

From: [REDACTED]
To: [Consultation](#)
Subject: RIS - Electricity Safety (Registration and Licensing) Regulations 2020 [DLM=For-Official-Use-Only]
Date: Tuesday, 8 September 2020 5:10:07 PM

Hi Staff,

This seems like major changes to which is extensive training that electrician do anyway. We look at how industry has moved and the introduction of a lot of new equipments such VSD controls, Solar, PLCs, UPSs, Inverters, Energy storage (Batteries) and soon to be Electric Cars. Now we are talking about retesting which all evaluate to extra costs and time. Most electricians have various lic's be it Electrical, Cablers, Gas, Security, Coaxial, Krone, etc. costs for the lic's, insurance etc. together with training will be unaffordable as it gone on. The average tradie tries learning and acquiring more and more new skills to keep up with industry to try and make a buck but it's hard to keep up with it all unfortunately. Some would be looking at this as a money making exercise. Next they will be asking you have affiliation with a Union, NECA etc. When does anyone start making money after all this? In analysing the numbers a sole worker with a number of Lic's would be up for thousands of dollars before they begin. As soon as something new comes along, people jump into it to try and get extra revenue such as what happened with Solar which end up with a vast influx of dangerous practises. Experience has shown in the USA where issues with electrical works were divide having various people to complete one job and causing high costs. For example, one person installing conduits, the second person installing the wires, the third person fitting off and the last person commissioning. Image what this would do to our industry on top of what's going on as we speak.

I am a qualified trainer assessor with Cert 4 qualifications and spend hours putting competency assessments together which are periodical tests such like what you are proposing. My back ground is in electrical electronics featuring in all aspects of Maint of backup power systems, Generator/Mobile Generators, DC backup supplies, UPSs, Radar, A/Con systems etc. Some of our ex-employees actual worked for Energy Safe Vic.

I work for a large government organisation of which we have an internal competency assurance system in place and it has been ongoing for over 30 years now. The time involved in keeping our internal competency assurance in place made up of accreditations and technical certifications afloat is a very time consuming and costly exercise. With the way the government and the education department have headed, I have had to upgrade my training and assessing qualifications twice in the approx. last 5 years. I am frighten to think what else is coming by industry changes to make continual incomes and not thinking about the bigger picture.

The purpose it was brought to play was in regards to:

- Safety, to the workers, users, equipment and the stake holders,
- Assurance, in that staff can safely remove/test/restore equipment from live operation,
- Understand the full complexity of the consequences involved should things go pear shape,
- Have mitigations in place for the unexpected,

- Refreshers as the way we do things change, standards change, regulations change and new equipment comes aboard thus methods may change.

Other things we do: We have controlled periodic training in,

- Fire extinguisher training
- First aid / CPR training
- Defibrillator training
- Switchboard recue

Our Maint inspections are all recorded and stored in various ways of which I also review as need as evidence showing that the job is done correctly by the staff concerned.

All electrical works encompass a SWMS which is reviewed by all staff before commencement of work.

My questions to you are:

- Will this account for anything in your proposal?
- Can we setup something approved in house testing to save on time and money?
- Would someone like me be able to get training or guidance to perform in house testing?
- In the Webinar a statement was made that to work on battery banks, Generators and Solar systems etc. will **only be done by A Grade holders**.

Does this mean the restricted Lic. holders will not be allowed to work on this equipments?

What voltage levels will be the cut off for these types of works?

Would data centres only be allowed to be maintained by A grade electrical workers?

This may open up a big can of worms but will need to be addressed early so everyone is clear on what's going on.

The Fridgie, Mech fitters, Generator Maint staff, Electronic Techs with restricted Lic holders all will be stuck in limbo, what are they to do?

I would be interested in seeing what is planned and would consider seeing what I can do to be a part of this all.

I happy to elaborate further if it's not clear.

Regards,

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