INDUSTRY ENGAGEMENT DOCUMENT

JEN PL 0140

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AUTHORISATION

Approved by

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PUBLIC

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DOCUMENT HISTORY

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EXECUTIVE SUMMARY

Jemena recognises the importance of managing supply and demand to ensure our electricity network is developed optimally to minimise costs and deliver efficient prices to customers. Through this document, Jemena is committed to engage with industry and the community to encourage innovative initiatives that will assist in managing electricity demand and delivering efficient network investment outcomes.

INDUSTRY ENGAGEMENT DOCUMENT

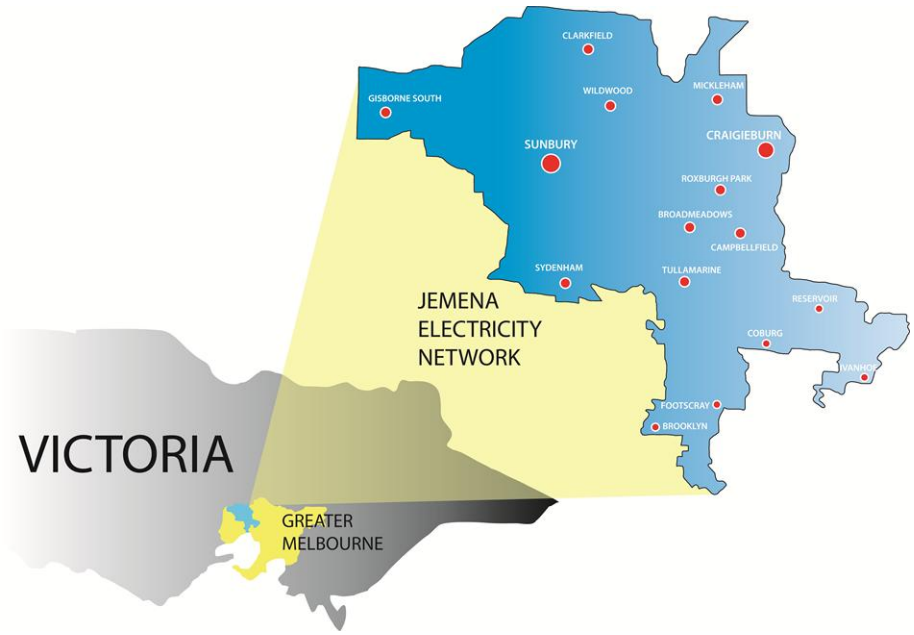
This Industry Engagement Document is prepared in accordance with the requirements of Clause 5.13.1 (e) to (j) and Schedule 5.9 of the National Electricity Rules (**NER**). It documents Jemena's strategy for engaging with non-network providers[1], considering non-network options, including Stand Alone Power System (**SAPS**) options, in its distribution investment planning.

ABOUT JEMENA

Jemena is one of the five distribution network Service providers (**DNSPs**) in Victoria serving over 375,000 electricity sites, 88 per cent of which are residential. Jemena's network service area covers 950 square kilometres of northwest greater Melbourne and includes the Melbourne International Airport at its approximate physical centre. The network has over 6,600 kilometres of electricity distribution lines and cables, delivering in excess of 4,320 GWh of energy to a number of energy retailers.

The network service area ranges from Couangalt, Clarkefield and Mickleham in the north to Williamstown and Footscray in the south and from Hillside, Sydenham and Brooklyn in the west to Yallambie and Heidelberg in the east. It borders with each of the other Victorian DNSPs: CitiPower, Powercor, AusNet Services, and United Energy and interconnects to the transmission network owned by AusNet Services.

An illustration of the Jemena electricity network supply areas is presented in the map below:



[1] As defined in Clause 5.10.2 of the NER.

JEMENA'S INDUSTRY ENGAGEMENT PLAN

Jemena recognises the importance of managing both supply and demand in planning the development of its electricity distribution network, whilst meeting customer expectations of supply security and reliability. To achieve this balance, Jemena is undertaking studies and trials to inform itself of the viability and impact of various demand management and distributed energy resource technologies to support identified network needs. These activities are conducted in parallel with broader industry consultation including the publication of this Industry Engagement Document, the Distribution Annual Planning Report (**DAPR**) and any Regulatory Investment Tests for Distribution (**RIT-D**), which provide non-network providers with an opportunity to submit innovative, cost-competitive non-network or SAPS options for Jemena to consider.

A strong level of understanding and support from the community are important to ensure the benefits of demand management and distributed energy resources are maximised. DNSPs and non-network providers will need to embrace changes in the way electricity is generated, distributed and consumed to pursue solutions to identified network limitations that provide maximum net benefit to consumers.

STRUCTURE OF THIS DOCUMENT

This Industry Engagement Document has been prepared in accordance with the requirements of the NER and follows the framework of Schedule 5.9. This document will be reviewed and published at least once every three years.

Section 1 of the document briefly outlines how Jemena will investigate, develop, assess and report on potential non-network options and potential SAPS options, addressing Schedule 5.9 (a) of the NER.

Section 2 addresses Schedule 5.9 (b) of the NER by setting out how Jemena will engage and consult with potential non-network providers to determine their level of interest and ability to participate in the development process for potential non-network options or potential SAPS options, through the establishment of an Industry Engagement Register for the registration of Interested Parties including non-network providers. The Section goes on to discuss how Jemena will negotiate with non-network providers in accordance with Schedule 5.9 (c) of the NER and elaborates on the information to be provided by non- network providers as called for in Schedule 5.9 (d).

Section 3 briefly summarises the criteria, as called for in Schedule 5.9(e) of the NER that Jemena is to apply in evaluating non-network option or SAPS proposals.

Section 4 provides an outline of the principles that Jemena will consider in developing payment levels for non-network options in accordance with Schedule 5.9 (f) of the NER, including any incentive payment schemes in accordance with Schedule 5.9 (g) of the NER.

Section 5 outlines the methodology that Jemena uses for determining avoided customer transmission use of system (TUoS) charges as required under Schedule 5.9(h) of the NER. The methodology assesses the impact a non-network option has on the maximum demand of the relevant terminal station during the top ten maximum demand days in a calendar year and then calculates the avoided TUoS usage charge.

Section 6 presents a summary of the factors that Jemena takes into account when negotiating connection agreements with embedded generators (when offered as non-network options), the process employed and a summary of any specific regulatory requirements for setting charges and the terms and conditions of connection agreements for embedded generating units in accordance with Schedule 5.9 (i), (j) and (k) of the NER.

Section 7 has a placeholder to present worked examples to support the description of how Jemena will assess potential non-network options in accordance with Schedule 5.9 (l) of the NER. A link is given to relevant, publicly available information produced by Jemena as well as an outline of how parties

may be listed on the Industry Engagement Register and Jemena's contact details all in accordance with Schedule 5.9 (m), (n) and (o) of the NER.

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ABBREVIATIONS

AER	Australian Energy Regulator
DAPR	Distribution Annual Planning Report
DMIAM	Demand Management Innovation Allowance Mechanism
DMIS	Demand Management Incentive Scheme
DNSP	Distribution Network Service Provider
DSP	Demand Side Participation
GWh	Gigawatt Hours
JEN	Jemena Electricity Networks
MD10	Top Ten Demands
NER	National Electricity Rules
NPV	Net Present Value
RIT-D	Regulatory Investment Test - Distribution
SAPS	Standalone Power System
SIR	Service and Installation Rules
TCPR	Transmission Connection Planning Report
TS	Terminal Station
TUoS	Transmission Use of System
VEDCOP	Victorian Electricity Distribution Code of Practice

1 BACKGROUND

Efficient non-network and Standalone Power System (**SAPS**) options that are able to credibly address an identified network need, can defer network capital expenditure and its associated ongoing operating and maintenance costs. Non-network and SAPS solutions can also alleviate the network limitation risks in the period leading up to the implementation of a planned network investment.

Clause 5.13.1 of the National Electricity Rules (**NER**) is intended to ensure greater consistency and transparency in Distribution Network Service Provider's (**DNSP**'s) consultation on and evaluation of expenditure for network investment against non-network and SAPS options. This Industry Engagement Document sets out to fulfil those requirements of the NER.

1.1 INDUSTRY ENGAGEMENT ACTIVITIES AND ROLES

The General Manager Asset and Operations – Electricity has the overall accountability for activities relating to Jemena's Industry Engagement Strategy in accordance with the NER.

Reporting to the General Manager Asset and Operations – Electricity are a number of teams responsible for assessing the needs for distribution investments associated with augmentation and end-of-life asset replacement.

In particular, the Future Network and Planning Manager is responsible for developing Jemena's industry engagement and distributed energy resources integration strategy and capability, administering demand management opportunities under the Demand Management Incentive Scheme (**DMIS**), distributed energy resources integration trials supported by funding under the Demand Management Innovation Allowance Mechanism (**DMIAM**), and providing support for the consideration of non-network and SAPS options in distribution investment planning.

The Future Network and Planning Manager is also responsible for the publication of the Distribution Annual Planning Report (**DAPR**) and the Regulatory Investment Tests – Distribution (**RIT-D**) consultation process.

1.2 OBLIGATIONS

Jemena has an obligation under the NER to engage with non-network providers and consider non-network and SAPS options as alternatives to network options for distribution investment. Jemena will engage with non-network providers in accordance with its Industry Engagement Strategy as outlined in this document.

For those network augmentation and asset replacement projects where the estimated capital cost of the most expensive potential credible option is more than $7 million[2], Jemena has an obligation under the NER to apply the RIT-D and in these cases, Jemena will engage with non-network providers as part of the RIT-D process.

Since the Rule came into effect, Jemena has conducted a number of RIT-D on significant augmentation and asset replacement projects. Details can be found in Jemena's RIT-D webpage.

[2] AER publishes final determination on the 2024 cost thresholds review for the regulatory investment test | Australian Energy Regulator (AER)

2 INDUSTRY ENGAGEMENT REGISTER

This section addresses the provisions of the NER, which requires Jemena to provide a description of its engagement process with potential non-network providers.

Under the NER, Jemena must, when considering distribution investments:

1. engage and consult with non-network providers and
2. take account of non-network and SAPS options.

The objective of this engagement process is to explore and, if appropriate, implement non-network or SAPS options that address specific network limitations.

2.1 ESTABLISHING AN INDUSTRY ENGAGEMENT REGISTER

For the purpose of engaging with non-network options providers under the NER, Jemena has established an Industry Engagement Register, which records the details of parties (herein referred to as **Interested Parties**) who have requested to be kept informed of opportunities to provide potential non-network or SAPS options to address network limitations. The registration form is available on Jemena's website[3].

The Industry Engagement Register assists Jemena's consultation on network limitations by maintaining details of Interested Parties, therefore allowing Jemena to inform these Interested Parties of instances where non-network or SAPS options may potentially be used.

2.2 REGISTERING AS AN INTERESTED PARTY

A person or organisation, such as non-network providers, may register as an Interested Party by following the instructions available on Jemena's website. Section 7.3 provides a more detailed process for registering as an Interested Party.

Parties who register their interest will be informed by Jemena of developments relating to distribution network planning and expansion, the publication of options screening reports and project assessments.

Interested parties are required to provide the following information as a minimum at the time of registration:

- Name and contact details of the registering person or organisation
- Business registration information (Trading Name, ABN, ACN, etc)
- Nature of the business
- Business and Management structure
- Location
- Prior experience.

[3] Jemena - Industry Engagement webpage.

2.3 INITIAL ENGAGEMENT

Jemena will engage with the Interested Party following their registration through phone calls, preliminary meetings or other means to further understand the registered parties' intent and capabilities as a non-network provider.

2.4 PRE-QUALIFICATION

Jemena is committed to engage with industry and the community and encourage innovative initiatives that will assist in managing electricity demand and delivering efficient network investments. Jemena's Future Network and Planning team has been given the task of undertaking studies, pilots and trials so as to be informed of the practicality and potential for various demand management and distributed energy resources integration initiatives as an alternative to traditional network options in addressing network limitations.

In recognising the effort and time required to determine technical and commercial viability of a non-network provider and their proposed solution in response to any future RIT-D process, Jemena is providing the opportunity to all non-network providers who register their interest with Jemena to engage in a pre-qualification process.

The pre-qualification process will provide Jemena an opportunity to assess the technical and commercial viability of non-network options at an early stage. This will provide efficiency to both Jemena and interested parties during the RIT-D process and enable Jemena to provide feedback to the non-network provider and provide them an opportunity to prepare for future engagement.

2.5 PRE-QUALIFICATION PROCESS AND CRITERIA

The pre-qualification process starts when Jemena receives a pre-qualification application with all associated documentation. Jemena will perform a preliminary assessment and will advise the registered Interested Party of any further information required. Jemena then initiates the pre-qualification assessment process and advises the Interested Party of the outcome in due course.

The pre-qualification process flow diagram can be found in Section 1, Appendix 1. Jemena will assess all non-network proponents' submissions against the following criteria to determine the capability and viability of the parties:

- Commercial/Financial
- Technical
- Industry Experience
- Systems and Technology
- Safety and Regulatory Compliance

2.5.1 COMMERCIAL/FINANCIAL

Jemena recognises that non-network and SAPS solutions may require significant commercial/financial investment and to ensure Jemena's customers are not exposed to undue risk, will undertake an assessment of the commercial/financial status of a non-network proponent to ensure they have the required financial viability to be able to provide services to Jemena Electricity Networks (**JEN**) and its customers for the life of the contract.

2.5.2 TECHNICAL

Jemena recognise that non-network and SAPS solutions will require in-depth understanding of electricity distribution characteristics, operation and customer loading arrangements. To ensure Jemena's customers are not exposed to undue risk Jemena will undertake an assessment of the technical capabilities of a non-network proponent to ensure they have the required knowledge and skills to be able to provide the services to JEN and its customers.

2.5.3 INDUSTRY EXPERIENCE

While prior industry experience is not mandatory, past electricity industry experience will be highly desirable as Jemena recognise that non-network and SAPS solutions will require in-depth understanding of electricity distribution characteristics, operation and customer loading arrangements.

2.5.4 SYSTEMS AND TECHNOLOGIES

Jemena recognise that non-network and SAPS solutions will require demand management systems and/or distributed energy resources technologies to control and manage net electricity demand as seen by the network to address a specific network limitation. This may include aggregated control and management of electricity distribution customer demand and generation. Jemena will undertake an assessment of the technology and solution utilised by the non-network proponent to ensure the party is able to provide the services to JEN and its customers within the requirements of the performance specification.

2.5.5 HEALTH, SAFETY AND COMPLIANCE

Health and Safety compliance along with legal and regulatory compliance is of utmost priority and the core operating principle of Jemena. Jemena will undertake an assessment of the Health, Safety and compliance track records and quality processes of the non-network proponent to ensure parties are not exposed to any undue risk. Through assessment of the technical capabilities of a registered Interested Party, Jemena will also ensure the party have the required knowledge and skills to provide the services in a safe and compliant manner to JEN and its customers.

2.6 HOW TO APPLY FOR PRE-QUALIFICATION

Applicants who wish to undertake pre-qualification are to contact the Jemena Industry Engagement Responsible Person. Contact details are listed in Section 7.4 of this document.

2.7 NEGOTIATING WITH NON-NETWORK PROVIDERS

Jemena encourages non-network providers with an interest in Jemena's electricity network, to register as an Interested Party. Interested Parties will be notified of Jemena's emerging network constraints through the publication of the Distribution Annual Planning Report (**DAPR**), Transmission Connection Planning Report (**TCPR**) and consultations with regard to Regulatory Investment Test – Distribution (**RIT-D**).

Jemena will engage with Interested Parties and consider non-network and SAPS options as alternatives to network options for addressing system limitations as published in the DAPR, RIT-D options screening reports, or on Jemena's Industry Engagement webpage. All subsequent complying submissions received will be evaluated against the criteria as stipulated in the RIT-D options screening reports. The results of the evaluation are used to determine whether there is a viable non-network option for implementation in accordance with the NER.

2.8 INFORMATION TO BE PROVIDED BY NON-NETWORK PROVIDERS

For projects subject to the RIT-D under the NER, non-network providers are required to provide information in accordance with the requirements specified in the options screening reports. The requirements may include technical characteristics such as the size of peak demand offsets, timing of offsets, operational profile and reliability. The non-network providers are to provide a detailed submission addressing Jemena's requirements and may include:

- Proponent name and contact details;
- Overview of the extent to which the proposal addresses the identified need;
- A technical description of the proposal, including:
  - name, address and contact details of the person responsible for non-network support;
  - type or technology proposed;
  - size and capacity for network support (MW/MVA/MWh);
  - proposed location(s);
  - frequency and duration;
  - proposed dispatch arrangement;
  - notice period required to enable the proposed solution;
  - proposed contract period;
  - electrical layout schematics;
  - availability and reliability performance details;
  - network connection requirements, if needed;
  - contribution to power system security or reliability;
  - contribution to power system fault levels, load flows and stability studies (if applicable);
  - the operating profile;
  - reliability; how each of these matters is consistent with the applicable technical standards;
- Timing of delivery of solution and its estimated lifespan;
- Contingency plans, in the event of delays in delivery timing of the solution;
- Proposed operational and contractual commitments, including financier commitments;
- Planning application information, where required;
- Salvage and removal costs; and
- An evaluation of potential risks associated with the proposal, including a comparison with the risks associated with the preferred network augmentation option, and any actions that can be taken to mitigate these risks. This assessment should address the risk of not meeting the demand requirement and the compensation arrangements that would apply in such circumstances.

2.9 EXAMPLE OF A BEST PRACTICE PROPOSAL

As examples of best practice non-network proposals come to hand and subject to commercial confidentiality, they will be included in future revisions of this document.

3 CRITERIA TO EVALUATE PROPOSALS

This section provides an outline of the criteria that will be applied in evaluating non-network and SAPS proposals. In broad terms the NER state that all projects in which the most expensive credible option is greater than $7 million are to be the subject of a RIT-D as follows:

> *"The purpose of the regulatory investment test for distribution is to identify the credible option that maximises the present value of the net economic benefit to all those who produce, consume and transport electricity in the National Electricity Market (the preferred option). For the avoidance of doubt, a preferred option may, in the relevant circumstances, have a negative net economic benefit (that is, a net economic cost) where the identified need is for reliability corrective action."*

In keeping with the above principle, the overall general criteria applied to evaluating non-network and SAPS option proposals under the NER include the technical, temporal and behavioural requirements of the non-network proposal as well as the cost.

The evaluation will be guided by the documents "Regulatory Investment Test for Distribution - Application Guidelines"[4] and "Cost Benefit Analysis guidelines"[5], updated and issued by the Australian Energy Regulator (**AER**) on November 2024.

3.1 NON-NETWORK OPTIONS

The specific criteria for which non-network and SAPS option proposals will be assessed are:

- compliance with the information requirements as set out in Section 2.8;
- submission of the proposal on time, according to the deadlines published with the options screening report;
- the option's technical viability (credible option test);
- analysis of the option's net present value (**NPV**), including sensitivity analysis;
- the option's compliance with all applicable laws, standards and regulations;
- the option's compliance with Jemena's connection guidelines, applicable to the size and type of connection;
- the community, customer and stakeholder acceptance of the option;
- the non-network provider's commercial viability (can the non-network provider build it, fund it and operate it); and
- the capacity of the non-network provider to meet Jemena's contractual requirements.

[4] AER - RIT-D application guidelines, Version 6 - November 2024.

[5] AER - Cost-Benefit Analysis (CBA) guidelines, Version 3 – November 2024.

3.2 COMMUNITY ENGAGEMENT

Recent community engagement regarding smart meters and Jemena's Electricity Outlook Portal have increased awareness with consumers of the impact their behaviour has on electricity prices. Jemena's Electricity Portal provides residential customers who have a smart meter with the opportunity to understand their electricity consumption.

In this Industry Engagement Document, Jemena has therefore provided for strategies that consolidate this improved awareness through ongoing communication activities to highlight the benefits of Demand Side Participation (**DSP**). Central to this approach is the ongoing collaborative work with stakeholders such as local government, developers, building and building service designers and community and consumer groups. Jemena undertakes initiatives which involve educating and informing these stakeholders and the media on the benefits of DSP.

Jemena is interested in engaging with local communities as well as individual customers to increase participation in and awareness of its demand management and distributed energy resources integration trials. Jemena regularly meets with customers who have volunteered to participate in specific trials, and documents the findings of these trials through targeted case studies and information campaigns to publicise their results.

Jemena will engage with Interested Parties through the mechanisms discussed in Sections 2.1 to 2.3 of this document.

Regarding specific non-network and SAPS option proposals, the proponent may also need to undertake similar community engagement activities to determine the level of community or stakeholder acceptance of the proposal being put forward. Jemena can meet with non-network providers to ensure that Jemena's community engagement strategies are understood and consistent with any actions planned or undertaken by non-network providers.

4 NON-NETWORK OPTIONS PAYMENT PRINCIPLES

In compliance with the NER, Jemena is to provide an outline of the principles it considers in developing the payment levels for non-network and SAPS options. In establishing an overarching framework to set non-network options payments principles Jemena will, in assessing the proposed non-network options, have regard to:

- deferred capital expenditure;
- the impact on operation and maintenance costs; and
- the extent the non-network option meet Jemena's requirements.

Jemena will negotiate a network support agreement, which will include commercial terms and payment with the successful non-network provider. The general principle that Jemena would apply to network support payment is that amount paid under any network support agreement at any time should reflect the costs avoided by the provision of network support up to that time. This is to avoid over-compensating the non-network provider in the event that the network support agreement is terminated earlier than expected.

Jemena will identify opportunities from schemes, such as the Demand Management Incentive Scheme (**DMIS**), during its consultation with non-network providers.

5 METHODOLOGY TO DETERMINE AVOIDED CUSTOMER TUOS CHARGES

Avoided Transmission Use of System (**TUoS**) charges are only payable to proponents of non-network solution if the solution results in discernible reduction in the peak demand at the relevant terminal station.

The five detailed steps of the methodology to be used in determining avoided customer TUoS charges are as follows:

1. **Load:** Using the relevant non-network solution interval data, calculate the load at the relevant terminal station (**TS**) assuming the relevant non-network solution is not activated. This is done by adding the non-network solution to the metered TS metering data.
2. **MD10:** Determine the top ten demands (**MD10**) and their timing occurring at the relevant TS assuming the relevant non-network solution is not activated. Using the data from step 1, determine the maximum daily demand at the relevant TS and then determine the top ten daily demands using the prevailing survey period TUoS Usage Charges (i.e. weekdays from 7:00am to 11:00pm EST).
3. **New MD10:** Calculate the new MD10 quantities for the relevant TS assuming the relevant non-network solution is not activated. Using the data in step 2, calculate the average of the top ten demands at the relevant TS.
4. **Incremental average:** Calculate the incremental average of the top ten demands.
5. This is the difference between the average of the top ten demands calculated in step 3 and the average of the top ten demands using the metered TS demands.
6. **Avoidable TUoS:** Calculate the avoidable TUoS usage charges resulting from the activation of the non-network solution. Multiply the prevailing TUoS usage price at the relevant TS by the incremental average of the top ten demands calculated in step.

6 FACTORS IN CONNECTING EMBEDDED GENERATORS WHEN OFFERED AS NON-NETWORK SOLUTIONS

6.1 CONNECTION AGREEMENT

As part of the embedded generation (including storage) connection process with a non-network provider, Jemena will negotiate a connection agreement that contains all technical material, commercial provisions and terms and conditions of the connection, including any ongoing fees to be paid by the non-network provider. The connection agreement imposes obligations on both Jemena and the non-network provider to ensure the proposed connection will not adversely impact the safety, quality and reliability of supply to other network users.

Responsibilities defined under the Victorian Electricity Distribution Code of Practice (**VEDCOP**) and NER require that the DNSP to enforce a comprehensive but reasonable technical requirements. To this end, Victorian DNSPs maintain a set of service installation rules (**SIR**) to ensure that embedded generator installations comprise suitable equipment, a safe environment for personnel operating the distribution network and the public and does not adversely affect the DNSP's distribution system.

If the non-network provider decides to augment or significantly modify their generating plant after the Connection Agreement is executed, the non-network provider must make an application to Jemena to modify their plant using the process described below.

6.2 CONNECTION PROCESS

Jemena's web site contains up-to-date information about the connection process of embedded generation. Refer to https://jemena.com.au/electricity/our-services/solar-and-renewables-for-installers-recs.

6.3 CONNECTION CHARGES

Clause 5.3AA(f) of the NER contemplates a distributor and a non-network provider reaching agreement on the following aspects of their connection agreement:

- a connection services charge;
- a use of system services charge;
- amounts payable in relation to costs incurred by the distributor in providing generator access; and
- compensation to be provided by the distributor to the embedded generator, or by the embedded generator to the distributor, when certain constraints occur.

Jemena will negotiate in good faith to reach agreement on all matters in the connection agreement with the non-network provider, in compliance with the NER and any relevant guidelines.

In addition to the above, Jemena will negotiate to reach agreement with the non-network provider to cover risk and insurance provisions, stakeholder communication and other usual commercial provisions.

7 ASSESSING POTENTIAL NON-NETWORK OPTIONS

7.1 WORKED EXAMPLES

This document will be updated with worked examples once they become available.

7.2 LINKS TO PUBLICLY AVAILABLE INFORMATION

Related documents are available from Jemena's web site, including:

- Distribution Annual Planning Report (DAPR), published annually in December:
- Transmission Connection Planning Report (TCPR), published annually in December.
- Jemena Embedded Generation Guidelines
- Regulatory Investment Tests for Distribution - Options Screening Reports (as appropriate)
- Trial case studies (when published).

7.3 REGISTERING ON THE INDUSTRY ENGAGEMENT REGISTER

This Section describes how parties may be listed on the Industry Engagement Register in accordance with the NER.

Jemena invites expressions of interest from parties, including non-network providers, who wish to be included on the Industry Engagement Register. The application information for registration is available on Jemena's Industry Engagement webpage.

Interested Parties should note that names and information on the Industry Engagement Register will be made public unless confidentiality is specifically requested.

Alternatively, an email requesting to be placed on the Industry Engagement Register may be sent to **IndustryEngagement@jemena.com.au** with the following information:

- First Name
- Surname
- Position (if applicable)
- Company name (if applicable)
- Postal address
- Email address
- Contact phone number
- Additional comments

A confirmation email will be sent to the Interested Party once that Party has been included on the register.

7.4 CONTACT DETAILS

Jemena's contact details for matters relating to this document is:

Network Planning Team Leader
RE: Industry Engagement (Demand Side Engagement)
Email: IndustryEngagement@jemena.com.au
567 Collins Street
Melbourne, VIC, Australia

8 APPENDIX 1

Pre-qualification process flow diagram: