



23 January 2023

Greenfields Electricity Connection Customer Service Standards Review

Stockland welcomes the findings and commitments made by each Electricity Distributor and strongly believes this is a productive way forward within the Greenfields URD space.

Stockland has no objection or additional comments relating to the Revised Customer Service Standards, Consultative Committees & Proposed Customer Outcomes Statements, but feel there is still room for improvement relating to the Performance Reporting Framework; namely around the repercussions of Electrical DBs not meeting the minimum requirements.

Per the below tables, CitiPower/PowerCor, Jemena & AusNet all failed to meet many key metrics in several of the last reporting cycles. If this were to continue once the standards are implemented, what are the expectations of the ESC in ways of ensuring continued failures aren't repeated? Are there penalties for the DBs in these instances?

Table 4: CitiPower and Powercor's performance against metrics for the last two reporting periods

Connection step	Performance measure 2021	Performance measure 2022	Quarterly Performance			
			July to September 2021	October to December 2021	January to March 2022	April to June 2022
Master plan reviewed	70% reviewed in 10 days	80% reviewed in 10 days	77%	64%	45%	17.6%
*Design reviewed	18 days	16 days	16.1 days	19.2 days	22.2 days	19.9 days
As built plans reviewed	70% in 5 days	70% in 5 days	93%	97%	85%	83.1%
*Audit completed	70% in 6 days	70% in 6 days	78%	74%	83%	26.3%
*Issued certificate of practical completion	90% in 5 days	90% in 5 days	94.2%	93%	84.4%	93.7%
Time to tie in	90% by agreed date	>95% by agreed date	100%	100%	98%	94.7%

*Denotes metrics which CitiPower and Powercor proposes to retain.

Table 6: Jemena – performance against metrics in 2021 - 22

Connection step	Performance measure (average days)	Performance measure (maximum days)	Average performance July to December 2021	Average performance January to June 2022
Offer issued	40 days	65 days	50 days	34 days
Master plan reviewed	15 days	20 days	84 days	44 days
Design reviewed	15 days	20 days	34 days	45 days
Pre-commission audit	5 days	10 days	16 days	15 days
Consent to statement of compliance	5 days	10 days	3 days	3 days
Time taken to tie-in	30 days	40 days	36 days	35 days

Table 5: AusNet Services' performance against metrics for the last two reporting periods

Connection step	Performance measure	Quarterly Performance			
		July to September 2021	October to December 2021	January to March 2022	April to June 2022
Designs reviewed approvals	90% in <15 business days	92%	95%	88%	97%
As built plan reviewed	95% in <3 business days	100%	100%	100%	100%
Pre-commission audit	95% in business 10 days	100%	98%	98%	98%
Final network audit	95% in 10 business days	99%	93%	93%	97%

We also believe there are further areas of refinement that could occur within respective DBs to greater enhance the propositions and outcomes within the URD space and remove administrative roadblocks.

- **PowerCor**
 - **Timing of Masterplanning & Approvals** - Commitment around timeframes for Masterplans requires further review and should be included within the reporting framework. This is continually an area that causes excessive delays in the design, approval and ultimately delivery of works. We request that this be included in the metrics, due to PowerCor controlling this process in-house as opposed to the other DBs where third party design consultants manage this process.
- **AusNet:**
 - **Inability to complete concurrent designs** - Current system does not allow for concurrent designs to be completed, reviewed, and approved within the same project. This puts additional pressure on the timing of the design review and approval timeframes, as future designs cannot commence until the current one is completed, creating delays and stop works on sites while the administrative side of the process is being completed. This is then compounded by the fact that AusNet's "3-strike policy" (where if Final Audits aren't completed within 90 days of tie-in, the Developer gets a strike on their record, and 3 strikes removes the ability for SoC to be given) requires additional drawing amendments too. As for a Final Audit to be completed, "tie-in details" are required to be added onto previously completed drawings, meaning that these plans need to be "locked-out" again, resulting in future designs not progressing in the timely manner they would have otherwise and again creating another bottleneck of approvals and delays on the ground for works to be completed. We request that the drawing system used by AusNet is updated to allow concurrent designs and approvals to be completed within the same development.
 - **Timing of ACCC & Contracts** – Current process requires contracts to be issued and signed ahead of issuing ACCC and works being able to commence onsite. We request that ACCC's be issued ahead of contracts being provided and executed (at developer's risk) so long as approved plans are issued by AusNet. This removes yet another administrative item in process and given commentary above about the already elongated design review and approval process in AusNet, all savings would be considered beneficial. As part of this change, we propose that contracts need to be received and executed prior to SoC being issued.

We thank you for the opportunity to be a part of this process and look forward to working collaboratively with the ESC on driving positive outcomes for the industry.

Yours sincerely,



Zeb Roberts
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