



Ref: A120081

10 May 2019

Christine Allen  
Independent Pricing and Regulatory Tribunal  
PO Box K35  
Haymarket Post Shop NSW 1240

Dear Christine,

### **Consultation on draft NSW Public Lighting Code reporting manual**

Essential Energy welcomes the opportunity to provide comment on the *Draft Electricity Networks Reporting Manual – NSW Public Lighting Code compliance reporting – April 2019* (Manual). Essential Energy is generally in agreement with the proposed Manual and has commentary on specific items below.

#### **2.2 Content of the reports**

In section 2.2.1 *Annual Performance Report* there is a requirement to report compliance with the Service Standards at Schedule 1 of the Code and in section 2.2.2 *Quarterly Report* there is a requirement to report the time taken to repair each fault and whether the repair time for each general fault met the 10 business day standard. The Service Standards specify that repair time excludes the time for specific excluded events. To report on this measure in accordance with the Code, Essential Energy's information systems need to have the ability to log and record status changes for public lighting fault jobs, including for the specific excluded events, so that fault rectification timeframes can be split into work time and excluded time. Essential Energy's current information systems do not have this capability.

As discussed during the meeting held in your offices on 26/03/2019, Essential Energy is undertaking a whole of business transformation program, and part of this transformation is the renewing of our information systems. Due to the complex sequencing of changes under transformation, restrictions will be placed on changes that can be made to current information systems and the timing of those changes. The capability to capture the data needed to meet the reporting requirements will be included in the requirements for the replacement systems under the transformation program. Implementation of these systems is expected to be at least two to three years away.

To assist IPART to monitor compliance with the service standards in our quarterly reporting, Essential Energy propose to report on all general and specific faults by providing a total duration time for each task as opposed to splitting the task time and excluded time to get a total task duration. The reason for delay of all tasks will be provided giving visibility of the challenges causing delays and allow benchmarking between reporting periods to see performance trends in service levels.

#### **2.3 Lodgement**

In section 2.3 *Lodgement* there is a requirement for the annual performance report to be signed off by the Chair of the Board of Directors or a duly authorised Board Member of the network operator. Essential Energy proposes that the requirement should be for the annual performance report to be signed off by the CEO or their delegate, consistent with all other performance reports.

If you or your officers have any questions in relation to our response please contact me or alternatively our Compliance Manager, David Mattson, on [REDACTED] or via email at david.mattson@essentialenergy.com.au.

Yours sincerely



Chantelle Bramley  
**General Manager Strategy, Regulation and Transformation**