



22 January 2021

Mr [REDACTED]
Regulatory Reform Adviser, Energy Division

Via email: [REDACTED]

Dear [REDACTED],

Re: CPRG Update – Proposed performance reporting templates and updates to guideline

CitiPower, Powercor and United Energy welcome the opportunity to comment on the Essential Services Commission's (ESCV) consultation relating to the 'Proposed performance reporting templates and updates to the Compliance Performance and Reporting Guideline' (CPRG).

Following the Electricity Distribution Code review on Customer Service Standards, the ESCV has proposed to introduce new performance reporting obligations, and have developed draft performance reporting templates for:

- embedded generator connection timeframes
- unplanned interruption data
- guaranteed service level (GSL) payments.

The ESCV have also drafted a schedule of amendments to the CPRG.

We provide comments on each of these topics in turn below. Our comments focus on ensuring consistency with the Australian Energy Regulator's (AER) reporting obligations to minimise inefficient differences in reporting without a clear driver, and to address areas for improvement or clarification.

A. Embedded generator connection timeframes

- EGCT09 (*Technical or further assessment required*) has two valid options – "Yes" or "No". If the response is "No" then EGCT10 & EGCT11 would not be applicable. EGCT10 & EGCT11 should therefore be "optional" or "if relevant" and not "mandatory"
- EGCT12 (*Date all correctly completed connection paperwork received, including Electrical Works Request and Certificate of Electrical Safety (CES)*) – please amend this to remove the word "correctly" as the validity of how correct/accurate this occurs in the CES Validation. The suggestion that it is "correct" at submission is misleading.
- EGCT14 (*Date meter reconfiguration request received (either the date a service order was received from retailer, or the date a request for meter reconfiguration was received from the customer or their representative)*) – please provide clarification. If this is "the date a service order was received from retailer" it is the same date as EGCT18 (only a single service order is received from the retailer), if this is "the date a request for meter reconfiguration was received from the customer or their representative" it is the same date

as EGCT12 (the submission date by the customer/their agent). Although it is labelled “if relevant” we are concerned this may create confusion in the process/detail.

B. Unplanned interruption data

To ensure consistency on a national basis, it is suggested that the ESCV refer to the definitions contained in the AER’s Distribution Reliability Measures Guideline. For example:

- Momentary interruption (contained in the final decision): an interruption continuing for a period of three minutes or less, except where an interruption less than three minutes has already occurred within that three minute period
- Cumulative hours of interruptions on major event days (CPRG): the cumulative total number of hours without supply on a major event day, where any interruption was more than 3 minutes, that occurred in the reporting quarter
- Count of momentary interruptions (CPRG): The total count of interruptions that were three minutes or less in the reporting quarter
- Unplanned interruption data (CPRG): This data must be provided to the commission on a quarterly basis, following the completion of each quarter in a financial year commencing 1 July 2021. This data must include all unplanned interruption data and include all active National Metering Identifiers (excluding unmetered connection points) even if the supply address did not experience an unplanned interruption.

The ESCV may also wish to refer to the AER definitions of feeder classifications and other definitions to ensure consistency across jurisdictional and national reporting.

C. GSL payments

Rather than populate the ESCV’s proposed draft GSL template and risk transfer errors, we suggest that distributors provide the ESCV a copy of the “Annual RIN worksheet 6.9 STPIS – GSL” that is submitted to the AER. The spreadsheet contains the same information and would be a more efficient use of time.

Should the ESCV have any queries regarding this submission, please contact [REDACTED] on [REDACTED], or [REDACTED]. We are more than happy to discuss our comments above with the ESCV prior to the final version.

Yours sincerely,

[REDACTED]

[REDACTED]

Head of Regulation
CitiPower, Powercor and United Energy