes.

We are participating in this process with a view to finding alignment between JGN's strategy and the long-term interests of consumers with respect to price, quality, safety, reliability and security. We bring insights from participating in network determination processes across the national electricity market (NEM), as well as information about NSW consumers gleaned from our six-monthly Energy Consumer Sentiment Survey.

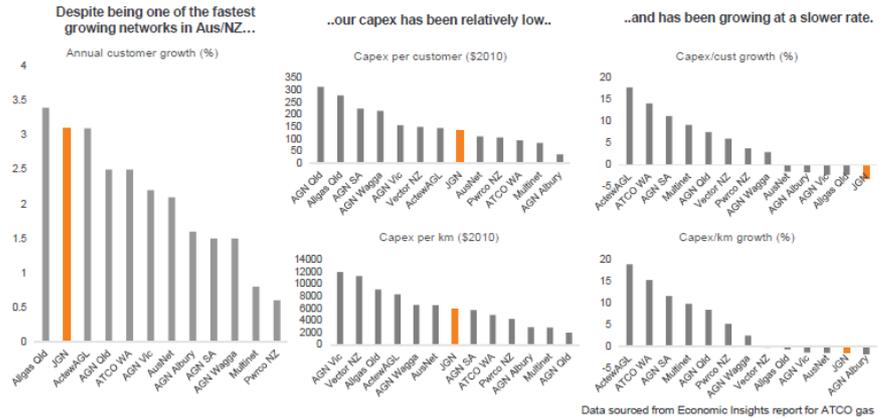
We will continue to engage with JGN to find out more about the underlying drivers of its Draft Plan and provide feedback to JGN both directly and through further forums convened by JGN.

We have also collaborated with other consumer representative groups such as the Public Interest Advocacy Centre.

### **Improving cost competitiveness and affordability – reducing the asset base levels**

It is pleasing to note that JGN already has a relatively efficient capital expenditure regime compared to other network businesses (based on two measures - \$/customer and \$/km of pipework), even with it being one of the fastest growing networks in Australia. Furthermore, it appears that the level of capital expenditure (per customer) incurred by JGN is declining. This is summarised in the graphs in Figure 2 tabled at the deep dive session held on 19 February 2019.

**Figure 2: JGN efficiency compared to other networks**



Source: JGN material provided at 19 February 2019 deep dive

There are several initiatives being proposed in the Draft Plan to reduce the level of the asset base growth. To consider whether we could support this proposal, we would want to see further information from JGN to be assured that these initiatives meet the affordability theme in a way that is in the long-term consumers’ interests. For example:

- Shortening the asset lives for future capital expenditure initiatives. While this will reduce the level of the asset base in future regulatory periods, it will increase the level of the asset base by \$21m for the 2020-25 period. JGN’s stated justification for changing asset lives is to partly address the uncertainty around the long-term future of gas consumption and therefore network usage (that is, stranded asset risk). However, it is not clear to us whether this change should be made now or whether it may be more prudent to defer making this decision until the 2025-30 period. Not only is it the case that deferring this change by five years may not significantly increase bills for consumers during that later period, it will also enable more information to be available to assess whether stranded asset risk is real or not.
- Connections capital expenditure – while we support the principle of the cost of connections being included in the asset base (on the understanding that it would lead to an overall reduction in the network charges for each customer), it would appear that JGN does not compare favourably with industry peers. We would like further clarification on the prudence and efficiency of the forecast connection capital expenditure given that it represents 45% of the total forecast capex being proposed during the 2020-25 period.
- Mandating the installation of volume boundary meters for new high rise apartments that have a centralised water heater installed. The benefits of this proposal is that it reduces the total capex for connection by \$14m. What we would like to understand is the broader implication for the consumer and how the broader costs and benefits play out. For example, indirect access to competition through body corporate decision making processes and protections in how costs are allocated amongst residents.

We also note that some of the initiatives being proposed by JGN in the Draft Plan address one of the four key themes referred to above, but they appear inconsistent with at least one of the other themes. Therefore, a balance needs to be struck to ensure that overall, the long-term interests of consumers is being met. At this stage, we believe that further work needs to be undertaken by JGN to demonstrate that the appropriate balance has been struck that the inclusion of the initiative in the Draft Plan is in the long-term consumer interests.

This is particularly the case for the following initiatives:

INITIATIVE	THEME	
	AFFORDABILITY FOR CURRENT CUSTOMERS	INTERGENERATIONAL FAIRNESS
Changing asset lives for new investment to ensure fair recovery of costs from customers	x - ↑\$21m during 2020-25	? – only fair if asset stranding risk is real and JGN is sharing some of the risk
Expensing corporate overheads and pigging costs previously capitalised	x - ↑\$70m in opex during 2020-25	✓ - no rate of return will be earned from future customers
Accelerate recovery of the depreciation on inline inspection assets	x - ↑\$16m during 2020-25	? – because asset life is proposed to be 5 years, it doesn't appear to affect customers now or in the future

**Service levels – safety and reliability**

We support the initiatives included in the Draft Plan to ensure that current levels of safe and reliable service provision will be maintained into the future.

We do note however, that there was a significant discrepancy between the levels of capex incurred by JGN between 2015-2020 on ensuring the safe and reliable operation of the network compared with the levels for that kind of expenditure that were allowed by the AER for that same period, as shown in the Table 1 below:

**TABLE 1: JGN 2015-20 APPROVED AND ACTUAL CAPEX**

CAPEX CATEGORY	ACTUAL EXPENDITURE (\$M)	VARIANCE FROM AER APPROVED FORECAST (%)
Meter replacement	108.45	↓44%
Facilities and Pipes	68.95	↓45%
Information Technology	107.77	↓27%
Augmentation	51.03	↓54%
Mains replacement	31.91	↓58%
Other	60.64	↓34%

We would like JGN to outline in more detail the following information (and we would expect the AER to require such detail):

- JGN’s risk management framework to determine priorities for capital expenditure initiatives. In particular, to ensure that all regulatory obligations are being met, but also to ensure that saving expenditure in one period on preventative maintenance does not lead to greater expenditure being incurred in subsequent periods on reactive maintenance. Having this further explanation provided will also give us greater comfort with the prudence and efficiency of the capital expenditure forecast for 2020-25.
- The reasons for the significant variances in these expenditure line items.

We would also like JGN to outline the extent to which the replacement capex it proposes to incur will align with the [AER's industry practice application note for asset replacement planning](#). While this note has been prepared by the AER primarily for the purposes of electricity businesses, the principles contained in the note have equal relevance for gas network businesses.

### Fairness amongst customers

The Draft Plan proposes an average 12% reduction in gas bills across all customer categories. While we support the proposed approach in the Draft Plan that bill reductions will be applied uniformly (in percentage terms) across all customer categories, we would like JGN to build a better case for the initiatives that have been identified “intergenerational fairness” grounds. These are the following initiatives that seek to change the balance between tariff levels payable by today’s customers and those payable by future customers:

- shortening asset lives for new capex;
- accelerating depreciation of internal pipeline inspection assets; and
- expensing all corporate overheads that used to be capitalised.

One of the other initiatives that has been proposed, on the basis that it improves fairness between intergenerational consumers, is the proposal to adopt a medium-term approach to certain capex initiatives, particularly

relating to the augmentation of the asset. It appears to us that, in circumstances where there may exist uncertainty about the long-term usage of the network, adopting a medium-term approach to these investments could be a better “no regrets” solution than spending more on the particular investments. This is because:

- if growth continues, while additional expenditure will need to be incurred in the future, it will only result in a negligible increase on average charges over time.
- However, if the network is in decline in the future, the increase in charges that may arise at that point in time will be significantly less than had a long-term approach to investment been adopted (because of the higher asset base value).
- If growth continues, there will be additional inconveniences to consumers – such as traffic congestion caused by the need to undertake dig-ups to lay additional pipework. However, this can be managed.

### Planning for a net-zero carbon future

JGN has proposed three strategic initiatives to address the risk that gas may no longer be used (or it will no longer be competitive) and therefore, the use of the asset will become stranded. JGN argues that this risk is higher than before and is being driven largely by the introduction of government policies, such as the NSW government’s aspirational objective of achieving net-zero carbon emissions by 2050.

Reflecting on the need for businesses to better optimise the networks, before these initiatives can be supported, we would like JGN to:

- more clearly outline the case that the likelihood of stranded asset risk has increased dramatically. We would like to understand the extent to which this risk is more heightened in NSW than in other jurisdictions, as it is understood that the initiatives being proposed to address this issue haven’t been adopted in other regulatory proposals or gas networks in other jurisdictions.
- If it’s accepted that there is an increased risk of asset stranding – consider further alternatives that will maintain cost pressures and ensure gas remains as competitive as possible. For example, whether it may be appropriate to move from straight line depreciation to economic depreciation. To help inform our view, any further analysis should outline the bill impacts of the different depreciation methodologies.
- If accelerated depreciation is considered as one of the best options to manage the risk of asset stranding – make a clearer case to show that the proposed changes to asset lives should be made in the Draft Plan to help manage the risks, instead of waiting another five years to allow time for Hydrogen to be proven as an economically viable substitute for natural gas in the network. In this context, we note that work has already commenced to test and prove hydrogen as a viable source of energy. The Council of Australian Governments (COAG) Energy Council has indicated that a national hydrogen strategy should be presented to

Ministers in December 2019<sup>6</sup>, and that work in 2019 will be underway to examine the use that hydrogen will have in the domestic gas network<sup>7</sup>.

- Demonstrate that JGN is sharing some of the risk of asset stranding. It is not apparent to us that the risk should solely be shared between current and future customers.

## Concluding comments

The key issues of affordability and fairness are very important in the context of broader energy market issues.

Energy consumers are increasingly being called on to fund large infrastructure projects across Australia. In NSW alone, the Australian Energy Market Operator's Integrated System Plan sees multiple electricity interconnector projects for NSW, which electricity consumers will fund. In addition to this, electricity and gas consumers (who are the same people, as not all electricity consumers have gas, but all gas consumers have electricity) are being asked to fund both the electricity and gas infrastructure for the Western Sydney Aerotropolis and the Science Park.

This raises questions for us about the suitability of the current cost-recovery mechanisms for large infrastructure projects of national and state significance.

We continue to call on electricity and gas network businesses to think harder about how these projects can be covered within existing allowances; or identify other approaches where consumers do not pay for the risk attached to these projects. We were pleased to see that Endeavour Energy's revised 2019-24 revenue proposal to the AER saw the cost allocation for the Aerotropolis reduced by 35.7 per cent from \$61.2 million in its initial regulatory proposal. Endeavour Energy's revised approach involved "...a lower cost solution that utilises existing networks in the earlier stage of development with further work to be considered for the next regulatory period."<sup>8</sup> As we move into more uncertain times, options for managing risk (such as staging large infrastructure projects) that do not impose large risk-costs on consumers will become more important.

We look forward to continuing to work with JGN as it develops its regulatory proposal.

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<sup>6</sup> COAG Energy Council, *National Hydrogen Strategy Request for Information – Discussion Paper*, March 2019. Page 7. Accessed from [https://consult.industry.gov.au/national-hydrogen-strategy-taskforce/national-hydrogen-strategy-request-for-input/supporting\\_documents/nationalhydrogenstrategyrequestforinputdiscussionpaper.pdf](https://consult.industry.gov.au/national-hydrogen-strategy-taskforce/national-hydrogen-strategy-request-for-input/supporting_documents/nationalhydrogenstrategyrequestforinputdiscussionpaper.pdf)

<sup>7</sup> Ibid, page 4

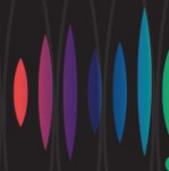
<sup>8</sup> Endeavour Energy, *Revised Regulatory Proposal 1 July 2019-30 June 2024*, page 14. Accessed from <https://www.aer.gov.au/networks-pipelines/determinations-access-arrangements/endeavour-energy-determination-2019-24/revised-proposal>

If you have any questions about our comments in this submission, please contact Shelley Ashe, Associate Director Advocacy and Communications on 02 9220 5514 or by email at [shelley.ashe@energyconsumersaustralia.com.au](mailto:shelley.ashe@energyconsumersaustralia.com.au).

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