

### Valley Clean Energy Board Meeting

Thursday, July 11, 2019 at 5:30 p.m.
City of Woodland Council Chambers, Woodland, CA

# PG&E / Valley Clean Energy Authority CCA Time-of-Use Rate Transition

July 2019





#### **Residential TOU Transition Origination**

#### Why TOU Transition?

In an effort to make rates more understandable to customers, more costbased and to encourage customers to shift usage to times of day that support a cleaner more reliable grid, the CPUC directed Pacific Gas & Electric Company, Southern California Edison & San Diego Gas & Electric to begin Residential Rate Reform.

- Simplifying the rate structure
- Utilization of energy efficiency technologies & promoting conservation
- More Accurate Cost Allocation

Source: CPUC RRR TOU Decision 17-12-023:



#### State Campaign - Keep it Golden

- "A statewide campaign that will be high-level, emotion-based, and provide Californians with the context for the changing rate structure and a vision to rally around."
- Provides a neutral explanation of TOU



Source: CPUC RRR TOU Decision 17-12-023:



#### **Time-of-Use Transition Phase I**

#### **Background:**

- In April 2018, PG&E transitioned ~114k customers to the new TOU Rate (Everyday, 4-9pm)
- Customers received a combination of 90, 60 and 30 Day communications
- 3 CCAs participated: MCE, Sonoma Clean Power & Silicon Valley Clean Energy

#### **Highlights:**

- Customer retention has been high through 11 months (over 99,746 customers remain on rate)
- Based on qualitative and quantitative studies, customer awareness has been high (68% aware they were part of a transition)

- Self-serve rate change selection was high (60% on-line/web)
- Preliminary Load Impacts show an overall reduction of 4.2% of total peak load per customer per hour

CCA & bundled customer overall performance was similar



#### Residential TOU Transition Phase 1 (Pilot) Overview

**EVERY DAY** 

MORNING TO MID-DAY: LOWER PRICE (OFF-PEAK)

5 a.m. to 4 p.m. (\$)

LATE AFTERNOON TO EVENING: HIGHER PRICE (PEAK)

4 p.m. to 9 p.m. 💲

LATE NIGHT: LOWER PRICE (OFF-PEAK)

9 p.m. to 5 a.m. (\$)

| Summer                      | T&D Only                         | Generation<br>Only | Total                  |
|-----------------------------|----------------------------------|--------------------|------------------------|
| Peak (4-9pm Every Day)      | \$0.20425                        | \$0.17059          | \$0.37484              |
| Off-Peak (9pm-4pm Every Day | \$0.20425                        | \$0.10715          | \$0.31140              |
|                             |                                  |                    |                        |
| Winter                      | T&D Only                         | Generation Only    | Total                  |
| Peak (4-9pm Every Day)      | <b>T&amp;D Only</b><br>\$0.17362 |                    | <b>Total</b> \$0.28775 |

Baseline Credit: [\$0.08001] Applied to Baseline Usage Only

<sup>\*</sup>PG&E bundled pricing ETOU-C – effective 3/1/19

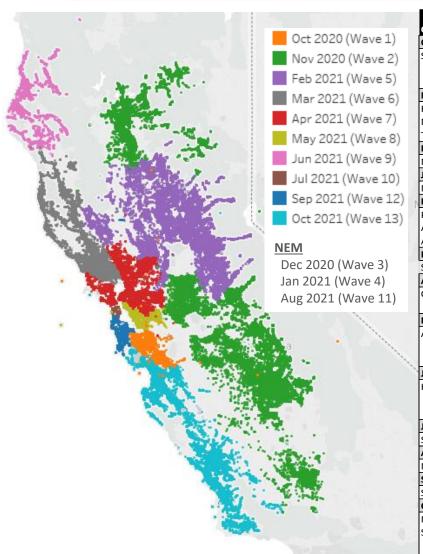


#### **Residential TOU Full Transition Overview**

- Beginning in October 2020, PG&E will begin transitioning all eligible E1 Tiered rate plan customers to "Time-of-Use Peak Pricing 4pm-9pm Every Day" (ETOU-C) rate plan.
- ETOU-C rate plan will become the default rate plan in October 2020.
- Customers will have the **ability to elect** to remain on their current rate plan or choose another rate plan.
- Up to 12 months of bill protection will be provided to all PG&E charges for transitioned customers.
- Customers will be provided with a **minimum of 2 notifications prior to the transition** including: information on the New Time-of-Use rate plan, how to remain on their current rate and bill protection.



#### **TOU Full Rollout Plan (13 Waves)**

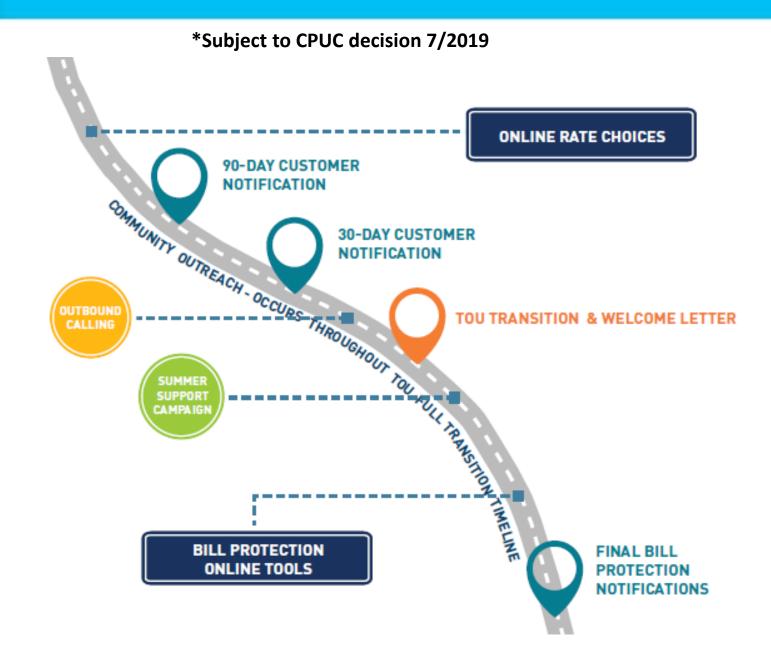


|  | Service Provider Territory            |                       |
|--|---------------------------------------|-----------------------|
| Counties   | Included                              | Totals                |
| Oct 2020 (Wave 1)  | G , GI E (GIGE)                       | 390,000               |
| Santa Clara  | San Jose Clean Energy (SJCE)          | 230,000               |
|  | Silicon Valley Clean Energy (SVCE)    | 170,000               |
| Nov 2020 (Wave 2)  |                                       | 200,000               |
| Fresno, San Joaquin, Kern, Tuolumne, Shasta, Madera,     | PG&E Bundled                          | 200,000               |
| Merced, Tehama, Plumas, Stanislaus, Mariposa, Kings,     |                                       |                       |
| Tulare, Lassen   |                                       |                       |
| Dec 2020 (Wave 3)  |                                       | 10,000                |
| NEM Only   |                                       | ~10,000               |
| Jan 2021 (Wave 4)  |                                       | 10,000                |
| NEM Only   |                                       | ~10,000               |
| Feb 2021 (Wave 5)  |                                       | 180,000               |
| Placer, El Dorado, Yolo, Butte, Nevada, Calaveras, Lake, | PG&E Bundled                          | 120,000               |
| Amador, Sutter, Yuba, Glenn, Colusa, Sacramento, Sierra, | Pioneer Community Energy (PIO)        | 40,000                |
| Alpine   | Valley Clean Energy (VCE)             | 20,000                |
| Mar 2021 (Wave 6)  |                                       | 140,000               |
| Sonoma, Mendocino  | Sonoma Clean Power                    | 140,000               |
| Apr 2021 (Wave 7)  |                                       | 410,000               |
| Contra Costa, Solano, Marin, Napa                        | MCE                                   | 310,000               |
|  | PG&E Bundled                          | 100,000               |
| May 2021 (Wave 8)  |                                       | 400,000               |
| Alameda  | East Bay Community Energy             | 370,000               |
|  | (EBCE)                                |                       |
|  | PG&E Bundled                          | 30,000                |
| Jun 2021 (Wave 9)  |                                       | 40,000                |
| Humboldt, Trinity, Siskiyou                              | Redwood Coast Energy Authority (RCEA) | 40,000                |
|  | PG&E Bundled                          | 850                   |
| In 2021 (Mayo 10)  | PG&E Bulluleu                         | 260,000               |
| Jul 2021 (Wave 10) San Francisco                         | CleanPowerSF (CPSF)                   | - 1                   |
|  | CleanFowersF (CPSF)                   | 260,000               |
| Aug 2021 (Wave 11)                                       |                                       | <b>10,000</b> ~10,000 |
| NEM Only Sept 2021 (Wave 12)                             |                                       | 200,000               |
| San Mateo  | Peninsula Clean Energy (PCE)          | 200,000               |
| Oct 2021 (Wave 13)                                       | reministra clean Energy (FCE)         | 260,000               |
| Monterey, Santa Cruz, San Luis Obispo, Santa Barbara,    | Monterey Bay Community Power          | 170,000               |
| San Benito   | (MBCP)                                | 170,000               |
|  | PG&E Bundled                          | 90,000                |
|  | King City Community Power             | 2,300                 |

Note: Customer counts are approximate and depend on final exclusion criteria. Also, assuming NEM customers transition on their true-up date, each wave would have an additional ~10K NEM customers. This table assumes all customers within each CCA territory are enrolled with the CCA service provider.



#### **Residential Transition Notifications Roadmap**





## Residential TOU Full Transition Overview – Generation only Bill Protection Analysis

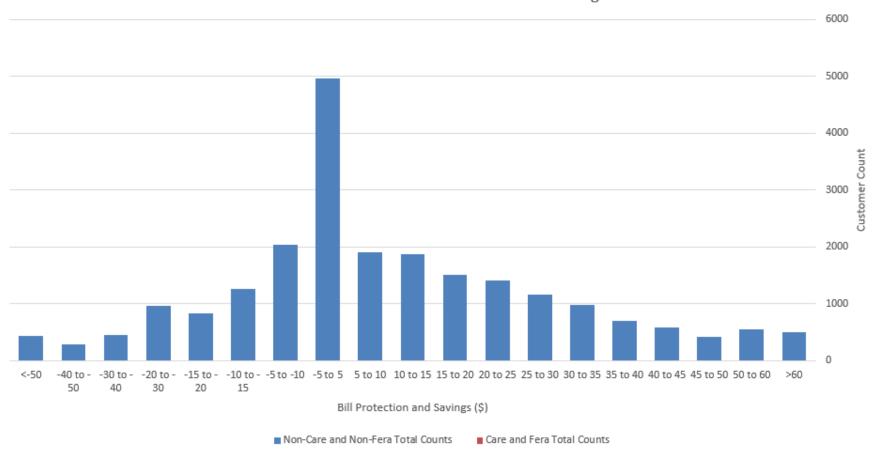
|  | TOU MORE expensive than Tiered Rate | TOU LESS expensive than Tiered Rate |
|--|-------------------------------------|-------------------------------------|
| Estimated Annual Generation Bill Difference (\$) | \$300,934                           | \$141,697                           |
| Number of Customers<br>Impacted                  | 13,784                              | 8,970                               |
| Annual Bill Impact/Customer                      | \$21.83                             | \$15.80                             |

<sup>\*</sup>Estimates are calculated with PG&E generation pricing



#### Residential TOU Full Transition Overview -**Generation only Bill Protection Analysis**





#### Overall:

- 39% neutral (8,896) less than +/- \$10 per year impact
- 42% non-benefiters (9,678) \$10 or more per year impact
- 19% benefiters (4,222) (\$10) or more per year impact



#### **Residential TOU Transition Cost Recovery**

#### **Traditional Approach:**

- TOU rates designed to be revenue-neutral
  - assume all customer remain on the rate
  - collect the same revenue as collected with tiered rates.
- Resulting revenue shortfall due to self-selection
  - some non-benefiters do not remain on the rate
  - can be tracked in a balancing account
- Rates can be "trued-up"
  - Adjust rate after first year to collect the first-year shortfall

#### **Alternative Approach:**

- Estimate revenue shortfall in advance & increase rates via rate adders
  - Estimating revenue shortfall is very uncertain
  - Rate adders may be set too high or too low requiring a subsequent "true-up"



## **TOU Residential Full Transition – Environmental Benefits**

#### Greenhouse Gases (GHG):

- Estimated savings of 5,000-10,000 tons of CO<sub>2</sub> per year across PG&E territory due to load shifting resulting from the new TOU rate plan
  - Range dependent on number of CCAs following
     PG&E 4pm-9pm peak period
  - Equivalent to removing about 1 2 thousand gas-powered cars from the road

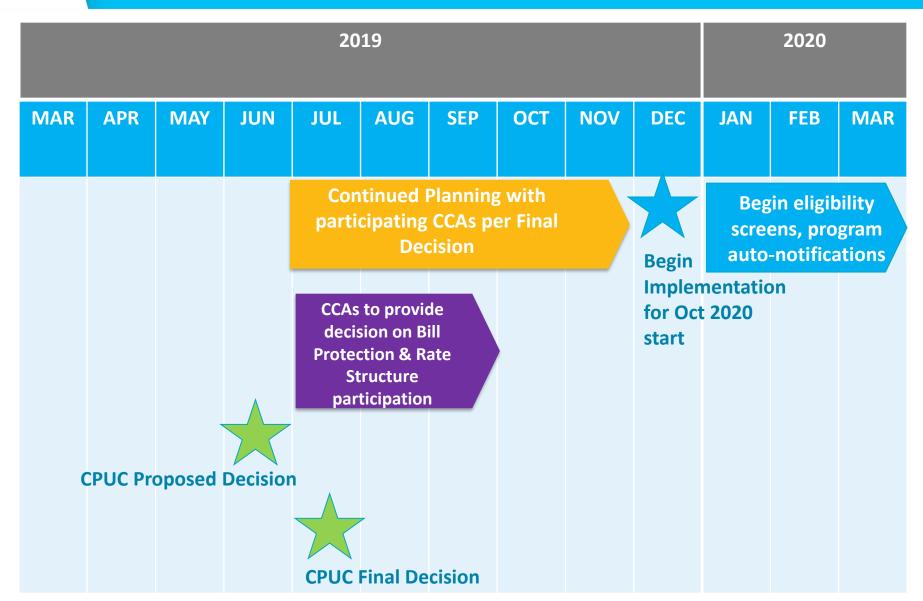


 Greater benefits expected with peak period conservation (versus load shifting) and/or a higher volume of renewables

GHG estimate based on calculations performed in 2018 according to the methodology agreed upon by the CPUC, PG&E, and the other CA IOUs. GHG equivalency based on https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator.



#### **CCA/PG&E Joint Planning Timeline**





#### **TOU Residential Full Transition – Why Participate?**

#### Support Statewide policy

- Align on policies for a cleaner, more reliable energy grid
- Contribute to greenhouse gas reductions

#### Enhance Customer Experience

- Streamlined and consistent experience for Valley Clean Energy Authority's and PG&E's mutual customers
- Reduced customer confusion
  - CPUC Proposed Decision instructs PG&E to transition tiered customers to the ETOU-C rate plan with a peak distribution component regardless of CCA participation





#### **State Campaign - Keep it Golden**



## **Appendix**

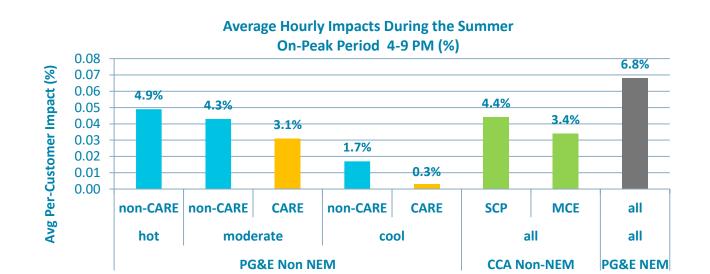




#### **TOU Transition Phase 1 (Pilot) Overview**

#### **Load Shifts & Conservation:**

- PG&E preliminary results: overall energy conservation and some load shifting
- Summer load reductions declined or remained the same
  - SCE & SDG&E showed comparable results
- Transitioned TOU rate customers averaged 0.046 kWh daily peak period reduction per customer per hour
  - 4.2% reduction total peak load per customer per hour
  - Impacts vary across climate zones, customer segments, day types
    - Hot climate customers have highest peak load reduction; 4.9%





#### Residential TOU Transition Phase 1 (Pilot) Targets

## CCA Transition customers responded well to the transition from start through post summer months



- Satisfaction with rate plan remains stable at **6.5**/10
- Continued high levels of awareness and understanding



- 53% of CCA customers say they are taking actions to shift or reduce usage
- Some slight differences in actions taken to shift/reduce – likely due to climate zones



#### Residential TOU Transition results are encouraging



#### **Overall**

- Awareness metrics increased from baseline
  - 84% aware of TOU rate plans .... Up from 60%
  - 59% aware on a TOU rate .... Up from 10%
- Customers exceeding awareness and understanding targets set by the CPUC
  - Aware of rate choices and TOU rates
  - Understand benefits of lowering/shifting electricity use
- 78% understand their bill is based on how much energy they use and when they use it
- PG&E's results are comparable or higher than other California IOUs



#### **Residential TOU Transition Phase 1 (Pilot) Targets**

#### Transition customers continue to exceed goal metric target levels

|     |   | Wave 2           | Baseline | Goal        |
|-----|---|------------------|----------|-------------|
| 1   | Rate plans are available that give you more control over your bill                | 46%              | -        | -           |
| 2   | Customers know where to go to get info about how to manage their electricity use  | 52%              | 52%      | 66%         |
| 3   | Customers understand how energy use can impact bills                              | <b>▲ 6.7</b>     | 5.1      | 6.5         |
| 4/5 | Customers understand the benefits of lowering/shifting their electricity use      | <b>6.9</b>       | 6.4      | 7.2         |
| 6   | Customers are aware that PG&E provides rebates, energy efficiency programs & tips | <b>70%</b>       | 64%      | <b>72</b> % |
| 7   | Customers feel that they were provided useful information explaining their bills  | <b>▲ 7.5</b> *   | 7.0      | 7.2         |
| 8   | Customers are aware of TOU rates  | <b>&amp; 81%</b> | 60%      | 68.8%       |
| 9   | Customers are aware of rate choices   | <b>▲ 52%</b>     | 35%      | 47.5%       |
| 10  | Customers have an optimal experience (satisfaction with products and services)    | 7.6              | 7.5      | 7.3         |

Significantly higher than baseline

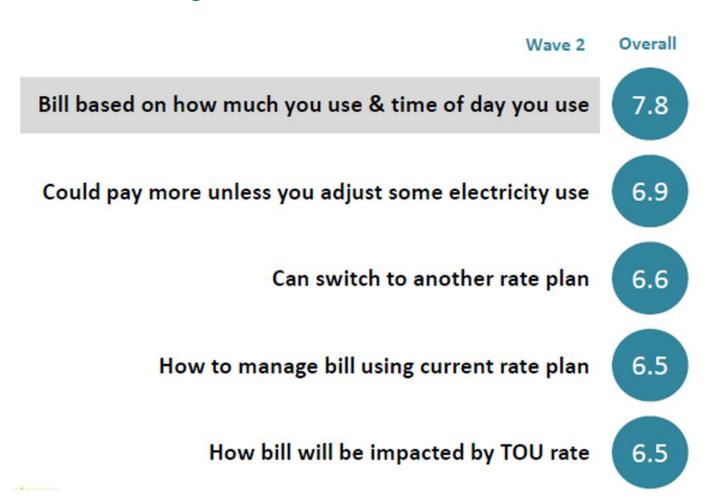
<sup>\*</sup> Wave 1, not asked in Wave 2



#### **Residential TOU Transition Phase 1 (Pilot) Targets**

Transition customers continue to have a good understanding of basic TOU rate details

Baseline average 4.7





#### Wave 1 CCA results showed significant uplift

|  | PG&E Bundle              | ed Customers  | CCA Cus                  | stomers                                    |
|--|--------------------------|---|--------------------------|--|
|  | Baseline<br>Nov/Dec 2017 | Post transition<br>Wave 1 – Track C<br>May/Jun 2018 | Baseline<br>Nov/Dec 2017 | Post transition<br>Wave 1<br>May /Jun 2018 |
| TOU PHASE I TRANSITION KEY MEASURES  |                          |   |                          |  |
| Customers are aware of TOU rates   | 60%                      | 86%   | 45%                      | 86%  |
| Customers are aware household is part of TOU transition                              | -                        | 66%   | -                        | 68%  |
| Customers are on aware they are on a TOU rate plan                                   | 10%                      | 59%   | 7%                       | 57%  |
| Customers are aware of rate choices  | 35%                      | 62%   | 21%                      | 58%  |
| Customers understand they could pay more unless they can adjust electricity use      | 4.8                      | 6.9   | 4.3                      | 7.0  |
| Customers understand higher priced peak hours  | -                        | 62%   | -                        | 71%  |
| Customers feel that they were provided useful information explaining impact to bills | 7.0                      | 7.1   | -                        | 7.7  |
| Customers have an optimal experience (satisfaction with PG&E products and services)  | 7.5                      | 7.6   | 7.4                      | 7.6  |



#### **Residential TOU Transition Phase 1 (Pilot) Targets**

## PG&E's results are comparable or higher than other California IOUs

|   |                                 | Wave 2 | PG&E   | SCE    | SDG&E  |
|---|---------------------------------|--------|--------|--------|--------|
|   | Aware household part of trans   | ition  | 62%    | 48%    | 59%    |
|   | Aware can decline transition (i | 64%    | 60%    | 69%    |        |
| h | Aware of TOU rates              |        | 81%    | 73%    | 81%    |
| ? | Aware of rate choices           |        | 52%    | 48%    | 52%    |
|   | Understanding of peak hour tin  | nes    | 62-76% | 41-61% | 60-72% |
| 1 | Awareness of Bill Protection*   |        | 22%    | 17%    | 23%    |
|   | Understanding of Bill Protectio | n      | 28%    | 17%    | 23%    |
| Ĭ | Have shifted or reduced electri | city   | 47%    | 40%    | 50%    |

\*SDG&E: 'No-risk pricing'

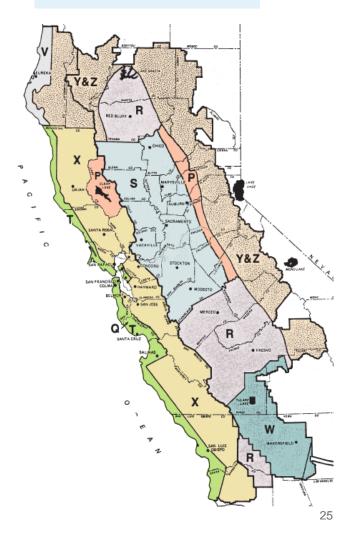


## Residential TOU Full Transition – Guiding Principles

- Geographic rollout by County
  - Hottest areas well in advance of summer
  - Enables targeted media/community outreach
  - Except NEM: transition in true-up month
- Transition during months customers do not experience their highest bills

| Month | ns Acce | ptable 1 | for Trar | sition | by Base | eline Te | rritory |   |      |   |  |  |
|-------|---------|----------|----------|--------|---------|----------|---------|---|------|---|--|--|
|       |         | Н        | ot       |        | IV      | 1odera   | te      |   | Cool |   |  |  |
|       | P       | S        | R        | W      | Q       | X        | Υ       | T | V    | Z |  |  |
| Oct   | Υ       | Υ        | Υ        | Υ      | Υ       | Υ        | Υ       | Υ | Υ    | Υ |  |  |
| Nov   | N       | Υ        | Υ        | Υ      | N       | N        | Υ       | Υ | Υ    | Υ |  |  |
| Dec   | N       | Υ        | Υ        | Υ      | N       | N        | Υ       | Υ | Υ    | Υ |  |  |
| Jan   | N       | Υ        | Υ        | Υ      | N       | N        | Υ       | Υ | Υ    | Υ |  |  |
| Feb   | Υ       | Υ        | Υ        | Υ      | Υ       | Υ        | Υ       | Υ | Υ    | Υ |  |  |
| Mar   | Υ       | Υ        | Υ        | Υ      | Υ       | Υ        | Υ       | Υ | Υ    | Υ |  |  |
| Apr   | Υ       | Υ        | Υ        | Υ      | N       | Υ        | Υ       | Υ | Υ    | Υ |  |  |
| May   | Υ       | N        | N        | N      | N       | Υ        | Υ       | Υ | Υ    | Υ |  |  |
| Jun   | N       | N        | N        | N      | N       | N        | Υ       | Υ | Υ    | Υ |  |  |
| Jul   | N       | N        | N        | N      | Υ       | N        | Υ       | Υ | Υ    | Υ |  |  |
| Aug   | N       | N        | N        | N      | Υ       | N        | Υ       | Υ | Υ    | Υ |  |  |
| Sep   | Υ       | N        | N        | N      | Υ       | Υ        | Υ       | Υ | Υ    | Υ |  |  |

#### Baseline Territories in PG&E Service Area



#### Item 15 - 2020 Integrated Resource Plan

- Activities are getting under way for the CPUC required 2020 Integrated Resource Plan.
- Filing is due May 1, 2020.
- Templates and data requirements are under development by CPUC staff.
- Informal feedback sessions between stakeholders and CPUC are taking place.



### 2020 Integrated Resource Plan

| Approximate timing | Activity  |
|--------------------|---|
| August 16, 2019    | 2018 Preferred System Plan LSE Progress Status Data Request Due   |
| Aug/Sep, 2019      | CPUC staff release proposed data and requirements for 2020 filing |
| September, 2019    | CPUC release of preliminary RESOLVE Reference System Portfolio    |
| October, 2019      | CPUC formal release of Reference System Plan                      |
| Oct/Nov, 2019      | VCE Board introduction/kick-off of VCE IRP Process                |
| December, 2019     | CAC and public meeting on IRP scope and scenarios covered         |
| December, 2019     | Proposed Decision Released on Reference System Plan               |
| December, 2019     | Final templates, tools, and filing instructions released          |
| February, 2020     | Commission Decision on Reference System Plan                      |
| February, 2020     | Draft IRP ready   |
| March, 2020        | VCE Board discussion and feedback on draft IRP                    |
| April, 2020        | VCE Board Adoption of IRP   |
| May 1, 2020        | CPUC IRP Filing Due   |

- 2019 Procurements are essentially complete.
- Procurements for 2020 are 64.4% complete.
- Resource adequacy procurement is underway for 2021 and 2022, as requirement by the CPUC.



2019 and 2020
 Power costs
 looking better
 than forecast last
 November

| 2019 Power Supply Cost   | Ta | Target Budget |    | Current Budget |    | Savings (Costs) |
|--------------------------|----|---------------|----|----------------|----|-----------------|
| Market Energy            | \$ | 29,079,467    | \$ | 27,642,841     | \$ | 1,436,626       |
| CAISO Variable Fees      | \$ | 126,983       | \$ | 123,723        | \$ | 3,260           |
| REC Costs                | \$ | 3,470,566     | \$ | 3,377,424      | \$ | 93,141          |
| Resource Adequacy Cost   | \$ | 7,432,636     | \$ | 7,844,033      | \$ | (411,397)       |
| CAISO GMC Cost           | \$ | 319,856       | \$ | 311,952        | \$ | 7,903           |
| Market Services Charge   | \$ | 67,777        | \$ | 66,037         | \$ | 1,740           |
| System Operations Charge | \$ | 240,078       | \$ | 233,915        | \$ | 6,163           |
| SCID Fee                 | \$ | 12,000        | \$ | 12,000         | \$ | -               |
| Carbon Free Premium      | \$ | 1,060,085     | \$ | 1,060,085      | \$ | -               |
| 2019 Total Power Cost    | \$ | 41,489,593    | \$ | 40,360,059     | \$ | 1,129,534       |

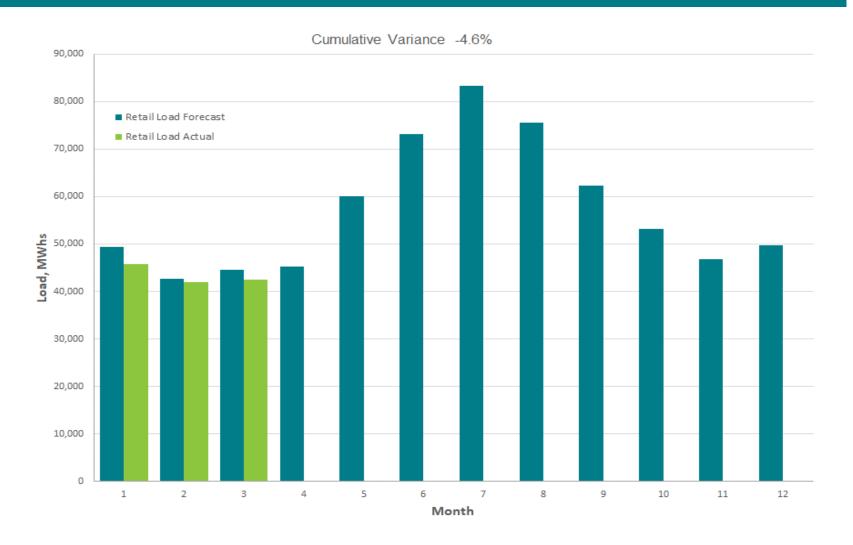
| 2020 Power Supply Cost   | Bas | eline Forecast | Cu | rrent Forecast | Net | Savings (Costs) |
|--------------------------|-----|----------------|----|----------------|-----|-----------------|
| Market Energy            | \$  | 32,952,900     | \$ | 31,167,768     | \$  | 1,785,132       |
| CAISO Variable Fees      | \$  | 133,891        | \$ | 133,350        | \$  | 541             |
| REC Costs                | \$  | 3,699,395      | \$ | 3,627,478      | \$  | 71,917          |
| Resource Adequacy Cost   | \$  | 7,505,146      | \$ | 8,501,052      | \$  | (995,906)       |
| CAISO GMC Cost           | \$  | 336,603        | \$ | 335,291        | \$  | 1,312           |
| Market Services Charge   | \$  | 71,465         | \$ | 71,176         | \$  | 289             |
| System Operations Charge | \$  | 253,138        | \$ | 252,115        | \$  | 1,023           |
| SCID Fee                 | \$  | 12,000         | \$ | 12,000         | \$  | -               |
| Carbon Free Premium      | \$  | 1,277,433      | \$ | 1,476,091      | \$  | (198,658)       |
| 2020 Total Power Cost    | \$  | 45,905,368     | \$ | 45,241,031     | \$  | 664,338         |



• 2021 is looking \$5M worse off.

| 2021 Power Supply Cost   | Bas | eline Forecast | Cı | urrent Forecast | Net | t Savings (Costs) |
|--------------------------|-----|----------------|----|-----------------|-----|-------------------|
| Market Energy            | \$  | 35,560,603     | \$ | 35,412,322      | \$  | 148,280           |
| CAISO Variable Fees      | \$  | 146,870        | \$ | 141,690         | \$  | 5,180             |
| REC Costs                | \$  | (1,571,224)    | \$ | 1,442,666       | \$  | (3,013,889)       |
| Resource Adequacy Cost   | \$  | 8,097,302      | \$ | 10,247,249      | \$  | (2,149,947)       |
| CAISO GMC Cost           | \$  | 368,069        | \$ | 355,511         | \$  | 12,558            |
| Market Services Charge   | \$  | 78,392         | \$ | 75,627          | \$  | 2,765             |
| System Operations Charge | \$  | 277,677        | \$ | 267,884         | \$  | 9,793             |
| SCID Fee                 | \$  | 12,000         | \$ | 12,000          | \$  | -                 |
| Carbon Free Premium      | \$  | 1,401,262      | \$ | 1,493,722       | \$  | (92,460)          |
| 2021 Total Power Cost    | \$  | 44,002,882     | \$ | 49,093,160      | \$  | (5,090,278)       |







## Item 17 – Biannual Enterprise Risk Management (ERM) Report Background

- In 2018, Board adopted an Enterprise Risk Management (ERM) framework
  - Provides transparency and insight into risks that impact VCE
- ERM strategic approach to risk management
- ERM:
  - 1. Regulates opportunities and risks
  - 2. Develop better understanding of opportunities and risks
  - 3. Actively manage risk exposure down to acceptable levels
  - 4. Assist in achieving business plan objectives and operational performance



#### Item 17 - Summary of 2018 activities

- Established EROC committee and monthly meetings
- Developed ERM framework and tools
- Conducted Risk Survey
- Developed VCE top risk portfolio



#### Item 17 - Risk Portfolio

- Developed VCE's Risk Portfolio
  - Determined key risks
  - Likelihood and velocity of the risks and potential impacts
  - VCE's ability to reduce or control the risk



### Item 17 - Risk Portfolio

| Risk                          | Description   | Current<br>Residual Risk | Target<br>Residual Risk |
|-------------------------------|---|--------------------------|-------------------------|
| PCIA                          | Risk that PCIA rate could increase as a result of CPUC decision   |                          |                         |
| Regulatory & policy risk      | Risk of additional regulatory requirements increasing complexity and cost of operations                                       |                          |                         |
| Rate structure                | Risk of rate design not following marginal costs (non-TOU PCIA, demand charges, varying generation rates)                     |                          |                         |
| Media & community             | Risk of unfavorable public communications   |                          |                         |
| Opt-out rate                  | Risk of higher than expected opt-out level  |                          |                         |
| Cyber security & data privacy | Risk of data breach as a result of a cyber breach or physical attack  |                          |                         |
| Commodity Procurement         | Risk of fluctuations associated with commodity prices   |                          |                         |
| Economy-business agility      | Risk that customers will be impacted by poor economy, lowering or flat revenue impacting VCE growth opportunities             |                          |                         |
| Capital availability/cashflow | Risk that VCE is unable to secure affordable financing  |                          |                         |
| Business model                | Ability to quickly identify and respond to business risks that have the potential to impact the ability to achieve VCE goals. |                          |                         |
| Financial Markets Volatility  | Swings in global financial markets and currencies may create significant challenges that VCE will have to address             |                          |                         |
| Changing customer expectation | Risk that customer's changing expectations as a result of innovation may result in reduced customer revenue and loyalty       |                          | Ŏ                       |



#### Item 17 - Risk Response Plan

- Top 5 VCE Risks from survey and assessments
  - VCE's Response
  - Current trend
  - VCE's plan
  - Trigger/Control
  - Owner



### Item 17 - Key Priorities for 2019

Maintaining operation risk management process

