

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

Via email: [pina.bria@sa.gov.au](mailto:pina.bria@sa.gov.au)

20 March 2020

Dear Sir/Madam,

**Re: Change to notice requirements relating to planned interruptions of energy supply**

The Australian Energy Council ('AEC') 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.

The Energy Council is the industry body representing 23 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia, sell gas and electricity to over ten million homes and businesses, and are major investors in renewable energy generation.

The AEC considers that within the SAPN justification for an extension of the derogation, that the estimated costs of compliance provided by SAPN can be taken to be plausible but not reliable, as only an estimation is provided. We would urge the Department to undertake its own assessment of SAPN's calculations in this regard.<sup>1</sup> The AEC agrees with SAPN's contention that activities such as electricity meter replacement work can be undertaken without causing an outage of greater than 15 minutes and operational experience supports this.

The AEC has encouraged jurisdictions to embrace NECF wide rules. The Australian Competition and Consumer Commission (ACCC) Retail Electricity Pricing Inquiry (REPI) report encouraged jurisdictions to review and unwind any derogations that are not based on jurisdiction-specific characteristics or needs that cannot be met by NECF-wide rules. The AEC do not believe that the current derogations are required because of unique customer or other characteristics of the South Australian energy market. 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, based on stakeholder consultation, the decision was made to extend the Regulation beyond 30 June 2020 the AEC requests in that case that the extension of the derogation be widened to cover the activities of Metering Coordinators (MCs) for electricity meter replacement work for an outage of less than 15 minutes. If the Department and stakeholders consider that it is appropriate to have a

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<sup>1</sup> SAPN has previously advised that compliance with the requirements of Rule 90 of the National Energy Retail Rules would result in an additional \$2.1 million per annum in operating costs.

planned outage for short periods for networks, without the need to notify a consumer, then reasonably that should extend to the MCs.

Any questions about this submission should be addressed to David Markham, by email to [David.Markham@energy.council.com.au](mailto:David.Markham@energy.council.com.au) or by telephone on (03) 9205 3107.

Yours sincerely,

**David Markham**  
New Energy  
Australian Energy Council