

09.01.18

Mr David Chan
Australian Energy Regulator
Casselden Place
Level 17, 2 Lonsdale St
Melbourne VIC 3000

Dear David

Subject – ESV Validation Report, UE 2016-2017 Fire Start Report

United Energy (UE) appreciates the opportunity to provide comments on the Energy Safe Victoria (ESV) Validation Report for the United Energy (UE) 2016-2017 Fire Start report provided to the AER under the F-factor Scheme Order 2016, clause 7.

UE note that a new F-factor Scheme Order was gazetted on 22 December 2016 and became effective on that date. The AER consulted on templates in mid 2016 to be used for the 2016/2017 fire season which used the Country Fire Authority (CFA) fire danger rating, UE used these AER templates in its AER reporting for the 2016/2017 season.

The ESV Validation Report has corrected the fire danger multiplier formula in the AER template to ignore the CFA declared fire danger period for the municipality and has instead used the Bureau of Meteorology (BOM) assessment of the fire danger in the region. As a result of this change, the total UE ignition risk units, IRU, is amended to 7.34. UE supports that the use of the BOM rating is consistent with the F-factor Scheme Order and the IRU should be corrected to 7.34.

A number of locational discrepancies have been noted by ESV primarily related to the fact the ESV reporting system (OSIRIS) utilises automatically populated address co-ordinates, rather than the F-Factor Reporting sheet which uses the actual pole GIS data coordinates. UE welcomes the opportunity to discuss these along with the minor timing discrepancies also highlighted.

UE also acknowledges that ESV found UE had reported all fires.

If you have any questions regarding the above, please feel free to call me on 0404 098 597.

Kind regards

Verity Watson