Networks Information Requirements Review

Workshop 8: DNSP Service Performance and Other Information

Summary

29 September 2022



Networks Information Requirements Review: DNSP Service Performance and Other Information (Workshop 8)

Date of Workshop: 29 September 2022

Attendees

Attendees included representatives from: AER, AusNet Services, Endeavour Energy, Energy Queensland, Evoenergy, Jemena, Power and Water, Powercor, SA Power Networks and TasNetworks.

Workshop structure

The group discussed the new data requirements for Export Services as well as Safety and Major Event. The group reviewed the issues on the issues registers and the data use cases for Service Performance data and other remaining issues on the register.

The issues register (with responses), the data use cases and the new data requirements for Export Services and Safety were provided to workshop participants prior to the workshop via our website. See Workshop materials.

Topic 1. Export Services

Workshop discussion

The AER has published an extra workbook (see <u>supporting materials</u> to this workshop) that sets out the updated data requirements for Export Services.

This workbook includes text boxes which set out the primary purpose test to be applied to expenditure reported against these requirements.

No further issues were raised by the group on Export Services.

AER Response to issues raised regarding Export Services:

The export services (DER) data requirements have been updated since the consultation workbooks were issued in March 2022. AER has been working with DNSPs to collect information required for export services. New export services information tables have been prepared and align with information currently being sought by the AER through information requests to which businesses have already responded. A draft set of reporting tables have been included with the material for Workshop 8, including definitions.

In the context of the AER's current review in relation to Incentivising and measuring export service performance, export service data requirements are being considered. This review runs until March 2023, and it is likely that the export service data requirements will be refined in line with the submissions to, and findings of, this review.

Export Services capex is a new expenditure category for table 2.1. This will align the RIN capex drivers with those in our new standardised capex model and how we report capex in our capex attachments.

Topic 2. Service Performance data

2.1 Customer Service Incentive Scheme (CSIS)

Workshop discussion

Currently the annual RINs include CSIS worksheets, which reflect specific schemes applying to individual businesses. As such we do not think the CSIS worksheets are a good fit for the annual information Orders, due to the timing of schemes being introduced not aligning with the timing of Orders, and specifically the Orders not aligning with regulatory periods. There are also the differences in schemes being development, and the fact that not all businesses have a CSIS, and the schemes are not mandatory.

Taking all that into account, the AER think a more pragmatic approach will be to serve a RIN, following the final decision of a reset; solely focussed on CSIS information requirements. We will align reporting and assurance with the obligations under the Orders, so that timing and assurance engagements can be consolidated.

Powercor noted this sounds like the AER plans to align the process to the Orders framework and thus the businesses would still report CSIS annually.

AER confirmed the annual reporting (and auditing) requirements will be able to be done together in one process.

Powercor will discuss this with their team and come back the AER if required.

AER advised there will be more time available to address this at the consultation stage following the publication of the Preliminary Orders. We will be incorporating feedback from businesses during this consultation stage.

2.2 Customer definitions

Workshop discussion

The AER once again reiterates we do not mean to change any definitions in the release of our new data requirement consultation workbooks. Rather, we are attempting to articulate the different definitions of customers for various purposes.

As outlined in the new data requirements workbook for Export Services, customers can be split into two discrete groups: metered and unmetered. These two groups are exhaustive and will capture all possible customers. Metered customers can then be further categorised into three discreet and exhaustive categories as follows: Active NMI; Inactive NMI, Deactivated NMI. Using these four categories we can define the various classifications of customers we require for our data requirements. For example:

- Customers (Economic Benchmarking) = Unmetered + Metered [Active NMI + Inactive NMI]
- Customers (STPIS) = Metered [Active NMI + Inactive NMI]
- Customers (Export Services) = Metered [Active NMI + Inactive NMI]

2.3 Customer numbers

Workshop discussion

The AER is proposing to collect raw data and calculate averages. This is so we have more options regarding what we can do with the data than if we just collected the calculated average. We are not proposing to change any methodology.

2.4 Customer service metrics

Issue #11 - Call Centre Performance

Issue raised by Essential: If Call Centre metric no longer applicable under STPIS, is this tab removed -or just left blank?

Does each DNSP need a new tab for their own CSIS metrics, which will be measured on different basis?

AER response:

Call centre performance data - the data requirement substitutes for AR RIN tables 6.7.1 and 6.6.1. Given it is still a metric under the STPIS it will remain in the information requirements.

The AER is considering the need for NSPs with a CSIS to report against this metric in the future.

ACTION ITEM 1: AER to review the need for Call Centre Performance metrics.

Workshop discussion

The AER is still considering the need for Call Centre Performance metrics. One question we are considering is how easy it would be for businesses to retrospectively provide this data if the series was discontinued but required again, for example, 5 years later.

Power and Water Corporation noted the difficulties its organisation faces in collecting this data, and historical data (especially prior to 2013/14) in general.

2.5 Other service measures

Issue #31 - Unmetered Customers

Issue raised by Jemena: This section appears to request the number of unmetered customers but the definitions tab lists out different device types, including street lights, traffic controls, phone or transport cubicles etc. We wish to clarify if the AER requires the number of unmetered customers or the number of unmetered devices, noting that an individual unmetered customer may have multiple unmetered devices.

AER response:

We will review the definition of unmetered customers. The current list of devices is provided for context only, and we are seeking information on customer numbers not device numbers.

Workshop discussion

Jemena is happy with this response

ACTION ITEM 2: AER to review the definition of unmetered customers.

Issue #14 - GSL

Issue raised by Essential: Evidence of GSL administrator and scheme provided in row 42

If GSL covered under another jurisdiction Essential is not clear on the need to report exceedances to AER.

AER response:

The AER uses GSL data to meet its obligations under the NERR, as well as for performance monitoring and reporting.

There is a need for the AER to obtain this data prior to the normal reporting period, and we will give consideration to how that requirement can be incorporated into the new arrangements.

Issue #83 - GSL

Issue raised by CPU: Clarifications required: Guaranteed Service Levels Scheme: would we populate this section with Essential Services Commission as scheme administrator and specify which version of the Distribution Code we are using? Guaranteed Service Levels

Scheme: Annual RIN 6.9 requires numbers and \$, is it intended that it will only be numbers in future? Is 'energy not supplied' (Annual RIN 3.6.8) still required?

AER response:

Expenditure (\$) data requirements are outlined in Workbook 06: Operating Expenditure.

Energy not supplied is collected under the service performance data (and referenced against the EB RIN table 3.6.2). Disaggregation of energy not supplied at the feeder level is not required.

Workshop discussion

GSL data is used by the AER's Performance Reporting team. We are currently reviewing this information request, so businesses are only required to provide this information once. However, this needs to be balanced against audit and assurance requirements.

ACTION ITEM 3: AER will consider the timing of GSL data reporting and audit requirements.

2.6 Feeders

Issue #34 - Urban feeder

Issue raised by Jemena

This concept is defined as "a feeder, which is not a CBD feeder, with actual maximum demand over the reporting period per total feeder route length greater than 0.3 MVA/km". However, the definition in the AER's Distribution Reliability Measures Guideline is "a feeder, which is not a CBD feeder and has a three-year average maximum demand over the three-year average feeder route length greater than 0.3 MVA/km". We request clarity from the AER on whether the calculation should be based on reporting period or a three-year average.

AER response:

We will update the definition to reflect the Distribution reliability measures guideline.

ACTION ITEM 4: AER will update the definition of Urban Feeder to reflect the Distribution reliability measures guideline.

<u>Issue #77 Length of High Voltage Distribution Feeders</u>

Issue raised by CPU: Clarity is required, should it be current financial year (FY) data or 3-year average data which is used to calculated feeder categories?

AER response:

We prefer to collect raw data, and will calculate the three year average data if needed. Length of high voltage distribution lines should be reported for the current financial year.

Workshop discussion

The AER is moving towards the collection of raw data. With raw data, we can calculate averages as required.

2.7 Interruptions

<u>Issue #38 - Interruptions</u>

Issue raised by Jemena: this section requests duration of interruption data for each interruption reported. However, the current CA RIN reports the average duration of sustained customer interruption, and JEN has historically reported the Customer Average Interruption Duration Index (CAIDI) of the event in this RIN. We seek clarity from the AER on whether this column is still referring to average duration (CAIDI) per event, as each event—whether planned or unplanned—can have multiple restoration stages of different durations. Under the definition in this worksheet, it could be interpreted that DNSPs are required to count five outage restoration stages of one outage cause as five separate outages.

AER response:

The AER is reviewing appropriate data requirements for staged restoration.

ACTION ITEM 5: AER will consider how we can adjust the data requirement table to account for stage restoration. This will be included in our next iteration of workbooks.

Workshop discussion

At this stage, the AER is looking to collect all interruptions greater than 1 min. The AER can then include interruptions required under the various guidelines (e.g. STPIS, Economic Benchmarking) as needed.

2.8 Exclusions

<u>Issue #35 - Excluded events</u>

Issue raised by Jemena: This concept is "as defined in the AER's STPIS scheme and/or the AER's Distribution Reliability Measures Guideline". However, in many cases, excluded events refer only to section 3.3(a) of the STPIS (page 13), whereas in some cases, they refer to both sections 3.3(a) and 3.3(b) of the STPIS (pages 13-14). Therefore, we recommend that the AER clearly defines excluded events by referencing these specific sections of the STPIS.

AER response:

We will review the definitions and concepts associated with customer numbers to ensure the data collected meets our requirements, including for STPIS purposes.

ACTION ITEM 6: AER to review the definitions and concepts of Excluded Events to ensure the data collected meets our requirements, including for STPIS purposes.

2.9 Reliability

Issue #148 - Customer Base

Issue raised by EQL: Request the inclusion of this term – 'Has the meaning prescribed in the AER's Distribution Reliability Measures Guideline.' As previously defined in AR RIN Template 6.2.4

Excludes Unmetered Customers

De-Energised (Disconnected) Customers

(De-Energised (Disconnected) Customer is a customer that has been disconnected from the DNSP's distribution electricity supply network. Therefore, since the DNSP is no longer supplying power to the premise, the customer cannot be counted or experience any Interruption in power supply.)

AER response:

We will review the definitions and concepts associated with customer numbers to ensure the data collected meets our requirements, including for STPIS purposes.

ACTION ITEM 7: AER will review the definitions and concepts associated with customer numbers to ensure the data collected meets our requirements, including for STPIS purposes

2.10 PWC unique issues

<u>Issues - #188, #189, #190, #191, #192, #193, #194, #195, #220, #221, #222, #223, #227, #224, #229</u>

There was no further discussion on these issues.

Topic 3. Safety and Major Event expenditure

Workshop discussion

The Safety and Major Event data requirement tables were included as placeholder information requirements in the consultation workbooks, signalling the AER's interest in developing the data requirements. We have now decided to focus on safety incidents, rather than major events, reflecting the discussion in the 2021 network performance report. We have provided sample tables (see <u>supporting materials</u> for workshop 8 on our website) for collecting safety related data – for major incidents and non-major incidents. These workbooks contain 'working definitions' of the terms, as well as advisory text to enable understanding of how we came to the definitions.

Our working definitions on safety incidents are what we believe aligns with data, as far as practicably reasonable, that is provided by NSPs to the jurisdictional regulators. We note that differences in jurisdictional reporting could result in less than perfect alignment across jurisdictions. Our highly preferred position is to rely on a single definition to increase the degree of comparability.

AusNet Services noted the workbooks contain a definition for 'Safe Operation of the Network' but couldn't see where this data was requested in the workbook. AusNet Services also notes O&M are already mutually exclusive so they cannot create any more categories.

The AER noted these data requirements are seeking to leverage existing data requirements from the Category Analysis RIN table 2.8.1 – descriptor metrics for routine and non-routine maintenance and Table 5.2.1 – Asset age profile. Our intent is to develop a lead indictor to accompany the safety incident data (lagged indicator). Table 2.8.1 collects data on maintenance activities undertaken for a similar but different asset categorisation to that reported under table 5.2.1. Table 2.8.1 also maps asset categories to the activity type, and we think a better approach to align the data between these two tables would be to map the

maintenance/inspection activities to the asset classification used in table 5.2.1. This approach would appear to provide more informative data by improvement the links between assets (and their age) and the associated maintenance and operational activities. The AER would like the businesses to review the definitions in the workbook and identify areas aligned with data provided to jurisdictional regulators to identify areas of potential inconsistency. The AER's intent is not to replicate the role of jurisdictional regulators, but to leverage the existing data that NSPs collect and provide to jurisdictional regulators where appropriate. It would be useful to get NSP views on these initial definitions to identify a need to further development.

CPU notes they will likely have further comments.

ACTION ITEM 8: Businesses to review the Safety concepts, definitions and data requirements and provide feedback to the AER, including details of jurisdictional data reporting requirements.

Topic 4. Other issues on the register

<u>Issue #91 - RIT and contingent project expenditure:</u>

Issue raised by CPU: We do not have clarity on what would fall under these categories or their use cases. We would need time to determine if we could provide it and develop appropriate reporting when we do.

Issue #92 - RIT and contingent project expenditure:

Issue raised by CPU: We do not have clarity on what would fall under these categories or their use cases. We would need time to determine if we could provide it and develop appropriate reporting when we do.

AER response #91 and #92:

AER will provide definitions of RIT expenditure and contingent project expenditure in the next iteration of data requirement workbooks.

NOTE: definitions will align with current rules/guidelines. Given the high value of projects subject to RIT and for some contingent projects there is considerable interest in comparing out-turn expenditure and outcomes against project plans and proposals.

Workshop discussion

The AER notes A NULL response is valid where no RIT-D assessment for a project or no contingent project has been undertaken.

Topic 5. Next Steps

The next public facing step is the publication of the Preliminary Orders, including publication of updated data requirement workbooks and an Explanatory Statement. We aim to publish this December 2022/January 2023.

The AER will then hold a second round of public consultation through to March 2023.

We aim to develop Draft Orders by June 2023 (followed by further consultation) and Final Orders by September 2023.

While a new IT solution won't be developed in time for the 2023/24 reporting requirements, we will work with the individual businesses to modify their current data submission templates to make them fit for purpose.

The AER will send a short survey to workshop participants to gauge the usefulness of this series of data requirements workshops.