

Accredited Service Provider Scheme Review: Options Summary

This paper accompanies the Accredited Service Provider (ASP) Scheme Review Position Paper and has been designed to support stakeholder feedback. The Position Paper set out many options arising from stakeholder consultation to be considered for the future of the Scheme. This Options Summary pulls out the key summary points from the consultation (shaded boxes) and presents the options assessed as feasible. Options assessed as somewhat feasible and infeasible are contained in the Position Paper.

For each of the options included in this Options Paper, there is a brief description, a high-level assessment of the cost (\$, \$\$, \$\$\$), time (✦, ✦✦, ✦✦✦) and the extent of the dependencies—that is, the extent to which the action is dependent on other actions being completed first or alongside it to be able to be implemented—with low dependency options able to be implemented sooner than high dependency options (↔, ↔↔, ↔↔↔¹), and an indication of how important the issue is considered for the Review. The Position Paper includes more detail for each of the options.

There are two areas where we are seeking stakeholders' comments:

- The first is to express the relative importance for the issue, including whether you agree or disagree with the importance placed on the issue by the Review
- The second is in offering alternative options if your preferred option is not included. If you want to offer an alternative option, you will need to include a detailed justification with evidence as to why your proposed approach is better than those considered feasible.

Each section is numbered with the same number as in the Position Paper to enable easy referral between the two documents.

Review section 2. Customer service

2.2 Outcomes for consumers

- End consumers' input to the Review, although limited, indicates that the Scheme is likely achieving its outcome of improved services.
- Users and Scheme participants suggested potential improvements that would further benefit consumers, supporting the arguments for change that have been explored through this paper.

2.3 Improving Scheme administration

- Scheme administration no longer meets the expectations of participants nor contemporary customer service standards. This is the greatest concern of ASPs.
- Modernisation of administration could include an improved digital platform, greater efficiencies and increased communication with participants.
- Improved administration may also provide a trigger for DNSPs to review their authorisation processes with a view to decreasing demands on ASPs and registered employees.
- Investment in administration should deliver improved outcomes for businesses and consumers alike.

¹ In the Position Paper, dependencies are described in detail. Dependencies have been translated to symbols in this summary.

Options: Improving Scheme administration

Option	Involves	Review importance	Your importance
Update administration platform	Online portal to support self-service by ASPs. Cost: \$\$ Time: †† Dependencies: ⇔ to ⇔⇔	High	<i>Your rating (H/M/L)</i>
Sharing a unique identifier for registered employees to speed registrations	Allocating a unique identifier to every registered employee. This supports seamless registration to other ASPs. Cost: \$ Time: † Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
<i>Stakeholders to identify preferred option if not addressed.</i>	<i>Include your detailed justification along with relevant evidence.</i>		

2.4 Applicant and participant-focused education

- There is scope to improve the information provided to applicants and participants.
- Better information is likely to support improved turnaround times through reduced errors in applications.
- There are calls for the Department to provide more communication to the sector, particularly around best practice, emerging issues and, where relevant, incidents.

Options 2.4.1: Understanding of application processes and Scheme Rules

Option	Involves	Review importance	Your importance
Improve information provided for applicants	Redrafting the Scheme Rules so they are in plain English, and prepare a plain English guide to support applicants. Cost: \$ Time: † Dependencies: ⇔ to ⇔⇔	High	<i>Your rating (H/M/L)</i>

Option	Involves	Review importance	Your importance
Clearer application forms	Redesign the application process so it is clearer for applicants. Cost: \$ Time: † Dependencies: ⇔	Medium	<i>Your rating (H/M/L)</i>
Update Scheme website	Make the website more user friendly for Scheme stakeholders. Cost: \$ Time: † Dependencies: ⇔	Medium	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
<i>Stakeholders to identify preferred option if not addressed.</i>	<i>Include your detailed justification along with relevant evidence.</i>		

Options 2.4.2 Improved information sharing and education

Option	Involves	Review importance	Your importance
Newsletter	Introducing a new, regular newsletter to distribute to relevant participants, drawing attention to important issues, risks or changes. Cost: \$\$ Time: †† Dependencies: ⇔	Low	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
<i>Stakeholders to identify preferred option if not addressed.</i>	<i>Include your detailed justification along with relevant evidence.</i>		

Review section 3: Scope of the ASP Scheme

3.2 Continued need for the Scheme and Scheme administration

- There is strong support for the continuation of the Scheme and a clear belief that the Scheme is delivering against its objectives.
- There is also support for the continued administration of the Scheme within government. Those that raised the prospect of a different administrator typically highlighted the need for specific focus on the issues, greater responsiveness to change and improved customer service.

Options 3.2: Scheme administration

Option	Involves	Review importance	Your importance
Remain in DPIE	No change to the current administrative arrangements for the Scheme. Cost: None Time: None Dependencies: None	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

3.3 Scope of works being regulated by the Scheme

- There is strong support to allow additional work types, including “tiger tails”, relocations and vegetation management, particularly as there appears to be a direct benefit for consumers in having ASPs do this work.
- Changes to the scope of the Scheme may require amendment of the legislative definition of contestable works.
- Submissions consistently supported including classes of work in the ASP Scheme rather than relying on some other mechanism such as mutual agreement.
- The approach to defining and categorising work needs to consider how to optimise the efficiency of the Scheme, as each new class or category of work requires additional resources to assess applications and monitor compliance.

Options 3.3.1: Scope of the Scheme

Option	Involves	Review importance	Your importance
Maintain current scope	Scope of work remains 'connection services' under the legislation. Cost: \$ Time: † Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Broad definition change	Changing the legislation for the ASP Scheme from 'connection services' to 'any work paid for by a consumer or the proponent' in relation to connection to the network or to a DNSP. Cost: \$\$ Time: †† Dependencies: ⇔ ⇔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

Options 3.3.2: New types of work

Option	Involves	Review importance	Your importance
Review and add the most supported types of work	A quick technical review of the most supported types of work (tiger tails, asset relocations, transmission and sub-transmission, vegetation management and ASP L3 asset inspections) to do a final assessment of appropriateness and the accreditation requirements. Cost: \$\$ Time: †† Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

Options 3.3.3: Updating the classes

Option	Involves	Review importance	Your importance
Rationalise classes	Align classes with unique competencies, reducing the number of classes. Cost: \$\$ to update, \$ to maintain Time: ◆◆ Dependencies: ⇔ ⇔	Medium	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

Options 3.3.4: Scheme terminology

Option	Involves	Review importance	Your importance
Use descriptors as names in sequential order	Revise the naming of levels so they explain the type of work Cost: \$ Time: ◆ Dependencies: ⇔	Low	<i>Your rating (H/M/L)</i>
Update labels for grades	Adopt labels (Bronze, Silver, Gold) rather than letters and add a category for 'Provisional' for new entrants. Cost: \$ Time: ◆ Dependencies: ⇔	Low	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

3.4 Relationship between accredited organisations and registered employees

- The expectations of accredited companies² versus their registered employees creates a significant design complication that plays out in a range of ways, most notably through the requirement to register each employee with each of the companies with which they work.
- Determining organisational competence on the basis of its access to registered employees also creates a tenuous relationship between the ASP and the types of work for which it is considered competent.
- Clarifying this design feature would benefit all stakeholders in the system.

Options 3.4: Relationship between accredited organisations and registered employees

Option	Involves	Review importance	Your importance
ASP requires continued access to competent principals for each class of work	The ASP can only be accredited for classes of work for which it has an employee (possibly senior) who can act as the “designated principal” for each category of work. Cost: \$\$ upfront, \$ ongoing Time: ♦♦ upfront, ♦ ongoing Dependencies: ↔ ↔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

3.5 A focus on safety

- The vast majority of submissions identified that safety in the industry is improved through the ASP Scheme’s activity in systems assessment for accreditation. The Scheme works in conjunction with the activity of DNSPs to promote and report on safety.
- There is insufficient information to determine the extent to which safety remains an issue for the industry.
- Nevertheless, there is both a strong case and strong support for strengthening current requirements to address the specific expectations of work health and safety regulation.

² For simplicity, we have used the term companies to also encompass sole traders.

Options: Safety

Option	Involves	Review importance	Your importance
Annual self-assessments	Introducing a requirement for annual returns from ASPs including self-assessments of safety systems against a template established by the Scheme. Cost: \$ Time: † Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

3.6 Metering

- The separation of accreditation of metering providers from ASPs appears to have created a more fragmented, costly system that does not benefit industry or consumers.
- It was argued that this fragmentation and cost was likely to increase further with the accelerated rollout of smart metering, creating a compelling case for change.
- The separation of responsibility for metering installation, in the AEMO, and the ASP Scheme, in the NSW Government through DPIE, is likely to create some challenges for reform.
- The NSW Government will consider options to address this.

Review section 4: Regulatory framework

4.2 Educate

- The consultation raised issues with both the education of potential Scheme participants before seeking accreditation and with end consumers of Scheme-accredited services.
- There was broad support for improved information availability through the DPIE website, including improved metrics on the performance of individual ASPs, coupled with a broader campaign potentially involving social media, in-person or online information sessions and other forums to improve information for consumers on how to access contestable services.
- There is significant scope for improved information to potential applicants for accreditation on the website, which would in turn improve the completeness and speed of accreditation and registration.

Options 4.2.1: Consumer-focused education

Option	Involves	Review importance	Your importance
Searchable database	Improving current information to offer a searchable database that provided information on the following by ASP: Cost: \$ Time: † Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Plain English guide	A simple document outlining how the Scheme works, what's involved in designing and undertaking contestable works including the process, stakeholders and likely timeframes, and the Scheme's position in the broader electricity network. Cost: \$ Time: † Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
General awareness	Improved information on the website, short video/s, social media presence, information sessions offered by DPIE. Cost: \$\$ Time: † – †† Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

4.3 Enable—accredit, register

- Submissions and forums were generally keen to improve the requirements for accreditation and registration, with only three submissions suggesting that there was no need for change.
- Submissions proposed updates for training requirements and an expansion of the assessment of competence for accreditation.
- There were also suggestions about how to improve the currency of information for registered employees, accompanied by a reduction of duplication between registration and authorisation arising from improved information sharing.

Options 4.3.1: The accreditation process

Option	Involves	Review importance	Your importance
Assessment of competence: training	Updating the training requirements for recognition of competence, as current requirements are out of date. Cost: \$ Time: † Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Assessment of competence: other dimensions	Introduce new requirements to address gaps suggested by submissions. Cost: \$\$ Time: †† Dependencies: ⇔ to ⇔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

Options 4.3.2: The registration process

Option	Involves	Review importance	Your importance
Registration and authorisation information sharing	Introducing an improved database, that allows current and complete information on registered individuals to be provided to DNSPs, thereby reducing demands for information. Cost: \$\$\$ Time: †† Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>

Option	Involves	Review importance	Your importance
Currency of registration	Strengthening requirements for registered employees to maintain currency of information. Cost: \$ Time: †† Dependencies: ↔ to ↔ ↔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

4.4 Monitor—ongoing competence, who provides information, new audit process

- There was an overwhelming view presented that ensuring ongoing competency is a current Scheme weakness in practice, and that it should be strengthened.
- A key driver was a desire for the industry to be recognised for its skill and performance, which required identifying and removing poor performers.
- Improving monitoring requires identifying where data will come from and ensuring the data is sufficiently robust for regulatory response, which some argued drives a need for a new audit and inspection program.

Options 4.4.1: Ongoing competence

Option	Involves	Review importance	Your importance
Minimum work volume	A requirement for a pre-determined minimum level of work overall for company/ individual to maintain status. Cost: \$ Time: † Dependencies: ↔	High (partial solution but easiest and low cost)	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

Options 4.4.2: Collecting information

Option	Involves	Review importance	Your importance
Information sharing by DNSPs	Building on the existing information sharing provisions to calibrate the approach between different DNSPs with an aim to harmonise how work is assessed. Cost: \$\$ Time: ⬆️⬆️ Dependencies: ⇔ ⇔	High	<i>Your rating (H/M/L)</i>
Self-assessments	Introducing a requirement for annual returns from ASPs including data on performance, safety systems and competence. Cost: \$ Time: ⬆️ Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

4.5 Act—regrading, escalating responses, enforcement and appeals

- Continuing from section 0, compliance and enforcement activity responds to indications that ASPs or registered employees are not competent.
- These issues were raised in fewer submissions, but were the subject of intense discussion in some forums and a limited number of submissions. They are also fundamental to good regulatory practice.
- Grading—and regrading—is an important building block because it currently aligns with incentives like fees, and so a refresh is strongly supported.
- Enforcement activity through suspension and cancellation is already part of system design, but could be bolstered in practice.

Options 4.5.1: Grading

Option	Involves	Review importance	Your importance
Initial grading	Amending the current three-level system (ABC) to introduce a 'Provisional' category, to indicate a new entrant. Cost: \$ Time: ⬆️ Dependencies: ⇔	Medium	<i>Your rating (H/M/L)</i>

Option	Involves	Review importance	Your importance
Regrading/ downgrading in response to other issues	A reassessment may be triggered by significant performance material provided by DNSPs or arising from the targeted inspection/audit program proposed above. Cost: \$ Time: † Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

Options 4.5.2: Regulatory responses

Option	Involves	Review importance	Your importance
Regrading	Regrading is the first response in an escalating regulatory framework. Cost: \$ Time: †† Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Removal of ASP accreditation for specific classes or types of work	The Scheme regulator is permitted to limit the types of work the ASP can perform in response to demonstrated and significant breaches and non-compliances associated with specific classes. Cost: \$ Time: †† Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Suspensions	As per the current process, ASPs prepare material to demonstrate their improved performance, in line with new grading policies. Cost: \$\$ Time: †† Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>
Cancellations	In response to significant breaches or patterns of incidents ASPs would be de-accredited. Cost: \$\$ Time: †† Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>

Option	Involves	Review importance	Your importance
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

4.6 Influence

- The Department can contribute to a more robust regulatory environment by working through influence with key partners.
- Submissions highlighted a range of issues that are not within the scope of the Scheme, but which could be addressed through influence, including training offerings and the DNSP interface.
- The Department is well placed to build a more complete understanding of the operating environment, its pressures and emergent needs, which could lead to targeted offerings by others and improved coordination of regulation.

Options 4.6: Influence

Option	Involves	Review importance	Your importance
Liaison with other regulators	Regular engagement with Fair Trading and SafeWork to exchange information on system changes; establish exchange of information protocols regarding individual ASPs/registered employees to improve the regulatory environment. Cost: \$ for initial discussions, \$\$ for action Time: † Dependencies: None	High	<i>Your rating (H/M/L)</i>
Addressing market failure or thin markets	Identifying where the market is currently not adequate and taking action to boost participation. This might involve working with RTOs, NECA, or other government agencies to establish training pathways and ensure coverage. Cost: \$\$ Time: †† Dependencies: ⇔ to ⇔⇔	Low	<i>Your rating (H/M/L)</i>
Training	For qualifications, working with universities or further education institutes as well as industry bodies to promote access to relevant training.	Medium-Low	<i>Your rating (H/M/L)</i>

Option	Involves	Review importance	Your importance
	For ongoing training, gathering intelligence on emerging issues which would highlight additional training needs, and then working with industry bodies and RTOs to shape offerings. Cost: \$\$ Time: ★★ Dependencies: ⇔		
DNBP interface	Working closely with DNSPs to ensure the interface between accreditation and authorisation is as seamless as possible for participants. Cost: \$ Time: ★★ Dependencies: ⇔⇔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
<i>Stakeholders to identify preferred option if not addressed.</i>	<i>Include your detailed justification along with relevant evidence.</i>		

4.7 ASP Level 3s

- There was strong agreement that the approach to ASP L3s needed to be overhauled. The underlying concern was that there was not a sustainable pathway for new ASP L3s to enter and attain mastery in the industry.
- At minimum, an update to qualifications for entry is needed. There is strong support for more nuanced and tailored pathways indicating expertise and experience.
- There was also strong support for changes in the way competence is assessed once ASP L3s are undertaking projects.

Options 4.7.2: Pathways to grow the market and reflect expertise of ASP L3s

Option	Involves	Review importance	Your importance
Provisional status for ASP L3s	Recognising new entrants or less experienced designers as Provisional, coupled with a requirement that provisional designers work under fully qualified designers. Cost: \$ Time: ★ Dependencies: ⇔ to ⇔⇔	High	<i>Your rating (H/M/L)</i>

Option	Involves	Review importance	Your importance
Your alternative option	Justification		
<i>Stakeholders to identify preferred option if not addressed.</i>	<i>Include your detailed justification along with relevant evidence.</i>		

Options 4.7.3: Performance assessment and information gathering for ASP L3s

Option	Involves	Review importance	Your importance
Grading system for ASP L3s	Introducing a grading system of some kind to reflect competence. Cost: \$\$\$ Time: ◆◆-◆◆◆◆ Dependencies: ⇔ ⇔	Medium	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
<i>Stakeholders to identify preferred option if not addressed.</i>	<i>Include your detailed justification along with relevant evidence.</i>		

Review section 5: Ongoing governance of the regulatory framework

5.2: Regular review and update

- The submissions and the forums both expressed broad support for regular Scheme review.
- The proposals recommended that reviews consider the performance of the Scheme against its stated objectives, governance arrangements and the effectiveness of the Scheme's management.
- There was no agreement on the timeframe for review, although it will likely require tailoring for specific elements.

Options 5.2: regular review and update

Option	Involves	Review importance	Your importance
Formal, scheduled review of the overall Scheme	Considering the performance of the Scheme against its stated objectives and the changed operating environment and identifying changes required. Cost: \$ Time: ⬆️⬆️ Dependencies: ↔	High	<i>Your rating (H/M/L)</i>
Training requirements	A scheduled review once every year or every two years to adjust training expectations. Cost: \$ Time: ⬆️ Dependencies: ↔	High	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

5.3 Advisory arrangements

- The submissions and consultations recommended that a range of advisory arrangements be considered.
- However, proposals were split between ad hoc consultative forums and more structured governance arrangements and, in one case, reformed governance extending beyond the Scheme to the industry more broadly.
- There are benefits from both ad hoc and ongoing arrangements; ultimately a combination of the two may be of use.

Options 5.3: Advisory arrangements

Option	Involves	Review importance	Your importance
Ongoing advisory body	A formally established advisory body that meets periodically to provide advice on issues. Cost: \$\$ Time: ⬆️⬆️ Dependencies: ⇔ ⇔	High	<i>Your rating (H/M/L)</i>
Ad hoc consultative forums	Convening industry representatives and experts on an individual issue basis. Cost: \$ Time: ⬆️ Dependencies: ⇔	High to address the issue	<i>Your rating (H/M/L)</i>
Your alternative option	Justification		
Stakeholders to identify preferred option if not addressed.	<i>Include your detailed justification along with relevant evidence.</i>		

5.4 Fees

- There was a diversity of views about the best approach to funding Scheme enhancements, with broadly equal support for: assessing costs and setting fees accordingly; DNSPs making a contribution; and funding by the NSW Government of the enhancements required.
- Any increase in fees must be linked to immediate improvements in Scheme administration.
- At minimum, fees should be reviewed and updated annually, against an agreed benchmark.

Options 5.4: Fees

Option	Involves	Review importance	Your importance
Fees cover costs	Assessing the costs required for full operation of the Scheme and setting the fees accordingly. Cost: \$ Time: ⬆️ Dependencies: ⇔	High	<i>Your rating (H/M/L)</i>

Option	Involves	Review importance	Your importance
Your alternative option	Justification		
<i>Stakeholders to identify preferred option if not addressed.</i>	<i>Include your detailed justification along with relevant evidence.</i>		