

Our Ref: CM-10114

12 June 2020

Submission via Engage Victoria and by email to edc.review@esc.vic.gov.au

Aaron Yuen
Senior Regulatory Manager, Analysis and Reform (Energy)
Essential Services Commission
Level 37, 2 Lonsdale Street
MELBOURNE VIC 3000

Dear Mr Yuen,

DRAFT DECISION ON REVIEW OF CUSTOMER SERVICE STANDARDS IN THE ELECTRICITY DISTRIBUTION CODE

I am writing in response to the Essential Services Commission's (ESC) draft decision into customer service standards in the Electricity Distribution Code. Energy Safe Victoria (ESV) has reviewed the draft decision and wish to provide the following comments for your consideration.

Informing customers of possible outages when testing bushfire safety technology

ESV notes that the draft decision includes a requirement for "*distributors to publish notices in local or Victorian newspapers to notify local communities about the potential for unplanned outages resulting from testing of bushfire safety technology. Distributors will also be required to post a notice on their websites at least four business days before the testing occurs*".

This requirement is detailed in a proposed new clause, 9.1.15 as shown below:

9.1.15 A **distributor** planning on undertaking testing of **REFCL** must:

- (a) give at least 4 clear **business days'** notice to **customers** of the planned testing by publishing on their website and in relevant local or state newspapers notice of the planned testing;
- (b) include in the notice required to be given under (a):
 - (i) the date and time of the planned testing;
 - (ii) the testing that will be performed;
 - (iii) the potential for unplanned **interruptions** as a result of the testing; and
 - (iv) what **customers** may do in the event of an unplanned **interruption**, including where information on unplanned **interruptions** and estimated restoration times may be found.

The proposed new clause does not define planned testing. There are many different types of tests undertaken on rapid earth fault current limiter (REFCL) networks; stress tests as they are commissioned, initial compliance testing and ongoing annual compliance testing once in operation.

ESV is of the view that asset failures, and thus customer interruptions, are more likely to occur during, or shortly after, stress testing of a new REFCL-protected network, when they are conducted as part of the commissioning process. This testing is specifically designed to confirm that network assets can withstand the over-voltages that occur when a REFCL compensates for a single phase to earth fault. ESV understands that major electricity company (MEC)s already notify customers of these activities.

It should be noted that MECs proactively replace assets that are expected to fail (referred to as hardening works) prior to stress testing in order to minimise customer interruptions as far as practicable. This activity has matured as experience has been gained throughout the delivery program; therefore ESV would expect customer interruptions to decrease even further over time.

Stress testing is closely followed by initial compliance testing. Historically this has required in the order of 100-150 tests to be performed at each Zone Substation to ensure that the REFCL meets the *required capacity* requirements as defined in the *Electricity Safety Act 1998* and the *Electricity Safety (Bushfire Mitigation) Regulations 2013*. From ESV's experience, some failures have occurred as a result of this activity, but they have generally been few, and again are decreasing with experience.

In regard to ongoing annual compliance testing, ESV recently accepted Powercor's updated policy that allows for a substantially reduced number of tests, where sites have already been tested at least once and there have been no material network changes that would affect performance. Theory and recent operational experience has shown that full testing of complying substations is not required to re-confirm performance where there have been no material changes to the network.

This approach was successfully taken for testing at Camperdown recently with 20 tests being performed in one day, compared to 128 tests over a week for initial testing in 2018. ESV anticipates that AusNet Services will implement a similar approach in the near future, which will greatly reduce the number of tests and the associated risk of outages.

ESV is of the view that outages resulting from REFCL testing are becoming increasingly rare due to the more mature understanding gained from having now completed a considerable volume of hardening works and testing over recent years. Any outage is usually due to fault types that can occur at any time of the year regardless of whether REFCL protected or not.

ESV is concerned that the requirement to notify customers of planned testing will:

- add an unnecessary burden to notify customers of what is now considered fairly routine live network testing
- lead to unsubstantiated and unjustified negative perceptions of this critical safety program by the community
- hinder the MECs ability to perform uninterrupted testing that may lead to delays in the REFCL delivery program and realisation of safety benefits to the community
- limit the necessary flexibility the distribution company requires in its REFCL testing program to make changes due to weather events or other network issues, which will

then cause delays in the REFCL delivery program and the realisation of safety benefits to the community.

ESV understands that outages are of a concern to customers, but given that the REFCL program is such an important Victorian Government bushfire safety initiative, ESV believes that the requirement to notify customers prior to any testing is not warranted and should be removed, or at a minimum restricted to only be for stress testing as part of the initial commissioning process.

Should you have any queries regarding this matter, please contact me directly by email [REDACTED] or telephone [REDACTED]

Yours sincerely

A handwritten signature in black ink that reads "Brett Fox". The signature is written in a cursive, flowing style.

Brett Fox
HEAD OF ELECTRICAL NETWORK INFRASTRUCTURE