

20 March 2020

15 Minute Planned Interruption Consultation
Government of South Australia
Department of Energy and Mining
Level 8, ANZ House
11 Waymouth Street, Adelaide, 5000

Lodged electronically: pina.bria@sa.gov.au

Dear Sir/Madam

Change to notice requirements relating to planned interruptions of energy supply

EnergyAustralia welcomes the opportunity to make a submission to the South Australian Department for Energy and Mining ('Department') on its *Change to notice requirements relating to planned interruptions of energy supply* discussion paper.

EnergyAustralia is one of Australia's largest energy companies with around 2.5 million electricity and gas accounts across eastern Australia, including ~8,000 electricity customers in the Australian Capital Territory (ACT). We also own, operate and contract an energy generation portfolio across Australia, including coal, gas, battery storage, demand response, wind and solar assets, with control of over 4,500MW of generation capacity.

Question 1 – Customer Complaints

- *Are stakeholders aware of any customer complaints relating specifically to planned interruptions of less than 15 minutes?*

No, EnergyAustralia has not received any complaints relating to SAPN conducting planned interruptions of less than 15 minutes. The customer complaints would be directed either to the Energy and Water Ombudsman of South Australia (EWOSA) or directly to SAPN.

- *If so, can stakeholders provide information about the extent of the complaints?*

As above.

Question 2 – Options

- *Which of the Options discussed in this paper do stakeholders support?*

Option 1 – Extend the current derogation to 30 June 2025 or another date (specify).

Option 2 – Remove subrule (5) thereby making the derogation open ended, as proposed by SAPN.



EnergyAustralia

LIGHT THE WAY

EnergyAustralia Pty Ltd
ABN 99 086 014 968

Level 33
385 Bourke Street
Melbourne Victoria 3000

Phone +61 3 8628 1000
Facsimile +61 3 8628 1050

enq@energyaustralia.com.au
energyaustralia.com.au

Option 3 – Remove the derogation altogether, thereby reverting to Rule 90 of the NERR with no variations.

EnergyAustralia supports Option 3. We do not believe there are any jurisdiction specific needs that require this derogation and our view is that South Australian customers should experience the same protections offered to customers in other jurisdictions. Therefore, our position is that the South Australian Government should not extend the existing derogation which exempts SAPN from notifying customers of planned interruptions of 15 minutes or less.

If you would like to discuss this submission, please contact me on 03 8628 1704 or travis.worsteling@energyaustralia.com.au.

Regards

Travis Worsteling
Senior Industry Regulation Advisor