



Stakeholder Engagement Plan

OEDAŞ

2018

OEDAŞ



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1 INTRODUCTION

1.1 Overview

This document presents the Stakeholder Engagement Plan (“SEP”) for the financing of OEDAŞ’ capital expenditures program including distribution network expansion, upgrade and rehabilitation to support efficiency improvement, network stability and enhance service quality (the “Project”). The lender for the Project is European Bank for Reconstruction and Development (“EBRD”) and International Finance Corporation (“IFC”). The Project is currently subject to investment planning and lenders’ approval for financing the period of 2017-2020.

This SEP has been developed by OEDAŞ as a public document, in order to present plans for stakeholder engagement, consultation and disclosure in line with the environmental and social policies of OEDAŞ, international standards and lenders’ requirements. The SEP is a living document, which is to be updated for each phase of the Project and as needed.

1.2 Who are we?

OEDAŞ is an electricity distribution company with exclusive distribution rights in the provinces of Eskisehir, Afyon, Uşak, Kutahya and Bilecik (known as OEDAŞ region), serving to the 16th region among the total 21 electrical distribution regions in Turkey.



OEDAŞ Electricity Distribution Region No: 16

OEDAŞ presently delivers 24-hour uninterrupted energy distribution services in OEDAŞ region to approximately 1.66 million subscribers serving a population of 2.7 million in 194 towns and 1596 villages, within 59 districts within a surface area of 49,419 km² up to 300 km distance in north-south direction and up to 270 km distance in east-west direction through an operating distribution network of 43,687 km. OEDAŞ distributed a total net energy of 5.7 TWh in 2015 (net). The organizational structure comprises of one Gas and Electrical Distribution General Manager who overlooks and is responsible for the entire OEDAŞ business unit. The General Manager receives reports from an Electrical Distribution Director who manages distribution, system operation, control system, quality, environmental, health and safety (QEHS), legal affairs, human resources and administration, tariffs and regulation, property expropriation, and investment planning departments at the head office in

Eskisehir. In addition, there is a total of five operation managers for Eskisehir, Afyon, Kutahya, Bilecik, and Usak regions who report directly to the Electrical Distribution Director.

Within the scope of the investment program for electricity distribution services, the area of activity of OEDAŞ includes construction of new distribution facilities, conducting capacity increases, construction of additional facilities for the existing network, conducting maintenance and repair services, evaluation of connection applications, providing service through executing network connection agreements with the consumers, reading the indexes from the consumer meters, conducting lighting works, conducting replacement and calibration works for the meters, tackling with the technical and non-technical losses, conducting services for minimizing the electrical failures, the duration and number of power cuts and ensuring the continuity of electricity supply.

1.3 Purpose of Stakeholder Engagement Plan (SEP)

The main goal of this SEP is to ensure that project-affected people and other stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Project and its impacts and mitigation measures. Stakeholder engagement process helps to:

- identify and involve all potentially affected stakeholders;
- generate a good understanding of the project among those that will be affected;
- identify issues early in the project cycle that may pose risks to the project or its stakeholders;
- ensure that mitigation measures are appropriate (implementable, effective and efficient); and
- establish a system for long-term communication between the Project and communities and customers that is of benefit to all parties.

The main purposes of this document are to:

- define a consultation approach for stakeholders in relation to land acquisition, construction and operation of the Project as well as existing operations of OEDAŞ;
- identify resources and responsibilities for implementation and monitoring of the consultation program; and
- set up a grievance mechanism for the stakeholders, including a process to address views and concerns.

1.4 Structure of the SEP

Contents of this SEP include the following:

- Project description and key environmental and social issues;
- Public consultation and information disclosure requirements;
- Identification of stakeholders and other affected parties and customers during operation phase;
- Overview of previous stakeholder engagement activities;
- Stakeholder engagement programme and methods of engagement;
- Grievance Mechanism;
- Resources and Responsibilities; and
- Monitoring and Reporting.

2 PROJECT INFORMATION

2.1 Project background

2.1.1 Distribution Network and Facilities

OEDAŞ has approximately 43,687 km of distribution network consisting of aerial lines and underground lines. Third parties also own distribution lines. The capacity of the electricity distribution lines and the number of transformers, poles and armatures owned by OEDAŞ and the third parties are given below. Installation of oldest facilities within the distribution network date back to 1960s.

OEDAŞ Distribution Network Assets

Asset Name	Type	Technical Properties	Owned by	
			OEDAŞ	Third Party
Distribution Lines (km) LV: Low Voltage (up to 1 kV) MV: Medium Voltage (1 kV to 34.5 kV)	LV	Aerial line (km)	17,742.59	311.88
		Underground line (km)	2,107.92	132.66
		Total (km)	19,850.51	444.54
	MV	Aerial line (km)	15,189.48	6,812.16
		Underground line (km)	1,047.99	342.32
		Total (km)	16,237.47	7,154.48
Number Transformers			7,562	14,891
Number of Poles			626,293	91,832
Number of Armatures			330,499	15,097

OEDAŞ assets also include administrative buildings, client service centers, repair and maintenance units, main warehouses, operational warehouses, and transformer stations.

Repair and Maintenance Units / Warehouses:

Of the 59 districts OEDAŞ operate in, there is a total of 42 Repair and Maintenance Units and five main warehouses distributed in five OEDAŞ regions. All necessary equipment and materials are stored in this main warehouse and regularly transferred to operation facilities based on defined stock levels.



Sultandere Main warehouse in Eskisehir Province

List of Repair and Maintenance Units / Warehouses

Regions (Provinces)	Districts	Facilities
Eskisehir	Merkez	Repair & Maintenance Unit
	Sultandere	Main Warehouse
	Beylikova	Repair & Maintenance Unit
	Çifteler	Repair & Maintenance Unit
	Günyüzü	Repair & Maintenance Unit
	İnönü	Repair & Maintenance Unit
	Kirka	Repair & Maintenance Unit
	Mahmudiye	Repair & Maintenance Unit
	Alpu	Repair & Maintenance Unit
	Mihaliççik	Repair & Maintenance Unit
	Saracakaya	Repair & Maintenance Unit
	Sivrihisar	Repair & Maintenance Unit
Afyon	Merkez	Main Warehouse
	İscehisar	Repair & Maintenance Unit
	Dinar	Repair & Maintenance Unit
	Dazkiri	Repair & Maintenance Unit
	Çay	Repair & Maintenance Unit
	Emirdağ	Repair & Maintenance Unit
	Sultandağı	Repair & Maintenance Unit
	Sinanpaşa	Repair & Maintenance Unit
	Bolvadin	Repair & Maintenance Unit,
	Şuhut	Repair & Maintenance Unit
	Sandikli	Repair & Maintenance Unit
	İhsaniye	Repair & Maintenance Unit
Kutahya	Merkez	Repair & Maintenance Unit, Main warehouse
	Gediz	Repair & Maintenance Unit
	Altıntaş	Repair & Maintenance Unit
	Çavdarhisar	Repair & Maintenance Unit
	Emet	Repair & Maintenance Unit
	Tavşanlı	Repair & Maintenance Unit
	Simav	Repair & Maintenance Unit
	Domaniç	Repair & Maintenance Unit
Bilecik	Hisarcik	Repair & Maintenance Unit
	Merkez	Repair & Maintenance Unit, Main warehouse
	Söğüt	Repair & Maintenance Unit
	Gölpazari	Repair & Maintenance Unit
	Pazaryeri	Repair & Maintenance Unit
	Osmaneli	Repair & Maintenance Unit
Uşak	Bozüyük	Repair & Maintenance Unit
	Merkez	Repair & Maintenance Unit, Main warehouse
	Ulubey	Repair & Maintenance Unit
	Sivaslı	Repair & Maintenance Unit
	Eşme	Repair & Maintenance Unit
	Banaz	Repair & Maintenance Unit

Transformers and Distribution Centers

There is a total of 22,453 transformers within the OEDAŞ network, out of which 18,869 are placed on poles and 2,098 are contained in housing. The total installed power of transformers is 4,982.40 MVA (2015). The transformers are hermetic, expansion tank, oily and dry types.

SCADA System

SCADA (Supervisory Control and Data Acquisition) system is not in place. Reportedly, OEDAŞ has plans to invest in SCADA system in the future. SCADA system is developed to provide a better quality and uninterrupted power service within the distribution network. It aims to maintain business continuity and minimization of the outage times.

2.1.2 Operational Performance

Past, present and projected operational performance parameters of OEDAŞ (in terms of distributed energy and number of customers served) are given in the table below (A: Actual, F: Forecast). The distributed energy is expected to grow from 6,341.26 GWh in 2016 to 7,210.24 GWh in 2019 which corresponds to 13.7% growth, and customer base is expected to grow from 1.66 million customers in 2016 to over 1.80 million by 2019. The loss/theft ratio for 2016 was recorded at 5.75% and targeted ratio for the upcoming years is 7.9%. The net consumption in the OEDAŞ region in 2016 is 19%, 9%, 28%, 6% and 41% by industrial, commercial, residential customers, irrigation and lighting, and eligible customers, respectively. The same trend is also expected in the future.

OEDAŞ Operational Performance Parameters

Figures	2011 A	2012 A	2013 A	2014 A	2015 A	2016 A	2017 F	2018 F	2019 F
Distributed Energy (GWh)	5,447.20	5,584.95	5,872.42	6,044.50	6,199.08	6,341.26	6,734.76	6,909.90	7,210.24
# of Customers	1,432,366	1,471,565	1,515,857	1,565,042	1,611,585	1,661,395	1,676,938	1,754,050	1,802,317
Loss/Theft Ratio	7.14	7.15	7.86	7.61	7.62	5.75	7.90	-	-

*A: Actual, F: forecast

2.1.3 Planned Investments for 2017-2020 period

The planned investments by OEDAŞ for 2017-2020 period total to an amount of 1,473 million TL (based on Consumer Price Index as of June 2017). Investments are mostly related to distribution network as presented in the table below.

Planned Investments for 2017-2020 Period

Type of Investments	Planned Investment Amount* between 2017-2020 (million TL)
Grid Investments	1,234
Environment, Safety and Other Investments Required by Law	114
Grid Operating Investments	85
Meter Reading Investments	21
Other Investments	19
Total Planned Investment Amounts	1,473

*Amounts are presented in Turkish Lira based on CPI as of June 2017 (309.78)

Based on the information provided, the following table presents a breakdown of network investments for the 2017-2020 period to improve OEDAŞ' operation performance.

Breakdown of Network Investments (2017-2020)

	2017	2018	2019	2020	Total
Transformer Capacity (kVA)	229,000	173,000	144,630	90,810	637,440
OVERHEADLINES (km.) - Transmission	447	1,349	562	335	2,692
CABLE (km)	1,639	876	858	488	3,861
OVERHEADLINES (km.)	41	526	1,133	1,090	2,790

2.2 Potential Environmental and Social Impacts of the Project

Based on environmental and social assessment undertaken for the Project, the potential environmental and social issues have been identified to be mainly related to the following:

- Improve environmental and social management systems and strengthening of current resources;
- Establish and implement a robust environmental and social monitoring system (including training programs);
- Improve waste management practices;
- Enhance hazardous substances and materials management practices;
- Manage greenhouse gas emissions during operation;
- Minimize risks of soil and groundwater contamination;
- Occupational health and safety management and monitoring during construction and operation;
- Develop and implement procedures and plans to protect community health and safety;
- Strengthen subcontractor management during construction and operation;
- Improve labor related policies and procedures;
- Develop emergency preparedness and response action plan;
- Conduct seismic risk surveys for old operation buildings;
- Conduct a life and fire risk survey at all facilities;
- Develop a Corporate Land Acquisition Policy Framework (LAPF);
- Implement a Stakeholder Engagement Plan (SEP) and improve existing grievance mechanism;
- Evaluate the ecological potential of the areas where the distribution lines will pass, including regional bird survey based on desk top assessment.

3 NATIONAL REGULATORY AND INTERNATIONAL REQUIREMENTS

Turkish Environmental Impact Assessment (EIA) Regulation (Official Gazette Date/Number: 25.11.2014/29186) includes provisions for environmental impact assessment, public consultation and disclosure of project information for projects listed in annexes of the regulation. Electricity distribution lines and relevant facilities are not covered under the annexes of the Turkish EIA Regulation; hence, OEDAŞ operations are not subject to national EIA requirements. Accordingly, no stakeholder engagement has been needed according to Turkish legislations.

Due to international financing and as best industry practice, OEDAŞ will ensure that the Project will comply with the requirements of EBRD Environmental and Social Policy (May 2014) and IFC Environmental and Social Sustainability Policy (January 2012). According to best practice and the EBRD and IFC performance requirements, OEDAŞ is offering consultation opportunities for stakeholders as described in the following sections. OEDAŞ will appropriately engage such stakeholders on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation, on an ongoing basis during project implementation.

As OEDAŞ, we strive to fulfill our responsibilities towards the environment, the public and customers in our service region. Our primary goal is to ensure quality and continuous services, with due respect to the environment and by protection of health and safety of our workers. As such, we will be developing a Quality Management System (QMS) that covers procedures, instructions and other relevant documents related to environmental and social issues. The QMS and related documentation are currently in preparation by following the provisions of ISO 9000, ISO 14001 and OHSAS18001 management system standards.

4 STAKEHOLDER IDENTIFICATION

4.1 Introduction

For the purposes of this plan, a stakeholder is defined as any individual, organization or group who is potentially affected by the Project or who has an interest in the Project and its impacts. The purpose of stakeholder identification is to identify and prioritize Project stakeholders for consultation who may be affected (either directly or indirectly in positive or negative way) by the Project or who have an interest in the Project but are not necessarily directly impacted by the Project. It is important to note that stakeholder identification is an ongoing process, and thus stakeholders will continue to be identified during different stages of the Project.

Priority stakeholders identified for the Project are outlined in sections 4.2 to 4.8. Stakeholders that may potentially be impacted due to future construction/operation related works of OEDAŞ are considered to include the following:

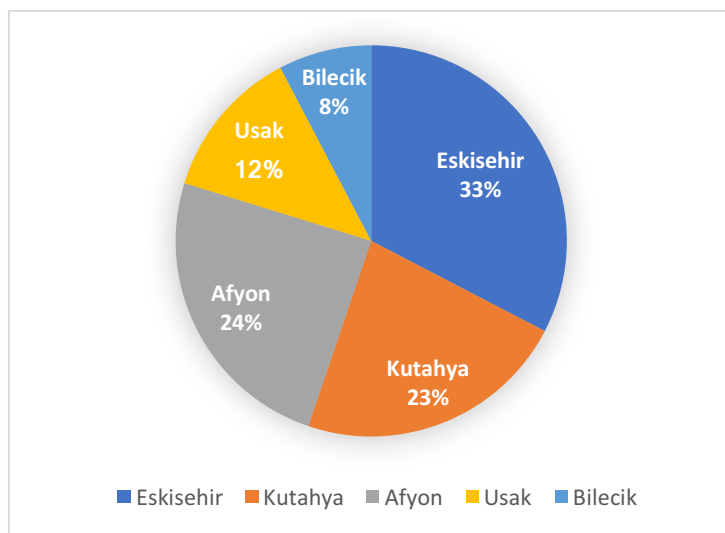
- Customers (including households, commercial businesses and industrial facilities);
- Landowners/users;
- Local communities located in five regions within the operation area (Eskisehir, Afyon, Kutahya, Bilecik, Usak);
- Employees;
- Sub-contractors (repair and maintenance, connection/disconnection in electrical installations, meter reading operations, cleaning services, security services, call center, construction, cleaning, security, etc.) and suppliers;
- Governmental organizations including ministries (e.g. Ministry of Energy and Natural Resources, Ministry of Environment and Urban Planning, Ministry of Labor and Social Security) and affiliated public institutions (e.g. OEDAŞ);
- Local authorities located in five provinces within our operation area;
- Non-governmental organizations (e.g. ELDER, Chambers of Electrical Engineers/ Chambers of Electrical Technicians);
- Local and national media; and
- General Public.

The stakeholder list will be updated regularly to include any new stakeholders identified. If you are not in the provided lists and would like to be informed about the project please contact OEDAŞ at numbers provided in the last page of this SEP document.

4.2 Customers (including Vulnerable Groups)

Customers (about 1.66 million service beneficiaries) are among the most important stakeholders for the Project in relation to electricity distribution operations particularly in terms of quality and efficiency of services provided by OEDAŞ. Service beneficiaries include local residents, commercial businesses/industries, and eligible customers.

OEDAŞ serves a total population of nearly 2.7 million spread out in five provinces. Distribution of served population by provinces is presented below:



Provinces	No. of Subscribers
Eskisehir	525,845
Kutahya	364,133
Afyon	395,623
Usak	202,021
Bilecik	123,963

Among the costumers, potential vulnerable groups will be given priority as stakeholders and their access to project information disclosure will be ensured. Such groups may include women, disabled people and certain disadvantaged groups (including illiterate people, elder people, people with special needs and similar). OEDAŞ will identify the vulnerable directly affected landowners/users prior to construction of each project and will develop measures to ensure they are not disadvantaged due to land acquisition/construction and operation of the activities undertaken by OEDAŞ.

4.3 Neighboring Communities and Facilities (including Vulnerable Groups)

Neighboring communities and facilities to OEDAŞ facilities are among the important stakeholders both in relation to operational activities (particularly related to repair and maintenance activities in the vicinity of settlements and sensitive receptors) and future construction activities (mainly in terms of impacts on local residents and businesses related to physical or economic displacement).

Physical investments in 2018 are planned to be undertaken in the districts listed below. Details of each planned project are presented in Annex A.

Provinces	Districts
Eskisehir	Alpu, Çifteler, Günyüzü, Han, İnönü, Mahmudiye, Merkez, Mihalgazi, Odunpazarı, Sarıcakaya, Seyitgazi, Sivrihisar, Tepebaşı
Afyon	Başmakçı, Bayat, Bolvadin, Çay, Dazkırı, Dinar, Emirdağ, Hocalar, İhsaniye, İscehisar, Kızılören, Merkez, Sandıklı, Sinanpaşa, Sultandağı, Şuhut
Kutahya	Altıntaş, Aslanapa, Bayat, Çavdarhisar, Dumlupınar, Emet, Gediz, Hisarcık, Merkez, Pazarlar, Seyitömer, Simav, Tavşanlı
Bilecik	Bozüyük, Gölpaazarı, Merkez, Osmaneli, Paşalar, Pazaryeri, Söğüt, Yenipazar
Usak	Banaz, Eşme, Karahallı, Merkez

4.4 Landowners/users (including Vulnerable Groups)

The Project may require some permanent acquisition of private land, which will require agreements with applicable land owners/users. OEDAŞ will inform and consult the affected land owners/users regarding the land acquisition and compensation procedures, legal rights and land use restrictions during the construction and operation phases through written notifications, community leaflets, posters, newsletters, and face-to-face meetings. Directly affected landowners/users will be identified during preparation of the expropriation plan for the period 2017-2020. In order to minimize

expropriation needs, OEDAŞ will take all necessary measures to avoid physical resettlement in future investment projects and will consider, to the extent possible, public areas (such as roads, streets, parks, squares, etc.) for distribution network routings.

Among the land owners/users, potential vulnerable groups will be given priority as stakeholders and their access to project information disclosure should be ensured. Such groups may include women, disabled people and certain disadvantaged groups (including illiterate people, elder people, people with special needs, land users without official title deeds and similar).

4.5 Employees

The employees of the company will be affected by the Project and associated changes in operations including changes in workload, shifts and similar. No retrenchment or workforce expansion is planned within the scope of the Project. A total number of 1,222 permanent staff are currently employed under OEDAŞ, of which 95 women are employed representing approximately 7.8% of the total workforce. OEDAŞ is committed to be in compliance with the Turkish Employment Laws and EBRD PR2/IFC PS2 requirements on labor and working conditions.

Employees will be informed about the grievance mechanism during recruitment and at all stages of the Project. To this end, meetings with worker representatives will be held to inform the employees about the grievance mechanism. Trainings and toolbox talks will also be conducted to familiarize the employees about mechanism of internal grievance. Face to face meetings will be held with each employee if required. Employee satisfaction surveys will be conducted to be able to get feedback on the grievance mechanism and necessary actions will be taken to improve the mechanism.

4.6 Contractors and Suppliers

Sub-contractors and suppliers of OEDAŞ constitute important stakeholders for both existing operations and Project related activities. OEDAŞ engages with several full-time subcontractors including repair and maintenance, connection/disconnection in electrical installations, meter reading operations, cleaning services, security services, call center, construction works (both above- and underground facilities). In average, a total of 284 full-time subcontractor employees work per month in OEDAŞ operations. We are committed to subcontracting of local workforce from the OEDAŞ regions, which is regarded as a positive social impact of the Project. Suppliers of equipment and associated services and other suppliers of services (such as maintenance of fire systems) are also considered as stakeholders of the Project.

Subcontractor employees will be informed about the grievance mechanism at all stages of the Project. To this end, trainings and toolbox talks will be conducted to familiarize the contractor employees about mechanism of internal grievance. Face to face meetings will be held if required. Regular annual employee standard reviews will be carried out by OEDAŞ.

4.7 Governmental Organizations

Governmental agencies can be grouped as national, provincial, district and local (i.e. neighborhood) levels. These organizations include authorities with statutory responsibilities relevant to the Project or to environmental or social issues, and other bodies responsible for providing infrastructure relevant to the Project. A list of governmental agencies relevant to the Project has been prepared as presented below:

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Ministry of Energy and Natural Resources (MENR)	MENR has regulatory functions such as determining energy targets and policies and ensuring production and consumption of energy in accordance with these targets and policies.
	The Grand National Assembly of Turkey (TBMM/Parliament)	TBMM is the sole body given the legislative prerogatives by the Turkish Constitution on behalf of the Turkish nation and this right is inalienable.
	TEDAŞ (Turkish Electricity Distribution Inc.)	TEDAS is a key stakeholder, since the ownership of distribution assets and the new assets arising from investments rests with TEDAS as per the 'Transfer of Operating Rights Agreement' signed with this state-owned organization. The TEDAS General Directorate undertakes the necessary expropriations and obtains right-of way for distribution network routings. This organization also provides occupational trainings and relevant certifications.
	TEIAS (Turkish Electricity Transmission Inc.)	TEIAS has been activated on 01.10.2001 so as to take over the all transmission facilities in the country and to carry out the planning of load dispatch and operation services.
	TETAS (Turkish Electricity Contracting and Trading Co.)	TETAS is responsible for the wholesale distribution of electricity in Turkey, as well as importing and exporting additional electricity resources.
	EMRA (Energy Market Regulatory Authority)	Distribution licenses to regional electricity distribution companies are granted by EMRA. The authority also determines electricity tariffs, ensures service quality and approves investment plans and expropriation requests of distribution companies.
	Ministry of Environment and Urban Planning (MEUP), General Directorate of EIA, Permits and Audits	MEUP has regulatory functions such as environmental impact assessment permits and environmental permitting. MEUP may have views on future investments in relation to EIA regulation.
	MEUP, General Directorate of Environmental Management	
	MEUP, General Directorate of Spatial Planning	
	Ministry of Labor and Social Security (MoLSS), General Directorate of Occupational Health and Safety	MoLSS have specific policies and regulations on labor and working conditions, and occupational health and safety. They will be engaged during recruitment of employees and regularly on work permits, Social security and insurance payments etc. The MOLSS may conduct audits on labor and working conditions.
	MoLSS, General Directorate of Labor	
	MoLSS, Social Security Institution	
Provincial	ISKUR (Labor Institution of Turkey)	Governorships are the highest authorities in provinces representing national government. Complaints and requests by the public regarding electricity distribution services that are received by Prime Ministry Communications Centers (BIMER) are being directed to OEDAŞ.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Governorships	
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Municipalities	
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Municipalities, Departments of Fire Brigade	In case of fire, fire brigade is the responsible body to respond.

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial/Operational Directorates of Forestry	Directorates of Forestry have regulatory functions such as permitting related to forest crossings and may also have views on future construction activities.
	1 st Regional Directorates of Highways	This organization has regulatory functions such as permitting related to highway crossings and may also have views on future construction activities.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial Directorates of Environment and Urbanization (PDEU)	PDEUP has regulatory functions such as environmental impact assessment permits and other environmental permitting. PDEU may have views on future construction activities.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial Directorates of Disaster and Emergency Management	These organizations have a function to manage and respond to emergency cases.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial Directorates of Security (Police)	In case of crime related issues, police perform necessary actions.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial Directorates of Health Services	In case of adverse health issues, 112 emergency medical services are informed.
	Eskisehir, Afyon, Usak, Kutahya and Bilecik Provincial Directorates of Culture and Tourism	This organization may provide specific views related to archaeological potential of future construction areas.
District/ Local	Local governorships	Local municipalities and governorships and their relevant associated bodies may be important in case of emergency cases. In addition, these authorities together with the headmen of the neighborhoods in the vicinity of future construction areas may have specific views about the activities.
	Local municipalities	
	Muhtars (i.e. village heads) in the vicinity of operation areas and future construction areas	

4.8 Non-Governmental Organizations (NGOs)

A list of key NGOs that may have interest in the Project has been prepared as given below:

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
National	Association of Distribution System Operators (ELDER)	This association may have views in relation to future investments and may also provide support on stakeholder consultation activities.
	Association for the Protection of Consumers (TÜKODER)	This association may have views in relation to service quality and electricity billing issues.
Provincial	Chambers of Electrical Engineers (Eskişehir, Bilecik and Kütahya Offices)	These chambers may provide provincial-specific and/or site-specific views related to future construction and operation activities.
	Chambers of Electrical Technicians (Eskişehir, Bilecik, Afyon and Kütahya Offices)	
	Chambers of Industry (Eskişehir, Bilecik and Kütahya Offices)	

5 PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

OEDAŞ has mechanisms for stakeholder engagement, information disclosure and grievance management. Stakeholder engagement activities undertaken to date with various groups are summarized below.

Customer Relations

OEDAŞ has Customer Relations Departments, managing customer relations of the companies. Communication with customers is carried out through the forms available in OEDAŞ' company websites and the call center (i.e. 'ALO 186'). Grievances from customers are also received by phone, e-mail or letter. There is one common call center of OEDAŞ, which is being operated by an external contractor company (Pusula) with 125 employees. The call center operates 24 hours, 7 days a week.

Depending on the issue, any complaints addressed to the Head Office or Regional Office will be first reviewed by the management and conveyed to the relevant department within OEDAŞ to be resolved. Should a complaint require a visit to site, OEDAŞ technical personnel plans a trip to investigate the matter, if possible resolves the problem, if not immediately informs the complainant with a correspondence stating the method and duration that the problem will be resolved according to governing law within 15 to 20 days.

In addition to the call center, website, by phone, e-mail and letter, it is possible for the consumers to submit views and grievances to a national system called BIMER-Prime Ministry Communication Center and the EMRA (Energy Market Regulatory Board). Legally, responds to all views and grievances should be made in a maximum of 15 days.

A database of the grievances received through different channels and government channels will be established and analyzed to better facilitate customers and to improve the quality of the services and operation provided by OEDAŞ.

Corporate Communications

OEDAŞ discloses announcements and corporate reports through the company websites and press releases. Additionally, regular meetings are conducted by OEDAŞ with media organizations and public authorities. OEDAŞ is a member of the Electrical Distribution Services Association (ELDER). Information disclosure activities are conducted by ELDER regarding high electricity prices and electricity losses include public service/information announcements (TV-radio), press releases, press meetings, lobbying activities and meetings with regulatory authorities.

6 STAKEHOLDER ENGAGEMENT APPROACH AND FUTURE STAKEHOLDER ENGAGEMENT PROGRAMME

This Chapter provides an overview of the proposed stakeholder engagement approach for existing electricity distribution operations and future construction activities. The main communication methods and mechanisms that have been and/or will be used by OEDAŞ to consult with key stakeholders are summarized in the table below:

Stakeholder Engagement Approach

Stakeholder Type	Information to be Disclosed	Engagement Tool(s)	Time Frame
Customers (Local residents and commercial businesses/ industries – including vulnerable groups)	Project information and service/operation updates	<ul style="list-style-type: none"> Website (http://www.osmangaziedas.com.tr/) Media announcements (including newspapers, radio and TV) Handouts Written notifications of governorships and related administrations prior to investment works, who will then inform relevant customers 	Pre-construction, Construction, Operation
	Grievance mechanism	<ul style="list-style-type: none"> Comment/complaint forms available at OEDAŞ administration offices, website, face-to-face meetings Telephone E-mail Mail BIMER (complaint mechanism through state authorities) EMRA or through other local authorities such as Muhtars (i.e. village heads) and municipalities 	Pre-construction, Construction, Operation
Neighboring communities and facilities that may be affected by the Project (Including vulnerable people)	Project information and updates, particularly any activities likely to cause particular disturbance to the nearby neighborhoods (such as traffic disruption, dust/noise generation, land acquisition and livelihood impacts, Community Health and Safety, land use restrictions etc.)	<ul style="list-style-type: none"> Website (http://www.osmangaziedas.com.tr/) Media announcements (including newspapers, radio and TV) Community brochures/handouts and posters at appropriate locations at the directly affected settlements prior to construction, renovation or maintenance works in settlement areas Face-to-face meetings at each affected community Written notifications of local authorities prior to investment works, who will then inform communities that may be affected 	Pre-construction, Construction, Operation
	Grievance mechanism	<ul style="list-style-type: none"> Comment/complaint forms available at OEDAŞ administration offices, website, face-to-face meetings Grievance forms will be disseminated to the project affected people prior to land acquisition and construction activities 	Pre-construction, Construction, Operation

Stakeholder Type	Information to be Disclosed	Engagement Tool(s)	Time Frame
		<ul style="list-style-type: none"> Complain boxes and community information boards will be set up in projects' affected settlements. Telephone E-mail Mail 	
Landowners/ Users (Including vulnerable groups)	Project information and updates, particularly any activities requiring physical or economic displacement, compensation process, legal rights of landowners/users etc.	<ul style="list-style-type: none"> Written notifications to affected people Community leaflets Posters/information boards Face-to-face consultation meetings Negotiation meetings and mutual agreements/protocols signed with affected people 	Pre-construction, Construction, Operation
	Public grievance mechanism	<ul style="list-style-type: none"> Comment/complaint forms available at OEDAŞ administration offices, project sites, website, and will be distributed to the affected people during face-to-face meetings Telephone E-mail Mail 	Pre-construction, Construction, Operation
Company employees	Project updates and changes in operations	<ul style="list-style-type: none"> Face-to-face meetings Trainings Tool box Employee satisfaction surveys, regular employee standards reviews Employee grievance mechanism Meetings with workers' organizations and workers' representatives. 	Pre-construction, Construction, Operation
	Internal employee grievance mechanism	Contact supervisors or appointed OEDAŞ personnel by: <ul style="list-style-type: none"> face-to-face communication telephone e-mail comment boxes 	Pre-construction, Construction, Operation
Contractors and suppliers	Project updates and changes in operations	<ul style="list-style-type: none"> Face-to-face meetings Regular employee standards review for contractor employees Trainings Tool box Employee grievance mechanism 	Pre-construction, Construction, Operation
	Internal grievance mechanism	Contact supervisors or appointed OEDAŞ personnel by: <ul style="list-style-type: none"> face-to-face communication telephone e-mail comment boxes 	Pre-construction, Construction, Operation
Worker Organizations/ Unions	Internal employee grievance mechanism	<ul style="list-style-type: none"> Face-to-face meetings Telephone E-mail Mail Employee grievance mechanism Periodical meetings with the union representatives 	Pre-construction, Construction, Operation

Stakeholder Type	Information to be Disclosed	Engagement Tool(s)	Time Frame
Governmental organizations	Project information and updates	<ul style="list-style-type: none"> • Face-to-face meetings • On-going communication with relevant regulatory stakeholders related to permitting, emergencies, etc. • Written notifications of local authorities prior to investment works 	Pre-construction, Construction, Operation (face-to-face meetings at least semi-annually)
Non-governmental organizations	Project information and updates	<ul style="list-style-type: none"> • Website (http://www.osmangaziedas.com.tr/) • Media announcements • Periodical press releases • Face-to-face meetings • On-going communication with relevant stakeholders 	Pre-construction, Construction, Operation (face-to-face meetings at least semi-annually)

Stakeholder engagement is a continuous process that should be monitored and updated as necessary according to the needs of new activities in order to maintain constructive relationships with the customers, local communities and other stakeholders. The company website will be updated to include information on Project related activities and any changes in environmental policy, plans and procedures that are followed. All comments and grievances will be managed in accordance with the Grievance Mechanism of OEDAŞ as described in Chapter 7.

As detailed in Chapter 2, planned investments by OEDAŞ are mainly related with the distribution network and planned in the five regions (Eskisehir, Afyon, Usak, Kutahya and Bilecik) based on tentative investment planning. OEDAŞ will ensure necessary coordination with communities, directly affected landowners/users, customers and local authorities (i.e. village leaders, municipalities and governorships) during construction and the lifetime of electricity distribution operations. Regional public consultation meetings will be conducted with the local communities with participation of directly affected landowners/users and representatives of local authorities, to ensure disclosure of Project related information at least 30 days prior to relevant activities (to cover pre-construction, construction and operations stages). Additionally, the Investments Department of OEDAŞ will inform local authorities in writing regarding any planned construction activities in the relevant region at least 10 days prior to start of the relevant investment works.

The exact dates/times and venues of public meetings will be announced through the company website (<http://www.osmangaziedas.com.tr/>), media announcements, and brochures/handouts/posters and written notifications of local authorities who will then inform communities. There is a total of 328 tentative investment projects planned for 2018 in five regions. Details of each planned project are presented in Annex A.

Information on planned investment for 2018 – OEDAŞ

Afyon	
District	# of project
Başmakçı	2
Bayat	1
Bolvadin	4
Çay	4
Dazkırı	3
Dinar	13
Emirdağ	9
Hocalar	1
İhsaniye	6
İscehisar	4
Kızılören	3
Merkez	15
Sandıklı	6
Sinanpaşa	4
Sultandağı	3
Şuhut	2
Subtotal	80

Bilecik	
District	# of project
Bozüyük	3
Gölpazarı	3
Merkez	3
Osmaneli	3
Paşalar	1
Pazaryeri	2
Söğüt	2
Yenipazar	1
Subtotal	18

Uşak	
District	# of project
Banaz	1
Eşme	1
Karahallı	1
Merkez	5
Subtotal	8

Eskişehir	
District	# of project
Alpu	6
Çifteler	4
Günyüzü	2
Han	1
İnönü	5
Mahmudiye	2
Merkez	22
Mihalgazi	1
Odunpazarı	13
Sarıcakaya	1
Seyitgazi	7
Sivrihisar	12
Tepebaşı	13
Subtotal	89

Kütahya	
District	# of project
Altıntaş	12
Aslanapa	8
Bayat	1
Çavdarhisar	1
Dumlupınar	1
Emet	8
Gediz	11
Hisarcık	4
Merkez	45
Pazarlar	1
Seyitömer	2
Simav	19
Tavşanlı	20
Subtotal	133

7 GRIEVANCE MECHANISM

Existing Customer Grievance Mechanisms of OEDAŞ:

As noted above, OEDAŞ manages public grievances and comments through its grievance evaluation and resolution procedure. The main characteristics of the available customer grievance mechanism are as follows:

- As described in Chapter 5 above, communication with customers is carried out through the contact forms available in the company website (<http://www.osmangaziedas.com.tr/>) and the call center ('**ALO 186**'). Please note that ALO 186 is subject to tariff costs.
- Submitted grievances are first recorded and reviewed by the OEDAŞ Head Office and Regional Office Management. The management then directs the grievance to the relevant department of the company for evaluation and resolution, and informs the customer based on the feedback he/she receives from the department.
- Maximum response/ complaint resolution period to customers' grievances is 15-20 days, in accordance with timetables provided by regulations and penalties are applied in case of exceeding the response period.
- In addition, it is possible for the public to submit views and grievances to a national system called BIMER-Prime Ministry Communication Center. Views and grievances can be submitted through BIMER website, telephone, mail or in person. According to Turkish legislation on access to information (Law No: 4982), responses to all information requests and grievances should be made in a maximum of 15 working days by the company to the relevant authority where the complaint is raised.
- All submitted grievances and demands are recorded by OEDAŞ and assessed fairly and appropriately in accordance with the company's internal procedures.

Grievance Mechanism Developed for the Project:

OEDAŞ will maintain its existing customer grievance mechanism described above for construction and operation activities.

In addition, OEDAŞ will enhance its grievance mechanism by carefully implementing the procedures described below to effectively address Project related issues and grievances (i.e. future investments and relevant construction/operational activities) and all affected stakeholders. This will ensure that all comments, suggestions and complaints received from the stakeholders especially from landowners/users and local communities that are mostly affected by the future investments are dealt with appropriately and in a timely manner. **All grievances will be acknowledged within 5 working days; responded to within 15 working days and closed out no later than a total of 20 working days.** If a longer term programme is required to provide an adequate solution then this programme will be detailed on the register against the specific grievance and complainant will be informed about the new schedule for complaint resolution.

Local communities will be informed about the grievance mechanism during the consultation and disclosure activities which will take place prior to and during construction and through the company website, (this SEP which is on public domain at the website), and community leaflets, handouts, posters that will be distributed in each affected village/settlement. The future project activities/investments will also be disclosed through press releases. Face to face meetings will be held with each affected community to discuss project activities, timetables and updates (particularly related

to any activities requiring physical or economic displacement and compensation process as well as those likely to cause disturbance such as disruption of traffic, generation of dust/noise, etc.).

OEDAŞ welcomes any comments or any other enquiries on the commitments within this document or the Project in general. OEDAŞ is committed to an open and fully formalized approach to management of any grievances in relation to the Project and related construction activities. Stakeholders may use the existing communication system described above to submit their comments/grievances related to the Project (i.e. company websites, call center, Customer Care Department). See the contact details on the last page of this SEP.

An overview of grievance handling process is described below:

1. All concerns, complaints or comments related to the existing operations and/or future investment activities of OEDAŞ can be submitted in writing, by email, by telephone or in person at offices (See the contact details on the last page of this SEP). Grievances may be submitted using the 'Comment/Grievance Form' presented in Annex B. Individuals who submit grievances have the right to request that their name be kept confidential.
2. All verbal and written grievances submitted by the stakeholders will be considered. Verbal grievances will be written on grievance forms by the responsible person as defined below.
3. All grievances will be registered in a grievance log to ensure that each grievance is assigned an individual number and that consistent tracking and corrective actions are carried out. The grievance log will contain:
 - Date of submission of the grievance;
 - Reference number;
 - Contact details of the complainant;
 - Content of the grievance;
 - Identification of parties responsible for the resolution;
 - Dates when the investigation was initiated and completed;
 - Findings of the investigation;
 - Proposed corrective action;
 - Date of response sent to the complainant (unless it is anonymous);
 - Statement of satisfaction of the complainant;
 - Date of closing out the grievance; and
 - Any outstanding actions for non-closed grievances.
4. The grievance will be evaluated by OEDAŞ Head Office and Regional Office Management with the assistance of relevant line management in order to identify what actions need to be taken, and an appropriate response will be developed.
5. All grievances will be acknowledged within 5 working days; responded to within 15 working days and closed out no later than a total of 20 working days. The complainant will be contacted through telephone or face-to-face meeting, if needed to confirm that the proposed corrective action taken is satisfactory, and the complainant's response will be recorded in the grievance log.
6. The grievance will be closed out by signing the complaint close out form and the close out date will be recorded in the grievance log. If the complainant is not satisfied with the action taken, further assessment and re-evaluation of the grievance will be undertaken by a higher organizational level within OEDAŞ. The complainant will be informed about the progress on a regular basis.

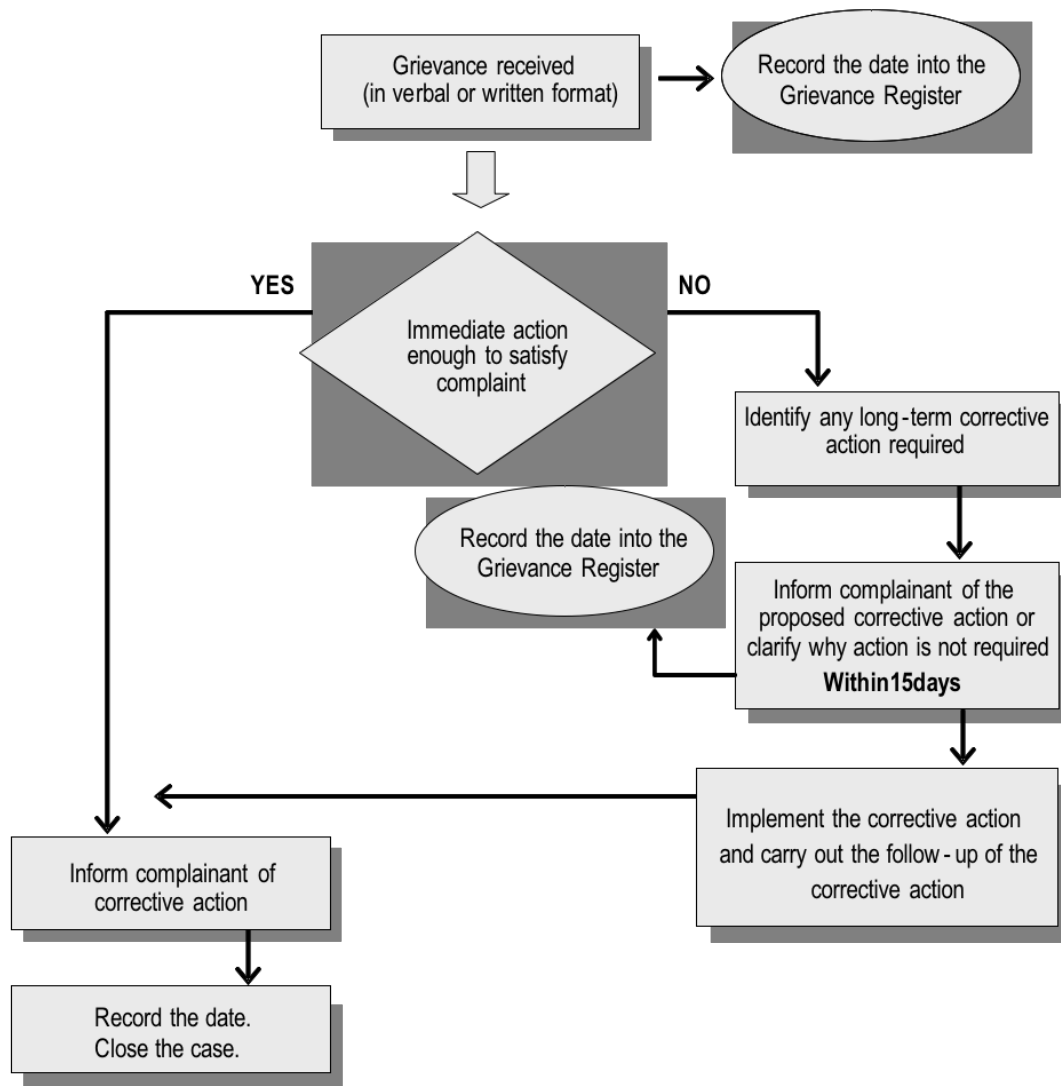
7. Any grievances related to subcontractors' activities will be managed in line with the mechanism described here.
8. All grievances will be recorded and assessed on regular basis to ensure successful close out of all grievances. In case of failures in closure of complaints by the contractors/subcontractors in agreed time, the complainant will be informed about the estimated closing date and will be provided an update about the findings thus far.
9. If grievance evaluation team identifies the received complaint is invalid, it will be rejected while informing the complainant of the decision and their entitlement to seek internal review.

In addition to grievances, comments will be reviewed once a week to identify if they require a response. Comments will be reflected to a comment log that will include information on the date of the comment submission, details of the person submitting the comment, issue of comment, response required or not, and date of response.

All grievances, comments, feedback and all stakeholder engagement activities (i.e. consultation meetings, community health and safety trainings, social investment activities etc.) will be reported on the project website on regular basis. The progress on the implementation of the SEP and implementation of the grievance procedure will also be provided to EBRD and IFC as part of annual Environmental and Social Monitoring Report.

The grievance procedure is presented with a grievance flow chart as given below:

Grievance Procedure



8 RESOURCES AND RESPONSIBILITIES

The implementation of this SEP will be conducted and monitored by OEDAŞ “Osmangazi Elektrik Dağıtım A.Ş.” Units responsible of implementation of this SEP, along with their main roles include the following:

Unit	Roles/Responsibilities
Liaison Officer (to be appointed)	<ul style="list-style-type: none">• Management of the public grievance mechanism related to Project activities as described in Chapter 7 above.• Management of construction contractor’s performance on stakeholder engagement and grievance management.
Customer Relations	<ul style="list-style-type: none">• Handling of customer relations, complaints and applications.
Corporate Communications Department	<ul style="list-style-type: none">• Organization of public meetings, management of media relations and announcements, website announcements and updates.
Investments Department	<ul style="list-style-type: none">• Notifications of governorships/related administrations and local authorities prior to investment works, distribution of informative brochures/handouts and posters at appropriate locations prior to investment works in settlement areas.
Legal Affairs Department	<ul style="list-style-type: none">• Management of relations with regulatory stakeholders related to permitting, emergencies, etc.
Quality Environmental Health Safety Department	<ul style="list-style-type: none">• Handling of environmental and quality related issues with respect to the planned investments and ensuring that community concerns are addressed.
Human Resources Department	<ul style="list-style-type: none">• Management of internal grievance mechanism.

9 REPORTING

All comments and complaints received will be recorded in a comment log and grievance log, respectively. Implementation of SEP shall be reported and shared with the wider public and communities through regular progress update reports and news on the websites.

10 COMPANY CONTACT DETAILS

The contact details for submitting grievances to OEDAŞ and contacting its units are provided below:

OEDAŞ “Osmangazi Elektrik Dağıtım A.Ş.”

İSTİKLAL MAHALLESİ ŞAİR FUZULİ CADDESİ NO:7 26010

ODUNPAZARI / ESKİŞEHİR

E-mail: info@oedas.com.tr

Telephone (Customer Care Department and other departments listed above):

+90 222 211 60 00

Telephone (Customer Call Center): ‘ALO 186’

Fax: +90 222 230 15 53

Website: <http://www.osmangaziedas.com.tr>

ANNEX A

List of Planned Investments for 2018

Province	District	Number of projects	Description of projects	Cost of project (TL)
Afyon	Basmakci	2	LV-HV Power Plant	3,721,089
	Bayat	1	LV-HV Power Plant	2,301,860
	Bolvadin	4	LV-HV Power Plant, Power Transmission Line, Step-down Transformer	2,776,436
	Çay	4	LV-HV Power Plant, Power Transmission Line, MV Power Transmission Line	3,586,965
	Dazkiri	3	LV-HV Power Plant, Lighting Power Transmission Line	1,183,196
	Dinar	13	LV-HV Power Plant, Power Transmission Line, Power Plant	10,545,451
	Emirdag	9	Additional TRP Region, LV-HV Power Plant, LV-MV Power Plant	4,348,420
	Hocalar	1	LV-HV Power Plant	6,004,268
	İhsaniye	6	LV-HV Power Plant	6,619,401
	İscehisar	4	LV-HV Power Plant, Power Transmission Line	2,453,110
	Kızılören	3	Step-down Transformer and Power Transmission Line, LV-HV Power Plant	7,903,592
	Merkez	15	LV-HV Power Plant, Small Additional Facilities	50,249,128
	Sandikli	6	LV-HV Power Plant	7,691,903
	Sinanpasa	4	LV-HV Power Plant	2,013,145
	Sultandagi	3	LV-HV Power Plant, Power Transmission Line	4,018,567
	Suhut	2	LV-HV Power Plant	1,605,721
Bilecik	Bozüyük	3	Additional Facility, Power Transmission Line	4,811,839
	Gölpazari	3	Power Transmission Line	4,860,931
	Merkez	3	Power Transmission Line, Step-down Transformer	5,401,332
	Osmaneli	3	Step-down Transformer, Power Transmission Line	1,545,337
	Pasalar	1	Step-down Transformer and Power Transmission Line	1,408,587
	Pazaryeri	2	Power Transmission Line	2,422,265
	Sugut	2	Power Transmission Line	11,254,729
	Yenipazar	1	Power Transmission Line	276,313
Eskisehir	Alpu	6	Power Transmission Line, LV Power Plant	1,800,104
	Çifteler	4	Power Transmission Line, Step-down Transformer	2,688,241
	Günyüzü	2	Power Transmission Line	395,042
	Han	1	Power Transmission Line	270,397
	İnonü	5	LV Power Plant, Step-down Transformer, Power Transmission Line	811,011
	Mahmudiye	2	Step-down Transformer, Step-down Transformer connected LV-HV Power Plant	378,859
	Merkez	22	LV-HV Transformation, Small Additional Facilities, SCADA/OMS/DMS, Automatic Meter System, Meter Investments, Training Place Construction, PPE Purchasing, Retrofitting Expenses, Expropriation Investments, Approved Project Costs, Environmental Improving Cost, ISO 55001 Asset Management System Establishment Cost	90,732,625

Province	District	Number of projects	Description of projects	Cost of project (TL)
	Mihalgazi	1	Power Transmission Line	158,611
	Odunpazari	13	Power Transmission Line, Step-down Transformer, Power Transmission Line, Underground LV-MV Power Grid	40,915,725
	Saracakaya	1	LV Power Grid	88,295
	Seyitgazi	7	Power Transmission Line	1,986,293
	Sivrihisar	12	Power Transmission Line, LV Power Grid, LV-MV Lighting Power Grid, Step-down Transformer, Power Transmission Line	19,424,396
	Tepebaşı	13	MV Connection, Power Transmission Line, Step-down Transformer, Power Grid	11,216,661
Kutahya	Altıntaş	12	Power Grid, LV-HV Power Grid, Power Transmission Line, Lighting Energy Power Plant, Step-down Transformer and Connection Lines	8,377,663
	Aslanapa	8	LV-HV Power Grid, Step-down Transformer	4,164,033
	Bayat	1	Power Transmission Line	1,923,391
	Çavdarhisar	1	LV-MV Power Grid	2,586,719
	Dumlupınar	1	Lighting Facility	348,524
	Emet	8	LV-HV Power Grid, Power Transmission Line, Step-down Transformer	6,977,099
	Gediz	11	LV-HV Power Grid Maintenance, Power Grid, LV-HV Power Grid, Power Transmission Line	8,606,284
	Hisarcık	4	Power Grid, LV-HV Power Grid	1,365,314
	Merkez	45	LV-HV Power Grid, Power Transmission Line, Lighting, Step-down Transformer, TRP Plant, LV-MV Power Plant	43,502,761
	Pazarlar	1	Step-down Transformer and Power Transmission Line	105,766
	Seyitömer	2	Power Transmission Line, Distribution Center	1,731,740
	Simav	19	LV-HV Power Grid, Power Grid, Power Transmission Line, LV-MV Power Grid	13,121,198
	Tavsanlı	20	LV-HV Power Grid, Road Lighting, Power Grid, Power Transmission Line, Step-down Transformer, Small Additional Facilities	20,083,820
Uşak	Banaz	1	Power Transmission Line and LV-HV Power Plant	5,959,635
	Eşme	1	Power Transmission Line and LV-HV Power Plant	12,676,719
	Karahallı	1	LV-HV Power Plant	4,014,787
	Merkez	5	LV-HV Power Plant, Step-down Transformer, Small Additional Facilities	38,742,985
Total number of projects		328	Total costs	494,158,279

ANNEX B
Comment/Complaint Form

COMMENT/COMPLAINT FORM		
INFORMATION ABOUT THE PERSON SUBMITTING COMMENT AND/OR COMPLAINT (Please leave blank if you wish to remain anonymous. Your comments/complaints will still be considered by OEDAŞ)		
Full Name:		
Date:		
Contact Information: (Please provide necessary information based on how you wish to be contacted)		
By mail		
By phone		
By e-mail.....		
Indicate your purpose: <input type="checkbox"/> Comment <input type="checkbox"/> Complaint Recorded by: <input type="checkbox"/> Person submitting comment/complaint <input type="checkbox"/> Other (please specify who)		Signature confirming receipt of completed Comment/Complaint Form copy
YOUR COMMENTS ON THE PROJECT (Continue on the back of the sheet if required)		
INFORMATION ABOUT YOUR COMPLAINT		
Please Describe the Complaint (Continue on the back of the sheet if required)		
Date of Incident Regarding Complaint <input type="checkbox"/> One time incident/grievance (Date) <input type="checkbox"/> Happened more than once (how many times?) <input type="checkbox"/> On-going (currently experiencing problem)		
What would you propose to resolve the problem? (Continue on the back of the sheet if required)		
This section will be filled by OEDAŞ		
STATUS OF COMMENT		
Comment Logged (Y/N)	Date of submission:	Logged by:
Response Required (Y/N)	Date of response sent:	
STATUS OF COMPLAINT		
Complaint Logged (Y/N)	Date of submission:	Logged by:
Date of Response sent:	Complaint closed (Y/N):	Close out date and signature: