



26 September 2019

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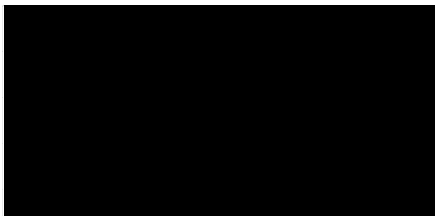
Dear Mr Jenkins

**RE: Comments on Electricity Safety (Management) Regulations – Exposure Draft**

Please find attached comments on the Electricity Safety (Management) Regulations – Exposure Draft.

If you require any clarification or require further participation in any workshops, please contact 

Yours sincerely,



Electricity Distribution

Clause 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 as specified in reporting guidelines issued by Energy Safe Victoria from time to time; and
  - (b) provide Energy Safe Victoria with a report of the incident in accordance with the reporting guidelines
- (2) This regulation applies if a serious electrical incident-
- (a) caused the death of or injury to a person; or
  - (b) caused significant property damage; or
  - (c) caused significant disruption to the community; or
  - (d) involved an electric line with a nominal voltage of more than 66 000 volts; or
  - (e) involved an imminent risk of electrocution; or
  - (f) involved a fire originating from the MEC's supply network; or
  - (g) involved any of the following-
    - (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 energised bare conductor that is less than 4.3 metres above the ground;
    - (vii) part of the MEC's supply network becoming dislodged from its supporting structure;
    - (viii) an uncontrolled release of a live conductor.

**Comments:**

- Clause 28 (1a & b), reference to ESV reporting guidelines in the regulations makes it mandatory and should be moved to a footer as a reference. The main reason for this clause is to notify serious electrical incidents ASAP to ESV. To make this clause clearer, an addition of the minimum information (where available) to be included in the notification:
  - 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
- Clause 28 (2d), reference to a nominal voltage is not necessary. Reference should be changed to transmission line as this will cover any voltage.

- *Clause 28 (2f), reference to fire should be changed to fire causing ground damage. ESV have made it clear that crossarm / pole fires or other fires from assets that do not cause ground damage does not require notification, only a 20 day report. i.e. does not require a notification.*
- *Clause 28 (2g vii), a part of the MEC's supply network becoming dislodged from its supporting structure, does not mean it is unsafe to the public. This subclause should be removed as it will be reported as a 20 day report. i.e. does not require a notification.*

#### Clause 29

(2) For the purposes of section 142(1) and (2) of the Act, an electricity supplier that is an MEC must report to Energy Safe Victoria a serious electrical incident to which this regulation applies in accordance with the reporting guidelines referred to in regulation 28(1)

As per comment previous comment, please remove reference to "reporting guidelines" as this would make the guidelines mandatory. Also it does not assist with the clarification as to what is the minimum information required for notification to ESV.