



Revised Regulatory Proposal

Supporting Information: Fuse Reach Program

Aurora response to the AER's Draft Distribution Determination

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1. Introduction

Aurora provided the AER with its *Regulatory Proposal* on 31 May 2011 in accordance with the provisions of Chapter 6 of the *Rules*. Aurora also set out its answers to the Regulatory Information Notice (RIN) issued by the AER on 21 April 2011 in its response (*RIN Response*) of 31 May 2011.

The AER have reviewed Aurora's *Regulatory Proposal* and *RIN Response* and provided Aurora with the AER's *Draft Distribution Determination*, associated consultant's reports and AER models on 29 November 2011 in accordance with the provisions of Chapter 6 of the *Rules*.

Aurora provides its *Revised Regulatory Proposal* to the AER in response to the AER's *Draft Distribution Determination* in accordance with the provisions of Chapter 6 of the *Rules*. This document provides specific supporting information as an appended attachment to Aurora's *Revised Regulatory Proposal*

2. Fuse Reach Program (RELSA)

2.1. Summary

In Aurora's *Regulatory Proposal*, Aurora proposed a fuse reach program to identify and rectify sites where the protection on low voltage (LV) circuits does not adequately protect the circuits, usually because of the length of the circuits.

The drivers for this program are public safety and mitigation of fire starts.

In its *Aurora Revenue Review*¹ report to the AER, the AER's consultant determined that this program was primarily related to addressing reliability (and operational inflexibility) issues with no explanation as to how this decision was arrived at. As a result of this, the AER has rejected this program.

Aurora contends that the AER's consultant made an error in assessing the drivers of this program as reliability driven, as opposed to safety driven and considers that the program should be included in Aurora's program of work for the forthcoming *Regulatory Control Period*.

2.2. Background

In Aurora's *Regulatory Proposal*, Aurora proposed a fuse reach program to identify and rectify sites where the protection on LV circuits does not adequately protect the circuits, usually because of the length of the circuits.

At sites where this is the case, in the event of a fault on the LV circuit, particularly if the fault is at the end of the circuit, the protection may not operate leaving the fault on the system.

This may result in conductors melting and falling to the ground, dropping molten metal in the process and starting a bushfire and may leave a live conductor on the ground posing a safety risk to the public.

In its *Aurora Revenue Review*² report to the AER, the AER's consultant determined that this program was primarily related to addressing reliability (and operational inflexibility) issues with no explanation as to how this decision was arrived at. As a result of this, the AER has rejected this program.

Aurora contends that the AER's consultant made an error in assessing the primary drivers of this program as reliability driven, as opposed to safety driven and considers that the program should be included in Aurora's program of work for the forthcoming *Regulatory Control Period*.

¹ Report – Principle Technical Advisor, Aurora Electricity Distribution Revenue Review, page 126 & 127

² Ibid

2.3. Conclusion

Aurora contends that the AER's decision was in error, that the decision to reject the fuse reach program based on the drivers is incorrect. Aurora has re-forecast this program in Aurora's program of work for the forthcoming *Regulatory Control Period*.

3. Confidentiality

Aurora does not consider any section of this document to be confidential.