

Our Ref: CM-10622

23 December 2021

[REDACTED]
Powercor Australia Limited
Level 1 40 Market Street
MELBOURNE VIC 3000

[REDACTED]
PROVISIONAL ACCEPTANCE OF POWERCOR AUSTRALIA LIMITED (POWERCOR) 2021 BUSHFIRE MITIGATION PLAN (REVISION 9.2)

I refer to Powercor's draft revised Bushfire Mitigation Plan (revision 9.2, 12 November 2021) (**BMP**) which was submitted to Energy Safe Victoria (**ESV**) on 12 November 2021 for consideration and acceptance under Subdivision 3 of Part 8 of the *Electricity Safety Act 1998* (Vic) (**Act**).

Pursuant to the Act, ESV has considered the documents that are listed in Attachment A to this letter which constitute Powercor's BMP. Subject to the qualifications in this letter, ESV is satisfied that those documents specify a plan that will minimise the bushfire danger arising from the supply network to which the BMP applies. However, as a result of the qualifications in this letter, this acceptance is provisional pursuant to section 83BF of the Act and applies from 21 December 2021 until 31 March 2022.

While ESV welcomes Powercor's commitment to increase minimum pole intervention levels at ESV's request, there remain concerns about how the commitment will be implemented. ESV also has concerns about the currency of documentation purported to be incorporated into the BMP (noting that additional information provided to ESV after submission of the BMP identified external documents with revision dates after the date the BMP was submitted to ESV for consideration) and with the lack of detail in the plan regarding Powercor's plans to improve management of conductor clearances (noting recent public statements made by Powercor). Attached to this letter is a notice under section 109 of the Act requiring Powercor to submit a further revision of its BMP to address these concerns.

ESV's consideration and provisional acceptance of the BMP is based on the following:

1. the documents listed in Attachment A to this letter; and
2. the presentation of Powercor's safety case supporting the ESMS.

The provisional acceptance of the BMP applies to the documents listed in Attachment A to this letter.

The provisional acceptance of the BMP does not include provisional acceptance of documents that are not listed in Attachment A of this letter, including documents that are referenced in the documents that are listed in Attachment A of this letter (whether specifically or generally), but are not themselves listed in Attachment A to this letter.

This acceptance applies for the purposes of the following sections of the Act:

1. 106 Compliance with electricity safety management scheme;
2. 113 Compliance with electricity safety management scheme as a defence;
3. 113B Compliance with bushfire mitigation plan; and
4. 113D Accepted bushfire mitigation plan forms part of accepted ESMS, (**ESMS/BMP provisions**).

The ESMS/BMP provisions do not apply to documents that have been provided to ESV by Powercor, but are not included in Attachment A to this letter and are therefore not incorporated into the BMP. The ESMS/BMP provisions also do not apply to revisions to documents that have been made that have not been submitted to ESV for acceptance and accepted by ESV pursuant to the Act.

However, ESV considers that those additional documents are relevant documents for the purpose of considering what measures are practicable for the discharge of Powercor's general duty under section 98 of the Act.

If you would like to discuss this provisional acceptance, please contact [REDACTED]

Yours sincerely

[REDACTED]

Marnie Williams
Commissioner and Chairperson
Energy Safe Victoria

Attachment A

Documents that form Powercor's provisionally accepted Bushfire Mitigation Plan under the *Electricity Safety Act 1998 (Vic)* with effect from 21 December 2021:

Document name:	Revision No:	Issue date:
Bushfire Mitigation Plan	9.2	12/12/2021
Bushfire Mitigation Plan Appendix A – Total Fire Ban Day Action Plan	14	12/12/2021
Bushfire Mitigation Plan Appendix A – Attachment A SWER ACR's	-	11/11/2021
Bushfire Mitigation Plan Appendix A – Attachment A CBs ACR's	-	11/11/2021
Bushfire Mitigation Plan Appendix B, C, D, E, F, H	11	12/12/2021
Document No. JEQA4UJ443MT-150-27602 - Asset Class - Overhead Conductors	1	6/05/2019
Guideline 18-20-G0001- Corona Camera Application Guideline	3.1	24/11/2014
Manual JEQA4UJ443MT-154-111 - Event Command Organisation Manual	0	9/10/2018
Manual 05-M450 - Asset Inspection Manual	3.3	6/12/2019
Technical Training Policy (JEQA4UJ443MT-173-25)	2	10/05/2016
Policy No. 05-C001.D-430 - Low Voltage Private Overhead Electric Lines	7.2	27/08/2015
Policy No. 05-C001.D-431 - High Voltage Private Overhead Electric Lines	2	30/09/2006
Policy No. 05-C001.D-320 - High Voltage Fuses	2.1	31/10/2016
Policy No. 05-C001.D-540 - Distribution Surge Arresters	8	18/06/2021
Policy No. 05-C001.D-330 - Insulators, Associated Hardware & Bird Covers	5.3	30/07/2020
Policy No. 05-C001.D-255 - Low Voltage Spreaders	4	6/12/2019
Policy No. 05-C001.D-392 - Management of Unserviceable Poles	3.1	31/03/2019
Policy No. 05-C001.D-280 - Cross Arms	6.2	21/08/2020

Document name:	Revision No:	Issue date:
Policy No. 05-C001.D-398 - Permanent Reinforcing of Wood Poles	2.1	16/11/2017
Policy No. 05-C001.D-251 - Bare Conductor Policy	2.2	25/11/2020
Policy No. 05-C001.A-025 - Priority Policy	4.4	1/07/2019
Policy No. 05-C001.D-291 – SWER Isolating Transformer Earthing Systems	1	23/12/2003
Policy No. 05-C001.D-292 – SWER Distribution Transformer Earthing Systems	2	7/12/2010
Policy No. 05-C001.D-570 - Thermovision Policy	3.2	30/06/2019
05-C001.A-090 – Asset Inspection Compliance Audit Procedure	2.2	17/03/2016
Procedure 18-06-P0001 - Asset Failure Investigation and Reporting	8.4	16/11/2016
Procedure 16-30-P0003 - Coordinating Bushfire Mitigation with other Organisations	7	24/09/2012
Procedure JEQA4UJ443MT-158-503 - Identification and Rectification of Defective POELs (LV)	5	9/06/2020
Procedure 07-30-P0013 - Manage Network Faults	6	14/09/2012
Procedure 18-20-P0002 - Asset Inspection	6	18/02/2019
Procedure 18-20-P0004 – Inaccessible Asset	1.1	13/10/2020
Procedure 18-05-P0003 - Asset Maintenance Policy and Asset Management Plan Review and Development	1.1	1/03/2019
CP_PAL_REFCL_101 - Policy for Initial Capacity Testing	1	23/03/2018
CP_PAL_REFCL_102 - Policy for Annual Capacity Testing	2	31/08/2021
CP_PAL_REFCL_103 - Demonstration of Required Capacity	1	23/03/2017
CP_PAL_REFCL_104 - Capacity Test Locations	3	27/09/2021
CP_PAL_REFCL_105 - Facilities for REFCL Performance Testing	1	3/04/2018
CP_PAL_REFCL_106 - Consideration of Influencing Factors Rev	1	11/04/2018

Document name:	Revision No:	Issue date:
CP_PAL_REFCL_302 - Resolution of Conditional Acceptance	1	1/11/2019
JEQA4UJ443MT-175-29 - Audit and Inspection Programme Requirements	5	14/04/2021
Work Instruction 16-30-W0004 - Line Condition Observation	9	11/10/2013
Pole Management Improvement Program – MS Project Plan	1	28/02/2020
Overhead Conductor Asset Management Plan	0	1/09/2020
Crisis and Emergency Management Manual	9	21/01/2014
Network Asset Maintenance Policy for Inspection of Poles Document No. 05-C001.D-390	4.9	19/05/2020
Network Asset Maintenance Policy for Management of Leaning Poles Policy No. D-393	2.1	8/04/2020
Policy 18 - 80 - CP0007 – ESMS Reporting to Energy Safe Victoria (ESV) and Fire Start Reporting to AER	3	22/11/2016
JEQA4UJ443MT-185-28490 - Incident Management Procedure	0	15/02/2017
Bushfire Mitigation Plan Creation & Update JEQA4UJ443MT-161-523	1	30/11/2016
Manage Fault Follow-up and Repair JEQA4UJ443MT-149-115	5	20/04/2020
CitiPower / Powercor Operations Procedures EQA4UJ443MT-185-11385	14	9/06/2021
Technical Training Guideline JEQA4UJ443MT-173-28	2	10/05/2016
Bushfire Mitigation Index Review JEQA4UJ443MT-161-628	2	24/07/2017
Electrical Network Action Plan for Hot Days JEQA4UJ443MT-149-555	8	28/09/2020
Minimising Fire Start Risk on Total Fire Ban Days JEQA4UJ443MT-68996575-177	3	20/03/2018
Management of Maintenance Items Outside Policy Timeframes	1	7/09/2019

Attachment B

Request under section 109 of the *Electricity Safety Act 1998* (Vic):