



Ref: BS:C2090463

24 March 2017

Electricity Networks Reporting manual review
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop NSW 1240

Dear Sir / Madam

Electricity Networks Reporting manual review - March 2017

Essential Energy welcomes the opportunity to provide a submission on the draft changes to IPART's Electricity Networks Reporting Manual - March 2017. Our response is broken into two sections, the first relates to Category 2 Reliability Incident reporting, and the second relates to Stage 3 reporting

Category 2 Reliability Incident reporting

The definition of Total Outage Duration for Category 1 Major Reliability Incidents is clear and requires no further clarification. Regarding Category 2 Reliability Incidents we are seeking further clarification on how multiple outages are to be regarded as a single incident once it is declared as a Major Event Day (MED).

In relation to causal reporting of an MED, taking into account the fact that in some cases on Essential Energy's Network up to 500 separate outages may contribute, we believe there could be a more practical way to report using one scenario to enable reporting as one single incident, these being either:

1. Select the outage with the longest time any single customer was interrupted; or
2. Report on the outage with the largest customer minute impact (SAIDI).

Currently we select the largest customer minute impact (SAIDI) when reporting on an MED, we would like clarification or direction as to which of the proposed methods above are preferred by IPART. If it is left to the discretion of each ENO as to how they determine and report on MEDs as a single event, inconsistencies in interpretation and reporting will result.

We believe that the current incident framework is suitable for safety incidents involving people (workers and members of the public) and property, however we believe a more detailed framework is required specific to reliability incident reporting. Essential Energy would welcome the opportunity to participate in workshops and consultation processes for the development of this reliability framework.

Stage 3 reporting

We have identified an issue in reporting escalation factors in OSIRIS. Both the Causal factors and Escalation factors have drop down fields for the ICAM Codes which means they will be exactly the same codes, with no real identification or differentiation of the escalation factor, e.g. if Essential Energy has identified the 'Causal Factor' for Organisation and System as 'training' the equivalent in

the 'Escalation Factor' can only be selected as 'training' from the ICAM Codes drop down list. In this example the escalation factor for training could be;

- Elapsed or expired training, or
- Inadequate training for the role.

These factors would escalate the probability of this incident occurring. Each Causal ICAM will require a relationship to be developed to identify appropriate escalation factors.

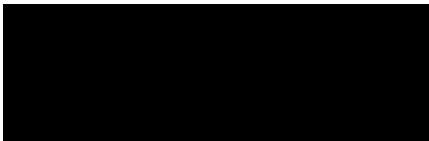
In regards to the wording in section 2.4.3 Stage 3 – Final Report, we ask that the following be considered for inclusion:

- please include 'or subject to Legal Professional Privilege' in paragraph 1 as part of, "Where the facts around an incident are unclear or unknown or *subject to Legal Professional Privilege* ..."
- please include a definition of 'escalation factor' and 'causal factor'.
- please explain the term 'first' in relation to effective mitigative controls, that is 'first' in chronological order, priority, control hierarchy etc.

As has been done with Stage 1 and Stage 2 reporting, Essential Energy encourages IPART, together with the other ENO's to continue to work collaboratively on Stage 3 reporting to provide the necessary feedback and technical expertise to help develop and evolve OSIRIS so that it aligns with the Networks Reporting Manual.

Essential Energy would be more than happy to discuss this submission in more detail at an appropriate opportunity. In the meantime, if you have any questions in relation to this submission, for Stage 3 reporting please contact [REDACTED] on [REDACTED] or for Category 2 Reliability Incident Reporting please contact myself.

Yours sincerely



David Mattson
Compliance Reporting Manager