

5 September 2017

Mr Hugo Harmstorf
Chief Executive Officer
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop NSW 1240

Submitted electronically via online submission

Dear Hugo

RE: ENDEAVOUR ENERGY'S SUBMISSION TO IPART IN RELATION TO DRAFT ELECTRICITY NETWORKS REPORTING MANUAL AND ELECTRICITY NETWORKS AUDIT GUIDELINE

Endeavour Energy welcomes the opportunity to provide written comment in respect of IPART's draft updates to its Electricity Networks Reporting Manual (**Reporting Manual**) and Electricity Networks Audit Guideline (**Audit Guideline**) dated 8 August 2017, which details proposals to:

- split the Reporting Manual for improved usability, from one (1) manual detailing the different sections to nine (9) separate manuals;
- split the Audit Guideline separated, for improved usability, from one (1) manual detailing different sections to six (6) separate guidelines;
- update certain sections of both the Reporting Manual and Audit Guideline to reflect Endeavour Energy's new operating licence, effective 14 June 2017; and
- minor wording changes throughout.

As requested by IPART, Endeavour Energy has conducted a review of the proposed changes, new format and usability of the documents and provide detailed comments in Attachment 1 to this letter.

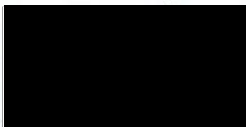
Overall, Endeavour Energy is supportive of the proposed updates that have been highlighted in the amended documents. However in relation to the new format and usability, we question why IPART considers it necessary to split the documents into different sections. There are concerns from Endeavour Energy stakeholders that when there are changes to the common elements of the Reporting Manual or Audit Guideline, the risk of differences between manuals will increase consequently. It also does not seem efficient to produce nine or six documents when one worked efficiently. I provide by example, that in our detailed comments attached, we have needed to raise a single issue multiple times as it relates to three of the nine reporting manuals.

Unless documented in the attachment, Endeavour Energy supports all other highlighted changes in the Reporting Manual and Audit Guideline.

Endeavour Energy is committed to meeting our regulatory obligations and welcome any further involvement required to finalise both the Reporting Manual and Audit Guideline.

If you wish to discuss this matter further please contact Fiona Place, Regulatory Compliance Analyst on [REDACTED] or alternatively via email at RegComplianceENDV@endeavourenergy.com.au.

Yours sincerely



Tony Narvaez
Chief Executive Officer

Attachment 1: Endeavour Energy comments on draft changes to IPART's Electricity Network Reporting Manual and Electricity Network Audit Guideline (**released 8 August 2017**)

Reporting Manual Reference	Endeavour Energy comment
<p>Reliability and Performance Reporting: Section 1, page 6, content</p>	<p>In the first paragraph under Content, there is an error message included in the text. This should be deleted if not intended.</p> <p>Table 1.1 outlines the quarterly reporting requirements against the reliability and performance licence conditions. Tables B.1 to Error! Reference source not found. in Appendix B provide further details on the obligations in the licence conditions.</p>
<p>Reliability and Performance Reporting: Table 1.1, page 7, Reporting requirements against reliability and performance licence conditions</p>	<ul style="list-style-type: none"> • Table 1.1 under IPART Code RP18 in the first bullet point states the Ausgrid licence, this should be amended to show 'and the Endeavour Energy licence' added after 'and the Ausgrid licence'. • The note referring to the Endeavour Energy Licence has the word Licence misspelt. It is shown as Licece. This should be corrected.
<p>Reliability and Performance Reporting: Section 1.2, page 7, Information on reliability and performance audits</p>	<p>The footnote ¹ at the bottom of section 1.2 needs 'Endeavour Energy licence, conditions 7.6 and 7.12' added.</p>
<p>Reliability and Performance Reporting: Appendix A, page 11, Annual Compliance Report Pro-forma</p>	<p>Endeavour Energy notes that IPART recently provided an amended version of the Annual Compliance Report Pro-forma to Endeavour Energy that removed the wording 'at its meeting on [date]'. The IPART representative advised that this amended version would be updated in the Reporting Manual in due course.</p> <p>Endeavour Energy request that the amended Pro-forma be included in this current review of the Reporting Manual.</p>
<p>Critical Infrastructure licence conditions reporting: Appendix A, page 11, Annual Compliance Report Pro-forma</p>	<p>Endeavour Energy notes that IPART recently provided an amended version of the Annual Compliance Report Pro-forma to Endeavour Energy that removed the wording 'at its meeting on [date]'. The IPART representative advised that this amended version would be updated in the Reporting Manual in due course.</p> <p>Endeavour Energy request that the amended Pro-forma be included in this current review of the Reporting Manual.</p>
<p>General Licence Conditions Reporting: page 8, footnote²</p>	<ul style="list-style-type: none"> • The footnote 2 relating to the Endeavour Energy Operator Partnership² contains incorrect details. Throughout the footnote, each Trust ACN is written in brackets with (CAN) instead of ACN These need to be corrected to reflect accurate details of the Partnership. • Endeavour Energy notes that IPART recently provided an amended version of the Annual Compliance Report Pro-forma to Endeavour Energy that removed the wording 'at its meeting on [date]'. The IPART representative advised that this amended version would be updated in the Reporting Manual in due course. <p>Endeavour Energy request that the amended Pro-forma be included in this current review of the Reporting Manual.</p>
Audit Guideline Reference	Endeavour Energy comment
	<p>No specific comments provided.</p>