

11 August 2017



Via email: AERInquiry@aer.gov.au

Chris Pattas
General Manager, Networks
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

Jemena Electricity
Networks (Vic) Ltd
ABN 82 064 651 083

Level 16, 567 Collins Street
Melbourne, VIC 3000
PO Box 16182
Melbourne, VIC 3000
T +61 3 9173 7000
F +61 3 9173 7516
www.jemena.com.au

Dear Mr Pattas

Submission on Draft Distribution Reliability Measures Guidelines, June 2017

Jemena Electricity Networks (Vic) Ltd (**JEN**) welcomes this opportunity to make a submission to the Australian Energy Regulator's (**AER**) draft Distribution Reliability Measures Guideline (**Guideline**).

JEN supports the Guideline as it will introduce a common set of definitions of reliability measures for all distributors. The Guideline provides clarity, removes the current inconsistencies in some definitions of reliability measures and it will improve comparability of reliability performances of distributors across the National Electricity Market.

Application of 3-minute MAIFI

JEN considers the change of the definition of a momentary interruption from a current threshold of 1 minute to 3 minutes is a significant and welcome change as it has the potential to drive further automation of distribution systems and improve network reliability outcomes.

JEN supports the removal of the current sub-three minute interruptions from the historical data when setting up future unplanned SAIDI and SAIFI targets. We note also that the current sub-three minute interruptions should be added to the historical data when setting up future MAIFI targets.

Supply outages due to malfunction of energy meters

Metering competition for small customers is scheduled to commence on 1 December 2017. Consequently, the exclusion of supply outages due to meter malfunctions from the definition of "outage" in the Guideline is timely and welcomed. Relevantly, an outage is measured at the point of supply.

If you have any queries in relation to this submission, please contact please contact Siva Moorthy on (03) 9173 8774 or at siva.moorthy@jemena.com.au.

Yours sincerely,

[Signed]

Matthew Serpell
Manager Asset Regulation & Strategy