

VIC Electrical Safety (CP) Regulations

ExxonMobil Australia Response

Incorporates responses from Esso Australia, Mobil Refining, Mobil Oil Australia.

5 Definitions

- Electrolysis drainage bond. The use of the term “railway” is too restrictive hence proposing to use a more general term. This could cover any future HV DC cabling. Suggest the following rewording: “Electrolysis drainage bond means the path by which stray current resulting from the operation of an adverse DC source returns from an underground or underwater metallic structure to its originating source.”

6 Prescribed systems

- Item (b) – May unintentionally capture floating production facilities or seasonal vessels that may be moored for long periods. Possible rewording may include: “protects a marine vessel that is not designed to be permanently fixed to a land-based structure.”
- Item (c) – Most offshore pipelines and facilities are ultimately connected to land above sea level. Proposed rewording to “Fixed offshore structure not electrically connected with land above sea level”.

10 Registration

- This clause, with consideration with clause 8 and 6, infers that CP systems between 250mA and 2A require registration, but do not have set expiration terms. Suggest clarifying whether systems below 2A require registration.

11 Refusal of Registration

- Item (1)(b) – acceptance criteria / interference limits defined in AS 2832. Suggest rewording to reflect these standards – “if it reasonable believes that any metallic structure, other than the one to which the system is or will be connected, may have its electrical potential with respect to earth changed, as defined by AS 2832, due to the operation of the system.”

18 Provision for testing

- Items (1) and (2) – Reference to “Time switch” definition to be altered to better reflect different interrupter technologies. Recommend using wording such as “The owner of a cathodic protection system... must ensure that the circuit incorporates a suitable means of interrupting the circuit for testing purposes.”