



Ethnic Communities' Council of NSW Inc.

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Submission to AEMC Distribution Reliability Measures – Draft Report

The Ethnic Communities Council of NSW (ECC) welcomes the opportunity to provide input into the draft report for the AEMC's review of distribution reliability measures.

Since its formation 38 years ago the ECC has been the peak body for culturally and linguistically diverse (CALD) community members and representative organisations in NSW. The ECC's main activities are advocacy, education and community development. It is a member of the Federation of Ethnic Communities Councils of Australia (FECCA) and the energy advocacy role represents FECCA in the NEM.

1. Sustained Interruptions

It is our understanding that each and therefore all interruptions contribute to wear and tear on equipment. This will shorten the life of an appliance and increase the frequency of maintenance and replacement. In older appliances that are more likely to be found in lower- income and newly arrived and refugee consumers' homes as well as more often found in small to medium sized family businesses owned by ethnic consumers, a single power interruption can directly trigger a failure and cause asset and product damage.

The ECC supports the Alternative Energy Association (ATA) view that ***momentary interruptions during a sustained interruption should not be excluded from MAIFI, due to impacts of momentary interruptions on consumers that occur irrespective of whether they are part of the longer interruption.*** We also support the ATA recommendation that ***where a choice needs to be made between the two, MAIFI (based on all momentary interruptions, not just those outside of sustained interruptions) be used instead of MAIFle.***

As a result of the information developed by the ATA the ECC is of the view that changing the **time limit** from one minute to three minutes better aligns distribution businesses incentives for reliability with the best interests of consumers, and will have little or no material impact on most consumers.

However the impacts on **consumers on life support** need to be assessed and taken into account in any changes in reliability measures. The ECC recommends that the AEMC consults with the appropriate disability support organisations about the impacts of any proposed changes on reliability on their members before proceeding.

The ECC recommends that the AEMC reword the proposed Exclusion 7 to clarify that it does not apply in such cases where 'non-excluded' event has caused or contributed to the fault situation for the reasons stated in the ATA submission (25 July 2014 p8)

The ECC accepts that network businesses should not be held accountable for events that are beyond their capacity to plan or control for, in order to eliminate the impact of catastrophic events. However we believe that the network businesses should be keeping full records of all interruptions and all interruptions should be captured in the relevant indices.

In the interest of fairness and cost-reflectivity, the ECC agrees with the AEMC that it would be appropriate to divide feeders into sections by customer type where this can easily and efficiently be done. At present the smaller users are cross subsidising larger consumers due to their different reliability requirements.

Finally, the ECC recommends that the use of standardised measures be binding across jurisdictions regardless of the recognised barriers described in the submission by the ATA (25 July p 10).

If you require additional information please contact Helen Scott, Energy Advocate on 02 9319 0288 or email energy@eccnsw.org.au .

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Mark Franklin', with a small dot at the end.

Mark Franklin
Executive Officer
Ethnic Communities' Council of NSW Inc.