JEMENA Electricity Networks (Vic) Ltd

Department of Environment, Land, Water and Planning - Timely Electricity Connections to New Housing Developments

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Attention: Carolyn Jackson Department of Environment, Land, Water and Planning

PO Box 500, East Melbourne Melbourne VIC 8002

1. OUR CUSTOMER OUTCOMES STATEMENT

Jemena Electricity Networks (Vic) Ltd (Jemena) has an ongoing commitment to driving change and improvement to its customer service standard, which has seen some significant improvements and achievements over the past two years. The work completed by Jemena to date will feed directly into our engagement with our greenfield developer partners.

Jemena hosted a session with our current Underground Residential Development (URD) partners on Thursday 12 November 2020 which comprised of an interactive walk through of Jemena's current URD process. This provided all participants with an opportunity to:

- a. Identify any pain points at each stage of Jemena's current process.
- b. Provide insight on what their individual customer service expectations were.
- c. Advise Jemena what performance reporting metrics would assist them.

As a group we aligned on key themes_below. These will shape the activities that Jemena is committed to focusing on over the next two years. Below is a summary of the key themes highlighted in our consultations:

Ongoing Digital Customer Experience Improvements –Jemena's online portal has assisted in simplifying the application and offer process and timeframes. In 2020, Jemena continued to invest in opportunities to further improve our online portal tool, in support of our digital customer experience journey. Jemena's digital platforms are a key tool in driving customer experience improvements. We are continuously seeking out opportunities to leverage these platforms to further develop our relationships with our customers.

Design Review Process Improvements – Jemena's average design review timelines have been mostly acceptable to our URD partners; however, they note that during the busiest times of the year these timeframes can increase significantly. Whilst it was appreciated that this occurs seasonally, they noted that better tracking of the design review commencement date, and accurate expected review dates will assist in the management of construction planning.

Project Manager Accessibility - URD partners proposed that each URD project be appointed a dedicated project manager to assist with their end-to-end process and provided with an escalation pathway within Jemena should they require any further assistance. The feedback we received indicated there were occasionally issues in getting a timely response when a swift decision is required during the construction phase.

2. ONGOING CUSTOMER CONSULTATION

Jemena currently manages the consultation with our greenfield development partners in a direct manner whereby we host weekly or fortnightly meetings between Jemena the developer and their representatives, this is offered and encouraged to all developers within our distribution network.

The feedback Jemena has received is that a quarterly Consultative Committee would not be beneficial as direct contact and, more frequent and targeted individual meetings allow the developers more access and control of the consultation with Jemena.

Jemena has on average three to four Greenfield developments going at any time. This level of activity gives us the ability to maintain a more direct relationship with our individual greenfield partners. We acknowledge the expected future growth in our distribution area and we are constantly reviewing our resources in line with our discussions with our URD partners.

Should there be any future benefit in establishing a consultative committee based on our Greenfield development partners feedback, Jemena would be open to establishing a consultative committee. This would be based on feedback from developers and industry partners along with an increasing need to address broader issues faced by the industry.

3. PERFORMANCE REPORTING

In line with Jemena's continuing improvements to customer service improvements, it has been determined that *monthly performance reporting* will be a beneficial supplementary tool.

Through our consultation with our development partners, the following stages of Jemena's new housing development process and performance measures were identified as the process steps most suited for regulation:

- a. **Masterplan Review Timeframe** Timeframe from a stage design submission date to the initial review date.
- b. **Design Review Timeframe** Timeframe from a stage design submission date to the initial review date.
- c. **Jemena Offer Time frame** Timeframe from the receipt of a *'complete'* application to the date a firm offer is provided from Jemena.
- d. **Pre-commissioning Audit Time frame** Timeframe from the Pre-commissioning Audit Request being received by Jemena's accredited Auditing contractor, to the date a Precommissioning Audit Date is booked.
- e. **Tie-in Time frame** Time from the submission of a *'complete'* tie-in request to the date a tie-in is booked.
- f. **Issuing of Statement of Compliance (SOC)** Timeframe from the receipt of a passed precommissioning audit to the issuing of SOC from Jemena.

4. JEMENA PROPOSED METRICS

The below metrics are proposed with the consideration of reasonably achievable maximum timeframes versus average timeframes.

Proposed Reporting	Proposed Average Target	Maximum Target
Masterplan Review Timeframe	<u>15 business days</u> - from the design receipt date of a complete design.	20 business days - from the design receipt date of a complete design.
Design Review Timeframe	<u>15 business days</u> - from the design receipt date of a complete design.	<u>20 business days</u> - from the design receipt date of a complete design.
Jemena Offer Time frame	<u>40 business days</u> - from the receipt date of a complete application.	<u>65 business days</u> - from the receipt date of a complete application.
Pre-commissioning Audit Time frame	<u>5 business days</u> - from receipt of request	10 business days - from receipt of request
Tie-in Time frame	<u>30 business days</u> - from receipt of request and passed pre-comm audit	<u>40 business daγs</u> - from receipt of request and passed pre-comm audit
Issuing of SOC	<u>5 business days</u>	10 business days

The use of maximum timeframes will see a strict 'First in, First serve' approach, limiting DB ability to prioritize customer works requests. The use of average timeframes allows flexibility for Jemena to prioritise stages at the request of the developer

5. JEMENA REPORTING

Jemena's current reporting focuses on the time for a customer to receive an offer which includes design review timeframes. Whilst we can formulate a generalized understanding of times taken for Design Review and issuing of SOC, Jemena will be required to further develop its current reporting capabilities to meet the new Customer Service Standard requirements.

Below is an extract of Jemena's current reporting of average days to provide an offer, for the past four years.



In support of the ESC and DEWLP Customer Service initiatives Jemena is currently in the process

of developing these capabilities.

6. EXEMPTIONS

The introduction of regulated timeframes for selected stages within the new property development process is holistically welcomed and aligns with Jemena's Customer Journey.

Amongst the multiple customer benefits this we foresee with the new proposed regulations; a key benefit will be the alignment of practices and results across all Victoria distribution businesses.

Jemena will continue to use its best endeavors to meet any passed regulation changes and proposes that the below exemptions be considered along with the implementation of each metric.

a. Design Review Timeframe -

- The initial review date will be the date a Jemena designer conducts an initial review of the proposed designs.
- Should Jemena be required to return the design with comments, it is proposing that the design second proposal must be returned within 5 business days of initial comments. Failure to do so will result in the design timeframe resetting.
- Jemena is also proposing to only allow up to two re-submissions before this design is made as 'exempt' from the regulated timeframe requirements.
- Any submission of stage design which require amendment of an approved overall design, will be subject to negotiated timeframe; and/or exempt to the regulated timeframe.

b. Jemena Offer Time frame -

- Offer times may vary subject to the complexity of the works or customer's requirements.
- Where applicable, Jemena proposes the ability to negotiate timeframes with customers in line with current activities.
- Offer revisions as a result of customer requirement, works scope or contestability changes should be subject to exemption of the regulation timeframe.

c. Pre-commissioning Audit Time frame -

- Jemena reserves the right to reject any incomplete requests for Audit.
- Any additional audits required as a result of non-conformances should be subject to exemption of the regulated timeframe.

d. Tie-in Time frame -

- Tie-in completions are subject to standard outage protocols, including community consultation, weather and latent conditions.
- Jemena propose any Tie-in cancellations due to reasonable circumstance are considered for exemption to the metric.
- Timeframes should factor in all planned outage customer and distribution business requirements outlined in the Electricity Distribution Code.
- Any reasonably identified concerns with work quality, including the submission of asbuilt drawings, have the opportunity to be exempt from the regulated timeframes.

e. Issuing of Statement Of Compliance -

- The developers must ensure they fulfil all requirements under Section 55 Planning & Environment Act 1987.
- Any non-conformances identified should be exempt to the regulatory timeframe.

7. COST & RISK

Further considerations to cost and risk conducted by Jemena have highlight a few points below as added consideration to the implementation of regulated timeframes.

Cost:

- Increased contractor unit cost as a result of regulated timeframes.
- Costs incurred by DBs for the development and implementation of reporting capabilities.

<u>Risk:</u>

- Imposed regulatory timeframes to residential developments may adversely impact timeframes on other customer connection timeframes as Jemena seek to ensure compliance.
- The use of maximum timeframes will see a strict 'First in, First serve' approach, limiting DB ability to prioritize customer works requests. The use of average timeframes allows flexibility for Jemena to prioritise stages at the request of the developer

8. CLOSING STATEMENT

Whilst 2020 has had its challenges, which we acknowledge has had significant impacts on our Customers, we have nonetheless continued to prioritize the delivery of a quality service to all our customers and developer partners. We are committed to delivering initiatives that support a better overall experience for our customers when they engage with Jemena.

Furthermore, Jemena looks forward to the opportunity of working with the DEWLP to drive improved outcomes for our developer partners.

Sincerely,

Tim Mchols

Tim Nichols Acting GM Strategy & Commercial Jemena