



23 January 2023

ESC Consultation Team
Essential Services Commission
By email: reception@esc.vic.gov.au

Dear ESC Consultation Team,

Submission: UDIA Victoria's response to Resetting the greenfields underground negotiated electricity connection customer service standards consultation paper

The Urban Development Institute of Australia, Victoria (UDIA Victoria) welcomes the opportunity to respond to the Essential Service Commission's (ESC) consultation paper, *Resetting the greenfields underground negotiated electricity connection customer service standards*.

UDIA Victoria is the peak body representing the urban development industry. UDIA Victoria is a non-profit advocacy, research and educational organisation supported by a membership of land use and property development organisations, across the private sector and Victoria's public service. We are committed to working with both industry and Government to deliver housing, infrastructure, and liveable communities for all Victorians.

Having previously submitted to the ESC on this matter (attached), UDIA Victoria is eager to relay the industry's feedback concerning the proposed amendments surrounding reportable metrics for each distribution business, amendments to customer response information as well as bring forward recommendations concerning further developing the interconnectivity between stakeholders and providers for the benefit of all Victorians.

Powercor and CitiPower Metrics

UDIA Victoria acknowledges the significant improvements made by Powercor throughout the consultation process, with marked improvement in communication and engagement, including their involvement within the consultation committee. We applaud Powercor's willingness to not only participate but engage.

Powercor and CitiPower have proposed a reduction in reportable metrics moving from six to three. UDIA Victoria is in favour of the proposed three amendments set out below, although the full six criteria should be retained with the following amendments to timeframes.

1. **Design review:** 15 days as a performance measure (previously 16 days for 2022), and 20 days as a target.
2. **Requested final audit (first audit):** 70 per cent within six days as a performance measure, and 70 per cent within eight days as a target.
3. **Countersign certificate of practical completion:** 90 per cent within five days as their compliance target and 95 per cent with their performance target.

Industry acknowledges the current level of engagement from Powercor. However, UDIA Victoria mirrors concerns outlined by the ESC within the consultation paper itself (page 9), that the removal of metrics like the master plan review measure will potentially lead to a continued and marked

reduction in performance in these fields. We also note that CitiPower and Powercor proposed these metrics be moved to 'compliance targets', which would exempt them from any potential legislated penalties associated with the current consultation. Removing these controls will limit the ability to mitigate any future issues. Future-proofing the system will ensure that the timely creation of liveable dwellings continues, in turn ensuring increased tax revenue for the State and homes for Victorians.

Industry proposes increasing the flexibility of those fields versus their removal, as follows:

1. **Master planned reviewed:** Reverting to the 2021 target of 70 per cent in 10 days as their compliance target while retaining 80 per cent in 10 days as the performance target.
2. **As-built plans reviewed:** Maintain the current 70 per cent in five days as lengthening or removing this metric will significantly impact industry.
3. **Time to tie in:** Maintain current >95 per cent by the agreed date.

We understand that the (then) Department of Environment, Land, Water and Planning is in favour of utilising the same outlined metrics proposed originally within the ESC consultation paper regulating three stages of the connection process: master plan, design review and the audit stage. To that end, aligning timelines would reduce the potential complications surrounding reporting and also further cement calls to maintain reporting of the full six criteria.

Powercor and CitiPower Proposed Customer Outcome Statements and Meeting Frequency

UDIA Victoria does not oppose Powercor and CitiPower's proposed customer outcome statements and supports the call to move meetings to biannually with quarterly reporting provided, given their clearer communication channels and willingness to engage with stakeholders.

AusNet Services Metrics

UDIA Victoria does not oppose of AusNet Services call to maintain the same performance framework metrics for the next regulatory periods as previously negotiated.

AusNet Services Proposed Customer Outcome Statements

We recommend that AusNet Services amend the wording on point one of the proposed customer outcome statements, so it closely reflects the current nature of services provided:

1. **Maintain** current high standards for connections timeframes for the parts of the greenfields underground negotiated electricity connection process that are AusNet Services' responsibility.

To

1. **Establish and maintain high standards** for connections timeframes for the parts of the greenfields underground negotiated electricity connection process that are AusNet Services' responsibility.

Jemena Metrics

UDIA Victoria does not oppose maintaining the currently proposed reporting metrics for Jemena. However, UDIA Victoria recommends the creation of a consultation committee, consistent with Powercor and AusNet Services, in place of the requested model of one-on-one consultation. With Jemena's increasing presence across Melbourne's greenfield markets, the early creation and uptake

of this practice would better position both Jemena and developers moving forward to working constructively in line with all other providers.

Jemena Proposed Customer Outcome Statements

We recommend that point one of Jemena's proposed customer outcome statements is amended from:

1. Ongoing digital customer experience improvements – continuous improvement to Jemena's digital platforms, including Jemena Portal.

To.

1. Ongoing **in-person and** digital customer experience improvements – continuous improvement to Jemena's digital platforms including Jemena Portal **and face-to-face customer service consultations.**

Whilst digital platforms can bring efficiencies, the continuation of in-person contact is critical to ensure greater outcomes for both parties. Increased engagement and incidental communication assists parties to work collaboratively and to solve issues, reducing potential escalations.

United Energy Metrics

For the same reasons as Powercor and CitiPower, UDIA Victoria does not support the reduction of United Energy's reportable metrics.

United Energy Proposed Customer Outcome Statements and Meeting Frequency

UDIA Victoria does not oppose United Energy's proposed amendments to its customer outcome statements and moving to a biannual consultation, provided that quarterly reports are provided by United Energy against their targeted metrics.

Conclusion

UDIA Victoria is grateful for the opportunity to provide our industry's feedback throughout this process and looks forward to continuing to work with both distribution businesses and the ESC to create the best possible outcomes for all parties.

Contact

Should you wish to discuss any of the matters raised in this response, please contact our Policy and Communications Officer, Callum Wilkinson, at callum@udiavic.com.au.

Yours faithfully



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