

19 January 2023

Natalie Kent Regulatory Analyst Energy Division Essential Services Commission By email (energyreform@esc.vic.gov.au)

Dear Natalie

Greenfields Negotiated Underground Electricity Connection Customer Service Standards Review 2023

Thank you for inviting HIA to comment on the revised Greenfields Negotiated Underground Electricity Connection Customer Service Standards.

The Housing Industry (HIA) is Australia's peak residential building industry association. HIA exists to service the businesses it represents, lobby for the best possible business environment for the building industry and to encourage a responsible and quality driven, affordable residential building and development industry.

HIA has also been independently contacted by the Department of Environment, Land, Water and Planning (DELWP), which is considering a Ministerial order for regulating timeframes. This may potentially introduce penalties for distribution businesses for not meeting performance targets.

We also understand these regulated timeframes may consider the performance metrics that distribution businesses have proposed through the ESC's processes to revise the Greenfields Negotiated Electricity Connection Customer Service Standards. HIA does not purport to comment on DELWP's independent review in this submission.

The proposal that the Greenfields Underground Negotiated Electricity Connection Customer Service Standards ("the standards") be extended from two to three years is supported by HIA. Allowing more time for the standards to apply before consultation on revised standards commences should be beneficial. HIA expects however that if there is a significant deterioration in the performance of distributors that action will be taken to address that problem.

HIA has no specific comments on the proposed changes to performance reporting metric changes or the consultative committee process.

Ideally the performance metrics would be consistent for all distributors but we understand that there are operational reasons for differences between distributors and the metrics need to be useful as well. CitiPower and Powercor and United Energy should provide a clear explanation as to why the master plan review performance metric is difficult to measure. There may be a case for some metrics not being reported by some distributors but there needs to be an explanation as to why this is appropriate.

We are supportive of a process which requires electricity distributors to regularly meet with developers in consultative committees or similar forums. A quarterly meeting with a consultative committee may not be always necessary provided there is sufficient reporting of performance measures and . HIA has participated in formal

consultative committees as well as provided general feedback on some individual customer outcomes statements.

Ultimately HIA would like the process of connecting electricity in new housing developments to be as fast and efficient as practicable. The sort of continual improvement HIA will be monitoring is for stabilisation of distributor performance in the target ranges.

Please do not hesitate to contact Roger Cooper, Senior Planning Advisor at <u>r.cooper@hia.com.au</u> or 03 9280 8200 should you require any further information about this submission.

Yours sincerely

HOUSING INDUSTRY ASSOCIATION LIMITED

Keith Ryan

Executive Director - Victoria

Keith Ryan