

24 February 2017

Mr Hugo Harmstorf
Chief Executive Officer
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop NSW 1240

Dear Mr Harmstorf

RE: Electricity Networks Reporting Manual with drafted updates – submission

Thank you for the opportunity for Endeavour Energy to provide written comment to IPART's review of the Electricity Network Reporting Manual (with drafted updates as at 10 February 2017), which details the reporting requirements for NSW Distribution Network Service Providers (DNSPs).

The information provided in accordance with this manual enables IPART to monitor Endeavour Energy's compliance with our regulatory obligations and assess the performance of our Electricity Network Safety Management System.

As requested by IPART, Endeavour Energy has conducted a review of the amended components of the draft reporting manual and provide detailed comments in Attachment 1 to this letter. Overall, Endeavour Energy is supportive of the drafted updates of the reporting manual that have been highlighted in the revised version for our review and comment.

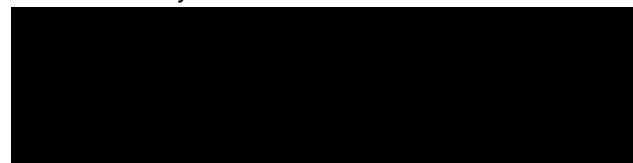
Please note in relation to section 6 – Employee guarantees, Endeavour Energy has reviewed the changes and has no feedback or issues with the proposed changes as they are aligned to the legislation and our application is consistent with their addition to the reporting manual.

Endeavour Energy would like to confirm that this submission does not contain confidential or commercially sensitive information.

Endeavour Energy is committed to safety and reliability and meeting our regulatory obligations and welcome any further involvement required to finalise the reporting manual.

If you have any queries or wish to discuss this matter further please contact Mr Jon Hocking, Manager Network Regulation on [REDACTED] or alternatively via email at [REDACTED].

Yours sincerely



Rod Howard
Acting Chief Executive Officer

Attachment 1: Endeavour Energy comments on draft changes to IPART's Electricity Network Reporting Manual (February 2017)

Reporting Manual Reference	Endeavour Energy comment
Section 7: Table 7.3.2 – Reporting requirements for distribution network operators	Endeavour Energy notes in table 7.3.2 in relation to reporting requirements for class 3 activities, that the following wording has been added “other details of such activity that IPART may require”. Without knowing what this may be, it may be difficult for Endeavour Energy to provide further breakdown of the SER information. Endeavour Energy would welcome any feedback of the issues IPART had in mind when making this change.
Section 7: Table 7.4 – Information on class 4, 5 and 6 activities	Endeavour Energy suggest that IPART replace the word switchgear listed as a categorisation to “Major Substation” as it would align better with the type of works undertaken under an REF.
Appendix C: Table C.1 - Classification of Causal Factors	<ul style="list-style-type: none"> • The classification of causal factors in table C.1 does not cover some major incident scenarios and focusses solely on personnel safety issues. • Endeavour Energy requests that this needs to be expanded as there is not an appropriate selection for reporting asset or network failures. • An example of this is Endeavour Energy’s attempt to report a category 2 fire incident on 7 November 2016. When attempting to complete the IPART online portal, none of the items listed in the drop down manual for “event classification” was appropriate for the fire incident, therefore the reporting could not be completed online and an email had to be sent to IPART notifying them of the issue.
Appendix E: Table E.1 – Distributor licence conditions and obligations – applicable to all licensed distribution network operators	In the first licence condition and obligation listed in table E.1 in Appendix E (IPART Code DL1) the reporting period seems to have been deleted. If this is not intended, it should be reinserted.
Appendix E: Table E.3 – Obligations in the Schedule of Ministerially imposed license conditions of a transacted distribution system	<ul style="list-style-type: none"> • Table E.3 in Appendix E outlines Obligations in the Schedule of Ministerially imposed licence conditions of a transacted distribution system. Previous versions of the Manual provided that this table applied to <u>Ausgrid only</u>, although that qualification now seems to have been removed. • Note 'a' at the footnote of the table (page 70) provides that the requirements are based on Ausgrid's distribution licence. • On its face Table E.3. would appear to be intended to apply to Endeavour Energy upon Endeavour Energy's distribution system becoming a transacted distribution system. • However, it is possible that the distribution licence issued in respect of the Endeavour Energy distribution system upon it becoming a transacted distribution system will differ from the distribution licence issued to Ausgrid (and the obligation under the Manual is to report non-compliances with actual licence conditions, i.e., Table E.3 does not purport to impose additional conditions). • Endeavour Energy therefore suggest that, for clarity, Table E.3 be expressed to apply <u>only</u> to Ausgrid (and the Manual be amended again when the terms of distribution licence that will apply upon the Endeavour Energy distribution system becoming a transacted distribution system being issued) or that Note 'a' at the footnote of the table be amended to provide that, to the extent that the terms of a distribution licence for a transacted distribution system differ from the requirements in Table E.3, the Manual will be updated accordingly.