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Attached is the 2020 S120P Annual Compliance Report for Jemena Electricity Networks (Vic) Ltd ("**JEN**") which has been completed in conformance with Energy Safe Victoria requirements and was approved by the JEN board on 10 July 2020.

S 120 P Annual Compliance Reports

3.1.1 REFCL Program Status [S120 P (1) a(i)]

JEN REFCL Project Activities		Date Completed	Percentage Completed	Weightings (indicative only)
Initiate	Business Case Commenced		0	5
	Business Case Approval		0	5
Design	Design Commenced		0	5
	Design Complete		0	5
Procurement	No. of REFCL units required	One (1) See Note 2a		
	REFCL order placed		0	5
	REFCL delivered to site		0	10
Construction-Lines	Line works commenced		0	5
	Line works completed		0	10
Construction-Stations	Station works commenced		0	5
	Station works complete		0	10
Construction-Third Party	No. of affected HV Customer Connections	One (1) See Note 5		
	HV customer works commenced		0	5
	HV customer works complete		0	10
Testing/Commissioning	REFCL testing/commissioning commenced		0	5
	REFCL commissioned and operable		0	5
Close-out	REFCL at "required capacity"		0	10
Total Weighted Percentage Complete			0	100

Notes:

The above table reflects the status of JEN's REFCL program for the current reporting period (1 May 2019 to 30 April 2020):

1. During this period JEN carried out a joint planning study with AusNet Services, with the aid of "*redaction – consultant no. 1*", to inform the high level scope and costs for potential REFCL solutions for Coolaroo (COO), a JEN zone substation and Kalkallo (KLO), an AusNet Services zone substation supplying three (3) Jemena feeders. The joint planning study approach was undertaken because of the proximity of the two (2) distribution areas and the significant future load increase in this growth corridor. The joint planning study report proposed three (3) preferred solutions as follows:
 - a. Install isolation transformers on underground feeders and REFCL's at both COO and KLO. This solution requires exemptions from the Regulations;
 - b. Construct new REFCL zone substation at Kalkallo North (AusNet Services responsibility), transfer overhead feeders supplied from KLO to the new zone

- substation, install two (2) REFCL's at COO and transfer underground feeders supplied from COO to adjacent zone substations. This solution requires exemptions from the Regulations; or
- c. Construct new REFCL zone substations at Greenvale (JEN responsibility) and Kalkallo North (AusNet Services responsibility), and in addition, install two (2) REFCL's each at both COO & KLO and rearrange existing feeders across all four (4) zone substations to balance capacitive currents. This solution requires no exemptions, but has the highest overall cost.
2. JEN has opted to proceed with a cost effective solution, a variant to the above three (3) preferred solutions, that includes:
 - a. Construction of a new zone substation with one (1) REFCL in the Greenvale area;
 - b. Transfer sections of the COO 22kV feeder network that have higher bushfire risk to the new zone substation to provide the Required Capacity as prescribed in the Regulations;
 - c. Undertake additional works on key sections of the remaining non-REFCL protected feeders that would remain supplied by COO, to mitigate bushfire risks; and
 - d. Seek exemptions from the Regulations for those non-REFCL protected feeders.
 3. JEN also engaged "*redaction – federal government agency*" to provide technical support to its proposed solution, including:
 - a. Provision of fire risk assessment data of the COO 22kV network at a granular level;
 - b. Determination of those sections of the COO 22kV feeder network that are non-compliant with the Regulations; and
 - c. Identifying a course of action for those non-compliant sections of the COO 22kV network based on "*redaction – federal government agency's*" scientific expert opinion.
 4. JEN has prepared an Exemption Application to support its proposed solution and has submitted it together with relevant documentation to ESV on 21 May 2020 for approval.
 5. Approval of JEN's Exemption Application will maintain the existing non-REFCL supply to "*redaction – HV customer no. 1*" HV supply points at Coolaroo and Roxburgh Park. Only one (1) HV customer supplied from COO ("*redaction – HV customer no. 2*") will be provided with a REFCL protected supply.

"*Redaction – HV customer no. 2*" engaged "*redaction – consultant no. 2*" to analyse the "*redaction – HV customer no. 2*" Oaklands Junction site 22kV electrical infrastructure for its capability to withstand the operation of a REFCL which Jemena will be installing at the COO zone substation on feeder COO11. Five (5) possible solutions were considered for this site in accordance with ESV guidelines, with the preferred option being Option 3 – details are as follows: Installing an isolation transformer with the commitment to developing and implementing a Bushfire Mitigation Plan (BMP) (which had been submitted to and approved by ESV). "*Redaction – HV customer no. 2*" will be responsible for the cost of implementing the preferred option at their site in order to receive a REFCL protected supply.

3.1.2 ELCA Program Status [S120 P (1) a(ii)]

Total HV Electric Line Volumes	At 1 May 2017	At 30 April 2018	Progress over Reporting Period
Bare Construction in ELCA	Route Km	Route Km	Route Km
Polyphase	0.0	0.0	0.0
SWER	0.0	0.0	0.0
Covered or Underground Construction in ELCA	Route Km	Route Km	Route Km
Polyphase	0.0	0.0	0.0
SWER	0.0	0.0	0.0

Note: There are no areas mandated as ELCA in the JEN distribution area. Therefore as defined by legislation, JEN is fully compliant with this bushfire mitigation obligation/duty.

3.1.3 SWER ACR Program [S120 P (1) a(iii)]

ACR NAME	FEEDER	Completion Date
Not Applicable	Not Applicable	Not Applicable

Note: JEN do not own or operate any SWER lines. Therefore as defined by legislation, JEN is fully compliant with this bushfire mitigation obligation/duty.

3.2.1 REFCL Program Status [S120 P (1) c(i)]

JEN REFCL Project Activities		Date Completed	Percentage Completed	Weightings (indicative only)
Initiate	Business Case Commenced	See Note 1d	100	5
	Business Case Approval	See Note 1d	100	5
Design	Design Commenced		20	5
	Design Complete		0	5
Procurement	No. of REFCL units required	One (1) See Note 1b		
	REFCL order placed		0	5
	REFCL delivered to site		0	10
Construction-Lines	Line works commenced		0	5
	Line works completed		0	10
Construction-Stations	Station works commenced		0	5
	Station works complete		0	10
Construction-Third Party	No. of affected HV Customer Connections	One (1) See Note 2		
	HV customer works commenced	See Note 2	10	5
	HV customer works complete		0	10
Testing/Commissioning	REFCL testing/commissioning commenced		0	5
	REFCL commissioned and operable		0	5
Close-out	REFCL at "required capacity"		0	10
Total Weighted Percentage Complete			11.5	100

Notes:

1. The tasks that JEN proposes to undertake in the next reporting period (1 May 2020 to 30 April 2021) associated with meeting our obligations under the Regulations are as follows:
 - a. Engaging a specialist contractor for the design, procurement, installation and commissioning of REFCL infrastructure by end September 2020;
 - b. Gaining approval for its exemption application for the solution consisting of a new Greenvale zone substation with one (1) REFCL by end September 2020;
 - c. Identifying and procuring land for new zone substation, including obtaining management approval for expenditure by end December 2020; and
 - d. Obtaining approved business case by end March 2021.

2. Approval of JEN's exemption application will maintain the existing non-REFCL supply to "*redaction – HV customer no. 1*" HV supply points at Coolaroo & Roxburgh Park. Only one (1) HV customer supplied from COO ("*redaction – HV customer no. 2*") will be provided with REFCL protected supply, and the following progress is expected in the next reporting period:

- a. To secure the internal funding for the project, complete the detailed engineering and design, and depending on lead times, to order the isolation transformer; and
 - b. To continue liaising with "redaction – HV customer no. 2".
3. The cost effective solution for JEN-owned 22kV feeders supplied by KLO will involve additional distribution works to mitigate the bushfire risks and exemption from the Regulations. This process is being managed by Ausnet Services, with input from JEN.

3.2.2 ELCA Program Status [S120 P (1) c(ii)]

Total HV Electric Line Volumes	At 1 May 2017	At 30 April 2018	Progress over Reporting Period
Bare Construction in ELCA	Route Km	Route Km	Route Km
Polyphase	0.0	0.0	0.0
SWER	0.0	0.0	0.0
Covered or Underground Construction in ELCA	Route Km	Route Km	Route Km
Polyphase	0.0	0.0	0.0
SWER	0.0	0.0	0.0

Note: There are no areas mandated as ELCA in the JEN distribution area. Therefore as defined by legislation, JEN is fully compliant with this bushfire mitigation obligation/duty.

3.2.3 SWER ACR Program [S120 P (1) c(iii)]

ACR NAME	FEEDER	Completion Date
Not Applicable	Not Applicable	Not Applicable

Note: JEN do not own or operate any SWER lines. Therefore as defined by legislation, JEN is fully compliant with this bushfire mitigation obligation/duty.