

29 July 2014

Mr John Pierce  
Chair  
Australian Energy Market Commission (AEMC)  
PO Box A2449  
Sydney South NSW 1235

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

Dear Mr Pierce

**Re: Support for ATA submission on Distribution Reliability Measures – Draft Report**

The Consumer Utilities Advocacy Centre Ltd (CUAC) is a specialist consumer organisation established in 2002 to represent Victorian energy and water consumers in policy and regulatory processes.

CUAC supports the Alternative Technology Association's (ATA's) submission to the AEMC regarding the Distribution Reliability Measures – Draft Report. We agree with the ATA in particular, but not only, that:

1. Momentary interruptions have effects on consumers regardless of whether they occur within a sustained interruption or not, and should therefore not be not excluded from the momentary average interruption frequency index (MAIFI);
2. For the reason given in 1., usage of MAIFI is preferable to use of MAIFle;
3. Interruptions of up to three minutes have similar effects on consumers to interruptions of up to one minute, so that raising the MAIFI and MAIFle limits from one minute to three minutes is in the long-term interests of consumers;
4. Recommendation 3. take into account the particular circumstances of people on life support, for whom the effects of one-minute and three-minute interruption may differ significantly;
5. Events that are not normally excluded should continue to be included where such a 'non-excluded' event has caused or contributed to a fault situation, and the proposed Exclusion 7 should be clarified to reflect this intent;
6. Network businesses should keep full records of all interruptions;
7. All interruptions should be captured in the relevant indices;
8. Network businesses should be given the option to report what each measure would have been with major/catastrophic events excluded, to demonstrate to energy users what portion of supply interruptions are beyond their control;
9. The AEMC's proposed changes to address feeder classification volatility are worthwhile;

10. It would be appropriate to divide feeders into sections by customer type where this can be done efficaciously;
11. The AEMC's proposed principles regarding the assessment of reliability to supply lowest reliability customers are well worthwhile, in particular as they pertain to:
  - a. meeting the need for consistency across jurisdictions;
  - b. the focus on the experience of individual customers, rather than feeder performance;
  - c. the comparison of these customers against similarly classified feeders;
12. MAIFI is an important feature of the customer experience of reliability and should be included when understanding the experience of lowest-reliability customers;
13. The AEMC recommends to the COAG Energy Council that the use of the standardised measures be binding across jurisdictions;
14. The National Electricity Rules prescribes that responsibility for setting out guidelines is to rest with the Australian Energy Regulator.

Yours sincerely,

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

Jo Benvenuti  
Executive Officer