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Via email: david.chan@aer.gov.au

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Dear David

RE: 2016-17 fire start validation report - Jemena

Thank you for your email on 5 February 2018 requesting that Jemena Electricity Networks (Vic) Ltd (**JEN**) resubmit its fire start report for the 2016-17 period (**Fire Start Report**) in response to some 'minor discrepancies' identified by Energy Safe Victoria (**ESV**) in its validation of JEN's Fire Start Report.

We note that all of the 'minor discrepancies' noted by ESV relate to instances where information submitted by JEN in its Fire Start Report do not match records contained in ESV's Online Safety Incident Reporting and Intelligence System (**OSIRIS**). JEN has reviewed ESV's validation report and can confirm that, in all cases, the information contained in JEN's Fire Start Report is accurate.

Some differences between JEN's Fire Start Report and OSIRIS records are a result of more accurate information becoming available after further review of an incident. We consider that it is not unusual to expect some differences between the information contained in OSIRIS and a distributor's Fire Start Report, given fire start reports are prepared after the reporting period has concluded, allowing time for the distributor to complete all incident investigations before it submits its fire start report—this is in contrast to OSIRIS information, which is often submitted to ESV in near real-time, and there is no consistent industry process to update OSIRIS data once a full investigation of a fire start incident is completed.

As noted in ESV's validation report, there are other reasons for variances between a Fire Start Report and OSIRIS records, such as where a distributor does not provide information for a non-mandatory field in OSIRIS but then includes corresponding information in its Fire Start Report. Further, as we have previously raised with the ESV, there is a recurrent OSIRIS issue involving the erroneous updating of the date of the incident if a report is re-opened on a subsequent date.

We will continue to engage with staff at ESV regarding any necessary changes to OSIRIS records. Following a review of fire start data, JEN affirms that its Fire Start

Report, submitted on 27 September 2017, should be considered the 'final' version for the 2016-17 reporting period. For this reason, JEN has not resubmitted its Fire Start Report to the AER with this letter.

In relation to the use of Fire Danger Ratings (**FDR**), we acknowledge the AER's guidance that FDR information should be sourced from the Bureau of Meteorology (**BOM**) for the purpose of calculating ignition risk units under the F-factor Scheme. JEN has sourced FDRs contained in its Fire Start Report from BOM, noting that these FDRs are calculated by the Country Fire Authority.

Should you have further questions regarding any of these matters, please contact Matthew Serpell, Manager Asset Regulation and Strategy, on (03) 9173 8231.

Yours sincerely



Johan Esterhuizen
General Manager Asset Strategy Electrical