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COAG Energy Council Secretariat
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Dear Secretariat

Consumer participation in network revenue determinations and associated regulatory processes

Consultation paper on consumer resourcing

The Major Energy Users (MEU) welcomes the opportunity to provide its views to the CoAG Energy Council secretariat on the discussion paper relating to consumer participation in network revenue determinations and associated regulatory processes. Attached to this letter is a response to the specific questions raised by the secretariat in its discussion paper.

The MEU observes that its Public Officer was heavily involved in the processes and discussions the secretariat had with consumers relating to the limited merits review, including those that related to the issue of consumer resourcing.

General observations

Network costs are, for most consumers, the single biggest cost element in the build up of the costs of delivered electricity and the second biggest in the cost of delivered gas. In proportion to the cost of the network services provided, the resources provided for end user advocacy for addressing network costs and conditions are so modest as to be negligible.

Medium and larger energy users are under considerable cost pressures (partly due to the massive rises in energy costs) and this has limited funds available for advocacy as such costs are seen to be of a discretionary nature. The numbers of medium and large energy users that do provide advocacy are small in number, and most end users are "free riding" on the advocacy provided by the few that get involved.

There is a view that consumer advocacy might well be provided by a wide range of “independent” consultants. This is not so. Consumers are rightly wary of consultants that work for the supply side of the market, as there is a perception that these consultants (who might gain the bulk of their income from the supply side) would provide such strong support for consumer interests as necessary. The AER recognises this concern when they appoint their consultants when carrying out network resets.

What is also often overlooked is that there is a general alignment of all consumer interests, whether large or small when addressing network resets. All consumers see that the allowed revenue needs to be minimised to the efficient level, and so develop a “smaller pie”. The only area where there might be some lack of alignment between consumers of different classes is in the allocation of the revenue (ie the allocation of the “pie” between various consumers). But in a reset, the amount of activity relating to the allocation of costs is generally modest as the costs tend to be allocated reflecting the amount of assets dedicated to each class of consumer.

The AER has just commenced its review of its binding rate of return guideline yet consumer advocacy on this integral issue to network regulation will be similarly impacted by resourcing constraints to that seen in regulatory resets. This indicates the urgency of the issue which is the focus of the Discussion Paper.

Falling advocacy on network resets

As the Discussion Paper points out, the funding of consumer advocacy for network regulation is falling under the ECA regime, compared to the funding provided under the Consumer Advocacy Panel. Concurrently, the numbers of consumer advocates involved with the various AER network regulatory processes has fallen both in oral and written advocacy. There are a number of reasons for this, including:

- There are limited numbers of qualified consumer advocates because of the requirements to be competent in such advocacy. With regard to network regulation, advocates have to have a good understanding of what energy networks provide and a wide a range of skills – high level communication skills, deep knowledge of how consumers of different classes use energy, as well as understanding the engineering, economics, financial, regulatory processes and even legal aspects involved in a network reset.
- With cost pressures facing many users of energy due to the massive increases in the costs of energy, the availability of discretionary funds for advocacy has fallen.
- The decision to require consumer engagement in network resets has greatly increased the amounts of time advocates have to devote to network reset activities as well as the consumer engagement initiated by networks. In earlier times, all that was required of consumer advocates was involvement in AER processes for resets

- At the same time, consumer advocates are being drawn into many other issues facing the energy markets, limiting their time for network reset advocacy. Such other activities include the proposed changes to the gas markets and the many rule changes and reviews by the AEMC, as well as government reviews and new policies. The increase in energy market complexity due to the introduction of climate change policies has also increased the amount of consumer advocacy needed.
- The pool of experienced advocates has been impacted by many becoming members of the AER CCP and not being available for direct consumer advocacy for some resets
- Many have ceased being energy consumer advocates through leaving to work in government departments, “poaching” by networks and by retirements. Concurrent with this reducing numbers, development and training of new advocates is limited by the funds available

Energy Consumers Australia (ECA)

The creation of the ECA has directly impacted the ability for many advocates to be active with network resets. The total funding available to ECA for consumer advocacy has remained much the same as was available to the Consumer Advocacy Panel (CAP), but the focus of the ECA is different to that of the CAP.

- The ECA is required under its constitution to provide funding for advocacy in the interests of residential and small business consumers whereas the CAP funded advocacy for a wider spectrum of consumers, reducing the funding to advocates who had been active representing the interests of medium and larger energy users. In this regard, it is pointed out that the ECA funding comes from all energy consumers.
- The ECA is allowed to provide funds for a much wider scope of activities than the CAP, effectively reducing funds for network resets. A review of the projects funded by the ECA highlights that considerable funding is now provided for projects that were not funded under the CAP regime.
- The ECA requires greater contributions from some fund recipients than were imposed by the CAP, reducing the ability of fund recipients to address more issues. This greater contribution requirement does not recognise that it is a relative few organisations that provide funding for energy consumer activity, meaning that these organisations are providing a service to the many “free rider” end users that provide no funds for the advocacy but benefit hugely from the outcomes. For some organisations, this co-funding can amount to 50% of the costs involved whereas the CAP provided a greater proportion of funds, reflecting the reality of the “free rider” issue.
- The funding approach used by the ECA is made on a project basis whereas the CAP also provided funds on a continuing basis. Providing funds on a known forward basis allows the funding recipient to know

whether they will have the resources to develop new advocates and implement succession plans. The short term funding approach by the ECA has not encouraged development of new talent to replace those advocates that leave consumer advocacy.

- The ECA approach to funding does not fully utilise the strengths that other consumer advocacy groups can provide to those groups that are funded by the ECA. Without ECA funding for network resets, these other groups (which could otherwise provide strong advocacy) use the funds they have got to apply to other aspects of the energy markets.

The impact of the Consumer Challenge Panel (CCP)

While a very welcome addition to consumer advocacy, it must be recognised that the CCP is responsible to provide advice to the AER, and are not consumer advocates when acting as CCP members on a reset. This means that the CCP cannot be considered to be a consumer advocate, even though in some ways the CCP does contribute to consumer advocacy.

Despite this, the reduced funding for network resets by the ECA has effectively meant that consumers are relying on the CCP to provide consumer advocacy, without understanding the unique role the CCP has.

Funding for network resets

Despite the rules requiring networks to engage with consumers, it must be recognised that without funding, the involvement of consumers in network resets will continue to be limited and therefore have less value than might otherwise be the case.

The MEU considers that establishment of some key guidelines for providing consumer advocacy for funding network resets and network consumer engagement would be beneficial. Such guidelines should recognise:

- For networks to directly fund consumers in the engagement processes provides a perception that these advocates might be “captured” by the networks and so raise questions about what has been agreed. This means that funding for consumer engagement has to be from an independent source.
- There needs to be a strong and informed consumer response to the AER processes
- There needs to be a structure (eg such as provided by the ECA or CAP) to receive and allocate funds for consumer advocacy on network resets
- Administrative costs relative to the funds provided need to be small
- There needs to be a funding structure that provides some certainty of future funding so that development of new advocates can be implemented

Concluding comments

The MEU is pleased to note that the secretariat has identified that consumer involvement in network regulation processes including resets is challenging on a number of fronts. Of these, is the significant time required to provide informed comments to the AER on important issues about the reset proposal and to provide the networks with accurate and useful feedback on what consumers need in regard to network services and the costs involved.

While the funds available from the ECA are limited, those that are available are focused on issues the ECA sees are important to residential and small business consumers often to the exclusion of funding for energy users not referred to in the ECA constitution.

It is of concern to the MEU that in this environment of low funding for consumer advocacy, there are many advocates that devote considerable amounts of their own time, unpaid, to ensure that there is adequate consumer advocacy in network resets. To some degree this has been a result of the increased requirement for consumer engagement that has been mandated, but the changes in funding for consumer advocacy has also been a contributor. For there to be competent consumer advocacy and engagement in a process that contributes such a large cost to the community (especially electricity which is a now considered an essential service) and is so complex and requires such diverse skills to be effective, there should not be a reliance on advocates carrying out such a service at their own cost.

We appreciate the opportunity to have provided this input to CoAG Energy Council secretariat project. Should you wish for amplification of any of the comments provided in this response, please contact our Public Officer (David Headberry) on 03 5962 3225 or at davidheadberry@bigpond.com .

Yours faithfully



David Headberry
Public Officer

Responses to secretariat questions

The MEU provides the following responses to the specific questions raised in the Consultation Paper. The MEU has endeavoured to keep its answers as concise as possible and refers to the commentary in the preceding sections to amplify its reasoning.

	Question	MEU observations
1	How effective is the current resourcing framework for funding consumer engagement in energy regulatory processes, particularly the AER's revenue determination and access arrangement processes? How can it be improved?	<p>The funding currently available is only available from ECA and its constitutional requirement to focus on residential and small business means there is little funding for other users of energy. Despite this, users other than those represented by ECA pay a significant amount of the revenues allowed for networks</p> <p>The funding that ECA provides for advocacy is limited and needs to address all issues in the electricity and gas markets, as well as network revenues. As the discussion paper notes, ECA has provided little funding for network regulation in recent years.</p> <p>While all energy users fund the ECA, not all end users are able to access ECA funding</p> <p>State and Territory funding for energy advocacy (eg PIAC in NSW) predominantly provides resources for residential consumers which are also the focus of ECA funding.</p> <p>Overall, the funding of resources for energy consumer advocacy for CE in network regulatory has fallen in recent years, leading to a reduction in advocacy and its effectiveness.</p>
2	How can the current framework better contribute to increasing the capacity of consumer representatives to engage	<p>The current framework provides little funding relative to the amounts available to the supply sectors of the energy supply chain. In particular the amounts available for end user advocacy pales into insignificance when compared to the amounts used by networks in their revenue resets, recognising that the costs incurred by</p>

	effectively in the AER's revenue determination and access arrangement processes, noting the complex and technical nature of the subject matter?	<p>networks are recoverable from consumers through the regulatory process. Effectively consumers are paying for the networks to maximise their revenues but provide little funding for advocacy on their behalf to minimise network costs. As the bulk of funding for energy issues comes from the ECA, the approach to funding taken by the ECA would have to change to enable advocates for other end user sectors to be funded for network regulation.</p> <p>The proposal for there to be a specific fund to resource consumer engagement (CE) in network resets and consumer advocacy in the AER processes would enable better consumer involvement in the regulatory processes</p>
3	What other resources, including non-monetary support programs or funding sources, are currently available to support consumer engagement in the AER's processes?	<p>Other than from ECA, State and Territory governments, there is little funding or non-monetary support available for advocacy by energy end users, including for network regulation. Some large firms have advisers on energy on their staff, but this is unusual, and even large and medium sized firms rely on the activities of a few large firms (such as those that provide funds for the Major Energy Users) to provide even limited advocacy. There is a considerable "free rider" problem with regard to energy advocacy.</p>
4	In previous consultation processes on the review of the LMR regime, some stakeholders suggested the option of introducing a 'purpose built' fund to which all regulated businesses would contribute funding to support consumer participation in the AER's determination and access arrangement process. It has been suggested that contributions could be calculated as a percentage of the	<p>The MEU notes that the regulated networks spend \$10s of millions each year on regulatory resets, yet the funds available for end users to address all network resets is less than \$1m pa.</p> <p>With the rise of consumer engagement demanded by regulatory bodies in the network regulatory processes, most of the funds currently available would not even provide adequate funding for end user involvement in each of the 19 networks' consumer advisory panels such as those implied under the guidelines for regulatory consumer engagement.</p> <p>The bulk of end users effectively "free ride" off the work and contributions provided by a relative few end user advocates so there is no reason why every end user</p>

	<p>regulated businesses’ total annual revenue. Such a fund may provide a more cost-effective and sustainable approach to resourcing consumer engagement in the AER’s process.</p> <ul style="list-style-type: none"> ○ Given regulated revenue amount to billions of dollars, is a small contribution by regulated business to support consumer advocacy justifiable? ○ What do stakeholders consider are the advantages and disadvantages of the proposal? 	<p>should not provide a contribution for the advocacy that will deliver benefits for all. It is clear that a contribution from every end user is warranted to ensure that network costs are limited and so provide a benefit for every end user. Noting the “free rider” aspect, the MEU considers that it is unreasonable for a few end users to fund advocacy that benefits all end users. Even when the ECA does provide funds for network advocacy, the costs are not fully covered by any grant the ECA makes, resulting in the advocates still providing a contribution for the benefits of the “free riders”. The MEU considers that a small contribution from every consumer (perhaps based on the amount of energy used by each) could be used to provide a fund for competent and knowledgeable advocacy on network resets. The advantages from such funding would be that there will be appropriate consumer involvement in the regulatory reset process (including CE) for a very low cost to each consumer. The disadvantages are few and lie in the manner of funding. If the funding is provided directly by networks, there is the risk of “consumer capture”. To overcome this, the MEU considers that the funding should be provided by networks to a central body which is independent of the networks and this independent body would provide funding to advocates based on their ability to provide competent advocacy. This process reflects the approach used to operate the Consumer Advocacy Panel – the forerunner of the ECA.</p>
<p>5</p>	<p>What are the barriers to effective consumer engagement in revenue determinations and access arrangement processes?</p>	<p>There are three forms of barriers. The first is adequate funding to enable the advocacy. The second is the number of competent advocates to carry out the advocacy. While there are many professional consultancy companies that could carry out consumer advocacy, the concern is that many also carry out tasks for the supply side, implying a potential conflict of interest over the longer term. This means that</p>

		<p>end users need to have advocates that are not conflicted in this way¹. As consumer advocacy is less profitable than working for the supply side, there is a dearth of appropriately qualified consumer advocates compared to those who work for the supply side.</p> <p>Thirdly, consumer advocates need either firsthand experience of being an end user and of interfacing with the networks or of being able to readily access that direct consumer experience. This does not come from surveys but by direct involvement in understanding how consumers actually use their energy, how they can respond to network activities and what real issues consumers actually face.</p>
6	What are the priority energy issues on which consumer engagement is required across the sector?	<p>Consumers want to be able to “turn the lights on” and not have to worry about the issues that lead to them being able to do that – consumers have their own issues to address and expect that networks will provide the necessary service without consumers having to be actively involved. Equally, consumers expect that the price they pay for the service provided is at the lowest possible cost.</p> <p>The priority issues for consumers are price, reliability and quality of the service provided, as well as the cost for a connection and when that connection will be made.</p> <p>Consumer advocates need to know what the driving issues faced by end users are and then they have to convert these usually high level conceptual issues into details which can then be applied to the regulatory reset and the processes involved.</p>
7	Is the key issue the amount of resources or the quality of resources for providing effective consumer	<p>It is both – the quality and the quantity of advocates are both in short supply for appropriate and sufficient consumer advocacy</p> <ul style="list-style-type: none"> ○ The impact of CE is difficult to assess. The main driver of the impact is the

¹ The AER for its Consumer Challenge Panel has faced this problem in the past and does not now allow advocates on the CCP to be active for supply side entities

	<p>engagement?</p> <ul style="list-style-type: none"> ○ What are appropriate methods of measuring the impact of consumer engagement? ○ How can improvements to engagement be measured to ensure success? 	<p>quality of the responses made such that the AER or the network would make changes to its decisions. A numerical guide could include the</p> <ul style="list-style-type: none">) numbers of responses from consumers,) amount of reference the AER or network makes in its decisions to the CE involvement) numbers of different issues raised <ul style="list-style-type: none"> ○ As well as assessing any numerical outcomes, a qualitative assessment by the AER could be undertaken, with any shortcomings passed onto the CE provider so that improvements can be made. The Consumer Advocacy Panel introduced such a qualitative assessment of CE responses ○ CE can be improved by ensuring the consumer advocates are qualified and experienced in the various aspects that comprise the needed activities. It is maintained by providing adequate funding to train new advocates to be able to continue the existing approach.
<p>8</p>	<p>Is it feasible to build/maintain the complex technical knowledge required for effective participation in the revenue/access arrangement processes within consumer group staffing, or is it likely to be more cost-effective and more practical to outsource this expertise as required?</p>	<p>If funding provided is adequate, this provides a career path for new consumer advocates and an incentive for existing advocates to provide the necessary training to continue effective participation. There are already a number of competent consumer advocates involved in network regulatory processes but these effectively “learned on the job” from other advocates. Existing advocates have already demonstrated a willingness to be involved with training new advocates, so that new advocates have the needed breadth of knowledge and competence to continue the task but there needs to be an ability to provide the funding for these new advocates to be able to learn and develop the skills. Outsourcing requires the primary provider of the CE to have the necessary competence and experience to properly assess and review the work outsourced; this can only be done if the primary provider already has the necessary competence as an advocate. However, outsourcing the work results in a transfer of</p>

		<p>knowledge away from the primary provider, potentially leading to a loss of knowledge and competence over the longer term.</p> <p>Outsourcing also raises the potential for conflicts of interest both in the short term and over the longer term if the outsourced provider later seeks to work with the supply side.</p> <p>.</p>
9	What support does the AER currently provide to assist consumer participation in regulatory processes?	<p>The AER does provide some guidance to consumers on the areas that the AER considers important through their Issues Papers and stakeholder forums and this, while helpful, does not provide clear identification of issues that consumers might consider important. Further, the structure of the forums initiated by the AER tends to limit CE to listening rather than actively providing input. For consumers to provide active input requires research ahead of the forum and this research is not funded by the AER.</p> <p>The proposed AER/ECA/ENA program for increased consumer involvement is a step forward, but it would appear from the initial draft of the proposed approach, that it relies on networks directly providing funds to consumers for incidental costs but little in the way of providing the full resourcing that active CE requires. As noted above, the MEU is concerned about capture of consumer advocates if networks directly provide funds for CE.</p>
10	How can the AER facilitate improved consumer engagement in regulatory processes?	<p>This can be achieved through a restructuring of the forums to stimulate and allow more consumer interaction. The main problem still remains that consumers are not sufficiently resourced to take advantage of such a change.</p>
11	How can the AER help build consumers' knowledge skills and capacity to better participate in regulatory processes?	<p>The AER has attempted this in some resets where it established forums where consumer advocates can interact with each other and with the AER, but this is not universally applied for all resets. The difficulty experienced in these forums has been that consumer advocates had been under resourced and therefore not able</p>

		<p>to take full advantage of the process.</p> <p>The MEU acknowledges the valuable support provided by the CCP representatives funded by the AER for specific network resets but as noted above, the CCP is to advise the AER (not consumers) and while the CCP members do provide useful guidance to advocates, this is not their primary function.</p> <p>The MEU notes that the AER is proposing to provide training and information to enable better consumer involvement in its Rate of Return guideline development. Yet again, the value of this support from the AER is impacted by the limited resourcing and the time commitment that consumer advocates can devote to the process without external funding from some other source.</p>
12	Is the key issue the amount of resources or the quality of resources for providing effective consumer engagement?	It is both. See earlier comments
13	How successful has the AER's CCP been in contributing to improved outcomes for consumers?	<p>The CCP process has helped, but it must be recognised that the CCP is to advise the AER, not necessarily consumer advocates. The CCP has attempted to engage with consumer advocates but again the limited resourcing of advocates has limited the value of interaction between consumers and the CCP.</p> <p>There are instances where networks, consumer advocates, the AER and its CCP have attended meetings where specific aspects of a reset are discussed. This has been very beneficial and should be more widely implemented. The limitation of the process is that consumer advocates are not sufficiently resourced to be able to devote the time necessary to maximise the value of such interactions.</p>
14	What have been the advantages and disadvantages of the CCP process?	The impact of the CCP has been positive, but with little resourcing for advocates, there has been an increasing reliance on the CCP by consumer advocates to provide the necessary input to the AER processes rather than from direct

		<p>consumer advocacy. Consumer advocates recognise the value of advice and better understanding of issues provided by CCP members</p>
15	<p>What support do network businesses currently provide to assist consumer participation in revenue determination and access arrangement processes?</p>	<p>Some networks are good at providing assistance to consumer advocates in identifying and understanding the issues but others less so. This is mainly done through groups such as “consumer advisory panels” established by the networks as part of their CE processes.</p> <p>Of concern, is that such meetings of consumer advisory panels are controlled by the network, which sets the agenda of meetings and the flow of information. To overcome this control of the process, consumer advocates need to be better resourced so they can identify the workings of such groups and what agenda items need to be rather than determined by the network. The MEU notes that the draft approach developed by AER/ECA/ENA attempts to address some of this bias through appointment of an separate chair, but this chair is funded by the network, again leading to perceptions of a conflict of interest.</p> <p>The main difficulty networks have is that consumer advocates are under-resourced and so have limited ability to devote time to considerable input needed for network driven CE.</p> <p>However, if networks directly fund consumer engagement then this implies a conflict of interest with the networks potentially being seen to be “buying” consumer support.</p> <p>To overcome this potential conflict of interest, consumer advocacy needs to be funded independently of networks.</p>
16	<p>How can network businesses facilitate improved consumer engagement in revenue</p>	<p>Networks are already examining and implementing various approaches to develop improved CE and this should be encouraged. Those approaches which are seen to be successful should be shared amongst networks and this is happening to some</p>

	<p>determinations and access arrangement decisions processes?</p>	<p>extent through the AER and CCP processes. However, the risk of network driven CE is that the networks drive the discussions and issues rather than consumers. Further, the current approach taken the AER is that a poor performance by a network in its CE is not penalised nor a good performance rewarded. Until there is some form of adjustment in a reset that is clearly a result of good or poor CE, the process has no “teeth”.</p>
<p>17</p>	<p>How can network businesses help build consumers’ knowledge skills and capacity to better participate in revenue determination and access arrangement processes?</p>	<p>Networks are trying to do this through their consumer advisory panels as it is recognised that energy network operations and their regulation are complex issues, and can’t be learned quickly. This is one of the main reasons for the AER and CCP pushing networks to make CE a continuing process and not just related to resets. However, the main drawback for consumer advocates devoting the requisite time to these CE processes is the under-resourcing of consumer advocates, preventing them from being able to devote sufficient time to learn about the core aspects and then to be able to disseminate the information and understanding to others, including training of new advocates.</p>
<p>18</p>	<p>How can networks demonstrate that consumer engagement they undertake is incorporated into the regulatory determination and access arrangement decision processes?</p>	<p>The networks are already trying to do this and the AER and CCP carry out some assessment as to its effectiveness. However, it has been seen that network driven CE can result in a “push” strategy where their CE is biased to deliver support for the aspects sought by the networks. This means that consumer advocates have to be sufficiently independent and experienced to be able to see if and when this is occurring. The AER and CCP has identified instances where this has occurred, but it is best prevented by ensuring that consumer advocates have sufficient resourcing for their CE to be able to carry out their own work independently of network driven CE, and to drive the discussion</p>

		agenda to issues of concern to consumers rather than issues of concern to networks
19	Under the existing framework, are there sufficient incentives for network businesses to invest in consumer engagement?	CE is still in its formative stages so the AER, while providing impetus for improved CE is not yet providing any benefit/detriment to networks based on the performance of their CE. Despite this, some networks have delivered much better CE than others.
20	What support can other stakeholders provide to consumer groups to build capacity in energy market issues?	<p>Over the years, retailers have shown little appetite to provide strong advocacy on behalf of consumers, even though there is a view that their interests and those of consumers overlap. In reality, retailers have little to gain from devoting resources to address consumer costs that are regulated or are a pass through such as conditions of use.</p> <p>The MEU has been involved with terms and conditions for reference services in gas AAs and the involvement of retailers, even though they are better aware of the impacts of the terms and conditions, rarely get involved to any extent, knowing that the same conditions will apply to their competitors².</p> <p>Retailers seek to differentiate themselves from other retailers but see that any benefit they might generate for consumers in regulated costs, is immediately available to their competitors and so retailers focus on where they can generate benefits for their customers which differentiates their services from their competitors and where the benefit is unique to them.</p> <p>Involvement in forums by other market bodies (eg governments, AEMC and AEMO) requires a time commitment that in most cases is not funded. While consumer advocates do get involved in these processes and those involved do gain a better understanding of issues, these forums either</p>

² The MEU has actively worked with networks and retailers on some issues but these relate more to the rules of the markets rather than specific network resets

		<ul style="list-style-type: none"> ○ tend to address much wider issues than network resets, or ○ address a specific issue of interest to the market body
<p>21</p>	<p>How can other stakeholders help build consumers’ knowledge, skills and capacity to participate more effectively in revenue determination and access arrangement processes?</p>	<p>Support to consumers that is provided by supply side stakeholders (generators, gas producers and retailers) has most commonly been delivered at a personal level rather than as a coordinated support mechanism for consumers. There is little incentive for supply side stakeholders to engage with consumers except when required by the market rules to do so (eg consumer engagement for network resets) or when the supply side sees that active consumer support will help achieve its goals.</p> <p>The MEU points out that it was the lack of appropriate CE by networks that led to the stipulation in the rules that they were to carry out this “new” function. While some networks did have some CE, this was not a common occurrence.</p> <p>The most common form of stakeholder support is between advocates for the different consumer classes tending to work more together and this is where most of the transfer of knowledge occurs but even this still tends to be at a personal level.</p> <p>The ECA has implemented a number of forums where advocates for different consumer classes do get together and share ideas and approaches and this should be encouraged.</p> <p>It should be noted that involvement in such forums requires resourcing so that consumer advocates can become aware of the issues and get actively involved.</p>

