

30 August 2022

EDB Targeted ID Review

Submission on Targeted ID review: Draft Decision

EA Networks appreciates the opportunity to make a submission to the Commerce Commission (the Commission) on its draft decision on tranche 1 of the targeted information disclosures (ID) review for electricity distribution businesses (EDB's). This submission is in addition to the matters included in the Electricity Networks Association submission on behalf of ENA's members, including ourselves. We wish to make two further submissions on the specific matters below.

Amendment Q11 – refine ID requirements on interruptions by clarifying definitions to ensure successive interruptions are recorded consistently

In the normal course of events, when an unplanned fault occurs, we may do a temporary repair followed by a permit repair at a later date. Currently the permit repair is undertaken as a planned interruption.

The draft determination proposed definition of successive interruption states:

'means an interruption that follows an initial interruption and either:

(a) relates directly to that initial interruption.

or

(b) occurs as part of the process of restoring supply of electricity lines services following that initial interruption.'

We note the 'or' between clause (a) and (b) suggests (a) is not time bound, i.e. the successive interruption can occur at any time after the initial interruption.

Applying the permit repair concept to the definition of successive interruption.

As the permit repair followed the initial interruption and directly relates to the initial interruption it meets the requirement of successive interruptions.

The meaning of SAIDI values within the draft determination

'the customer interruption minutes accrued for each interruption or successive interruption (system average interruption duration index values based on Class B (planned interruptions on the network) and Class C (unplanned interruptions on the network)) divided by the total number of connection points on the network.'

The meaning of successive interruption links permit and temporary repairs together. The meaning of SAIDI value makes it unclear if the permit repair is a class B or class C interruption. We believe that the most likely interpretation is that the successive interruption is to be recorded in the same classes as the initial interruption, which would seem to be the intent of clause (A) of successive interruption.

Our understanding is that the Commission intended to ensure that restoring of power is correctly recorded and is not intending to reclass post fault work that has been correctly notified as an unplanned interruption.

To clear up the uncertainty we suggest that the 'or' in the meaning of successive interruption is replaced with 'and'. This makes it clear that any successive interruption is limited to the process of restoring power following an initial interruption and follows how permit repairs have been treated in the past.

The issue is replicated for SAIFI interruptions.

ICP count for interruptions

The proposed definitions for SAIFI and SAIDI values requires the "divided by the total number of connection points on the network". We have concerns about the cost/benefit of initially calculating the number of connection point each time a SAIFI/SAIDI value is calculated.

The table below shows the percentage increase in ICP count from one year to another

	2021-22	2021-20	2019-2020	2018-2017	2017-2016
Percentage change from the prior year	1.39%	2.28%	0.30%	2.15%	1.02%

As shown the movement in ICP is immaterial, the cost of calculating initial ICP counts for each interruption is greater than any associated benefit. We would support amending the wording so that the calculation of the number of connection points only needs to be undertaken at the start of the financial year.

Contract person for EA Networks: Mark Lester

Email [REDACTED]

Phone [REDACTED]