

## NECF review of ESCoSA Codes and Licenses

### Distribution License

SA Power Networks considers that the following clauses should be removed<sup>1</sup> from our Distribution License, due to either implementation of national regimes or the commencement of the NECF.

- Remove clause 6.2(d) as now covered by NER chapter 5A and 6.
- Remove clause 9 and 9.1 as disconnection now covered by Retail Rule requirements.
- Remove clause 10 as now covered by NERL Part 4 – Small customer complaints and dispute resolution.
- Remove Clause 11 - as covered by NERL Part 4 Section 86.
- Remove clause 14 (except clause 14.2) as now covered by National Electricity Amendment (Distribution Network Planning and Expansion Framework) Rule 2012 No. 5.
- Remove clause 19 – Retailer of last Resort, now covered under the NECF and no longer SA Power Networks’ obligation.
- Remove clause 22 – Co-ordination agreements ceases at the commencement of the NECF.
- Remove clause 27 – B2B Information exchange now a national obligation.

References to National Electricity Code should be amended to National Electricity Rules.

All references to the Energy Consumer and Consent Code should be removed from the license as this Code has ceased to apply.

### Electricity Distribution Code

#### *Preliminary Section*

Section D – dot point 4 should remove “Meteorology” from National Meteorology Procedures” as there are other procedures that require compliance.

#### *Chapter 1*

Re-inclusion of the service standards (previously EDC 1.10 “Reconnection after Disconnection”) for re-energisation of a customers premises that has been de-energised at a retailer’s request or distributor has de-energised the customer’s premises otherwise that at the request of the retailer. As the NERR RR122 refers to a distributor reconnecting a customer’s premises in accordance with distributor service standards, where that customers has made the request for re-energisation within 10 business days of being de-energised.

#### *Chapter 2*

Removal of clauses and references to small embedded generators as these are now covered by the NER Chapter 5A.

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<sup>1</sup> SA Power Networks is aware that some of the clauses are still listed in the Electricity Act Section

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## Pre-Payment Meter System Code

Currently, this code is enacted on retailers through their ESCOSA issued retailer licenses which no longer exist. It is assumed that this document will need to be modified to be the “local instrument” referred to in NERL Part 2 Division 10.

## Guideline No.1 – Operational Performance Reporting

References to the *connection and supply contracts* should be removed from the Guideline. The reporting of performance against GSL payments should refer to the new section of the EDC section 1.1.4.

Consider that all references to *ETSA Utilities* should be removed and replaced with *Distributor*. The definition section has a definition of *Distributor* as SA Power Networks.

Removal of OP 1.3 as this obligation has been removed from the EDC

Removal of OP 1.4 as this obligation has been removed from the EDC.

## Electricity Guideline No.12 – Demand Management

No longer required as it has been superseded by the “**National Electricity Amendment (Distribution Network Planning and Expansion Framework) Rule 2012 No. 5**” that commenced operation on the 1 January 2013.

## Energy Industry Guideline No.4 – Compliance systems and reporting

### Distribution License

#### Type 1 Obligations

Change references if Distribution License is amended and number altered.

#### Type 2 Obligations

- Remove reference to clause – 1.12.1 Emergency disconnections no longer contained in the EDC.
- Remove references to Metering Code (especially clause 7.7.3 & 7.7.5 and 7.10.2 and 7.10.2 no longer exist) as no longer applicable.

#### Type 3 Obligations

There are a considerable number of clause references which are no longer applicable.

