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24 February 2017

Ms Nadia Daellenbach  
Independent Pricing & Regulatory Tribunal  
2-24 Rawson Place  
Sydney NSW 2000

Dear Ms Daellenbach,

**Drafted changes to IPART's Electricity Network Reporting Manual**

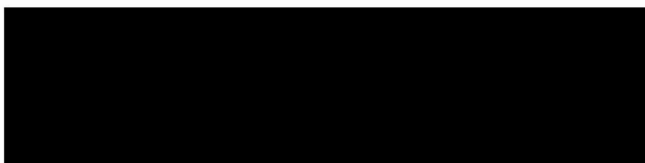
With reference to various changes made by IPART to the Electricity Network Reporting Manual (the manual), Ausgrid has the following comments on the version received on 13 February 2017.

- Ausgrid does not have any specific feedback to provide in response to changes outlined within the revised draft Employment Guarantees section on page 23, but for clarity wishes to advise that the following criteria are utilised for determining the eligibility of a person for clause 20(1)(c):
  - A contracted service provider has a contract with Ausgrid for a period of at least 12 months (lapsed or 12 months ahead);
  - The contracted service provider has a role/s within the contract on an ongoing basis that is for a period of 12 months or more (lapsed or ahead);
  - The role must be fulfilled by an individual person. This person may fulfil the role on an ongoing basis for 12 months or more or the person may have replaced another person during the period of 12 months or more. If there are multiple people associated with the 1 role Ausgrid does not include the role and these individuals within the data i.e. contact centre has 1 FTE answering calls however multiple people could be answering the calls, Ausgrid would exclude this from the FTE count; and
  - The individual person is solely or primarily in connection with Ausgrid on the basis that they work a minimum of 50% of their time exclusively for Ausgrid and no other external contractor for the duration of the time they are working for Ausgrid. Where an individual person may provide services to a number of organizations at any one time during a day Ausgrid would exclude this data i.e. IT support person provides support to Ausgrid on one day but also provides support to other organisations on that same day Ausgrid would exclude this from the FTE count.
- In table 7.4 (page 31), can an 'Other' asset category be added for class 4, 5 and 6 activities? This would be used to capture additional works not covered under the current four categories, such as access tracks, telecommunications, and renewable generation.

- The following conditions in the *Schedule of Ministerially imposed licence conditions of a transacted distribution system* – IPART codes ACI3, ACI5 and ACI7 (Table E.3) – do not contain any specific reporting obligations. However IPART’s brief description in the manual has introduced reporting requirements without any detail as to content.
- The ‘brief descriptions’ of licence conditions 9.2(c) (IPART code ACI3) and 10.2(g) (code ACI7) introduce an obligation to report on progress against implementation and transition plans; for licence conditions 9.4 and 9.5 (code AC15) the manual introduces an obligation to provide details. Can more information be provided about the form of these reports?
  - Are they to be included in the Annual Compliance Report for Critical Infrastructure Licence Conditions? Or a standalone report?
  - Do they need to be audited? If so, by what date?
  - Do they also need to report compliance against Critical Infrastructure Licence Conditions?
  - The reporting frequency for 9.2(c) and 10.2(g) is specified as ‘Annual, and by 15 December 2017.’ Does this mean annually on 15 December every year, or on 15 December 2017 and on 31 August every subsequent year?
- The ‘brief description’ of licence condition 10.2(g) refers to an ‘implementation plan’, however in the licence conditions, the plan is referred to as a ‘transition’ plan.

To ensure effective co-ordination across Ausgrid’s several business units impacted by the different subject areas in the manual, could you please direct any further enquiries to the undersigned.

Yours sincerely,



John Thomson  
Compliance Reporting Manager