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Independent Pricing and Regulatory Tribunal
Energy Savings Scheme
Level 15 / 2 – 24 Rawson Place
SYDNEY NSW 2000

A.O.: Scheme Administrator

Friday, 20 November 2020

RE: *Draft Energy Savings Scheme Engagement Charter*

Dear Scheme Administrator,

Please accept this written submission providing comments on the Draft Engagement Charter. Thank you for the opportunity to respond.

The engagement charter is a great initiative, and we trust an accurate reflection of the Scheme Administrator's commitment to (more) constructive engagement with industry. The charter states that it sets out how IPART engages with its stakeholders – i.e. what we can expect from IPART, and what IPART expects from us. Fundamentally the charter acknowledges that constructive, multilateral engagement is a reasonable expectation and indeed a shared responsibility. We believe this is a good basis to build on.

Please consider the following comments.

Commitment

The engagement charter opens with the IPART and DPIE's *joint responsibility for developing and implementing the regulatory framework, how IPART engages with stakeholders, and who to approach about different aspects of the ESS*. The charter lacks a statement of commitment. We believe it would be an improvement if the charter included a statement that reflects IPART's commitment to achieving what the charter sets out to achieve.

Measuring performance

The engagement charter lists commitments in relation to *ease of engagement, responsiveness, clarity and accuracy of information, and timeliness of decision making and furnishing of information*. Without clearer definitions of what constitutes *easy, responsive, clear, accurate, and timely*, it will be difficult to measure if a stakeholder meets expectations. Will IPART publish specific, measurable goals? For example:

- For ease of engagement, will IPART commit to a phone helpdesk, or an open, online Q&A forum, more frequent stakeholder update forums or frequent method workshops? All the above?
- For responsiveness and timeliness, will IPART publish and commit to response times and decision times for different types of queries/decisions?
- For clarity and accuracy of information, will IPART be implementing a public Q&A process for guidance material and centrally publishing clarifications?

We believe it would be an improvement if the charter set out in some detail what steps will be taken to make performance against the charter measurable.

Mutual expectations

One of the commitments made by the Scheme Administrator is to *consult with us* and – in consultation with us – the Scheme Administrator expects us to *be open to other ideas*. Consulting with industry is critical, and indeed industry needs to be open to other ideas. In addition, considering IPART's ultimate compliance authority, we believe that industry can be expected to want to consult with IPART, and that IPART can be expected to be open to other ideas as well. A mutual expectation in this regard fits well with making it easy to engage with IPART, keeping us informed, providing clear and accurate information, acting fairly and with respect, and the invitation to *come to IPART to find information on...and how to be compliant*. For these reasons we believe it would be an improvement if the charter recognised the mutual expectation and need for consultation and openness to other ideas.

We trust the Scheme Administrator will give our comments due consideration.

Sincerely,



Jens Mozer | Project Engineer / PIAM&V Team Leader



On behalf of EC Focus Pty Ltd.