



Ref: B936319

10 July 2018

Energy network performance measures review
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop NSW 1240

Email: www.ipart.nsw.gov.au/Lodge_a_submission

Dear Sir / Madam

IPART – Draft Electricity networks reporting manual – Safety management system performance measurement

Essential Energy welcomes the opportunity to provide comment on the *Draft Electricity networks reporting manual – Safety management system performance measurement – June 2018* (Manual). Essential Energy supports the approach taken by IPART in developing the Manual, to maximise the usefulness of the information collected by the networks, and reported to IPART and the public, while minimising the regulatory costs on the network operators.

Essential Energy has reviewed the Manual and is generally in agreement with the proposed reporting measures and has provided commentary on specific Tables / Performance Measures as an Attachment to this letter.

If you or your officers have any questions in relation to our response please contact me or alternatively our Compliance Manager, David Mattson, on [REDACTED].

Yours sincerely

[REDACTED]

Chantelle Bramley
GM Strategy, Regulation and Transformation

Attachment – Draft Electricity networks reporting manual comments

Table	Performance Measure / Detail	Essential Energy comments
Table A.1 Major Incidents	Protection of property – Network Property	Essential Energy notes that there is no requirement in the Incident Reporting Manual to report damage to Network Property other than where it relates to a reportable safety or reliability incident. Essential Energy questions the need to report non-electrical (i.e. buildings or fleet vehicles) property damage which has not resulted in a safety or reliability incident. The Electricity networks reporting manual – Incident reporting — April 2018 (Incident Reporting Manual), only requires reporting of incidents where "electricity works" are involved, Essential Energy suggests the Manual should be changed to reflect this.
Table A.2 Incidents	Protection of Property – Network Property	This is a new requirement - refer to comments under Table A.1 Major Incidents. The threshold for Incidents under the Incident Reporting Manual of > \$100K is a relatively low value for rectification of Network Assets. This will result in a considerable number of incidents, of questionable value, reported under this requirement.
Table A.3 Network assets failures	All	Essential Energy will provide 5-year average annual functional failure data for classes of assets where available.
Table A.5 Unintended contact, unauthorised access and electric shocks	‘Originating from network assets’ Network worker Public / Public worker	Essential Energy requests IPART provide a clear definition of ‘originating from network assets’ in the Manual. We suggest there may be benefits in separating electric shock and arc flash events on the network with those occurring on non-network assets (i.e. within customer installations). Essential Energy does not agree with the proposed definition of “Network worker”. Accredited Service Providers employees (ASPs) are not considered Essential Energy workers under the Work Health Safety (WHS) Act. The definition of “Network worker” should remove ASP employee to reflect this. A new category should be added to the table for ASP employees.
Table A.5 Unintended contact, unauthorised access and electric shocks	Animal	Essential Energy requests IPART to provide confirmation that the definition of Animal is consistent with the definition in the Incident Reporting Manual, i.e. ‘livestock or domestic pets’.

Table	Performance Measure / Detail	Essential Energy comments
Table A.5 Unintended contact, unauthorised access and electric shocks	Safe Approach Distance (SAD)	Essential Energy is seeking IPARTs guidance on how to avoid duplication of reporting e.g. an unintentional unauthorised access and a breach of SADs.
Table A.6 Reliability and Quality of Supply	NECF TYPE 1 – Life Support Breach	The definition of NECF TYPE 1 – Life Support Breach needs to be updated to Immediate Reports – Life Support in line with the current AER Compliance Procedures and Guidelines.
Table A.6 Reliability and Quality of Supply	High voltage into Low voltage	This information is captured however not all historical data may be available due to system constraints.
Table A.8 Property Damage	Third party property (assets including vehicles, buildings) Network Property (including non-electrical assets including vehicles, buildings) Agricultural property (eg livestock, crops, buildings)	Essential Energy would like to understand the requirement to separate Agricultural property damage from Third party property damage. Our systems do not currently differentiate between the two categories for property damage incidents. As these are new reporting requirements, Essential Energy does not have current or historical data broken into these categories. Essential Energy is seeking clear definitions from IPART on how to define Agricultural e.g rural, fringe areas, hobby farms, etc It is important to note that for some of these events Essential Energy is either (i) not informed or aware of 3 rd party damage, or (ii) not advised until sometime much later e.g. arising from a claim sometime well after the event.
Table A.8 Property Damage	Fire damage Physical impact damage Electrical damage	Essential Energy would like to understand the requirement to separate Property damage into Fire damage, Physical impact damage and Electrical damage and requests IPART to provide clear definitions and examples of each. Electrical damage would be very difficult to capture, particularly where lightning is involved i.e. lightning strike to premises may cause damage to electrical supply and third-party property and relate to all 3 categories. Also, after lightning events it is difficult to ascertain if electrical damage was caused from Essential Energy assets or the lightning impulse.

Table	Performance Measure / Detail	Essential Energy comments
Table A.14 Authorised Persons Training and competency	All	<p>Essential Energy requests IPART to consider removing this Table from the Manual. All Network Operators have robust authorisation criteria (prerequisite qualifications/competencies) that are confirmed as part of their authorisations process.</p> <p>The criteria that is not aligned to a Unit of Competency is managed and defined by each Network Operator, so there will be differences across the state due to individual business requirements. This diminishes any value that the information in this table would provide.</p> <p>Essential Energy would be happy to meet with IPART and other ENOs to discuss this further if required.</p>
Table B.1 Private Lines and Poles	Performance Measures	Essential Energy has developed a new process to capture this information following on from the findings of the Bushfire Preparedness Audit 2017. As such no historical data will be available.
Table B.1 Private Lines and Poles	HV Customers (metering point count) requiring inspection prior to the start of the reporting year.	Essential Energy has not previously inspected these sites and is unable to provide numbers for this activity. Essential Energy would be happy to discuss this further with IPART to better understand expectations of ENOs regarding HV customer sites.