

Engage Victoria Submissions (Electricity Distribution Code Review – Issues paper)

Every dot point indicates a different individual comment.

Customer service standards – Communication of potential outages	
1. Should we set an obligation on distributors to proactively contact vulnerable (such as life support) customers before a potential unplanned outage?	<ul style="list-style-type: none"> • Yes
	<ul style="list-style-type: none"> • Unplanned power outages is common only due to BAD MAINTENANCE, ... COLLAPSED , ... TRANSFORMERS, ... interference by un-controlled vegetation and the off shore money getting into multi developments, not doing their home work to the consumption of power needed for 200, 400, units on a site which is happening. Regrettably for life support, the problem with absolute time need, must be identified, to the need of permanent relocation of the individual , or Solar Batteries to maintain a essential power source
2. How should we update the current obligation on distributors informing government departments of unplanned long outages?	<ul style="list-style-type: none"> • I don't know
	<ul style="list-style-type: none"> • In this instance, because of the generation major problem by fuel needed, lack of practical generators by numbers, for adequate power available , LOSS of generated, by Power having to travel the distance by line to major cities through

	<p>out Victoria, it is essential the the Gov. of the day have constant contact with the privatized essential service who's priority, is profit with absolute minim \$\$ expenditure. Then with privatization you have the hypothetical problem of KICK BACKS, to avoid controlling issues between parties of both parts. I do believe there is major problems on the horizon, leaving nuclear the end result, but is there enough water available. to run it, and it must be owned by the Gov. of the day, NOT privatized MONEY generators, there were very bad mistakes made back in the 80's. this give us this calamity now.</p>
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Customer service standards – Communication of planned outages	
<p>3. What form of notification or engagement should be provided to customers by electricity distributors before a planned outage?</p>	<ul style="list-style-type: none"> • Letter or sms Letters give elderly people plenty of time to plan ahead. Not the internet. In rural areas, the internet does not always work. <hr/> <ul style="list-style-type: none"> • This is essential , especially when the health of the individual is concerned BUT also, for the individual, to take any precaution available, to prevent consumer loss or damage to the investment in one's property.United energy has been a good example, with one interruption, and a 2nd on the way, with a detailed sheet of what to expect, which means you may have to stay home for the day because of the automatic apparatus, electronics in the home, which suffer badly from quality and bad warranties, then possible relay collapse in the solar inverter.

<p>4. Should we impose a new obligation to notify customers of a cancelled or rescheduled planned outage?</p>	<ul style="list-style-type: none"> • Yes
	<ul style="list-style-type: none"> • THIS is an absolute need, I HAVE NO HESITATION SAYING, THEIR MUST BE A PENALTY, WITH \$\$ COMPENSATION, AS IT COULD BE A SIGN OF TOTALLY INCOMPETENCE ON THE PART OF THE DISTRIBUTOR, TO THE RETAILER OF POWER TO THE RESIDENTS AND SMALL BUSINESS OF THE STREET, SUBURB, CITY. THE RESIDENT MUST KNOW!!! AS IT WILL BE A CLEAR INDICATION OF THE CAPABILITY OF THE GOV. OF THE DAY. (which from my experience with the community groups, they wish to shoot the messenger.)

Customer service standards – Guaranteed service level scheme	
<p>5. Should the purpose of the scheme be redirected to address poor service or something else altogether?</p>	<ul style="list-style-type: none"> • I am not sure
	<ul style="list-style-type: none"> • YES. to readdress poor service, lack of information, threatening situations, by NO knowledge to supply & voltage, redirection to loop holes to avoid responsible against profit , to eventually collapse as the supply of essential utilities is paramount, to control the utilities is a must, for life essentials, the consumer can not find alternatives to electricity, gas, water, (water by the way is becoming a bit of a joke, if I stand in the rain, I will probably be charged for it.)

<p>6. Are there other ways we should think about improving service levels for the worst parts of the network in the code?</p>	<ul style="list-style-type: none"> • Some parts of the network have inadequate supply infrastructure to take up new technologies such as solar.
<p>7. Is each payment category still fit-for-purpose in meeting the overall purpose of the guaranteed service level Issues paper questions Essential Services Commission Electricity Distribution Code Review 9 scheme?</p>	<ul style="list-style-type: none"> • Yes, the home work for Off shore \$\$\$\$ developing residential ares, then dodgy builders, home builders, the E.S.C must , or an appropriate body must, be consulted for appropriate are's, suitable to consumer, for adequate supply to the demand needed, as at this day, & date, related to generated capacity and line travel to the consumer. • I am not sure • Invoicing could be a lot simpler, tricky discount rates for payment in a couple of days, then massive extra's if not, this sort of payment makes one wonder how much Aussie \$\$\$ is disappearing over sea's and not maintaining the system. (like solar panel industr, I am told some 960 Co's have jumped ship, leaving a lot of frustrated people with little or NO access to the warranties given, the 11 cents tariff is a insult to the purchaser, not realizing the the tariff will neve rreplace the cost of keeping the system functional, every year.
<p>8. Should customers receive a low reliability payment and a restoration payment?</p>	<ul style="list-style-type: none"> • Yes • MOST DEFINITELY, the warranty given on the original purchase must be honored, with penalty & punishment, for failure to honor the warranty, by promises made, to sell the system to people of the land to purchase, it is most important as solar panels are as bad as the LEMONS in the new car industry.

<p>9. Are there new categories that we should consider including in the scheme?</p>	<ul style="list-style-type: none"> • Redress for food producers who rely on electricity supply. At the moment, the producers carries all the business outage cost and continuity planning when power fails (such as generators). But the food they supply supplies the state.
	<ul style="list-style-type: none"> • I have NO hesitation in saying more issues will arise, as the consumer becomes victim to the sale of an essential utilities, so their must be point of LEGAL representation for the consumer victim, to be able to address the problem without massive costs, not of their own intention. BUT! the consumer victim must be aware, the warranties must be on letter head heading of the Co. of the sale conducted, as far to many inverters sold, importer , retailer, will try, and most often do, say the installer employed by them is responsible for all warranties stated. The installer, what a fraudulent practice, the installer believes he is employed by the seller of the system, and in most cases, would not have the capitol to replace the system by default to warranty given, this is why to many installers have jumped ship, because the seller of t
<p>10. we change our principle of worst served customer to capture systemic poor performance?</p>	<ul style="list-style-type: none"> • Not sure
	<ul style="list-style-type: none"> • YES, history in the building industry, and all mechanicals in / to , the building industry, MUST be be recorded, especially the failures, of materials, deviation of the trade practices of design to strength, especially slabs, to the safety of the purchaser, consumer, or having to travel through the building. (cladding as at this day and date, is a good example, of who takes the blame, the purchaser, ... the builder, ... the sub-contractor, ... or the consumer on purchase, ...

	<p>but where and what exactly was local council doing not to check this abomination, to side step the safety issue, and life of the end product.)</p>
<p>11. Are there any outage scenarios we should include or exclude from the scheme?</p>	<ul style="list-style-type: none"> • Not sure <hr/> <ul style="list-style-type: none"> • system to operate with some life to the product, as far as the stake holder go's, it is imperative of the management to make the money, irrespective, but not obvious, to provide the perks & pleasures contract packages, of the management tree, and shareholders , if they exist. <hr/> <ul style="list-style-type: none"> • There are none, to be NOT included, with definition, as what ever happens under a inclusion, with NO definition, I can say, they offending party will re-define a definition of the fault interpretation to their own \$\$\$\$ saving benefit.
<p>12. Should we impose timeframes for guaranteed service level scheme payments?</p>	<ul style="list-style-type: none"> • Not sure <hr/> <ul style="list-style-type: none"> • YES, as the building industry is not a continuous employment , 9 to 5 situation, as the contract has to be found, the \$\$ terms have to be confirmed in writing, as sub-contractors have a high rate of the \$\$ loss, on a major project, as they have on residential gain, by 2nd quality of the quality stipulated, then short cut the slab concrete, but adequate power supply to run the equipment

	<p>needed to give job quality. (you could say, just what exactly, is local council doing, to approve correctness of the safety of job, and essential utilities on site, for correct and adequate consumption.???))</p>
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Technical standards – Voltage standards

<p>13. Should the commission review the distributor’s voltage standards in the way distributors should manage voltage? In particular, we are seeking stakeholder feedback on the potential options for reviewing voltage standards, such as considering a ‘best endeavours’ approach or adapting the industry-recognised Australian Standard (AS 61000.3.100) for voltage management?</p>	<ul style="list-style-type: none"> • I do not know. What are the implications for bushfire scenarios?
	<ul style="list-style-type: none"> • YES, A voltage standard is absolute, as many existing white goods, need the 240 - 50 volt
<p>14. What are the appropriate customer protections relating to voltage management that we should consider? In particular, we welcome stakeholder feedback on how any changes to voltage standards might interact with Electricity Industry Guideline 11 – Voltage variation compensation.</p>	<ul style="list-style-type: none"> • ON - LINE payments , must never, be compulsory , or absolute, there must be a defined date of payment on receipt of the invoice not when it is put together and sent 5, 6 days after it is compiled then a big problem is when the pensioner receives all , electric, gas, water , in the one week one hell of a bill out of the disposable \$\$ of the pension.

Technical standards – Supply frequency	
15. Is there a need to consider the management of frequency in micro-grids and stand-alone power systems? And is it appropriate for these standards to be considered in the Electricity Distribution Code?	<ul style="list-style-type: none"> I don't know
	<ul style="list-style-type: none"> A standard must be set for any & all mechanical construction, or component, or apparatus, simply to prevent fraudulent practice of the retailer, and , supply down the line to the retailer, and regrettably the end consumer, as if the system can be tricked it most certainly will be. home generation will need to be watched carefully, to not corrupt line into the property, if so.

Technical standards – Minimum technical requirement for embedded generation	
16. Should we consider expanding the existing standards to capture all embedded generation technology?	<ul style="list-style-type: none"> I don't know
	<ul style="list-style-type: none"> Yes, as the consumer as others will, in some case accidentally corrupt the system but others may well look, to corrupt the system to the maxim, possible damage to out side the consumer use area.
17. Aggregation is a new and evolving model in the energy landscape. What matters should we be taking into consideration? Are there other matters we should be taking into consideration for this topic?	<ul style="list-style-type: none"> Not sure.
	<ul style="list-style-type: none"> I am not much help here as the terminology of the word must be clearly defined, and how one may, or can interrupt same, especially the legal profession simply because if the confetti hits the fan, you do not to have to contend with massive \$\$ count , and years to pick up the pieces.
	<ul style="list-style-type: none"> I don't know.

<p>18. Should we retire our register and harmonise by requiring distributors to comply with the national register only? What may be the potential benefits or issues with retiring our register?</p>	<ul style="list-style-type: none"> • NO! harmonizing is like the agreement over drinks, verbally easily misinterpreted, ... never said so, ... have not a clue, ... to what was discussed or agreed to. ... or what exactly will we fight over ... for stuffed up management trying to touch the peoples pocket.
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Technical standards – Other technical regulations	
<p>19. Should we review the power factor range and consider alignment with industry practices?</p>	<ul style="list-style-type: none"> • I am not sure however I hope all that is done complies with the appropriate standards and minimums. • Industry practices leave a lot to be desired, my reply is NO,! if you remain responsible for the totally management of Victorian power to the total State, and the resident, you must have the rule to make the system work without abuse by consumption or money.
<p>20. Should we consider harmonising with the National Electricity Rule and adapt the Australian Standard (AS 61000.3.6) for harmonics? What may be the potential benefits and or issues with harmonising?</p>	<ul style="list-style-type: none"> • I am not sure, however its appropriate we comply with standards as a minimum. • This unfortunately, is a problem, especially to the ethics of the discussion, as the party of the Commonwealth, to party of opposition of the State, who will play who, against the other for massive \$\$ contribution to the politics of the day, to win another day, and this is what the citizen of the day does not really understand, because of the time needed to understand and have the privilege of total access, but then , you could say,

	<p>too many over paid cooks just bugger up the simple pie.</p>
<p>21. Should the negative sequence limits of the code be harmonised with the national limits? What may be the potential benefits and or issues with harmonising?</p>	<ul style="list-style-type: none"> • I'm not sure
	<ul style="list-style-type: none"> • This is simple, you must have the intelligence to appreciate, and see the need, to practical commonsense discussion, where all states may benefit in Australia wide, by joint discussion to a contribution to reasonably quick electrical supply, (this I guess is like waiting for Moses to come down off Westgate) Australia is one hell of a big country, Australians were very much the retards till after the W11 WHEN HOMAGE TO THE MOTHER COUNTRY WAS NOT ALL THAT PRATICAL AUSTRALIAN BADLY NEEDED HOME INDUSTRY AND ESSENTIAL UTILITIES OWNED BY THE HOME COUNTRY IS ABSOLUTELY ESSENTIAL.

Other code issues	
<p>22. Are there any defined terms that you think are no longer correct or relevant that we need to address?</p>	<ul style="list-style-type: none"> • Victoria, and the people of Victoria are the owners, must be the owners of all essential utilities, they need and pay for , the requirement to an efficient, ... safe, ... & healthy standard, NOT off shore profiting from the Australian consumer, then most likely not paying tax, or avoiding the the tax that should be paid • The definition of Melbourne CBD should be changed, or the area defined as required to deliver a Melbourne CBD security of supply should be changed to address the continued expansion of Melbourne's financial, office and commerce centre.

	<p>The Docklands, St Kilda Boulevard and the Biomedical precinct are currently not included. The definition could also be expanded to include Fishermans Bend due to the current and future employment functions in the area.</p> <p>The zoning of land uses in the Capital City Zone could more accurately reflect this requirement.</p>
	<ul style="list-style-type: none"> • consumer, need protection to failure, but the big problem to cost, far to many stages with in multi companies peddling the ONE product, are the far to many massive salary packages of 6 figure incomes with perks & pleasures. <p>YOU HAVE ONE HELL OF A JOB TO KEEP THE INDUSTRY HONEST, OUT OF THE PUBLIC POCKET.</p>
<p>23. Should we align as much as possible and adopt national definitions set out in Appendix I? What may be the potential benefits or issues to align with the national definitions?</p>	<ul style="list-style-type: none"> • YES, providing national definitions are correct to the terminology, to manage and correct , the inevitable, should it be to the determent, of generator, ... resident, ... small business, ... industry, ... by open management standards clearly defined, that will not take legal years to define by miss-adventure
<p>24. Are there particular clauses that stakeholders think need to be made clearer?</p>	<ul style="list-style-type: none"> • Stake holders are a problem, by the anticipated maintenance, needed to keep the whole system functional to be usable on demand at the correct voltage needed to operate safely, for industry and domestic, hospitals being a major

General Comments	
Who?	Comments
Not supplied	I can only regard, the generation, distribution, retailing, has become a very serious matter, simply because the evolution of consumption by population growth, especially off shore money, with 40, 50 story plus

	<p>buildings with a massive consumption of electricity to maintain said buildings with pumps to services for sewerage need to distribute, filter, and re-distribute , possible as consumer water, apart from vegetation growth, water then firefighting, the need for electricity is beyond belief to allow pirates to plunder the pocket of the residents, small business. ... 240 -50 volts is the need not 180 perhaps 200, volts with tricky pricing to maximize the profit , as the disposable \$\$ from \$\$ income has disappeared, to paying one's way until death, is disappearing fast especially for pensioners, single parent, in shoddy rooming houses, then on top of this you have Local Cou</p>
<p>Tristan Lawrence</p>	<p>I have a few responses to specific topics in the issues paper:</p> <p>Q1-4: Regarding notifications for outages.</p> <p>I believe distributors must provide a service, or services that notify customers of planned and unplanned outages that will affect them, including initial and changes to planned outage and restoration times via free communication technologies such as email or an app. For vulnerable users, they should also be able to register for low-cost notifications such as SMSs or automated phone calls.</p> <p>Establishing these systems should be able to be done cheaply and will also make it easier to automate notifications to government if using a consolidated technology stack.</p>
<p>Charles Esson</p>	<p>REFCL</p> <p>The issues paper does not look at placing a time limit on the phase to neutral voltage swinging to line to line voltage and stressing voltage transformers.</p> <p>It would be best if the time limit lined up with IEC60044-7 - that is 8 hours.</p> <p>This request is made because some are concerned they cannot use standard European 22KV equipment on REFCL sytems leading to pressure to install isolation transformers when none is needed.</p>