

24 February 2021

Vashti Maher
Senior Economist
Essential Services Commission of South Australia

Via email: vashti.maher@escosa.sa.gov.au

Dear Vashti

re: Review of the Electricity Transmission Code – 2023-2028

ElectraNet appreciates the opportunity to provide initial input to the review of the Electricity Transmission Code (ETC) being undertaken by the Commission. We respond to your specific questions of 9 February 2021 as follows.

Aligning the ETC definition of emergency with the Emergency Management Act

How does ElectraNet interpret its rights and obligations under clause 9.1? How regularly does ElectraNet rely on clause 9.1? Are emergencies usually declared under the Emergency Management Act such that ElectraNet does not need to exercise this discretion?

Typically, unplanned outages occur due to actual or imminent events which would satisfy the definition of emergency under the ETC. Emergencies in the context of the transmission system are generally not of a scale which would invoke the Emergency Management Act.

ElectraNet's proposal to align the ETC definition with the Emergency Management Act definition is solely for administrative efficiency. Typically, issues associated with such definitional inconsistencies manifest in post event reviews. It is therefore proposed that the ETC definition be suitably broadened for consistency to encompass the full range of events captured by the Emergency Management Act definition.

There are no day to day issues for ElectraNet in the inconsistency of the ETC with the Emergency Management Act.

Clarifying the notification requirements in the Code in relation to unplanned interruptions

Clauses 9.2.1 and 9.2.2 of the ETC were introduced in the 2018 review to “address circumstances where an interruption to prescribed transmission services cannot be restored within applicable timeframes for reasons outside ElectraNet’s control or because safety is compromised”¹.

¹ p10 2018 review of the Electricity Transmission Code DRAFT Decision April 2018

The draft decision further noted that “*To provide transparency around ElectraNet’s actions in these situations, the Commission will require ElectraNet to inform affected customers and the Commission of the situation, including details of the event, the circumstances preventing restoration, the estimated duration of any interruption and the steps to be taken to restore prescribed transmission services.*”

Subsequently ElectraNet’s submission to the draft decision noted the important role of the distributor in notifying distribution connected customers and the current form of 9.2.2 appeared in the final decision.

The substantive issue regarding the current form of 9.2.2 is that an outage of a direct connect customer connection point is of no relevance to distribution customers, and equally the outage of a distribution connection point is of no relevance to our direct connect customers.

A suitable form amendment to the clause to reflect this is as follows:

*The transmission entity must give prompt notice of the events or circumstances to **the Commission and to affected transmission customers and/or, the distributor (as appropriate) and the Commission**, including details of the events or circumstances, an estimate of likely duration of the interruption to the provision of prescribed transmission services at one or more exit points, the extent to which its restoration obligations are or are likely to be affected and the steps taken to remove, overcome or minimise those effects.*

Should you have any queries or require additional information in relation to the above, please feel free to contact Bill Jackson in the first instance on (08) 8404 7969.

Yours sincerely



Simon Appleby
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