

6 March 2009

Mr Paul Reid
Assistant Director, Monitoring
Economic Regulation Authority
Level 6, 197 St George's Terrace
PERTH WA 6000

Dear Mr Reid

**DRAFT INCIDENT REPORTING MANUAL FOR WESTERN AUSTRALIAN ELECTRICITY,
GAS AND WATER LICENSEES**

I refer to the Authority's request for submissions in respect of the draft Incident Reporting Manual for Electricity, Gas and Water Licensees (Incident Reporting Manual).

Western Power acknowledges the Authority's legislative responsibility to monitor and report on the operation of Western Australian licensing schemes and to inform the relevant Minister of any failure by a licensee to comply with its licence conditions, including compliance with the relevant regulations and codes. We believe that the annual compliance reporting process serves this purpose well.

Western Power is fully committed to operating in an open and transparent electricity market. We also understand that the Authority's intention is not to create additional reporting requirements that would result in economic inefficiencies such as:

- interruptions to the effective operation of our transmission and distribution businesses;
- a necessity to employ additional resources; and
- provision of information that may not give the Authority a meaningful insight into our operations.

Consequently, to assist the Authority with its monitoring and reporting responsibilities, we propose that the significant incident information provided by Western Power under the Incident Reporting Manual consists of:

1. Significant incidents that have endangered or threaten to endanger the safety or health of a person

In accordance with regulation 35 of the Electricity (Supply Standards & System Safety) Regulations 2001, Western Power notifies EnergySafety of electrical incidents causing:

- serious injury resulting in a fatality or where a person is required to be admitted to hospital for assessment, monitoring or treatment; or
- serious damage to private property likely to exceed \$5,000; or
- serious damage to Western Power, our contractors or subcontractors' property:
 - by fire or explosion and attended by emergency services; or
 - likely to exceed \$50,000 in total.

The above information is provided to EnergySafety:

- immediately in the event of a serious injury; and
- within 24 hours of Western Power becoming aware of a serious damage.

We propose that the Authority is included in our *EnergySafety* significant incident notification process.

2. **Significant incidents that have endangered or threaten to endanger the environment**

In accordance with Part V of the *Environmental Protection Act 1986*, Western Power notifies the Department of Environment and Conservation (DEC) of environmental incidents involving discharges of waste that are likely to cause pollution or material or serious environmental harm:

- occurring as a result of an emergency, accident or malfunction; or
- in accordance with a works approval, licence or environmental protection notice; or
- as a prescribed kind.

The environmental incident reports are provided to the DEC electronically or by phone as soon as practicable after the discharge. This initial notification is followed by a written report.

We propose that the Authority is included in our DEC significant incident notification process.

3. **Significant electricity transmission incidents**

Western Power would be able to supply the Authority with the loss of load information (SWIN only) as generated by our System Disturbance reporting tool within the requested timeframe.

4. **Significant electricity distribution incidents**

Western Power would be able to supply the Authority with the following incident information within the specified timeframe:

- failure of emergency telephone response service that affect both transmission and distribution control centre.

In order to provide the Authority with the requested information relating to unplanned interruptions in the distribution network affecting:

- fewer or equal to 500 customers; or
- above 500 customers

Western Power would need to employ additional staff tasked with generating the required data from our existing systems and collating that information into incident reports. We consider this process to be economically inefficient.

Consequently, we propose to provide the Authority with daily reports showing unplanned interruptions:

- lasting 12 hours or more; and
- affecting any number of customers.

The suggested daily report would include each incident's:

- start time;
- end time;
- duration;

- suspected cause;
- feeder area;
- suburb;
- locality; and
- number of customers affected.

We trust the Authority finds Western Power's approach cooperative and helpful. Our aim is to provide the Authority with the maximum possible assistance without causing inefficiencies in the operation of our business.

Please do not hesitate to contact Western Power's Manager Compliance Margaret Pyrchla on 9326 4535 if you wish to further discuss our submission.

Yours sincerely

Phil Southwell
General Manager Strategy & Corporate Affairs