

27 March 2018

Neil Jenkins - Senior Policy Officer
Energy Safe Victoria
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Comments on the Discussion Paper and Proposed Draft Gas Safety (Safety Case) Regulations 2018

Dear Neil

With reference to the Discussion Paper and Proposed Draft Gas Safety (Safety Case) Regulations 2018, please find below Jemena's comments.

Discussion Paper	Jemena Comment
<p>Para 2.5</p> <p><i>ESV has identified that setting out a required form of safety case or specific guidance would assist parties preparing safety cases to better understand what is required, and would streamline ESV's assessment of safety cases. ESV intends to publish safety case guidance to support the proposed Regulations.</i></p> <p>Para 2.8</p> <p><i>In September 2017, ESV released a brief paper to key stakeholders outlining a range of potential changes to the regulations and invited comment. The 18 responses received were mostly supportive of proposals to increase flexibility in managing safety cases to better match regulatory burden to risk, without affecting gas safety outcomes.</i></p>	<p>Jemena's concern is centred around the risk that ESV may demand an increase in the level of prescription regarding the required form of the safety case. We would like to raise your attention to the general needs of key stakeholders for an <i>increase in flexibility in managing safety cases</i> as related to Para 2.8 where 18 stakeholder responses to regulatory change were received in 2017 in support of this.</p> <p>A "standard form" template does not suit our multi-asset and multi-jurisdiction organisation whereby a different safety case for different assets may be required. Our ISO55001 based asset management strategies favour an efficient and effective consolidated approach whereby we have "one safety management system" for all our assets.</p> <p>Jemena will provide a safety case that fully meets the Victorian regulations along with a detailed compliance matrix to map both the Regulations and any ESV safety case guidelines provided (in a similar fashion to how we provide a SafeOP mapping matrix to support the QLD safety case for the Petroleum and Gas (Production and Safety) Regulation 2004).</p>

Yours sincerely




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