

#	Section/Clause Reference	Issue	Comments
1	Front cover	Incorrect date	This should read 1 January 2012 or reflect the actual Commencement Date.
2	Table 1	Duration of a single interruption	PWC proposes that the Implementation Date is 1 February 2012 and that the table should be amended accordingly.
3	Table 1	Keeping appointments	<p>In the response to the Commission's Customer Service Incentive Scheme Draft Report, PWC noted that for rural areas the time threshold for keeping appointments should be two hours. However, in the draft Code this has been set at 1 hour.</p> <p>Power and Water notes that network businesses in Victoria and Queensland opt for an appointment window approach. Ergon Energy, for example, has an appointment window of one day. It is recommended that the threshold should be increased to two hours or that an appointment window approach be adopted for PWC.</p>
4	Table 1	Time for establishing a connection	PWC considers that clarification is needed as to when the time limits for reconnection should commence i.e. "Reconnection of an existing premises – within 24 hours of receipt <i>by the network provider</i> of a valid request for reconnection from the small customer".
5	Clause 1.2.2 (a) and (b)	Typographical error	Replace the word "object" with "objective".
6	Clause 2.1.3 and 2.1.4	GSL performance measures, levels, payment amounts and implementation dates	<p>Remove the words "during each financial year" and "in a financial year" from the respective clauses.</p> <p>Only two performance measures are based on a financial year and this is reflected in the wording in Table 1.</p>
7	Clause 2.2.1 (a)	Planned interruptions where load shedding is due to a generation shortfall will not give rise to a GSL payment	<p>Load shedding occurs for many reasons other than for generation shortfall. PWC considers that this wording should be changed to "load shedding due to a generation related cause".</p> <p><u>Subsequent clarification</u></p> <p>'Shortfall' implies that generation supply does not meet demand. 'Related cause' is a broader term and would include shortfalls in addition to technical causes. This would ensure that any generation related outages are excluded from GSL payments in line with the intention of the scheme ie. only applies to nominated network performance measures.</p>
8	Clause 2.2.1 (c)	Interruptions of less than one minute will not give rise to a GSL payment.	It is recommended that this is reworded to "momentary interruptions of less than or equal to one minute".

9	Clause 2.2.1 (d) iii	Interruptions caused by natural events that are identified as statistical outliers using the 2.5 beta method should not give rise to a GSL payment.	PWC recognises that this method is used elsewhere to identify major event days not just those incidents relating to natural events. PWC requests that the clause be reworded to "Major event days that are identified as statistical outliers using the 2.5 beta method, such as those caused by natural events".
10	Clause 2.2.1 (f)	An interruption resulting from a direction by a police officer or other authorised person exercising powers in relation to public safety.	PWC considers this should be reworded to "authorised officer". This should be included in the Definitions and have the same meaning as that provided in the <i>Electricity Reform Act</i> .
11	Clause 2.2.1 (g)	An interruption caused by a small customer's actions or electrical installation should not give rise to a GSL payment.	PWC considers that this should be reworded so that this applies to any third party, not just small customers, i.e. "an interruption requested by a third party or caused by a third party's actions or electrical installation". Subsequent clarification A third party could be a customer, a PWC contractor, the general public, etc.
12	Clause 2.2.2	For natural events, the network provider must apply to the Commission in writing within 30 business days of the event occurring.	Consistent with the comments above, PWC considers that references to "natural events" should be changed to "major event days". With regards to the need to apply to the Commission following a major event day, it is noted that this is not consistent with the approach adopted by the Australian Energy Regulator and appears to add an additional layer of bureaucracy and subjectivity. The Commission is already informed of noteworthy events and supply interruptions, for example, through the half yearly reports provided to it by the Power System Controller. The current Electricity Standards of Service framework provides for "major event days" to be excluded based on the 2.5 beta method. PWC proposes that this clause be removed from the draft Code to provide consistency with the standards of service framework.
13	Clause 2.2.3	The Commission will respond as soon as practicable to an application submitted to it under clause 2.2.2.	Consistent with the comments regarding clause 2.2.2, PWC proposes that this clause be removed from the draft Code.

14	Clause 2.3.1	The draft Code requires that Power and Water (as network provider) will publish information so that customers can identify the feeder from which they are supplied.	<p>This is not a practice currently adopted by comparable distribution service providers within Australia. Furthermore, it is not a legislative requirement of the Service Target Performance Incentive Scheme, recently developed by the Australian Energy Regulator.</p> <p>In response to the public consultation process for the Utilities Commission's review of options for a customer service incentive scheme, Power and Water noted that some customers move between feeders at considerable frequency. To provide accurate information on the feeders supplying each customer at every point in time would require capital expenditure on considerably more sophisticated technology than is currently employed. Power and Water recommends that the provision of detailed feeder information at the customer level is not a requirement of the GSL scheme until the technology is available to provide this information. This was also raised with Treasury in response to the Cabinet Submission and consequently references to this were removed from the final version.</p> <p>If PWC were to post a regulated Network map, using ESAA definitions of feeders, that sets out the network configuration existing at a particular point in time this could be misleading for customers. Clause 2.3.1 should be removed from the draft Code.</p>
15			CONFIDENTIAL MATERIAL REMOVED
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17	Clause 3.1.4	Payment of customers who move from their location.	<p>This clause appears to reference itself. Should this refer to clause 3.1.3?</p> <p>As noted in earlier correspondence, the Territory is characterised by a transient population. PWC considers that the resourcing required to pursue customers who have left the network makes this commercially unsound.</p>
18			CONFIDENTIAL MATERIAL REMOVED
19	Clause 4.1.3	Dispute resolution	PWC considers that it would be appropriate for the nature of the dispute to be defined i.e. whether it starts from the first claim of a GSL payment, the rejection of that claim, or the appeal to the rejection.
20	Clauses 4.1.3 and 4.1.5	The clauses refer to an "appropriate body" that has the authority to manage dispute resolution.	PWC requests guidance on which body the Commission considers could take on this role.
21	Clause 4.2.2 (b)	Typographical error	Replace "person" with "persons".
22	Definitions	Areas	PWC considers the references to "CBD area", "Urban area" and "Rural area" are misleading and should be removed.
23	Definitions	Code	Replace "Levels" with "Level".

24	Definitions	Connections	<p>PWC considers that the defined terms "connection alteration" and "new connection" should be removed on the basis that the different types of connection are adequately dealt with in Table 1.</p> <p>Part (c) of the "planned interruption" definition should be amended to remove the wording "(ie. where there is no existing connection or a connection alteration)."</p>
25	Definitions	Guaranteed service level	<p>Replace defined term "guaranteed service level" with "GSL" as this is the term referred to throughout the draft Code.</p>
26	Definitions	Regulated network	<p>PWC considers that the definition of the regulated network should be as follows: "Regulated network means the electricity networks as set out in the Schedule to the network licence issued by the Commission".</p>
27	Definitions	Feeder definitions	<p>PWC considers that the definitions of feeders should be consistent with existing ESAA definitions as detailed by the Commission in the Review of Options for Implementation of a Customer Service Incentive Scheme for Electricity Customers Final Report July 2010 Footnote on Page 18.</p> <p>CBD is a feeder supplying predominantly commercial, high-rise buildings, supplied by a predominantly underground distribution network containing significant interconnection and redundancy when compared to urban areas.</p> <p>Urban is a feeder which is not a CBD feeder, with a maximum demand per total feeder route length greater than 0.3MVA/km.</p> <p>Short Rural is a feeder which is not a CBD or urban feeder and has a total route length less than 200km.</p> <p>Long Rural is a feeder which is not a CBD or urban feeder and has a total route length greater than 200km.</p> <p>Clearly using these definitions will ensure benchmarking exercises are meaningful.</p>