

CP/PAL Comments to ESVs Summary of Findings in Validation Report for the CitiPower and Powercor 2017-2018 Fire Start Report

**Table 1: Summary of findings – Powercor**

Statistic	Relevant report section	Key findings	CP/PAL Comment
Clause 6(3)(d)	Request from AER	The fire start report addressed the Powercor distribution system separately from other systems managed by the service provider.	CP/PAL agrees with ESV findings.
Clause 6(3)(e)(i)	Comparative analysis — non-IRU factors	<p>There were eight differences between the assessment of the fire type made by Powercor and that made by ESV. These discrepancies were not material to the calculation of the total IRU amount.</p> <p>The assessment of the kind of fire identified eight fire starts where ESV would have classified the fire differently to Powercor. These incidents were:</p> <ul style="list-style-type: none"> <li>• Incident 20171031PWA_01 Powercor classified this incident as “started in or originated from a distribution system”, but ESV’s review identified that this incident was “started by any tree, or part of a tree, falling upon or coming into contact with a distribution system”. In the OSIRIS report for this incident, Powercor had noted that the cause of the incident was a tree falling across the powerlines.</li> <li>• Incident 20171220PWA_03 Powercor classified this incident as “started in or originated from a distribution system”, but ESV’s review identified that this incident was “started by any person, bird, reptile or other animal coming into contact with a distribution system”. In the OSIRIS report for this incident, Powercor had noted that the cause of the incident was a bird causing a flashover the resulted in a conductor splice parting and the conductor coming to ground.</li> <li>• Incident 20180102PWA_08 Powercor classified this incident as “started in or originated from a distribution system”, but ESV’s review identified that this incident was “started by any tree, or part of a tree, falling upon or coming into contact with a distribution system”. In the OSIRIS report for this incident, Powercor had noted that the cause of the incident was a service line to an unoccupied house coming to ground due to interference from a tree in the clearance space.</li> </ul> <p>Incident 20180108PWA_01 Powercor classified this incident as “started by any person, bird, reptile or other animal coming into contact with a distribution system”, but ESV’s review identified that this incident was “started in or originated from a distribution system”. In the OSIRIS report for this incident, Powercor had noted that the cause of the incident was conductor clashing. There was no mention of contact from a person or animal.</p> <ul style="list-style-type: none"> <li>• Incident 20180116PWA_01 Powercor classified this incident as “started in or originated from a distribution system”, but ESV’s review identified that this incident was “started by lightning striking a distribution system or a part of a distribution system”. In the OSIRIS report for this incident, Powercor had noted that the cause of the incident was a lightning strike in the vicinity.</li> <li>• Incident 20180314PWA_01 Powercor classified this incident as “started in or originated from a distribution system”, but ESV’s review identified that this incident was “started by any person, bird, reptile or other animal coming into contact with a distribution system”. In the OSIRIS report for this incident, Powercor had noted that it was</li> </ul>	<p>CP/PAL provide the following comments:</p> <p><b>Incident 20171031PWA_01:</b> CP/PAL disagrees with ESVs assessment. To clarify; cause of fire was a fuse hang-up during a fault that was caused by tree falling across high voltage lines at another location. Fuse should have operated correctly under these fault conditions, however the fuse failed and caused the ground fire. Powercor views the tree contact as a contributing factor, not the cause of the fire. Therefore categorisation of “started in or originated from a distribution system” is correct; however description of incident and causes in the OSIRIS incident report needs to be clarified by Powercor.</p> <p><b>Incident 20171220PWA_03:</b> CP/PAL disagrees with ESVs assessment. To clarify; cause of fire was a HV conductor falling to the ground due to splice failure which occurred during a fault initiated by bird contact. Powercor views the bird contact as a contributing factor, not the cause of the fire. Therefore categorisation of “started in or originated from a distribution system” is correct; however description of incident and causes in the OSIRIS incident report needs to be clarified by Powercor.</p> <p><b>Incident 20180102PWA_08:</b> CP/PAL agrees with ESVs assessment. Failure of service line was caused by tree contact. Categorisation of fire start #73 in F-Factor RIN has been amended to “started by any tree or part of a tree, falling upon or coming into contact with a distribution system”. Refer to updated: ‘Powercor F-Factor RIN 2017-18 (Ver 1.3) Final.xlsx’.</p> <p><b>Incident 20180108PWA_01:</b> CP/PAL agrees with ESVs assessment. Cause of fire was due to conductor clashing. Categorisation of fire start #77 in F-Factor RIN has been amended to “started in or originated from a distribution system”. Refer to updated: ‘Powercor F-Factor RIN 2017-18 (Ver 1.3) Final.xlsx’.</p> <p><b>Incident 20180116PWA_01:</b> CP/PAL agrees with ESVs assessment. Cause of fire was due to lightning strike. Categorisation of fire start #95 in F-Factor RIN has been amended to “started by lightning striking a distribution system or a part of a distribution system”. Refer to updated: ‘Powercor F-Factor RIN 2017-18 (Ver 1.3) Final.xlsx’.</p> <p><b>Incident 20180314PWA_01:</b> CP/PAL agrees with ESVs assessment. Cause of fire was due to animal interference. Categorisation of fire start #166 in F-Factor RIN has been amended to “started by any person, bird, reptile or other animal coming into contact with a distribution system”. Refer to updated: ‘Powercor F-Factor RIN 2017-18 (Ver 1.3) Final.xlsx’.</p>

suspected that the cause of the incident was a bat contacting the HV conductors.

- Incident 20180409PWA\_05  
Powercor classified this incident as “started in or originated from a distribution system”, but ESV’s review identified that this incident was “started by any person, bird, reptile or other animal coming into contact with a distribution system”. In the OSIRIS report for this incident, Powercor had noted that there had been a flashover on the cable terminations and the carcass of a ring-tail possum had been found below.

- Incident 20180723PWA\_05  
Powercor classified this incident as “started in or originated from a distribution system”, but ESV’s review identified that this incident was “started by any person, bird, reptile or other animal coming into contact with a distribution system”. In the OSIRIS report for this incident, Powercor had noted that bird contact had caused a loss of supply and, upon re-energisation, a fault current had resulted in a kiosk and ground fire. ESV has attributed the fire to the primary event, whereas Powercor has attributed it to an electrical breakdown (presumably separate to the primary event).

**Incident 20180409PWA\_05:** CP/PAL agrees with ESVs assessment. Cause of fire was due to animal interference. Categorisation of fire start #228 in F-Factor RIN has been amended to “started by any person, bird, reptile or other animal coming into contact with a distribution system”. Refer to updated: ‘Powercor F-Factor RIN 2017-18 (Ver 1.3) Final.xlsx’.

**Incident 20180723PWA\_05:** CP/PAL disagrees with ESVs assessment. Kiosk substation ignited during re-energisation; therefore categorisation of “started in or originated from a distribution system” is correct.

**Clause 6(3)(e)(ii)** Comparative analysis — IRU-specific factors

There were two differences in the location and five differences in the incident date/time and Fire Danger Ratings in the Powercor fire report that were potentially material to the calculation of the total IRU amount. These differences were addressed in the final fire start report used to calculate the total IRU amount below.

CP/PAL agrees with ESV findings. F-Factor RIN was amended as per feedback from ESV and resubmitted to AER on 30 Nov 2018. Previously resubmitted version: ‘Powercor F-Factor RIN 2017-18 (Ver 1.2) Final.xlsx’.

**Clause 6(3)(e)(iii)** Comparative analysis — non-IRU factors

There were three differences between the fire start report and OSIRIS in relation to pole identification number. There were nine differences between the fire start report and OSIRIS in relation to polyphase electric line identification number. These differences were not material to the calculation of the total IRU amount.

**Incident 20171031PWA\_01:** Equipment number 33005393 (pole id) provided in F-Factor RIN is correct. OSIRIS report to be amended.

**Incident 20171108PWA\_01:** Feeder number (line id) provided in F-Factor RIN is correct (RCT023). OSIRIS report to be amended.

**Incident 20171121PWA\_02:** Feeder number (line id) provided in F-Factor RIN is correct (SHTS-NKA2). OSIRIS report to be amended.

**Incident 20180110PWA\_01:** Feeder number (line id) provided in F-Factor RIN is correct (BET006). OSIRIS report to be amended.

**Incident 20180130PWA\_08:** Feeder number (line id) provided in F-Factor RIN is correct (SHN011). OSIRIS report to be amended.

**Incident 20180219PWA\_01:** Pole number provided in F-Factor RIN is incorrect. Correct equipment # is: 32007989. Pole id for fire start # 133 in F-Factor RIN has been corrected. Refer to updated: ‘Powercor F-Factor RIN 2017-18 (Ver 1.3) Final.xlsx’.

**Incident 20180302PWA\_01:** Feeder number (line id) provided in F-Factor RIN has been corrected as per previous feedback from ESV and resubmitted to AER on 30 Nov 2018. Previously resubmitted version: ‘Powercor F-Factor RIN 2017-18 (Ver 1.2) Final.xlsx’.

**Incident 20180321PWA\_03:** Feeder in F-Factor RIN (fire start # 184) has been updated (TRG004). Refer to updated: ‘Powercor F-Factor RIN 2017-18 (Ver 1.3) Final.xlsx’.

**Incident 20180322PWA\_05:** Feeder number (line id) provided in F-Factor RIN is correct (NHL015). OSIRIS report to be amended.

**Incident 20180411PWA\_03:** Feeder number (line id) provided in F-Factor RIN is correct (GL015). OSIRIS report to be amended.

Table 3: Variations in pole and line identification numbers

OSIRIS report	Cause of the variation		
	typographic error	different data	data not in OSIRIS
20171031PWA_01		pole id	
20171108PWA_01	line id		
20171121PWA_02	line id		
20180110PWA_01		line id	
20180130PWA_08		line id	
20180219PWA_01	pole id		
20180302PWA_01	line id		
20180320PWA_01		voltage	
20180320PWA_03		voltage	
20180321PWA_03		line id	
20180322PWA_05		line id	
20180329PWA_01		voltage	
20180411PWA_03	line id		
20180426PWA_02		line id	
20180514PWA_01		pole id	

**Incident 20180426PWA\_02:** Feeder number (line id) provided in F-Factor RIN has been corrected as per previous feedback from ESV and resubmitted to AER on 30 Nov 2018. Previously resubmitted version: 'Powercor F-Factor RIN 2017-18 (Ver 1.2) Final.xlsx'.

**Incident 20180514PWA\_01:** Pole number provided in F-Factor RIN is incorrect. Correct equipment # is: 30112650. Pole id for fire start # 161 in F-Factor RIN has been corrected. Refer to updated: 'Powercor F-Factor RIN 2017-18 (Ver 1.3) Final.xlsx'.

**Incident 20180320PWA\_01:** Voltage provided in F-Factor RIN has been corrected as per previous feedback from ESV and resubmitted to AER on 30 Nov 2018. Previously resubmitted version: 'Powercor F-Factor RIN 2017-18 (Ver 1.2) Final.xlsx'.

**Incident 20180320PWA\_03:** Voltage provided in F-Factor RIN is correct (22kV). OSIRIS report to be amended.

**Incident 20180329PWA\_01:** Voltage provided in F-Factor RIN is correct (22kV). OSIRIS report to be amended.

<b>Clause 6(3)(e)(iv)</b>	Comparative analysis — non-IRU factors	There were three differences between the fire start report and OSIRIS in relation to voltage of the line involved in the fire. These differences were not material to the calculation of the total IRU amount.	<p><b>Incident 20180320PWA_01:</b> Voltage provided in F-Factor RIN has been corrected as per previous feedback from ESV and resubmitted to AER on 30 Nov 2018. Previously resubmitted version: 'Powercor F-Factor RIN 2017-18 (Ver 1.2) Final.xlsx'.</p> <p><b>Incident 20180320PWA_03:</b> Voltage provided in F-Factor RIN is correct (22kV). OSIRIS report to be amended.</p> <p><b>Incident 20180329PWA_01:</b> Voltage provided in F-Factor RIN is correct (22kV). OSIRIS report to be amended.</p>
<b>Clause 6(3)(e)(v)</b>	Verification of IRU amount	The total IRU amount of 401.66 provided in the fire start report (Powercor F-Factor RIN 2017-18 (Ver 1.2) Final.xlsx) is correct.	CP/PAL agrees with ESV findings.
<b>Clause 6(3)(f)</b>	Completeness assessment	Powercor had reported all fires to ESV as the relevant entity.	CP/PAL agrees with ESV findings.

**Table 2: Summary of findings – CitiPower**

<b>Statistic</b>	<b>Relevant report section</b>	<b>Key findings</b>	<b>CP/PAL Comment</b>
<b>Clause 6(3)(d)</b>	Request from AER	The fire start report addressed the CitiPower distribution system separately from other systems managed by the service provider.	CP/PAL agrees with ESV findings.
<b>Clause 6(3)(e)(i)</b>	Comparative analysis — non-IRU factors	There were no differences between the assessment of the fire type made by CitiPower and that made by ESV.	CP/PAL agrees with ESV findings.
<b>Clause 6(3)(e)(ii)</b>	Comparative analysis — IRU-specific factors	There were no material differences between the fire start report and OSIRIS data sets in relation to the location or date and time of incidents.	CP/PAL agrees with ESV findings.
<b>Clause 6(3)(e)(iii)</b>	Comparative analysis — non-IRU factors	There were no differences between the fire start report and OSIRIS in relation to pole identification number. There were two differences between the fire start report and OSIRIS in relation to polyphase electric line identification number. These differences were not material to the calculation of the total IRU amount.	Feeders indicated in the F-Factor RIN for fire starts #4 and #6 are correct. Feeder information in OSIRIS for incidents 20170817PWA_02 and 20180103PWA_02 needs to be amended.
<b>Clause 6(3)(e)(iv)</b>	Comparative analysis — non-IRU factors	There were no differences between the fire start report and OSIRIS in relation to voltage of the line involved in the fire. These differences were not material to the calculation of the total IRU amount.	CP/PAL agrees with ESV findings.
<b>Clause 6(3)(e)(v)</b>	Verification of IRU amount	The total IRU amount of 0.98 provided in the CitiPower 2017-2018 fire start report (CitiPower F-Factor RIN 2017-18 Final.xlsx) is correct.	CP/PAL agrees with ESV findings.
<b>Clause 6(3)(f)</b>	Completeness assessment	CitiPower had reported all fires to ESV as the relevant entity.	CP/PAL agrees with ESV findings.