

# UFE Reporting Guidelines

## FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Central NSW Joint Organisation

***Submission Date:*** 30 September 2022

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## 1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft version of the *UFE reporting guidelines* that will form the basis of UFE Trends Reports in accordance with NER 3.15.5B.

## 2. Questions

Section	Description	Participant Comments
1.1	<p>Purpose and scope</p> <p>AEMO intends to publish each UFE Trends Report by 1 June each year covering a 12 month reporting period (For the (year “x”) UFE Trends Report the reporting period is 1 May (year “x-1”) to 30 April (year “x”)).</p> <p>Q1. Do stakeholders require a different reporting timeframe?</p> <p>Q2. If so, what reporting timeframe is appropriate? What benefits will be realised through a different reporting timeframe?</p>	<p>Q1. No. The proposed reporting timeframe is fine.</p> <p>Q2. N/A</p>
2	<p>Summary of analysis of UFE</p> <p>Charts in this section provide a summary of the UFE calculation components for each local area. The current proposal is to provide UFE component charts for the current reporting period based on FINAL version metering data.</p>	<p>Q1. Yes. The corresponding charts for the previous reporting years should be included. This would allow comparison by local area year on year.</p>

Section	Description	Participant Comments
	<p>Q1. Should the corresponding charts for the previous reporting period also be included? If so, what benefits will be realised?</p>	
3	<p>UFE benchmark analysis</p> <p>AEMO proposes to publish the median, average, upper limit and lower limit UFE values as benchmarks for each local area per reporting period.</p> <p>Q1. Is there a better methodology to determine benchmarking for a <i>local area</i>? If so, provide details of that methodology.</p>	<p>Q1. No alternate methodology is suggested.</p>
4	<p>UFE source analysis</p> <p>Areas of UFE source analysis are related to variables that modify metering data, as identified in section 4 of the Initial Draft <i>UFE reporting guidelines</i>.</p> <p>Q1. Are there other variables that modify metering data that should be included in the <i>UFE reporting guidelines</i>? If so, provide details of the other variables and their effect on metering data</p> <p>Q2. Should the importance/effect of these variables be ranked? If so, which variables should be analysed initially?</p>	<p>This region strongly supports minor energy flow metering.</p>
5	<p>Recommendations – UFE visibility improvements</p> <p>Q1. What are the benefits in reporting UFE values at a more granular level than at the local area? Noting that reporting at TNI level is not meaningful for local areas that have virtual TNIs.</p>	<p>Q1. A more granular level of reporting would provide customers greater visibility of their local network and provide evidence for advocacy purposes in relation to network issues experienced.</p>

Section	Description	Participant Comments
	<p>Q2. Should the seasonal variance information be presented in another way? If so, how should this information be presented and what will be the benefits of presenting the information in this alternative way?</p>	<p>Network issues in regional NSW are ongoing and difficult to gain traction with the DNSP on. Any evidence to support the issues raised by customers to lobby the DNSP for a better level of service is helpful.</p> <p>Q2. No alternate is suggested.</p>
6	<p>Recommendations – UFE reduction actions</p> <p>Q1. Are there other actions which should be explored to reduce UFE?</p> <p>Q2. Who holds the information to support these actions?</p>	<p>Q1. Yes. AEMO should be aware that initiatives such as smart controls for streetlighting and the roll-out of smart meters which would both work to reduce UFE, are difficult to access in regional NSW. Councils are consistently receiving estimated bills and are actively trying to install smart meters however it can be a challenging process and requests are not being swiftly rolled out upon request for various reasons.</p> <p>Further, as our DNSP does not have international standard asset management system, Councils are spending significant amounts of time and money on bill checking and are pursuing refunds for overcharges.</p> <p>With smart controls, the Southern Lights Group in regional NSW consists of Joint Organisations and their 42 member councils tirelessly lobbying the DNSP over the past few years to install smart controls on streetlights however, while this is being rolled out in metro NSW, the regional DNSP appears not to see the value both for themselves and for their customers. Smart controls would not</p>

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		<p>only reduce UFE through informing the DNSP when the light is not working optimally, but it also provides an opportunity for minor energy flow metering to allow councils to dim the lighting at appropriate times.</p> <p>Smart meters and smart controls both have the capacity to reduce the amount of unaccounted for energy.</p> <p>Support from AEMO for customers in regard to lobbying DNSPs to support these initiatives would be appreciated.</p> <p>Q2. DNSPs and retailers.</p>
Appendix A.1	<p>UFE analysis supporting information.</p> <p>Additional information to support UFE analysis in each local area. These charts are:</p> <ul style="list-style-type: none"> <li>• UFE for the local area</li> <li>• UFE for the local area as a percentage of local area ADME</li> <li>• UFE for the local area by metering data version, i.e. Prelim, Final, Rev 1 and Rev 2.</li> </ul> <p>Q1. Do the proposed charts, provide sufficient information, in conjunction with the charts in Section 2. to facilitate UFE analysis?</p> <p>Q2. If not, which other additional information is required? Provide details of other additional information required and the benefits of providing the additional information.</p> <p>Q3. Who holds the additional information?</p>	<p>Direction ought to be provided regarding “local area” to pursue more granularity – rather than leaving it to the DNSP.</p> <p>If Local Area is the local government area that would be helpful however advice as granular as possible to identify where the UFE is originating from would be more than helpful in solving the problem. This is particularly the case when the % are so high as is the case in this region.</p> <p>Given Councils are the leaders and advocates for a footprint we would like to see LGA as the minimum standard for “local.”</p> <p>The estimated \$300K pa CNSWJO Councils are paying in UFE could buy significant support in demand management, energy generation and storag</p>

Section	Description	Participant Comments

### 3. Other Issues Related to the UFE Reporting Guidelines

Stakeholders to provide details of other UFE related aspects that have not been included in the proposed *UFE reporting guidelines* and provide details of the benefits of these additional reporting items.

Participant Comments
<p>We attach a letter which details the concerns raised by the eleven councils within Central NSW. As a region we are actively trying to reduce consumption, costs and reliance on the grid through a variety of initiatives, and costs such as UFE significantly impact these.</p> <p>UFE charges for the 3 months from June to August 2022 have cost the eleven councils close to \$75,000 and are significantly higher than the +/- 5% advised by the retailer in April 2022.</p> <p>The UFE percentage in regional NSW is much higher than in metro NSW, and there are fewer customers to share the costs.</p> <p>Councils in NSW are rate pegged at 0.7% and the UFE of 6-10% in the past 3 months is not insignificant, and councils will not be able to easily absorb these charges.</p> <p>Please see the attached letter for further detail.</p>