

ESV ref: CM-1256

Mr Mark Feather
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Department of State Development, Business and Innovation
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Dear Mark

ESV LETTER ON NON ESSENTIAL PLANNED NETWORK OUTAGES

I refer to the Department's recently published consultation paper which, among other things, seeks comment on the proposed prohibition of non-essential planned network outages on very hot days.

It is suggested in the paper that planned electricity network outages occurring on hot days puts vulnerable customers at risk, as well as those who rely on electricity to manage routine activities such as accessing fresh water. The stated objective is to prevent electricity outages on hot days due to non-essential maintenance works.

The proposed solution to achieve this is by either placing restrictions on non-essential outages on hot days through amendments to the *Electricity Industry Act 2000*, through a review of the Electricity Distribution Code, or through changes to regulatory instruments administered by Energy Safe Victoria (ESV), such as the Electricity Safety Management Schemes.

Over the past two summers ESV has reviewed the procedures adopted by electricity businesses on Total Fire Ban days. Those enquiries revealed that the companies had comprehensive programs for maintenance works to be completed throughout the year and that, prior to any work commencing in rural areas where fire restrictions were in force, a Total Fire Ban Assessment was completed to establish whether planned works should proceed or not. The reviews also revealed that the companies either cancelled the planned works or rescheduled them for an earlier start time on the day so that they were completed by the middle and the hottest part of the day. Further, the businesses also have internal occupational health and safety processes that further restrict the amount and type of work undertaken on extreme heat days.

The current Electricity Safety (Bushfire Mitigation) Regulations require that operation and maintenance activities of the Major Electricity Companies' supply networks, both during the fire danger period and on days of Total Fire Ban, be included in the their bushfire mitigation plans. Those plans are required to be made publicly available on the companies' web pages and in their principal offices within Victoria. Those plans do not generally detail all the procedures adopted, rather they state the principles being adopted. Currently, regulations do not specifically require that companies specify activities on declared heat health alert days. ESV is aware that certain companies have procedures associated with declared heat health alert days. If it was thought to be of value to have the procedures associated with declared

heat health alert days publicly available, the Electricity Safety (Bushfire Mitigation) Regulations requirements could be broadened to require details of plans to limit electricity outages from routine network maintenance on days where the Department of Health has issued a heat health alert.

If it was considered desirable that these procedures were made publicly available sooner than later as part of the companies' bushfire mitigation plans, then some thought will need to go into considering which powers were available to cause the inclusion of these new requirements within the plans prior to those provisions being included in the revised Electricity Safety (Bushfire Mitigation) Regulations.

The timing of the proclamation of the recently passed Electricity Safety Amendment (Bushfire Mitigation) Act 2014 needs to be considered as it changes the submission requirements from annual to five-yearly and, as such, any early proclamation date would mean that the companies would not by statute be required to submit a revised plan for another four years. If the current legislation remains, ESV believes that there is sufficient time between now and 30 June for the Major Electricity Companies to produce revisions to their bushfire mitigation plans that include the requirement to include heatwave procedures in those plans. I believe this would be a proportionate regulatory response to the policy problem.

Finally, the Department should be aware that reducing outage times to undertake essential works has the potential to cause more live line work and therefore lead to other associated electrical safety risks.

I would be pleased to elaborate on any of these observations at your convenience.

Yours sincerely



Paul Fearon
DIRECTOR OF ENERGY SAFETY