

Contact: Andrew Knowles
Phone no: (03) 6270 3695
Our Ref: NW30638335
Your Ref:



28 May 2014

Glenn Bounds (Assistant Director – Price and Services)
Office of the Tasmanian Economic Regulator
GPO Box 770
Hobart TAS 7001

Dear Sir

Performance Reporting Guideline Review

Thank-you for the opportunity to provide input to the Consultation Paper for a review of the *Draft Electricity Supply Industry Performance and Information Reporting Guideline*, released by the Regulator in April 2014.

Aurora Energy Pty Ltd, ABN 85 082 464 622 (Aurora) is an incorporated, State Government owned fully integrated energy and network business, with complementary activities in telecommunications and energy-related technologies. Aurora provides electricity retail and distribution services to more than 270,000 customers in the Tasmanian jurisdiction. In this document, reference to Aurora should be taken as reference to Aurora in its capacity as the provider of distribution network services licensed by the Regulator under the *Electricity Supply Industry Act 1995* (Tas).

Aurora has no major concerns about the Regulator's proposed changes to Guideline insofar as they affect Aurora. The attachment to this letter, however, provides some comments on what Aurora considers to be minor drafting issues.

If you have any questions, please address them to the contact noted above.

Yours faithfully

A handwritten signature in black ink, appearing to read "Warren Batchelor".

Warren Batchelor

Chief Operations Officer
Distribution Business
Aurora Energy

ATTACHMENT TO AURORA SUBMISSION TO THE PERFORMANCE REPORTING GUIDELINE REVIEW

This attachment to Aurora's submission to the Consultation Paper for a review of the *Draft Electricity Supply Industry Performance and Information Reporting Guideline*, released by the Regulator in April 2014 (the Guideline) contains Aurora's observations on some of the proposed changes that relate to Aurora.

Definitions

The definitions for SAIDI and SAIFI in the marked up Guideline are not consistent with clause 8.6.11 of the Tasmanian Electricity Code (TEC). It is not clear how this interacts with the table on page 20 of the marked-up guideline, which refers to both SAIDI and SAIFI and clause 8.6.11 of the TEC.

Clause 4.3.1

There are two clauses 4.3.1 in the marked up Guideline; these comments refer to the newly introduced clause 4.3.1:

The Licensee must provide performance information in both hardcopy and electronic format. Information provided electronically must be in a format that is capable of being copied.

Aurora is concerned that this new requirement may contradict clause 6 of Aurora's distribution licence and clause 1.4 of the TEC.

Aurora also suggests that the Guideline should provide both an indication of how the electronic version should be provided (for example, as an attachment to an email, or on a CD or DVD), and a prescription of the appropriate format(s) for an electronic version of the document.

Clause 7.4.1

In relation to the new clause 7.4.1 in the marked Guideline, which relates to information provision by Aurora in respect of the Feed-in Tariff scheme implemented in the *Electricity Supply Industry Act 1995* (the Act), Aurora notes the following issues:

- the drafting of this clause is inconsistent with the drafting of clauses 7.2 and 7.3, which may create confusion;
- this clause contains no explicit requirement for Aurora to provide a report or information, rather it refers to a clause of the Act and relies on an implied connection between the Act and the Guideline;
- this clause prescribes no date(s) for the provision of the information;
- in each paragraph of the clause, the requirement "in the previous financial year" seems to relate to the year before the year that the performance report would cover; and
- in relation to the last paragraph (on page 25 of the marked-up Guideline), the words

The amounts paid ... before the end of the previous financial year...

should probably be

The amounts paid ... during the financial year ...