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CPRG update - Proposed performance reporting templates and updates to guideline for consultation

Dear [REDACTED]

Thank you for the opportunity to provide Jemena Electricity Networks' comments on the amendments to the Compliance and Performance Reporting Guideline (CPRG). We are comfortable with the information/data sought in the reporting templates and the format of the templates. However, we believe the definition momentary interruption require modification so that it aligns with the national framework, as intended in the final decision 8 of the Electricity Distribution Code (EDC) review.

Final decision 8 states:

We have updated the definitions of sustained and momentary interruptions to align with the national framework, where a momentary interruption is defined as less than three minutes and a sustained interruption is more than three minutes.

But we note the definitions of momentary interruption and sustained interruption in the EDC and CPRG are such that an interruption of three minutes is neither a 'momentary interruption' or 'sustained interruption'. To align definitions of sustained and momentary interruptions with the national framework, Jemena proposes the ESC reflect the definitions in the AER's [Distribution Reliability Measures Guideline](#) in the EDC.

We suggest clause 19 in the final decision and related definitions in the CPRG be amended as highlighted below.

Final decision:

"In clause 19, delete the definition of "momentary interruption" and insert new definition: **Momentary interruption** means an **interruption** continuing for a period of **three minutes or less than three minutes**, except where an **interruption** less than three minutes has already occurred within that three minute period." (p.116)

CPRG:

Cumulative hours of interruptions on major event days: The cumulative total number of hours without supply on a major event day, where any interruption was **equal to or** more than 3 minutes, that occurred in the reporting quarter. (p.4)

Count of momentary interruptions: The total count of interruptions that were **three minutes or less than 3 minutes** in the reporting quarter. Momentary interruption has the same meaning as clause 19 of the Electricity Distribution Code. Data relating to interruptions on a major event day (as defined in clause 19 of the Electricity Distribution Code) or that are excluded pursuant to clause 6.3.3 and 6.3.4 of the Electricity Distribution Code must not be included. (p.4)

Unplanned interruption data

This data must be provided to the commission on a quarterly basis, following the completion of each quarter in a financial year commencing 1 July 2021. This data must include all unplanned interruption data and include all **active National Metering Identifiers (excluding unmetered connection points)** even if the supply address did not experience an unplanned interruption. Data is to be provided on a quarterly basis, and not cumulative over the financial year. (p. 7)

Note, the AER's [Distribution Reliability Measures Guideline](#) excludes unmetered connection points. Reliability reports and data reported to AER does not include unmetered supply points such as street lights, telephone booths, sprinkler systems, etc.

If you have any question on the annual unplanned outage we have provided, please contact me on [REDACTED]

Yours sincerely

[signed]

[REDACTED]