

Mr Kris Funston
Executive General Manager
Australian Energy Regulator
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Dear Mr Funston

Submission re SAPN 2025-30 Regulatory Proposal

I am writing on behalf of SA Power Networks' Community Advisory Board, Regional and Remote Customers Sub-Committee regarding the SA Power Networks' 2025-30 Regulatory Proposal. I particularly want to comment on the proposed expenditure for regional reliability and network resilience.

The Regional and Remote Customers sub-committee was established in 2020 to work with SA Power Networks to look at opportunities to improve reliability and resilience service levels for worst served customers in the State. The group was a sub-committee of the Community Advisory Board. Membership of the sub-committee consisted of myself as Chair, [REDACTED], [REDACTED], [REDACTED] and [REDACTED] up until 30 March 2024. While a new Regional and Remote Customers Advisory Group (SA Power Networks has invited me to continue as Chair) will hold its first meeting in late May 2024, the following comments were made by the pre 1/4/2024 sub-committee.

Overall, we believe that SA Power Networks have undertaken an extensive engagement program, which has involved significant regional input at all stages of the program and feel that the Proposal reflects the voice of regional and remote customers and aligns with what customers told SA Power Networks during the engagement. The engagement also highlighted the need to work collaboratively with other service providers to better manage events and disasters. Furthermore, consumers told us during the engagement process that reliability and resilience of the electricity network is critical to the life of regional communities, particularly noting its crucial role in maintaining communication and other essential services such as health, retail and banking.

Many customers in regional and remote areas do not receive electricity supplies with anywhere near the same reliability levels enjoyed by customers in urban areas. While the programs proposed will improve service levels for worst served customers and customers on low reliability feeders, there is still more work to be done but we recognise the ongoing need to balance cost with service levels. We think the Proposal has found a reasonable balance of these conflicting requirements with a number of targeted programs to improve service levels for worst served customers in the South East, Eyre Peninsula and Upper North.

Another challenge that has been identified is the fact that the Essential Services Commission of SA (ESCoSA), as the regulator for minimum reliability service standards, uses different definitions for their regions than those used by SA Power Networks for reliability reporting. While SA Power Networks on the whole meets the reliability targets set by the regulator, rural and remote communities supplied by long, radial networks typically experience significantly longer outages than the state average.

We support the modest investment proposed to procure three mobile generators to address concerns raised by customers in relation to long duration outages. An improvement in Bushfire safety by implementing ultra-fast sensitive protection on 239 feeders is also supported.

We believe that overall, the Proposal has struck a reasonable balance between affordability pressures while improving service levels for worst served customers in the state. This has been supported by extensive engagement and listening to the voice of regional and remote customers.

Please feel free to contact me at [REDACTED] if you have any queries.

Yours sincerely

[REDACTED]

Michael Leane

Chair, Regional and Remote Customers Advisory Group