

22 January 2021

Energy Team
Essential Services Commission (Victoria)
Level 8, 570 Bourke St
Melbourne Victoria 3000

Dear [REDACTED]

Compliance and Performance Reporting Guideline - Proposed performance indicator reports

AusNet Services welcomes the opportunity to respond to the Essential Services Commission's (the **Commission**) proposed amendments to the Compliance and Performance Reporting Guideline (**CPRG**) and associated templates relating to new performance indicators for electricity distributors.

Thank you for the consultation activities the Commission has undertaken to update the CPRG and define the reporting requirements.

Reviewing and updating compliance and performance reporting requirements in line with recent reforms is a necessary step to ensure obligations that protect Victorian energy consumers with respect to price, quality, and reliability, are monitored, assessed, reported, and remediated (where necessary), as part of compliance frameworks.


Feedback is split into three categories covering the three new performance indicator reports:

1. Clarification
2. Timing of reports
3. Typographical & formatting

If you have any questions about our submission or wish to discuss this in more detail, please contact [REDACTED] at [REDACTED]

Sincerely

[REDACTED]
Compliance Officer
AusNet Service

Document Type	Document reference	Feedback
CPRG	Schedule 4 (1.1) Embedded generator connection timeframe indicators EGCT02	Clarification AusNet Service requests clarification on the definition of 'completed applications'. Where a meter reconfiguration is required, is the completion date considered when the meter configuration and solar tariff change? Where a meter reconfiguration is not required, connection validation is considered the completion date.
CPRG	Schedule 4 (1.1) Embedded generator connection timeframe indicators EGCT05	Clarification AusNet Services supports that this is an optional field.  The indicators already include date and NMI. These are more meaningful and useful for measuring performance. Furthermore, AusNet Services suggests that if there is no merit in collecting the Application Number, the Commission considers removing this indicator.
CPRG	Schedule 4 (1.1) Embedded generator connection timeframe indicators EGCT10	Clarification When a technical assessment is received an invoice is issued to a customer who has 30 business days for payment. Work does not proceed until payment is received. Payment of the invoice is considered the technical or further assessment application date. Clarification is required from the Commission that AusNet Services can continue to use invoice payment date as the technical or further assessment application date.
CPRG	Section 1.6 (Table 1.2) Performance Indicators – unplanned interruption data	Timing of reports Unplanned interruption data has been requested on a quarterly basis with due dates one month following the end of the quarter. AusNet Services is happy to provide the Commission quarterly unplanned interruption data, however, we recommend the due date is aligned with the new obligations under 6.4.3(b), 6.4.4(b) & 6.4.5 (Time for payment). Unplanned interruption data is used for the calculation of GSL payments. The EDC obligates that the time for payment of GSLs is 60 business days, as such, we believe it is necessary and more pragmatic to align performance reporting timeframes with payment provisions as the same data and validation activities are required. Aligning the performance reporting due date to the GSL payment timeframe ensures: <ul style="list-style-type: none"> - that operational teams have sufficient time to validate GSLs and widespread outages that occur on major event days; and - the Commission will receive data that matches GSL payments made in that quarter. Furthermore, there is no detriment to customers if our unplanned interruption performance report is aligned to GSL payment provisions.

Document Type	Document reference	Feedback
CPRG	Section 1.6 (Table 1.2) Performance indicators – guaranteed service level data & Section 4 (1.2) Guaranteed Service Level data	Timing of reports The Commission has noted that the first GSL performance report is due 30 September 2022 (and annually thereafter). AusNet Services recommends the due date is changed to 31 October 2022 to align with annual reporting to the AER.
		Annual data reconciliation Due to outage incidents that may extend beyond the quarter and normal operational quality assurance, unplanned interruption data may change throughout the year. To account for any changes to the data that may occur AusNet Services would like to provide a finalised and audited version of unplanned outage data (cumulative) following the end of the financial year, aligned with annual reporting to the AER.
CPRG	Section 1.6	Typographical & formatting Include the word 'also' under 1.6. <i>Electricity distribution licensees are also required to report on their performance in accordance with this guideline.</i> Assuming this sentence will follow the leading sentence under section 1.6 of the existing CPRG, the addition of 'also' ensures the section reads better (as indicated below). <i>Electricity and gas distribution licensees are required to report any potential noncompliance that they believe has occurred, or is reasonably likely to occur, in accordance with this guideline.</i> <i>Electricity distribution licensees are also required to report on their performance in accordance with this guideline.</i>
CPRG	Section 1.6 (Table 1.2)	Typographical & formatting Separate the 'Performance indicators - embedded generator connection timeframe indicators and unplanned interruption data' on separate rows. This will make it clearer that these are separate performance reports.
CPRG	Section 1.6 Form and contents of reports	Typographical & formatting The Commission has indicated the naming convention for 'GSL data' be [Distributor]_GSL_Year_Quarter].csv. However, this data has been requested on an annual basis only. The last part of the naming convention should reflect Financial Year to ensure the naming convention captures the report as an annual requirement