



Record number: D2021/180136
Container number: F2017/2807

Mr Lyndon Rowe
Utilities Commissioner
Utilities Commission
GPO Box 915
Darwin NT 080

Dear Mr Rowe

RE: ELECTRICITY INDUSTRY PERFORMANCE CODE – INDEPENDENT AUDIT – RESPONSE TO AUDIT FINDINGS, RECOMMENDATIONS AND MANAGEMENT COMMENTS

Power and Water Corporation (Power and Water) acknowledge the letter from the Utilities Commissioner on 13 April 2021 and the opportunity to provide additional feedback on the Electricity Industry Performance Code (EIP Code) Review and a revised EIP Code Report following the Independent Compliance Audit. The revised EIP Code report was provided to the Utilities Commission (Commission) on the 15 April 2021.

Power and Water understand the responsibilities and licence obligations in relation to data and that the deferral of the Outage Management System (OMS) project does not change these obligations. Power and Water are working towards improved data management processes for outage information as discussed at our meeting with the Commission on 5 March 2021.

During this meeting, Power and Water also undertook to consider seeking a one (1) year exemption from the Commission for aspects of the code that are not able to be achieved with our current systems, or that require further clarification to enable systems to be established.

Requests for exemptions are summarised in the table attached to this letter. These were specifically related to:

- Tracking appointments
- Historical data

Yours sincerely

Djuna Pollard
Chief Executive Officer

14 May 2021



Exemptions - Electricity Industry Performance Code

No	General	Request for Exemption	Reason
1	<p>S1.1.1(c) GSL payment amounts, by year.</p> <p>S.3.7.1 Network entities are to report on their GSL payments</p>	<p>It is requested that a one (1) year exemption is granted to remove the requirement for:</p> <p>Schedule 1:Guaranteed Service Level Scheme S.1.1 Performance indicators, guaranteed service levels and GSL payment amounts</p> <p>S.1.1.1 Table 1 sets out various: (a) performance indicators; (b) guaranteed service levels; and (c) GSL payment amounts, by year.</p> <p>Specifically: Keeping appointments: Within 30 minutes of the time agreed with the small customer</p>	<p>Power and Water, in the general course of its business, does not need to make appointments with small customers which require their attendance. It may schedule attendance for site access to conduct work at particular times but does not generally require the attendance of the customer. Any agreed schedule timing is a block time over a number of hours and generally involves further confirmation notification when Power and Water is about to attend. Power and Water does not generally make an arrangement to meet small customers at a specific time and any attendance does not generally require their presence.</p> <p>Power and Water may make arrangements to attend a location requiring special access for:</p> <ol style="list-style-type: none"> Connections Special Meter Reads (schedule made by retailer) Ad Hoc , Access to Work within Vicinity, High Loads <p>General: Currently, each of the business areas responsible have a system for tracking their own attendance and work schedules and if a specific appointment is made and not met, provides a GSL notification for payment. Power and Water does not have a centralised system for collecting, monitoring, maintaining or reporting each individual appointment. Except in a small number of instances which require customer presence, work is scheduled and monitored through our Work Management System or Retail Management System.</p> <p>New Connections Schedule: Scheduled agreements are made in accordance with: "Time for establishing a connection requirement". Any GSL obligation is made and reported under this performance requirement. Unless customer presence is required, no specific arrangements are made with the small customer and customer attendance is not generally required.</p>

			<p>Special Meter Read Schedule: A scheduled time for access is made by the Retailer with the customer for an indicative attendance time and notified via Power and Water to the Meter Read Contractor. The Meter Read Contractor plans the work and may agree an alternative access schedule with the customer as required. Attendance by the customer is not required. Power and Water is notified by the contractor of the completion details.</p> <p>Ad Hoc Schedule Arrangement: Appointments may be made for a variety of reasons including collection of information or briefings relating to upcoming work. Generally, these appointments are not with the customer but with contractors performing work on their behalf. These appointments are managed between the Power and Water representative and the individuals involved and generally involve ongoing discussions and mutual timing adjustments leading to the meeting.</p> <p>Summary: Power and Water in the normal course of its business does not make an agreement to meet with small customers at specific times and places. It arranges attendance schedules and may require access within a block time but does not generally require the presence of the customer. In the small number of instances where a meeting is required, the Power and Water representative and the customer arrange mutually suitable times which are updated as required.</p>
2	Historical data	<p>It is requested that a one (1) year exemption is granted to remove the requirement for:</p> <p>5.2.2 A report under this clause 5 must include:</p> <p>(c) four years of historical data plus the reporting period data.</p>	<p>Power and Water periodically summarises and extracts large amounts of data from a number of transaction systems to provide the data for UC Reporting. These Snapshots provide a static picture of the data at the relevant time and forms the basis of period based reporting. Once the annual reporting is completed, the data again summarised and stored and providing the basis for the historical data.</p> <p>If requirements change or errors are discovered, since the systems are largely transactional, there is little avenue to go back to a previous time period and recreate the data models at that time. Data has moved on and co-ordination between the various systems to create time consistent data is often not practical.</p>

			<p>Historical Reports Historical data is available in the previous reports. Generally this would provide adequate information to inform stakeholders of trends within regions and feeder categories.</p> <p>Published Outage Data Power and Water provides a list of all unplanned outages as part of its annual Regulatory Information Notice (RIN) submission to the AER. The AER publishes the non-confidential RIN's on its website and is available for download at any time.</p> <p>Changes to Code Requirements EIPC requirements are expected to change from time to time. To compare data over different versions of the code(s) may not be practical. Changes to definitions, exclusions or treatment of customer numbers are examples where a change in requirements are unlikely to be re-calculated due to the dynamic nature of network models used to calculate performance indicators at a point in time.</p> <p>Summary Given the availability of historical reports, outage data published on the AER's website and the limitations of historical data, it is difficult for Power and Water to comply with this requirement until the code is reviewed and requirements defined in more detail or removed, depending on the desired outcomes for performance trending.</p>
--	--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------