

9 July 2018



Mr Hugo Harmstorf
Chief Executive Officer
IPART NSW
PO Box K35
Haymarket Post Shop NSW 1240

Office of the
Chief Executive Officer

Level 22, 570 George Street
Sydney NSW 2000
All mail to GPO Box 4009
Sydney NSW 2001
T +61 2 9269 2115
www.ausgrid.com.au

By email: energy@ipart.nsw.gov.au

Dear Mr Harmstorf *Hugo*

Request for feedback – Energy Network Performance Measures Review

I am writing to you in response to your request for feedback on the Draft Electricity networks reporting manual (June 2018) for the review of Safety Management Systems, and for bushfire risk mitigation requirements released on 19 June 2018.

Ausgrid welcomes the invitation to provide input to the review of the safety management system reporting requirements. This process is an excellent opportunity to develop a clear and concise outline of reporting requirements which could significantly benefit the industry and all stakeholders through better transparency and benchmarking of asset and safety performance.

Ausgrid agrees in principle with the requirements the Draft Electricity networks reporting manual (June 2018). There are, however, some specific comments and clarification that are contained within Attachment A enclosed with this letter.

I believe this process is a valuable element of a transparent, efficient and fair compliance regime, and we look forward to working together to get the best outcome for all.

If you have questions about Ausgrid's response please contact Mr Mark Ragusa, Acting Head of Asset Strategy Performance & Innovation, on either [REDACTED]

Yours sincerely

A black rectangular box redacting the signature of Richard Gross.

RICHARD GROSS
Chief Executive Officer

Attachment A – Ausgrid Feedback on the Draft Electricity networks reporting manual (June 2018)

Table		Performance Measure	Ausgrid's Feedback
A.1	Major incidents	All	Consistent with our earlier submission, high level information will be reported to maintain and protect applicable legal rights and consistent with public interest considerations outlined in our submission to IPART on 13 April 2018.
A.2	Incidents	All	
A.3	Network assets failures	Switchgear - distribution (Underground supplied)	An editorial amendment should be made to change this performance measure to "Switchgear – distribution (Ground based)" for clarity of asset type.
A.5	Unintended contact, unauthorised access and electric shocks	Contact with energised underground network asset (e.g. conductor strike)	We note there is duplication in footnotes (d) and (h).
A.6	Reliability and Quality of Supply	Sustained voltage excursions outside emergency range	We understand this to be focussed on safety rather than power quality. In this context, Ausgrid will provide a count of occasions when the voltage at zone busbars have exceeded the sag/swell limits for sustained periods, as defined by AS61000.3.100.
A.9	Safety impacts associated with protection of the environmental	All	<p>An editorial amendment should be made to change the title of the table to "Safety impacts associated with protection of the environment" (i.e. not environmental).</p> <p>Also an editorial amendment should be made in footnotes (a) and (b) to clarify the following definitions:</p> <p>(a) EPA is the NSW Environment Protection Authority</p> <p>(b) EMF means electric and magnetic fields</p>
A.11	Design, construction and commissioning	All	Clarification is sought as to the unit of measure for reporting required.
A.14	Authorised Persons Training and competency	All	Consistent with our earlier submission, Ausgrid is only reporting on this requirement for staff and contractors (this does not include ASP data).
B.44	Asset Tasks	All	Ausgrid notes that Table 'B.44 Asset tasks' should be labelled 'B.4 Asset tasks'.