



Notice

5 January 2016

Contravention of type 1 electricity distribution licence obligation

ELECTRICITY NETWORKS CORPORATION (T/A WESTERN POWER)

The Economic Regulation Authority (**ERA**) has received notification from Western Power regarding a contravention of clause 7.7(4)(b) of the *Code of Conduct for the Supply of Electricity to Small Use Customers 2014 (Code)*.

Clause 7.7(4)(b) of the Code is classified as a Type 1 (considered the most serious and therefore immediately reportable) obligation for electricity distribution licence EDL1. Type 1 compliance obligations are classified as having a major impact on the basis that:

- the consequences of a contravention would cause major damage, loss or disruption to customers; or
- the consequences of a contravention would endanger or threaten to endanger the safety or health of a person.

Requirements of the Code

Clause 7.7(4)(b) of the Code which can be summarised as:

Where life support equipment is registered at a customer's supply address under subclause (3)(a) the distributor must, prior to any planned interruption, provide at least three business days written notice or notice by electronic means to the customer's supply address and, unless expressly requested in writing by the customer not to, use best endeavours to obtain verbal acknowledgement, written acknowledgement or acknowledgement by electronic means from the customer or someone residing at the supply address that the notice has been received.

Details of the contravention

On 1 December 2015, Western Power received a request from an electrical contractor (acting on behalf of a body corporate of a strata complex located in the Geraldton area) to isolate supply from the complex to allow them to perform electrical work on the existing mains connection. The request was lodged via Western Power's online service request form. Following advice from Western Power, the contractor entered the meter for unit 1 of the complex as the subject of the works in the online service request, and noted in the comments field that the meters to all six units in the complex would need to be switched off.

On 3 December 2015, the Western Power Customer Connections team processed the service request (which was categorised as an "appointment"). The team correctly copied over the information in the comments field of the service request to the instructions field of the service order, which was then dispatched to the works scheduler in Geraldton. The information that supply was to be interrupted to multiple customers requires the works scheduler to instigate the Minor Planned Interruptions Procedure (**Procedure**), which would have identified all customers affected by the interruption. However, the scheduler did not instigate the Procedure. Had the scheduler followed the Procedure they would have identified the resident in one of the units was registered as a customer requiring life support equipment (**LSE customer**), and would have been alerted to follow the procedures mandated under clause 7.7(4)(b) of the Code.

On 15 December 2015, the Western Power crew attended the site to de-energise the complex, which commenced at 10:15am. During their preparation for the work, the crew did not complete an appointments checklist. Had the crew completed the checklist, and identified that multiple customers would be impacted



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by the interruption in the appropriate field, they would have been instructed to stop work and then follow the Minor Planned Interruptions Procedure.

Shortly after the supply was removed to the complex the crew were informed that an LSE customer resided in the complex. The crew stopped work and confirmed the LSE customer was not in immediate danger. The LSE customer left the premises, and did not return until the supply was restored at approximately 1:00pm. The delay in restoring power to the complex was due to the need to secure materials required for the reconnection, and have specialist staff attend site to assist with the reconnection and meter testing.

Consequential Contravention of the Licence

The interruption of all six customers in the complex without providing them with at least 72 hours advance notice also constitutes six contraventions of clause 9 of the *Electricity Industry (Network Quality and Reliability of Supply) Code 2005*.

Western Power's Response to the Contravention

Western Power has commenced an investigation into the reasons for the contravention of the Code of Conduct. The field officers responsible for the contravention have been temporarily placed on restricted duties pending the outcome of the investigation.

On 16 December 2015, a notification was issued to all Western Power scheduling staff reminding them of the appointments process, and the need to follow the Minor Planned Interruptions Procedure when supply to multiple customers will be interrupted by planned works. By 30 June 2016, refresher training will be rolled out to all staff involved in the customer request appointment process concerning the above processes.

Western Power has committed to investigate and, if feasible, implement system solutions to:

- Introduce more automation into the appointments process to assist with triggering the Minor Planned Interruptions Procedure when supply to multiple customers will be interrupted.
- Improve the online form that is completed by electrical contractors to enable them to identify works that will interrupt supply to multiple customers.

ERA's response to the contravention

The information provided by Western Power shows that the incident occurred because the relevant staff members failed to follow the prescribed procedures in relation to the planned supply interruption.

Western Power has taken appropriate measures to address the cause of the contravention, and to prevent future recurrence of a contravention of this nature. The ERA does not propose to take any further action at this time.

For further information contact:

General Enquiries

Paul Reid
Phone: 08 6557 7976
Email: records@erawa.com.au

Media Enquiries

Tracy Wealleans
Phone: 08 6557 7942 or 0428 859 826
Email: communications@erawa.com.au