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Mr Ignatius Chin
AEMC Reliability Panel
Australian Energy Market Commission
PO Box H166
Australia Square NSW 1215

Email: panel@aemc.gov.au

Dear Mr Chin

**AEMC Reliability Panel
Review of the performance of the NEM during 2006-07**

Thank you for the opportunity to comment on the draft report published by the AEMC Reliability Panel in relation to the performance of the National Electricity Market (NEM) during 2007-07.

CitiPower and Powercor Australia (**Powercor**) are Victorian electricity distribution businesses participating in the NEM and registered by NEMMCO as Network Service Providers.

CitiPower and Powercor acknowledge that the report is focussed on the High Voltage Transmission and generation of the NEM, however; there is a section dealing with Distribution reliability which invites readers to compare the performance of the distribution businesses across the participating jurisdictions. CitiPower and Powercor are concerned that such comparisons are likely to lead to false conclusions because the data is not presented in a consistent way and the differences are not clearly explained.

For example, the Victorian reliability data presented in Figure 34 is inclusive of all outages, in other words not "normalised" to remove extreme events. This is partly explained in the notes below Figure 34 which state that no deductions have been made for exclusions granted under the service incentive scheme. This note is not clear as to

whether or not the data has been “normalised” on some other basis. In contrast the NSW data presented in Figure 32 is “normalised” to remove extreme events but there is no explanation to make this clear.

There are other differences which also make comparison difficult such as:

- NSW data presents SAIDI and CAIDI but not SAIFI, which is presented for the other jurisdictions.
- NSW and Tasmanian data includes system wide indicators, Victoria, Queensland, South Australia and ACT do not.
- Victorian, SA Queensland and Tasmanian data includes both planned and unplanned outages, NSW seems to provide only unplanned outages.

It would be preferable to present the data on a consistent basis, if this is not practical then the differences should be clearly explained.

Should you require further information in relation to this submission, please do not hesitate to contact me on (03) 9683 4282

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rolf H', with a long horizontal line extending to the right.

Rolf Herrmann
MANAGER REGULATION