

**7 September 2017**

Dr Peter Boxall  
Chair  
Independent Pricing and Regulatory Tribunal  
PO Box K35  
Haymarket Post Shop, NSW 1240



Dear Dr Boxall,

**Submission to compliance with the NSW Electricity Transmission Reliability Standard**

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in New South Wales. Established in 1982, PIAC tackles systemic issues that have a significant impact upon disadvantaged and marginalised people. We ensure basic rights are enjoyed across the community through litigation, public policy development, communication and training. The Energy + Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

PIAC welcomes the opportunity to respond to IPART's Electricity Transmission Reliability Compliance draft report.

**Proposed method of assessing compliance**

PIAC supports the changed calculation of restoration time for dual failures as it better reflects the restoration processes.

PIAC supports the use of more granular load duration curves based on real data from each bulk supply point, where available, rather than from an academically-derived logistic curve. However, this change in methodology does not seem to be reflected in Box 2.1 of IPART's draft report – PIAC recommends this be amended accordingly.

PIAC supports using the lifecycle average failure rate in determining compliance with the Expected Unserved Energy allowance as it is to be used to monitor compliance with a planning standard rather than informing TransGrid's asset management and replacement decisions. Further, using the lifecycle average failure rate would maintain consistency with the method IPART has used in setting the Expected Unserved Energy allowance in the standard.

PIAC supports the inclusion of third party agreements as a potential form of compliance for estimated asset restoration times, especially in regional and remote bulk supply points, where this provides a more cost-effective solution than TransGrid maintaining its own staff in these locations.

**Continued engagement**

PIAC would welcome the opportunity to meet with the IPART and other stakeholders to discuss these issues in more depth.

Yours sincerely,

**Craig Memery**

Energy and Water Policy Team Leader  
Public Interest Advocacy Centre

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