

Bushfire mitigation plan

Request from Energy Safe Victoria to submit a revised plan



REQUEST PURSUANT TO SECTION 109(1) OF THE ELECTRICITY SAFETY ACT 1998

I, Marnie Williams, Chairperson of Energy Safe Victoria issue the following request to **POWERCOR AUSTRALIA LTD** (ACN 064 651 109) pursuant to section 109(1) of the *Electricity Safety Act 1998* (Vic) as delegate of the Victorian Energy Safety Commission:

Preamble

1. ESV's objectives under the Act include to promote the prevention and mitigation of bushfire danger.
2. On 21 December 2021, ESV determined to provisionally accept the BMP. Provisional acceptance applies until 31 March 2022.
3. The purpose of this request is to address concerns held by ESV regarding the BMP in the following areas:
 - a. implementation of commitments made by the Supplier to increase level of pole interventions;
 - b. the scope and currency of documentation purported to be incorporated into the BMP; and
 - c. management of safety risks in connection with conductor clearances.

Application

4. The Supplier is a major electricity company for the purposes of the Act.
5. ESV may make a request to a major electricity company under s 109(1) of the Act at any time. The request must comply with s 109(2) of the Act.

Definitions

6. In this request:
 - a. **Act** means the *Electricity Safety Act 1998* (Vic);
 - b. **BMP** means the Supplier's bushfire mitigation plan (revision 9.2);
 - c. **ESV** means Energy Safe Victoria, a body corporate established under the *Energy Safe Victoria Act 2005* (Vic); and
 - d. **Supplier** means Powercor Australia Ltd (ACN 064 651 109).
7. Terms that are defined in the Act have the meanings given in that Act.

Request

8. ESV requests that the Supplier submit a revised bushfire mitigation plan for its supply network to replace the BMP that was provisionally accepted by ESV on 21 December 2021.
9. This request only relates to the BMP and not to the electricity safety management scheme of which that BMP forms part (see s 113E of the Act).
10. For the purposes of s 109(2)(b) of the Act:

- a. The matters to be addressed by the revision are:

Increasing pole interventions

- i. Revise section 6.21 (Sustainable Wood Pole Management Program) to include a plan with specific minimum annual pole intervention commitments for the period 1 January 2022 to 31 December 2026.
- ii. In each year of the plan include the minimum number of:
 - Network interventions;
 - HBRA interventions;
 - HBRA replacements;
 - Network reinforced replacements; and
 - HBRA reinforced replacements.

Currency of documentation

- i. Ensure that the BMP contains a list of all documents proposed to be incorporated by reference into the BMP (currently Appendix G). For each document that is proposed to be incorporated into the BMP, specify the number of the revision that is proposed to be incorporated and date on which the document was approved by the Supplier.
- ii. Ensure that ESV has been provided with a copy of each of those documents.

Conductor clearances

- iii. Revise section 6.12 (Technology Implementation Programs) in the BMP to include a section that describes the Supplier's plans in 2022 and 2023 to improve management of conductor clearances.
- iv. The BMP must include a description of:
 1. the use of Light Detection and Ranging (LIDAR) technology and associated algorithms and details of planned tasks with milestones;
 2. the standards that determine the clearance between conductors on the same or different circuits both at a structure and in span in respect of both construction and maintenance, including whether the standard specifies a measurement for the purpose of the clearance or sets a formula for the purpose of determining the clearance that applies;
 3. the method by which asset inspectors will assess the risk of conductors clashing, whether on the same or different circuits, both at a structure and in span;
 4. the method by which clearances between conductors, both at a structure and in span, are to be measured both at a structure and in span;
 5. the method by which asset inspectors will determine whether to report a potential lack of clearances between conductors on the same or different circuits both at a structure and in span;
 6. the method by which asset inspectors will determine whether the effect of a leaning pole may result in a lack of clearance between conductors, whether on the same or a different circuit, or a lack of ground clearance;

7. the time period within which a reported potential lack of clearance between conductors on the same or different circuits both at a structure and in span will be investigated;
 8. the time period within which a lack of clearance between conductors on the same or different circuits as determined by investigation will be (a) made safe, and (b) rectified to the applicable standard; and
 9. the method by which asset inspectors will determine the most appropriate spans to measure for ground clearance.
 10. the process and procedures for ensuring each person assigned to carry out inspection of conductor clearances is trained and competent to carry out such inspections
 11. the process and procedures by which the Supplier will monitor the effectiveness of the conductor clearance inspections carried out under the plan
 12. the process and procedures by which the Supplier will audit the effectiveness of the conductor clearance inspections carried out under the plan
- b. The proposed date of effect of the revision is to be before:
31 March 2022
- c. The grounds for the request are:
- i. As a major electricity company, the Supplier has various obligations and duties under the Act, including a general duty as set out in s 98 of the Act which provides that the Supplier must design, construct, operate, maintain and decommission its supply network to minimise as far as practicable:
 1. the hazards and risks to the safety of any person arising from the supply network;
 2. the hazards and risks of damage to the property of any person arising from the supply network; and
 3. the bushfire danger arising from the supply network.
 - ii. While ESV is supportive of the increased pole intervention commitments proposed by the Supplier, ESV is concerned that there is insufficient detail and a lack of clarity around how the Supplier will implement those commitments.
 - iii. A bushfire mitigation plan is required to be a plan for the Supplier's proposals for mitigation of bushfire risk in relation to its supply network (see section 113A(1) of the Act). To the extent the BMP relies on or references other documents external to the BMP, those documents must be able to be identified by revision number so that the documents can be located as required.
 - iv. The clashing of conductors is a recognised source of potential ignition of fire. A lack of clearance between conductors on the same or different circuits has been proven to lead to the ignition of fires. The BMP must set out the methods by which lack of clearance between conductors will be identified, reported and rectified, including appropriate time periods for these events to occur.
 - v. The objectives of ESV under the Act include to promote the prevention and mitigation of bushfire danger. This request aligns with this objective.

Compliance

11. The Supplier may make a submission to ESV in response to this request on all or any of the grounds specified in s 109(3) of the Act. The submission must be in writing, state the Supplier's reasons for the submission and be made within 21 days of the date that this request is received by the Supplier (see s 109(4)) of the Act).
12. Unless a submission is made in accordance with paragraph 10 above, the revised bushfire mitigation plan must be submitted to ESV on or before 21 February 2022.

Penalties

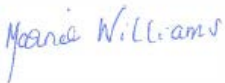
13. Section 110 of the Act provides:

Offence to fail to submit revised electricity safety management scheme on request

If Energy Safe Victoria requests the revision of an electricity safety management scheme in accordance with section 109, the major electricity company must submit a revised electricity safety management scheme for a supply network to Energy Safe Victoria—

- (a) if the major electricity company does not make a submission under that section, within the time (being not less than 60 days) specified by Energy Safe Victoria in the request; or
- (b) if the major electricity company has made a submission under that section and Energy Safe Victoria has not withdrawn the request, within the time (being not less than 60 days) specified by Energy Safe Victoria in the decision on the submission.

Penalty: In the case of a natural person, 80 penalty units;
In the case of a body corporate, 400 penalty units.



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Marnie Williams
Chairperson of Energy Safe Victoria
As delegate for the Victorian Energy Safety Commission

23 December 2021