



Our Ref: D20016924

Mr Adam Wilson
Chief Executive Officer
Essential Services Commission of South Australia
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ADELAIDE SA 5000

Via: escosa@escosa.sa.gov.au

Dear Mr Wilson

Draft Electricity Distribution Code and Electricity Guideline No. 1

Many thanks for the invitation by your officers to participate in the review of the Electricity Distribution Code and the Electricity Guideline No. 1. The Office of the Technical Regulator appreciates the opportunity to comment on these regulatory instruments.

I understand that officers of both of our organisations have recently liaised on these matters, and that my officers provided feedback on specific issues below:

Clause 2.3.2 of the Draft Electricity Distribution Code: Interruptions outside control of distributor

This clause of the draft Code provides exemptions from the Guaranteed Service Level (GSL) Scheme for “*interruptions not caused by and outside the control of the distributor*” and includes a bushfire event as an example.

It would be prudent to consider the scenario in which electrical infrastructure may cause the bushfire, and it may not be easily assessable whether such bushfire was then outside the control of the distributor.

To avoid ambiguity, it might be appropriate to refer to Force Majeure events in more generic terms for such GSL exemptions.

Chapter 3 of the Draft Electricity Distribution Code: Embedded Generators

As you are aware our officers have been closely cooperating in the recent past to identify emerging challenges to South Australia’s electricity system associated with the ongoing energy transformation due to technological developments.

In particular the widespread adaptation of Distributed Energy Resources (DER) such as residential and commercial inverter-based systems has created risks that need to be carefully managed.

Our officers are working closely with SA Power Networks, AEMO and other stakeholders to identify engineering solutions. Preliminary analysis indicates that a greater level of control of these resources



by a central organisation such as the distributor is likely to be required in the future to maintain or enhance power system security.

We appreciate the continuing cooperation with your officers on this matter and are of the opinion that chapter 3 might be an appropriate legislative tool to include such requirements for embedded generators.

We look forward to providing more details on possible technical requirements when chapter 3 will be separately reviewed later in the year.

Clause 3.8.2 and Proforma 4.1 of the Draft Electricity Industry Guideline No. 1

Many thanks for your agreement to allow a distributor to provide mandatory information to both our offices in combined quarterly and annual reports. We consider that a combined reporting process is assisting a distributor in meeting their requirements and reducing red tape for the industry.

The current wording of clause 3.8.2 of the Guideline may create ambiguity whether some reporting is supposed to occur on a monthly or quarterly basis. For clarity we propose to amend the below sentence as follows:

For example, Regulation 73 of the Electricity (General) Regulations 2012 requires SA Power Networks to lodge with the Technical Regulator, within 21 business days after the end of each month (or at a different frequency as agreed to by the Technical Regulator), a report concerning unplanned interruptions which occurred during the month.

Furthermore, my officers have informed me that they have reviewed the reporting requirements and propose the removal of the reporting requirement in Proforma 4.1 on the Number of network access permits requested and number of network access permits issued.

Many thanks for the opportunity to comment on these matters. If you have any queries on this submission, please contact Reinhard Struve on 08 8429 3306.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'R J Faunt'.

Rob Faunt
TECHNICAL REGULATOR

24 April 2020