

Our ref: DM#9961440
Your ref: D95886

26 October 2012

Mr Lyndon Rowe
Chairman
Economic Regulation Authority
PO Box 8469
PERTH BUSINESS CENTRE WA 6849

Dear Lyndon

Amendment by substitution to Electricity Distribution Licence

Thank you for your letter dated 4 October 2012 inviting Western Power to provide a submission in relation to the proposed amendments to Western Power's distribution licence (**EDL1**).

Western Power agrees with the inclusion of all of the proposed amendments to EDL1 with the exception of the Priority Restoration Register provisions which are contained in clause 29.

The proposed Priority Restoration Register obligations suggest that Western Power will be required to create and maintain a definitive customer restoration list with a specific ranking criteria. Western Power considers that this is impracticable for the following reasons:

1. When prioritising power restoration work following an unplanned interruption there are many factors which must be considered. These include, but are not limited to:
 - (a) public safety;
 - (b) seasonal weather conditions and their affect on customers (e.g. it would be appropriate to give aged care centres additional priority in periods of extreme hot or cold weather compared to periods of moderate temperatures);
 - (c) whether the customers affected by the interruption have alternative means of power generation to deal with the interruption;
 - (d) the number of customers affected by each interruption;
 - (e) the use that the affected customer has for the power and the benefits realised;
 - (f) whether the source of the interruption has been identified and if so what the source is;

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- (g) the type of work that is required to restore the power and the availability of the necessary equipment/materials to perform that work;
- (h) the estimated timeframe for the restoration work; and
- (i) the time of day that the interruption occurs (e.g. Pattersons Stadium is incredibly time critical when there is a night time event but not quite as critical during the daylight hours).

A fixed customer restoration list will be restrictive and inflexible and will not allow for the particular circumstances of the interruption to be considered.

Western Power considers that it would be more beneficial to require Western Power to create and maintain guidelines which detail the priority of considerations when planning restoration work following an unplanned interruption (which is the approach currently taken by Western Power in relation to this issue).

2. The proposed Priority Restoration Register obligation relates to the restoration of customers. The term customer is defined in accordance with the definition set out in section 3 of the *Electricity Act 2004 (WA)*. Western Power considers that an obligation in relation to prioritising work following an interruption should not be limited to customers but should apply to the entire network. For example, a situation where a fallen power line is a public safety issue but does not affect any customers would not be covered by the obligation.

Western Power would welcome an opportunity to discuss the above-mentioned issues further with the Authority.

If you have any questions or require further information regarding this matter, please do not hesitate to contact Margaret Pyrchla, Manager Risk & Compliance on 9326 4535.

Yours sincerely

Cameron Parrotte
GENERAL MANAGER SYSTEM MANAGEMENT