



Information Disclosure Determination 2012

Additional Requirements (Attachment A 17.1 to 17.6) for 30 June 2023

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Introduction

This document has been prepared to meet new requirements introduced to the Electricity Distribution Information Disclosure Determination 2012 (consolidated May 2023) which must be publicly disclosed by 30 June 2023.

These new Information Disclosure (ID) requirements prescribe that Marlborough Lines Limited's (MLL's) Asset Management Plan (AMP) "*must include qualitative information in narrative form, as prescribed in clauses 17.1-17.7*". However, the requirements may be disclosed in a standalone document published on MLL's website, by 30 June 2023.

Some of the information required by clauses 17.1 to 17.6* has been included in MLL's AMP which was publicly disclosed prior to 1 April 2023. Those that were not included in the AMP are included in this standalone document. For clarity, each of the new requirements are included in this document, but where requirements are included in MLL's AMP, this is noted accordingly.

* 17.7 of Attachment A does not require narrative information itself.

17.1 Planned and unplanned interruptions

ID requirement	Narration
<p><i>17.1 a description of how the EDB provides notice to and communicates with consumers regarding planned interruptions and unplanned interruptions, including any changes to the EDB's processes and communications in respect of planned interruptions and unplanned interruptions</i></p>	<p><u>Notification of outages</u></p> <p>MLL's requirements associated with planned and unplanned interruptions are prescribed in the Default Distributor Agreement (DDA) which is published on MLL's website.</p> <p>Electricity Information Exchange Protocols (EIEPs) 5A and 5B include business requirements for the exchange of planned and unplanned interruption information respectively that should¹ be exchanged between MLL and electricity retailers trading on the MLL network.</p> <p>Planned interruptions: MLL generally notifies consumers' electricity retailers of planned outages in accordance with EIEP5A and DDA requirements. Electricity retailers then notify their customers. Where a shorter than the prescribed timeframe is available for notification of a planned interruption, MLL notifies consumers directly, and electricity retailers separately.</p> <p>Unplanned interruptions: MLL has an outage map on its website which displays the areas impacted by unplanned interruptions which consumers can view. MLL also sends email notifications to retailers of unplanned interruptions, including the areas impacted, suspected or known cause of the interruption, and the estimated time of restoration.</p> <p><u>Changes to communications processes:</u></p> <p>MLL is actively assessing options to communicate interruption information to consumers, including utilising its own website to publish information about upcoming (planned) interruptions, as well as information and updates for unplanned interruptions. MLL is also planning to include planned and unplanned interruption information through the social media platform Facebook from June 2023.</p> <p>Another method under consideration is an "opt in" service for consumers to provide their mobile numbers and receive alerts about interruptions that affect them.</p> <p><small>1 – EIEP5A is regulated but with no effective date, while EIEP5B is not regulated.</small></p>

17.2 Voltage Quality

ID requirement		Narration
<p><i>17.2 a description of the EDB's practices for monitoring voltage, including:</i></p>	<p><i>17.2.1 the EDB's practices for monitoring voltage quality on its low voltage network;</i></p>	<p>Information relating to the above is included in section 6.1.4 Voltage Quality of MLL's AMP, available on MLL's website marlboroughlines.co.nz</p>
	<p><i>17.2.2 work the EDB is doing on its low voltage network to address any known non-compliance with the applicable voltage requirements of the Electricity (Safety) Regulations 2010;</i></p>	
	<p><i>17.2.3 how the EDB responds to and reports on voltage quality issues when the EDB identifies them, or when they are raised by a stakeholder;</i></p>	
	<p><i>17.2.4 how the EDB communicates with affected consumers regarding the voltage quality work it is carrying out on its low voltage network; and</i></p>	
	<p><i>17.2.5 any plans for improvements to any of the practices outlined at clauses 17.2.1-17.2.4 above;</i></p>	

17.3 Customer service practices

ID requirement		Narration
<p><i>17.3 a description of the EDB's customer service practices, including:</i></p>	<p><i>17.3.1 the EDB's customer engagement protocols and customer service measures – including customer satisfaction with the EDB's supply of electricity distribution services;</i></p>	<p>MLL undertakes an annual consumer satisfaction survey. The survey covers key areas relating to MLL services and performance and allows respondents the opportunity to rate their satisfaction of MLL on those areas. Key areas included in the survey are reliability (number and duration of interruptions), pricing, and connections, vegetation and other services.</p> <p>In its SCI, MLL targets a >85% overall consumer satisfaction rate. The annual consumer survey results are used to assess whether this target is achieved. The most recent survey (August 2022) achieved a result of 87%.</p>
	<p><i>17.3.2 the EDB's approach to planning and managing customer complaint resolution;</i></p>	<p>MLL has an internal complaints procedure setting out how to manage customer complaints. This is consistent with the requirements of the Scheme Rules. MLL's approach is to first try and resolve any complaint amicably with the complainant, but where the complaint cannot be resolved within the required time period, the complainant may elect to take the complaint to Utilities Disputes Limited.</p> <p>MLL (as required) is a member of the dispute resolution scheme provider (and advertises this on its website, including information about the provider).</p> <p>MLL also adheres to the requirements set out in the Electricity Industry Participation Code 2010 11.30A to 11.30D.</p>

17.4 Connections practices

ID requirement		Narration
<p><i>17.4 a description of the EDB's practices for connecting consumers, including:</i></p>	<p><i>17.4.1 the EDB's approach to planning and management of- (a) connecting new consumers and overcoming commonly encountered issues; and (b) alterations to existing connections;</i></p>	<p>MLL requires applications for new (or changes to existing) connections to be submitted using online forms on MLL's website. Information on the connection process and requirements are set out on MLL's website, as well as technical requirements such as MLL's network connections standard. Similarly, MLL's process and requirements for injection connections is set out on its website. The process is consistent with the requirements of Part 6 of the Electricity Industry Participation Code 2010.</p>
	<p><i>17.4.2 how the EDB is seeking to minimise the cost to consumers of new or altered connections;</i></p>	<p>MLL reviews the connections process and charges associated with connections. MLL's connections page on its website provides information about the charges paid by consumers for connections. MLL seeks to minimise the time spent on reviewing and processing applications to manage connections processing costs.</p>
	<p><i>17.4.3 the EDB's approach to planning and managing communication with consumers about new or altered connections; and</i></p>	<p>MLL has set out information for consumers regarding connections on its website, including the connections process. MLL communicates with the applicant to update them on the status of the application, and advises them of any conditions of connection that are required (for example, what new assets would be required, charges payable, any easements required for new assets, etc.)</p>
	<p><i>17.4.4 commonly encountered delays and potential timeframes for different connections.</i></p>	<p>The nature and size of any connection application can vary considerably. MLL receives anything ranging from a simple builders temporary supply connection (where network assets are already available at the boundary, and no new network assets are required), to an application for many megawatts of capacity in a rural part of MLL's network where significant investment in new assets would be required. Each connection application needs to be considered and reviewed carefully to ensure for example; privately owned low voltage assets connecting to MLL's network meet network standards, whether easements are required, vegetation works, any network reinforcement required, impact on voltage quality, etc. Connections can also involve other stakeholders, contractors, retailers, MEPs, and local authorities for example which can introduced additional time delays to connections.</p>

17.5 Significant Connections

ID requirement		Narration
<p><i>17.5 A description of the following which focus on the EDB’s capability and risk management regarding demand, generation, or storage capacity that the EDB considers are likely to have a significant impact on its network operations or asset management priorities. The EDB may consider voltage, network location, or other factors in making this assessment.</i></p>	<p><i>17.5.1 how the EDB assesses the impact that new demand, generation, or storage capacity will have on the EDB’s network, including:</i></p> <ul style="list-style-type: none"> <i>(a) how the EDB measures the scale and impact of new demand, generation, or storage capacity;</i> <i>(b) how the EDB takes the timing and uncertainty of new demand, generation, or storage capacity into account;</i> <i>(c) how the EDB takes other factors into account, eg, the network location of new demand, generation, or storage capacity; and</i> 	<p>Information relating to the above is included in section 6.1.4 Voltage Quality of MLL's AMP, available on MLL's website marlboroughlines.co.nz</p>
	<p><i>17.5.2 how the EDB assesses and manages the risk to the network posed by uncertainty regarding new demand, generation, or storage capacity;</i></p>	

17.6 Innovation practices

ID requirement		Narration
<p><i>17.6 a description of the following:</i></p>	<p><i>17.6.1 any innovation practices the EDB has planned or undertaken since the last AMP or AMP update was publicly disclosed, including case studies and trials;</i></p>	<p>Information on the above is included in MLL's AMP, available on MLL's website marlboroughlines.co.nz under section 3.3, other than 17.6.3 which is described under sections 7.8.4 and 7.8.5 of the AMP.</p>
	<p><i>17.6.2 the EDB's desired outcomes of any innovation practices, and how they may improve outcomes for consumers;</i></p>	
	<p><i>17.6.3 how the EDB measures success and makes decisions regarding any innovation practices, including how the EDB decides whether to commence, commercially adopt, or discontinue these practices;</i></p>	
	<p><i>17.6.4 how the EDB's decision-making and innovation practices depend on the work of other companies, including other EDBs and providers of non-network solutions; and</i></p>	
	<p><i>17.6.5 the types of information the EDB uses to inform or enable any innovation practices, and the EDB's approach to seeking that information</i></p>	