

11 August 2017

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

By email: [AERinquiry@aer.gov.au](mailto:AERinquiry@aer.gov.au)

Dear Mr Pattas

**RE Draft Distribution Reliability Measures Guideline**

TasNetworks welcomes the opportunity to make a submission to the Australian Energy Regulator (AER) regarding the draft Distribution Reliability Measures Guidelines and the associated Explanatory Statement.

As the Distribution Network Service Provider (DNSP) in Tasmania, TasNetworks is focused on delivering safe and reliable electricity network services while achieving the lowest sustainable electricity prices for Tasmanian customers. We are proud of our focus on reliability and our positive engagement with our local regulator, the Office of the Tasmanian Economic Regulator (OTTER), in developing customer focussed reliability measures.

TasNetworks recognises the benefits from a nationally consistent reporting framework for reliability but does not want to lose the benefits from jurisdictional schemes that have identified improvements in reporting that benefit customers.

TasNetworks has contributed to and supports the positions put forward in the Energy Networks Australia (ENA) submission. In addition to the recommendations in the ENA submission, TasNetworks would like to make further comments on several matters specifically pertaining to the Tasmanian context.

In relation to the ENA position on feeder classification, TasNetworks currently measures its reliability primarily on geographic classification basis and provides reporting on feeder performance within the AER's Regulatory Information Notices (RINs) for information only.



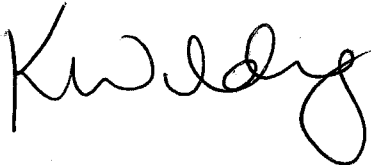
As a result, TasNetworks currently manages network reliability performance through geographic segmentation of customers to meet jurisdictional compliance requirements and achieve strategic STPIS objectives.

TasNetworks believes, especially in a Tasmanian context, that the classification of customers based on the geographic community more closely meets their expectations for reliability than using feeder classifications. Many urban parts of Tasmania are served by feeders that then extend into rural areas, reducing the customer density on the feeder below the threshold for the feeder to be defined as urban. This is a result of Tasmania's smaller and more dispersed population. This issue was identified as causing some perverse outcomes and was been addressed by OTTER and Aurora Energy (the DNSP at the time) through the identification of communities with similar reliability expectations.

TasNetworks acknowledges a nationally consistent approach is important for national comparison (still noting some of our concerns about the mis-classification of feeders) we strongly advocate the continuing use of the geographic classification in our STPIS.

If you wish to discuss any aspect of this submission, please contact Tim Astley, Team Leader NEM Strategy and Compliance, via email [tim.astley@tasnetworks.com.au](mailto:tim.astley@tasnetworks.com.au) or by phone on (03) 6271 6151.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Wilding', written in a cursive style.

Kirstan Wilding

Regulation Leader