

25 October 2021



Essential Services Commission
Via: Engage Victoria

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Dear Commissioners,

Re: Compliance Performance and Reporting Guideline (consultation)

Jemena Electricity Networks (**JEN**) would like to thank the Essential Services Commission (**Commission**) for the opportunity to provide feedback on the Compliance Performance and Reporting Guideline.

JEN owns and operates an electricity distribution network in the Northwest region of greater Melbourne and is impacted by the proposed amendments. JEN supports the implementation of a risk based compliance approach and broadly supports the proposed amendments as a well-balanced approach.

Draft decisions 1 and 2: Breach Type Classifications.

JEN supports the Commission's view in differentiating the classifications of compliance obligations with regard to the potential or actual risk of critical harm.

Draft decision 3 and 4: Breach Reporting Timeframes

JEN supports the Commission's view that breaches of obligations not classified as type 1 or 2 that have a material adverse impact on customers or the Victorian energy market should be reported to the Commission as soon as practicable. JEN would welcome the opportunity to work with the Commission to define some parameters that would remove the potential for interpretation variances.

JEN considers the Commission's approach for the proposed reporting timeframe for type 2 breaches to be reasonable. We note the rolling date of breach reporting could be problematic for some entities as it is not as structured as a set date format and are not averse to other potential approaches such as reporting type 2 breaches on the last day of the month following the month in which the breach was identified.

Draft Decision 5: Annual Breach Summary

JEN supports the Commission's decision to reduce the administrative burden of providing quarterly compliance summary reports and shifting the requirement to an annual submission.

If you have any questions regarding this submission, then please get in touch with me

[REDACTED]

Kind regards,

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