

INFORMATION DISCOLSURES SUBMISSION

THE EFFECTIVENESS OF ID

Under para 3.20.1¹ it states, “the ID requirements will enable Aurora’s customers and other stakeholders to identify and report situations where it parts as outlined in its CPP proposal and publicly disclosed plans”. The question is **who do you report this to?**

The Commerce Commission has already stated that it can only act on quality breaches.

Auroras management and board would have made considered and conscious decisions to depart from the original plans. They have met their regulatory requirements by providing the ID and do not have any regulatory requirement to formally respond to consumers to explain themselves.

The only ones Aurora must explain themselves to is their owners DCHL. Historically DCC, DCHL and Aurora have not responded to the past concerns of the public/consumers with regards to Aurora.

CHARTER AND COMPENSATION SCHEME

Auroras, management, board, or owners could easily renege on their public commitment to retaining its Charter and compensation scheme². The only way to ensure it is retained is for the Commerce Commission to mandate that it is kept, and any changes are approved by the Commerce Commission.

OUTAGES

Every planned and unplanned outage must be followed up with a post outage ID report with 48 hours and an engineering report which has been peer reviewed by a suitably qualified independent engineer within 30 days of the outage.

This is to prove to the public that:

- The work was done to an acceptable standard.
- To prevent incidents of repeat outages like those in Fairfield³, which had multiple repeat outages and potential public safety issues, where it would force Aurora to investigate root causes more thoroughly or it could be pointed out by the independent engineer on review⁴ for further investigation.
- Customers would have clarity on why there was an outage and could hold Aurora to account over it.
- Justify outages that were caused by weather related events were beyond actual design limits of the network.
- Protect Aurora from claims of negligence if they can prove that they have done the best to their knowledge.

These reports should add little extra cost as they are basically a completed job card and the cost of an independent reviewer would be small compared to the overall cost of the job. For example a pole replacement as these are being quoted at \$12K+.

¹ Commerce Commission Report Template

² Para 3.50 Commerce Commission Report Template

³ [Power outages cost businesses, ODT 14 Dec 2020](#)

⁴ [Richard Healey evaluation of Fairfield Failures](#)

Public Report Minimum Details

- Responding Contractor/s:
- Planned start time:
- Planned finish time:
- Actual start time:
- Actual finish time:
- Location/area of outage
- Customers affected
- Relates to a previous outage: If yes outage reference/s
- Planned scope of work
- Summary of work completed
- Safety incidents/concerns/new hazards
- If work ran over planed finish time:
 - Length of extended outage
 - Reason for extended outage
- Weather related outage:
 - If so:
 - Design limit of the equipment
 - Actual weather conditions at the time including source of data.
 - Did it fail under the design limit? Yes/no
- Effect on SAIDI etc
- Any future outages required to rectify any outstanding issues. Including references.

CANCELLED OUTAGES

Aurora needs to disclose why planned outages are cancelled. Especially at short notice. Consumers make contingencies for planned outages, such as to high generators, closing for the day etc.

On cancelling and rescheduling a planned outage it can double the cost for the consumer eg 2x generator hire and two days of no trade etc.

Therefore, Aurora needs to disclose the reasons to the public why the planned outage was cancelled.

VOLTAGE QUALITY MONITORING PRACTICES

Why is the Commerce Commission waiting so long to act and why is this not being done across all Lines Companies already? These levels are mandated in the Electricity (Safety) Regulations 2010 as follows:

28 Voltage supply to installations

(1) The supply of electricity to installations operating at a voltage of 200 volts AC or more but not exceeding 250 volts AC (calculated or measured at the point of supply)—

(a) must be at standard low voltage; and

(b) except for momentary fluctuations, must be kept within 6% of that voltage.

(2) The supply of electricity to installations operating at other than standard low voltage (calculated or measured at the point of supply)—

(a) must be at a voltage agreed between the electricity retailer and the customer; and

(b) unless otherwise agreed between the electricity retailer and the customer, and except for momentary fluctuations, must be maintained within 6% of the agreed supply voltage.

(3) A person who supplies electricity commits a grade A offence if he or she supplies electricity to an installation in breach of this regulation.

IAW with the NZ standards the nominal voltage is 230V, giving a voltage operating range IAW the Act of 216 to 246V.

The Commerce Commission waiting another two years for Information Disclosures to come into effect knowing or suspecting that Aurora is breaching the Electricity (Safety) Regulations 2010 can only be seen as corrupt. As the Commerce Commission is effectively protecting Aurora from a "Grade A Offence" by delaying the requirement of these Information Disclosures. Aurora have had at least 10 years to get these issues under control.

The technology to monitor these voltages is already in place in the Smart Meters now connected to the majority of homes in NZ and are able to monitor these conditions. They have been around for years and the Electricity Authority has been promoting their use for this purpose since 2010, Appendix B.1.e "**check voltage limits (high and low) on a low voltage feeder to ensure it is within compliance limits**"⁵.

The only reason why this does not happen across all lines companies is probably because that some of the Metering Equipment Providers (MEPs) are either owned by or are sister companies of lines companies which raises conflict of interest issues, e.g. Aurora's sister company Delta also acts as a MEP. If the MEPs detected a over/under voltage condition they would have to report it to the regulator and their owners would not like that very much. So, it cannot be a voluntary system.

⁵ [Electricity Authority, Advanced Metering Policy, Version 1.1, 2010](#)

Under the Electricity Industry Participation Code 2010⁶ in the below table it is already a requirement as smart meters, advanced metering functionality, are readily available in Aurora's case.

Electricity Industry Participation Code 2010
Schedule 12A.4, Appendix A

<i>SERVICE MEASURE</i>	<i>SERVICE LEVEL</i>	<i>CONDITIONS</i>	<i>SERVICE GUARANTEE PAYMENT</i>
	<i>Distributor or reported by 1 or more Customers.</i>	<i>by Transmission Interruptions.</i>	
4.2 Steady state supply voltage range	<i>Maintain voltage within ± 6% of nominal voltage at each point of supply.</i>	<i>Excludes momentary fluctuations. If no suitable means of measurement is permanently available (such as by advanced metering functionality), supply voltage must only be measured in response to a Customer complaint. Includes voltage excursions caused, or contributed to, by Transmission Interruptions.</i>	

The technology is already in place and the cost of implementation would be minimal and timeframe could be rapid. The Commerce Commission and other associated regulators need to sort this out.

If MEPs can be alerted to a tampering event on their smart meters they can be alerted to an under/over voltage condition.

Action required on Under/Over voltage condition:

- Aurora should disclose to Consumers immediately of an event so that equipment that is sensitive to under/over voltage conditions can be disconnected from the network.
- Consumers should also be refunded full cost of power that was charged over this period (lines charges, retail etc) as the power is outside set legal limits as per the Act.
- Events should count as an outage as the power being supplied outside set legal limits as per the Act.

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Cromwell

⁶ [Electricity Industry Participation Code 2010](#)