



Our Ref: SAC19\_044

25 September 2019

Mr Neil Jenkins  
Senior Policy Officer  
Energy Safe Victoria  
PO Box 262  
Collins Street West Vic 8007

Dear Neil,

**REQUEST FOR COMMENTS CONSULTATION PAPER OF THE PROPOSED  
ELECTRICITY SAFETY (MANAGEMENT) REGULATIONS 2019**

Thank you for the opportunity to comment on the above mentioned regulatory amendments. CitiPower and Powercor's (CPPAL) comments are provided below.

CPPAL will be attending the workshop meeting to be held on 17 October 2019 to discuss:

- ESV Energy Infrastructure Safety Management Policy,
- Electricity Safety Case (ESMS) Preparation and Submission Guideline for MECs, and
- Incident and Safety Performance Reporting Guidelines - MECs

CPPAL may wish to provide further comments to the proposed regulations following the workshop on 17 Oct 2019.

**Proposed Electricity Safety (Management) Regulations 2019**

*Part 2: Division 2 – Content of safety management system – asset operators and employer operators*

***Regulation 15 (2)(a) & 17 (1)(a) – technical standards***

It is recommended that the Electricity Safety (Management) Regulations require that an ESMS describe the process in which the asset operator undertakes to meet the requirements of published technical standards as opposed to requiring that **all** published technical standards be listed. It is more appropriate that only published technical standards that have a material impact to electrical safety be listed (such as AS/NZS 3000) as opposed to listing all standards.

**REGISTERED OFFICE**

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## Part 3 Records and Reporting

### **Regulation 28 – requirements for reporting of serious electrical incidents by major electricity companies**

It is noted in section 3.3 of the *Consultation Paper – Proposed Electricity Safety (Management) Regulations 2019* that there is a lack of clarity for MEC serious electrical incident reporting requirements in the current regulations. In order to achieve clarity, amendment is recommended to the proposed Electricity Safety (Management) Regulations.

It is recommended that Regulation 28 be amended as indicated below, to align with the obligations in the Electricity Safety Act 1998 for reporting any ‘serious electrical incident’<sup>1</sup> and to clearly state the requirement to **notify** and **report** serious electrical incidents.

### **28 Requirements for reporting of serious electrical incidents by major electricity companies**

- (1) For the purposes of section 142(1) and (2) of the Act, an electricity supplier that is an MEC must, if this regulation applies –
  - a. Notify Energy Safe Victoria of a serious electrical incident as soon as practicable; and
  - b. Provide Energy Safe Victoria with a report of the serious electrical incident at the completion of the investigation into the incident.
- (2) The notification of a serious electrical incident to which sub-regulation (1) applies must specify, to the extent that the information is available –
  - a. The nature of the incident;
  - b. Where and when the incident occurred;
  - c. The particulars of any person involved in the incident; and
  - d. Whether any emergency service attended the incident.
- (3) The report of the serious electrical incident to which sub-regulation (1) applies must specify –
  - a. The cause of the incident;
  - b. If any emergency service attended, what action was required to be taken by emergency service;
  - c. What remedial actions (if any) were taken by the MEC; and
  - d. What actions are proposed by the MEC to prevent a repetition of the incident.
- (4) This regulation applies if a serious electrical incident –
  - a. Caused the death of or injury to a person;
  - b. Caused significant property damage;
  - c. Caused significant disruption to the community;
  - d. Involved a transmission line;
  - e. Involved an imminent risk of electrocution;
  - f. Involved a ground fire originating from the MEC’s supply network;
  - g. Involved any of the following –

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<sup>1</sup> **Serious electrical incident** means an incident involving electricity which causes or has the potential to cause – a) the death of or injury to a person; or b) significant damage to property; or c) a serious risk to public safety.

- i. *An explosive failure of an asset;*
- ii. *A reverse polarity;*
- iii. *A high voltage injection;*
- iv. *A switching operation that inadvertently caused energisation;*
- v. *A person coming into contact with an energised network asset;*
- vi. *An uncontrolled release of a live conductor.*

(5) *In sub-regulation (4) –*

***Transmission line*** means an electric line with a nominal voltage more than 66,000 volts

CPPAL acknowledges that there is need for an ESV reporting guideline that further describes the reporting requirements as listed in the regulations, however for clarity and alignment to the Electricity Safety Act it is recommended that the guideline not be referenced in the regulations.

### **Regulation 29 – Reporting of other serious electrical incidents by major electricity companies**

Further to the recommended amendments listed above for Regulation 28, it is recommended that Regulation 29 be amended to the following.

#### **29 *Reporting of other serious electrical incidents by major electricity companies***

- (1) *This regulation applies to serious electrical incidents other than serious electrical incidents described in Regulation 28.*
- (2) *For the purposes of section 142(1) and (2) of the Act, an electricity supplier that is an MEC must provide Energy Safety Victoria with a report of a serious electrical incident to which this regulation applies at the completion of the investigation in to the incident in accordance with sub-regulation 28(3).*

Please contact me ( [REDACTED] ) should you have any queries.

Yours sincerely

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