

## Endeavour Energy Comments

Two minor comments are included in the attached document and positions on the Key Questions are outlined below, if you have any questions please feel free to give me a call.

I am currently organising meetings with each of our councils to discuss our latest AER submission and will raise the proposed changes to the code with each of them to get a feeling for their opinions on the key issues.

### Key Question

A) The role of Customers in the selection of lights for the Standard Luminaire List. (Section 11 of the updated Code)

- The core responsibility of the Service Provider is establish best whole of life practice, consultation with customers is an essential requirement in this to ensure the customer needs are being met, however with the number of customers being consulted with and their range of needs and demands agreement across them all will never be achieved. Part of the consultation process must be to provide feedback to all customers who provided input to ensure they are aware why particular requirements could not be implemented so that there is an understanding of why the service provider has made the decision they have. Endeavour Energy's favoured position in this area is – B.

B) Setting amended minimum service standards for the repair of light faults. (Section 10 of the updated Code)

- From a customer's point of view it is understood why an average and maximum service level is necessary. The issue is that this is a service level customers have not previously had and will therefore attract an increase in cost / price which at this point cannot be determined within the timeframes set for consultation of the code. Current repair times over the past 12 months for each customer are between the following ranges:
  - o Average Repair Time - 1 day and 20 days
  - o Maximum Repair Time - 1 day 181 days
- Throughout the last 12 months of discussions on this document the councils have not raised a maximum timeframe as a critical issue (or as an issue at all that Endeavour Energy is aware of) and therefore needs to be questioned if this is truly a necessary change from the customer perspective. With the change in technology towards more reliable LED's significant shifts in these areas have a high likelihood of increasing prices (due to the addition resources required to meet the new targets) whilst not particularly improving reliability or performance. The increases that will be seen over this time in performance will almost entirely be due to the shift in technology not the introduction of new targets and additional resources / costs.
- Ausgrid's proposed approach (linked to IPART feeder reliability standards concept) and timeframe for average (8 and 40 days) and maximum (12 and 60 day) targets are supported by Endeavour Energy and seen to be a reasonable middle ground considering the rapid changes in the public lighting network.
- Priorities on lights associated with "Higher road safety" is difficult to define as it's the councils / RMS that determine which roads these are and obtaining datasets in an efficient manner from each council may be the largest challenge as they may not exist. Considering outages of the public lighting network typically are either a single light out

or all lights outs due to the nature of the electrical network. It would appear more appropriate to focus on “all lights out” types of outages rather than “higher road safety”. Endeavour Energy currently determine these as an “emergency” job and therefore are not required to follow standard procedures for outage notification or Road Occupancy Licenses and can therefore allocate resources to them much faster and have them completed.

- C) Determining the compensation for a Service Provider’s failure to meet minimum service standards for the repair of light faults (Section 10 of the new Code).
  - Endeavour Energy has put forward a proposed penalty scheme of 0.25% of the council’s annual SLOUS bill if the average target is exceeded and supports the concept of applying the \$25 penalty (similar to the current code) to the proposed maximum targets payable to the effected residential customer.
  
- D) Minor Capital Works – Section 9
  - In previous meetings it has been requested that “minor capital works” be limited to works not requiring a lighting design.