

2019 Independent Accountability Panel Recommendations

The Panel's recommendations are drawn from the body of the Report, developed against:

- **Six Key Themes** identified by the Panel (which apply across a number of different Principles); and
- **Five Principles** of the Energy Charter.

Recommendations focus on what Signatories can do to better meet the Principles – whereas in [Appendix 5](#) the Panel offers some suggestions on form (how Signatories might more effectively structure and present their Disclosures in future).

Recommendations are not offered in any particular priority. The Panel notes that applicability of recommendations will differ among Signatories.

TABLE 1 – Consolidated Recommendations

Key Theme 1 – Know your Customers and Communities	
1	Develop an analysis of Signatory customers and directly-impacted communities, appropriate for the purposes of the Energy Charter.
2	Develop a breakdown of both small and enterprise customers into meaningful groups with respect to needs and preferences, especially in the different aspects of vulnerability.
3	Engage appropriately with, and measure outcomes for, the specific customer groups as evidence to demonstrate improvements against those customer groups' specific needs. This includes customer groups who may not engage as easily via digital means and/or inbound calls.
4	Research the characteristics of customers who may be least likely to complain (yet sometimes face the greatest hardship) and use the results to predict, engage and collaborate to improve outcomes for them.
5	Prioritise community and stakeholder partnerships and corporate / staff giving programmes which are clearly linked to engaging staff with customer needs, and/or improving energy customer outcomes.
Key Theme 2 – Go Above and Beyond Compliance	
6	Demonstrate how Signatory behavior and proactive initiatives – above and beyond compliance with energy law, rules and regulation – improve customer outcomes.
Key Theme 3 – Leverage High-Impact Points for Change Together	
7	Work together to develop a shared framework for high-impact leverage points in the energy system, by identifying methods of collective action which deliver greater and / or more rapid improvements in customer outcomes than Signatories can achieve acting on their businesses alone.
8	Apply the framework to high-impact leverage points which may include (1) joint advocacy for improved customer outcomes (2) tariff codesign and rollout (3) pooling of customer contact details for the purposes of improved customer experience, especially in the case of outages and operational impacts (4) better identification and support of customers facing vulnerabilities and (5) broader access to the benefits of distributed energy resources, addressing the challenges arising from the barriers to adoptions faced by many customers.

9	Initiate a broad conversation with customers and their representatives about addressing capacity to pay as a key aspect of affordability, and explore an 'affordability mindset' in energy pricing (prior to any design discussions and engagement with regulatory processes about implementation).
	Key Theme 4 – Develop Metrics and Report on Progress
10	Develop a clear understanding about the characteristics of appropriate metrics for measuring progress under the Energy Charter, for each Signatory individually.
11	Collectively agree an appropriate priority group of high-quality metrics which can meet the challenge of comparability across many Signatories, and allow future benchmarking – harmonising with existing regulatory reporting where possible and appropriate.
	Key Theme 5 – Close the Loop on Initiatives
12	Ensure the focus begins and ends with the customer or impacted community in relation to new products and services, investments, operations, and interactions – this includes first engaging to determine needs and preferences, then closing the loop back by confirming those needs and preferences have been met.
	Key Theme 6 – Elevate and Optimise Dispute Resolution
13	Ensure customer feedback and complaints are elevated to a governance and strategic level in the Signatory business, using the feedback as a key source of systemic improvements to customer outcomes.
14	Consider the suggestions provided to Signatories by the Ombudsmen to ensure customer feedback, internal and external dispute resolution processes are best practice.
15	Develop appropriate industry-wide dispute-resolution processes for enterprise customers of any size to satisfy Principle Four , acknowledging the multiple participants in the value chain and the lack of access to an Ombudsman service.
	Principle One – Put customers at the centre of our business and the energy system
16	Consider the voice and experience of the customer at the governance and strategic level of the Signatory business – including in relation to Board expertise and senior management advocacy.
17	Ensure Signatory staff and appropriate external stakeholders are broadly involved in the development of Energy Charter Disclosures.
18	Advocate to major shareholders to ensure mandates or other directions do not conflict with or restrict adherence to the Energy Charter – and seek to ensure such mandates are published and accessible.
19	Consider the quality of incentives - weighing up the benefits of alignment with customer outcomes through KPIs and at-risk elements of remuneration, against the risks of poorly-designed incentives leading to perverse outcomes for customers.
	Principle Two – Improve energy affordability for customers
20	Consider and seek to act upon all dimensions which contribute to the customer experience of affordability – not just the price of energy or the efficient costs of the system.

Principle Three – Provide energy safely, sustainably and reliably	
21	Develop a clear position on sustainability consistent with the cited GRI Sustainability Reporting Standards, supported by current metrics on emissions (perhaps based on NGRS) and future targets.
22	Broaden the evident focus in Disclosures on workplace health and safety to include safety and environmental impacts from Signatory assets and operations on host communities.
23	Ensure the impacts of transition on customers and communities – particularly communities which host Signatory assets which may close or change their operations – are included in actions under this Principle.
24	In addition to consulting with customers on the tradeoff between reliability and cost, ensure there is also a focus on improving the customer experience when reliability events occur.
Principle Four – Improve the customer experience	
25	Ensure there is equivalent attention to the needs of enterprise customers in relation to fair outcomes.
26	Provide evidence of empowerment of customers by streamlining access to, and portability of, customers' data.
Principle Five – Support customers facing vulnerable circumstances	
27	Work together across all parts of the energy supply chain to agree on the highest standards for managing energy debt in a manner consistent with the Energy Charter.
28	Determine and apply the best practice hardship standards to all customers, and advocate for harmonisation of regulation between jurisdictions at this level.
29	Develop strategies to optimise concession outcomes for customers, including advocacy on their behalf, consideration of shared incentives to reduce the volume of their energy usage, and systems and processes to ensure available concessions are provided to eligible customers.
30	Extend efforts on early identification, engagement and collaboration with customers at risk to a more proactive analysis and engagement, including analysis of data and outreach to those customers who may not self-identify or even contact their supplier when facing potential hardship.
31	Consider developing hardship programmes based on a mindset of supporting customers for success – both for the Signatory and the customer – in moving out of hardship.
32	Develop and partner in initiatives to structurally improve energy efficiency for customers facing vulnerabilities.