

March 12, 2021

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**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 further information relating to the above.

, if you need

Sincerely,

Karl Edwards
General Manager, Asset and Operations