



# Newstead Energy Project

## Complaint Investigation and Response Plan



## Document Control

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## Appendix A – Sample of Complaints Register

## 1. Background

Flow Power are constructing a 3MW solar farm with battery energy storage on Captains Gully Road, Newstead, Victoria (the Project). The Project has planning permission from the Minister for Planning (Planning Permit No. PA2000883-3.).

This Complaint Investigation and Response Plan (the Plan) has been prepared to address Condition 27 of the Planning Permit conditions. The Plan also outlines how Conditions 29 and 30 have been addressed which relate to complaints management. Table 1 lists these conditions and where they are addressed in the Plan.

This Plan covers complaints in relation to all aspects of the project including but not limited to it's construction, operation, decommissioning, and more broadly it's interaction with the energy industry and retail customers.

*Table 1 Permit Conditions*

<b>CONDITION</b>	<b>WHERE ADDRESSED</b>
<b>Complaints</b>	
27. Before development starts, excluding site preparation works, a Complaint Investigation and Response Plan must be submitted and approved and endorsed by the responsible authority.  When endorsed, the plan will form part of this permit.  The Complaint Investigation and Response Plan must:	This Plan
a) Respond to all aspects of the construction and operation of the solar energy facility.	Section 1
b) Be prepared in accordance with Australian/New/Zealand Standard AS/NZS 10002:2014 – Guidelines for complaint management in organisations.	Section 2
c) Include a process to investigate and resolve complaints (different processes may be required for different types of complaints)	Section 4
28. The endorsed Complaint Investigation and Response Plan must be implemented to the satisfaction of the responsible authority.	N/A
<b>Publishing information about complaints handling</b>	
29. Before development starts, the following information must be made publicly available and readily accessible from the solar energy facility project website, or another publicly available resource to the satisfaction of the responsible authority:	Section 4.1

CONDITION	WHERE ADDRESSED
<p>a) A copy of the endorsed Complaints Investigation and Response Plan.</p> <p>b) A toll-free telephone number and email contact for complaints and queries to the solar energy facility operator.</p>	
<p><b><i>Complaints Register</i></b></p>	
<p>30. Before development starts, a Complaints Register must be established which records:</p> <p>a) The complainant's name and address (if provided)</p> <p>b) A receipt number for each complaint, which must be communicated to the complainant</p> <p>c) The time and date of the incident, and the prevailing weather and operational conditions at the time of the incident</p> <p>d) A description of the complainant's concerns</p> <p>e) The process for investigating the complaint, and the outcome of the investigation, including the actions taken to resolve the complaint</p>	<p>Section 4.2.1</p>
<p>31. All complaints received must be recorded in the Complaints Register.</p>	<p>Section 4.2.1</p>
<p>32. A complete copy of the Complaints Register along with a reference map of complaint locations must be provided to the responsible authority on each anniversary of the date of this permit, and at other times on request.</p>	<p>Section 5.1</p>

## 2. Consistency with AS/NZS 10002:2014

This Plan has been prepared in accordance with the Australian/New Zealand Standard AS/NZS 10002:2014 – Guidelines for complaint management in organisations.

Table 2 outlines the sections of this Plan which align with AS/NZS 10002:2014 and the corresponding section of the Standard.

*Table 2 Consistency with AS/NZS 10002:2014*

<b>SECTION OF THIS PLAN</b>	<b>RELEVANT SECTIONS OF AS/NZS 10002:2014 WHICH THIS PLAN ALIGNS WITH</b>
Section 3 Guiding Principles	Section 5 Guiding Principles
Section 4.1 How Complaints Can Be Lodged	Section 8.1 Communication Appendix L Information to collect on a complaint Closing the complaint
Section 4.2.1 Recording of complaint in Complaints Register	Section 8.4 Receipt of complaint
Section 4.2.2 Acknowledgement of complaint	Section 8.6 Acknowledgement of complaint
Section 4.3.1 Initial assessment of the complaint	Section 8.7.1 Initial assessment of complaint
Section 4.3.2 Handling complaints assigned Level 1: Early Resolution Section 4.3.3 Handling complaints assigned Level 2: Internal Investigation, review and resolution Section 4.3.4 Handling complaints assigned Level 3: External investigation, review and resolution	Appendix H Three Level Model of Complaint Handling
Section 4.3.5 Communication with the complainant	Section 8.5 Tracking of complaint Section 8.7.4 Communicating with the complainant
Section 5.4 Escalation	Section 7.2 Review process
Section 4.5 Closing the complaint	Section 8.8 Closing the complaint



### 3. Guiding Principles

This Plan operates under the following guiding principles:

#### Enabling complaints

- Flow Power is focused on ensuring that complaints can be freely made with no detriment to the complainant.
- Our process is transparent, and no charges apply to make or have a complaint considered.
- We have a people-focused and proactive approach to seeking and receiving feedback and complaints, and a strong commitment to addressing any issues raised.

#### Managing complaints

- We will respond promptly to acknowledge receipt of any complaint made and give appropriate priority to complaints in accordance with the urgency of the issue raised.
- We will manage any complaints in a fair and impartial manner, ensuring that staff who handle and assess the complaint are suitably qualified.
- Where we determine that Flow Power is at fault, we will provide an apology and consider options for redress.
- Personally identifiable information about any individual will only be used in compliance with all relevant privacy laws.
- We will record all complaints in our Complaints Register, including details about the complaint, decisions made and any action taken to resolve the matter.

#### Continual improvement

- We will periodically review our complaint register as well as the operation of this Plan to identify trends and any opportunities to improve our business operations to reduce similar complaints occurring.
- We will also review the way in which we handle and assess complaints to identify opportunities for improvement.

### 4. Complaints Management Procedure

#### 4.1. How complaints can be lodged

Complaints and queries can be made by the following methods:

- **Email:** [ProjectsTeam@NewsteadEnergyProject.com.au](mailto:ProjectsTeam@NewsteadEnergyProject.com.au)
- **Toll-free phone number:** 1800 377 639
- **Mail:** PO Box 6074 Hawthorn, VIC 3122.

Information on how complaints can be lodged as well as a link to this Plan will be provided on the project website: [www.flowpower.com.au/newstead-energy-project/](http://www.flowpower.com.au/newstead-energy-project/) as shown in Figure 1.

The above contact details will also be included on any community notifications for the project, such as letters and newsletters.

No charges apply to make or have a complaint considered.

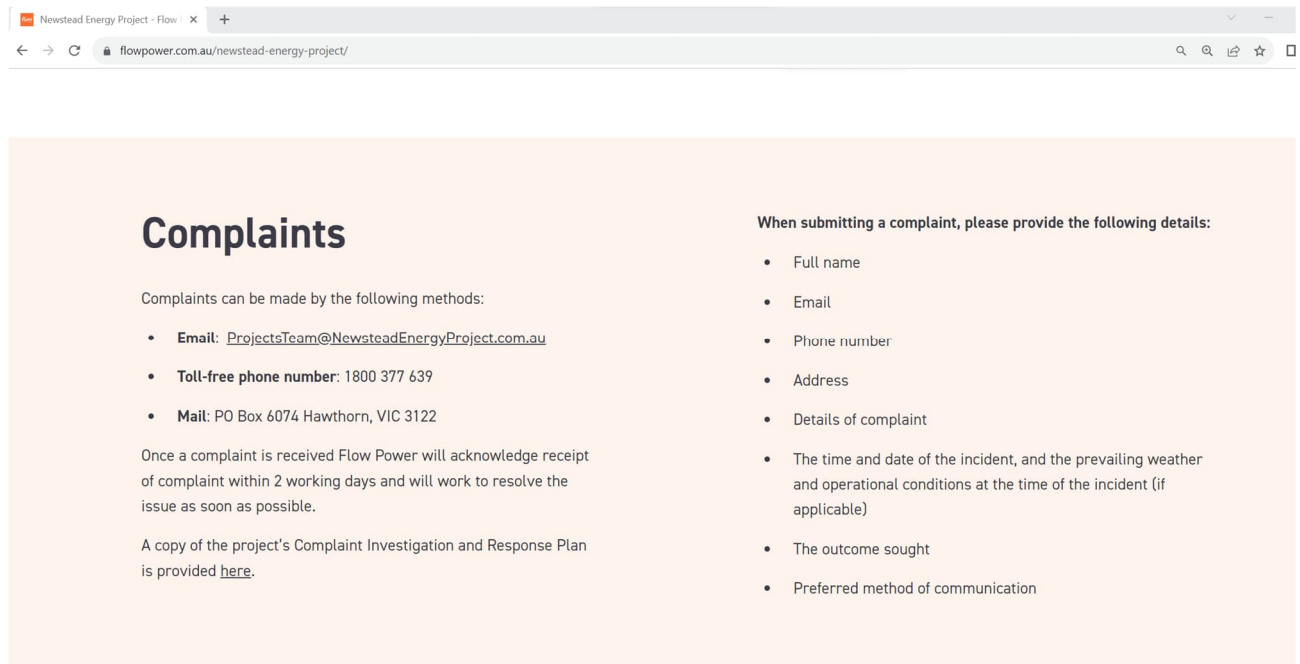


Figure 1 Project webpage containing information on how complaints can be lodged.

## 4.2. Receipt of complaint

### 4.2.1. Recording of complaint in Complaints Register

Once a complaint has been received, it shall be forwarded to the Project Manager who will record it in a Complaints Register. The Complaints Register is to record the following details:

- A Complaint Receipt Number for the complaint (a unique identifier to be assigned in the register).
- The time, date and method the complaint was made
- The complainant's provided contact details and preferred method of communication
- A description of the complainant's concerns
- The time and date of the incident, and the prevailing weather and operational conditions at the time of the incident (if applicable).
- The classification of the complaint as per Section 4.3 (Level 1, 2 or 3).
- The process for investigating the complaint and target timeframes.
- Person responsible for the complaint investigation and communication with complainant.
- The outcome of the investigation, including actions taken to resolve the complaint.
- Summary of communication with the complainant and method.

The Complaints Register will not be publicly available, and will be stored on Flow Power's document management system.

All complaints received must be recorded in the Complaints Register, even if they are resolved immediately.



The Project Manager will have the responsibility of coordinating the handling of the complaint and tracking it until it is closed.

#### 4.2.2. Acknowledgement of complaint

Within 2 working days of the complaint being made, the Project Manager shall provide the complainant with an acknowledgement of the complaint and provide the complainant with the Complaint Receipt Number which was assigned in the Complaints Register.

### 4.3. Complaint investigation and resolution

#### 4.3.1. Initial assessment of the complaint

Following receipt of the complaint, the Project Manager shall assess the complaint in terms of the following criteria:

- a) Severity
- b) Health and safety implications
- c) Complexity
- d) Adequacy of the information provided
- e) Impact on the individual, the general public, or Flow Power
- f) Potential to escalate
- g) Options available to address the concerns
- h) The need and possibility of immediate action
- i) Jurisdiction and statutory requirements
- j) The outcomes sought by the complainant
- k) Whether other organisations need to be involved.

Through consideration of the above criteria, the complaint should be assigned to one of the three below levels of complaint handling.

- Level 1: Early Resolution
- Level 2: Internal investigation and review
- Level 3: External investigation and review.

The procedure for handling complaints at each level is provided in the following sections.

#### 4.3.2. Handling complaints assigned Level 1: Early Resolution

Level 1 complaints are considered simple and quick to address. These should be resolved as quickly as possible, and no later than 5 working days from the complaint being made.

The response to the complainant shall be preferably given by the Project Manager, who acknowledged the complaint initially.

#### 4.3.3. Handling complaints assigned Level 2: Internal Investigation, review and resolution

Level 2 complaints are those which involve more significant issues that require further investigation and review by Flow Power staff, or complaints where the complainant is dissatisfied with the outcome of a Level 1 resolution.

Depending on the nature of complaint, the Project Manager may delegate the investigation to:

- another senior manager
- individual or multiple team members with relevant skills (e.g. environmental scientist, engineer etc.)
- a separate department of Flow Power
- a specialist subconsultant or subcontractor.

Investigation methods may include, but not be limited to:

- Discussions with onsite workers (e.g. construction, O&M staff)
- Review of relevant materials produced by onsite workers or remote monitoring systems (e.g. Site diary, Pre-start meeting forms, inspection reports, CCTV footage)
- Site inspections
- Site monitoring (e.g. noise measurements, dust monitoring etc).
- Discussions with other organisations (e.g. the Environment Protection Authority, local council, the Department of Planning and Transport).

An appropriate suitably qualified Flow Power staff member should engage in discussions with the complainant to see if some form of mutually acceptable resolution can be achieved.

Once a pathway for resolution has been identified, a more senior staff member shall review and sign off on the decision.

Level 2 complaints should target a resolution within 10 working days.

#### 4.3.4. Handling complaints assigned Level 3: External investigation, review and resolution

Level 3 complaints are very complex complaints, or complaints where the complainant is dissatisfied with the outcome of a Level 2 investigation and resolution.

Level 3 complaints shall be referred to an external complaint management mechanism. This could include:

- Resolution facilitated by an independent third parties such a mediator
- External investigation by an accountability body established by the government or industry
- External review via legal pathway (e.g. right of appeal to a tribunal or court).

External organisations may include:

- Industry or parliamentary ombudsman
- Professional oversight bodies
- Registration bodies
- Trades or industry bodies
- Anti-corruption commissions
- Independent industry regulatory voices and government regulatory bodies.
- Alternative dispute resolution organisations.
- Civil and administrative tribunals.

The timeframe for resolving Level 3 complaints will depend on the management mechanism. Typically timeframes would range from weeks to months.

#### 4.3.5. Communication with the complainant

During the complaint investigation and resolution process Flow Power shall regularly communicate its progress to the complainant, and provide estimated timeframes for resolution. An up to date status shall also be provided at the end of the estimated timeframes, and upon request.

Once a resolution has been identified, Flow Power shall communicate the below to the complainant:

- What actions were taken in response to the complaint
- Any resolutions that have been offered.
- The reasons for any decision that have been made.

Where it is determined that Flow Power is at fault, Flow Power will provide an apology.

#### 4.3.6. Specific procedures for handling common solar farm complaints

##### **Construction phase**

##### Construction noise

Construction noise is one of the more common complaints received by solar farm projects. A construction noise complaint shall be classified as a Level 2 complaint requiring internal investigation and resolution.

The below steps for investigating and resolving the complaint shall be undertaken:

1. Establish location of the complainant in relation to the construction site.
2. Establish the prevailing wind conditions at the time of the concerning noise.
3. Establish the construction activities that would have been undertaken at the time of the concerning noise.
4. Establish if the noise mitigation measures prescribed by the approved Environment Management Plan were implemented.
5. If further works of the same nature are planned, identify and implement mitigation measures that would further minimise the noise impacts. This may include the use of temporary noise walls, respite periods, staging of works etc.
6. If further complaints are made, noise monitoring by an acoustic engineer may be required to determine further remedies.

##### Dust emissions

Dust emissions are a common complaint during dry, windy weather. A dust complaint shall be classified as a Level 2 complaint.

The below steps for investigating and resolving the complaint shall be undertaken:

1. Establish location of the complainant in relation to the construction site.
2. Establish the construction activities that would have been undertaken at the time of the reported concerning dust.
3. Establish if the dust mitigation measures prescribed by the approved Environment Management Plan were implemented (e.g. use of water carts and covering of stockpiles).

4. If further works of the same nature are planned, identify and implement mitigation measures that would further minimise the dust impacts. This may require additional dust suppression techniques.
5. If further complaints are made, dust monitoring by a suitably qualified contractor may be required to determine further remedies.

#### Off-site sedimentation or runoff

Off-site sedimentation or runoff on neighbouring properties can occur if erosion and sediment controls are not effective. A complaint of this nature shall be classified as a Level 2 complaint.

The below steps for investigating and resolving the complaint shall be undertaken:

1. Establish location of the complainant in relation to the construction site.
2. Establish recent weather observations that may have contributed to the runoff.
3. Establish if the erosion and sediment control measures prescribed by the approved Environment Management Plan were implemented and maintained in good condition.
4. Identify and implement remedies for improving existing controls, and identify additional controls that would further minimise the erosion and sedimentation impacts. This would likely require input from a civil contractor or consultant.
5. If further complaints are made, monitoring by a suitably qualified contractor may be required to determine further remedies.

### **Operational phase**

#### Operational noise

An operational acoustic assessment undertaken for the project determined that the proposed operation of the solar farm is predicted to comply with applicable noise limits. Within 1 month and also within 1 year of the commencement of operation, a post-construction acoustic assessment will be prepared by a suitably qualified acoustic engineer. It must assess the compliance of the project with the NIRV Standard and, where necessary, make recommendations to limit the noise impacts in accordance with the NIRV Standard to the satisfaction of the Responsible Authority.

An operational noise complaint shall be classified as a Level 2 complaint requiring internal investigation and resolution.

The below steps for investigating and resolving the complaint shall be undertaken:

1. Establish location of the complainant in relation to the project site.
2. Establish the prevailing wind conditions at the time of the concerning noise.
3. Establish if the noise mitigation measures recommended (if any) by the most recent acoustic assessment were implemented. Rectify any measures that were not implemented.
4. If no clear reason for excessive noise is identified, noise monitoring undertaken by an acoustic engineer may be required to determine whether there is a noncompliance and recommend further remedies.
5. If noise monitoring results indicate noncompliance with the applicable noise limits, further mitigations measures must be implemented to ensure compliance.

#### Visual impacts including glare

An assessment of potential visual impacts undertaken for the project prior to construction predicted that the project would not be visible from non-involved residences. The project would however be visible to road users of Captains Gully Road.

Should the project receive a complaint regarding the visual impact of the project, including glint or glare, the below steps for investigation and resolving the complaint shall be undertaken. The complaint shall be classified as a Level 2 complaint requiring internal investigation and resolution.

1. Establish the location from which the complainant reports the visual impact (receptor location)
2. Establish time, weather and operating conditions applicable to the visual impact.
3. Undertake site visit to the receptor location, to understand impact. This should be undertaken at the same time as the reported impact, and during similar weather conditions (cloud cover etc.) as sun position and light conditions can affect the impact.
4. If possible, meet with the complainant to further discuss the impact and whether any mitigation measures may reduce the impact.
5. If necessary, a visual impact and/or glare specialist may be engaged to assess the impact and recommend mitigation measures.
6. If it is difficult to come to a resolution, the complaint may be escalated (refer to section 4.4).

#### **4.4. Escalation**

Complainants who are dissatisfied with how their complaint has been addressed or its outcome are able to escalate their complaint to a more senior level of staff.

If the complainant is still dissatisfied with the management of their complaint, they are able to seek a review by an appropriate external complaint management mechanism or body (refer to Section 4.3.4). Flow Power can help the complainant identify options for escalation if the complainant requests this.

#### **4.5. Closing the complaint**

At the time the complaint is resolved, the Complaints Register shall be updated to record the steps taken to address the complaint, the outcome, and any follow up action required with timeframes. Some complaints may require continual monitoring to ensure the effectiveness of measures taken.

### **5. Reporting**

#### **5.1. Annual Report to the Responsible Authority**

A complete copy of the Complaints Register along with a reference map of complaint locations must be provided to the Responsible Authority on each anniversary of the date of the project's permit (15 April) and at other times on request.

#### **5.2. Annual Report to Senior Management**

At the same time as the annual report to the Responsible Authority (refer Section 5.1), the same shall be provided to the Flow Power Executive Leadership Team.

### **6. Training**

All Projects Team staff shall be trained in this Plan prior to undertaking complaint management activities.

### **7. Plan Review and Continual Improvement**

This Plan will be reviewed annually alongside the Complaints Register to determine whether its procedures are adequate.

The Complaints Register shall be analysed to identify systemic, recurring and single incident problems and trends. This includes reviewing whether complainants are generally satisfied with the way their complaints are handled.

Where deficiencies or opportunities for improvement are identified, the Plan shall be revised accordingly and approved by senior management.



## **Appendix A – Sample of Complaints Register**

