

To: office@energyregulator.tas.gov.au

Subject: Proposed Distribution Network Performance consultation paper Nov 2006

Date: 21/11/2006

I wish to congratulate Peter Stolp and the Working Group on its documents for defining proposed distribution performance standards for different customer densities across Tasmania and wish to offer a couple of comments.

A few times through the document the "Performance Standards" are referred to as reliability standards and I wonder whether this should be the more correct title as the measures do seem to relate more to reliability than performance.

Performance standards for a distribution network would imply overall performance which would look at other things apart from reliability (in the form as presented in the report). Other things being the level of security (or redundancy) and quality of supply ie voltage levels and balance, frequency, dips, surges, short interruptions due to auto reclosers etc.

Hence, I suggest the proposed standards may be better formally described as Distribution Network Reliability Standards, or possibly Distribution Network Reliability Performance Standards.

The report talks extensively about distribution feeders but does not seem to make any distinction between HV or LV distribution. From the context of the report HV distribution feeders seem to be the only real consideration! GSLs apply for urban customers at the LV (415/240V) level therefore I think the report should at least discuss the impact of the new standards at both the HV and LV distribution levels.

The report refers to the costs to achieve the standards as capital costs and does not appear anywhere to show impact on increased operations and maintenance costs. For example, enhanced vegetation management plans, joint hot spot detection, more service personnel and trucks are all factors which can directly impact on achieving the desired reliability performance. If it has been identified that these areas can not be improved upon or are not as cost effective as new capital works to achieve the new standards then perhaps the report could make this clear.

Kind regards

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