

March 12, 2021

Ian Burgwin
General Manager
Electrical Safety and Technical Regulation
Energy Safe Victoria
PO Box 262
Collins St West
VIC 8007

Jemena Electricity
Networks (Vic) Ltd
ABN 82 064 651 083

Level 16, 567 Collins Street
Melbourne, VIC 3000
PO Box 16182
Melbourne, VIC 3000
T +61 3 9173 7000
F +61 3 9173 7516
www.jemena.com.au

**RE: RAPID EARTH FAULT CURRENT LIMITER FUNCTIONAL PERFORMANCE REVIEW
RECOMMENDATIONS**

Dear Ian,

I am writing to provide Jemena's formal response to ESV's Response to the Rapid Earth Fault Current Limiter Functional Performance Review. Jemena's response focuses on Recommendations C, E and F which are addressed directly to Major Electricity Companies (MECs).

Recommendation C

Jemena supports this recommendation in principle. Given the risk we intend to mitigate, it is important that the impact on REFCL performance as a result of a component failure is minimised. Jemena's design for its REFCL station at Coolaroo incorporates the use of REFCL for the 22kV Bus #1 supplying into high bushfire risk areas, and a similar REFCL on the 22kV Bus #2 which can be used to provide backup in the event the REFCL on Bus #1 is out of service. While this backup arrangement may result in a slightly reduced REFCL performance, the downtime is kept to a minimum. With the adoption of this design philosophy, the need for any strategic spare should be reviewed. Jemena is ready to take ESV through its design philosophy to ascertain if further improvement to backup arrangement is required.

Recommendation E

Jemena supports this recommendation, although we believe it could be difficult to achieve as experience to date suggest damping values can only be confirmed once the ASC is installed and tuned. Nevertheless, we see the benefit in this recommendation to manage our risk in maintaining compliance and would work with ESV and other DBs to explore viable options in the REFCL Technical Working Group.

Recommendation F

Jemena supports this recommendation, and agrees with ESV that improvement to REFCL configuration and operation can be proposed through the annual bushfire mitigation plan to deliver an improved risk reduction at the fault site. Again Jemena believes that the REFCL Technical Working Group is the best avenue for such discussions.

Please contact Michael Ciavarella, Network Assets Manager on (03)) 9173 8738 , if you need further information relating to the above.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Karl Edwards', with a stylized, cursive script.

Karl Edwards

General Manager, Asset and Operations