

Our Ref: CM-10961

15 March 2021

Ms Cheree Marchant
Policy Officer Energy Institutions and Regulations
Department of Environment, Land, Water and Planning

Submission emailed to: stakeholder.consultation@delwp.vic.gov.au

Dear Ms Marchant

RE: REGULATING ELECTRICITY CONNECTIONS FOR NEW HOUSING DEVELOPMENTS - CONSULTATION

Energy Safe Victoria (ESV) is the electrical safety and technical regulator in Victoria, part of our role is to ensure compliance and investigate breaches of the *Electricity Safety Act 1998* (the Act) and subordinate regulations.

I am writing to submit an ESV response to the Consultation Paper titled *Regulating electricity connections for new housing developments*.

ESV understands that the aim of the regulation is to improve the timeliness for connecting electricity to new housing developments, and acknowledges that improvements have already been made by each Distribution Business (DB) in their connection process over the last two years.

ESV has not assessed the merits of the proposed timeframes and assumes that, when developing them, the DB's have made adequate provision to ensure they can discharge their obligations under the Electricity Safety Act and the Occupational Health and Safety Act. It is important that any proposal to introduce regulated timeframes does not compromise safety in any way.

ESV will continue to monitor and verify this is so by undertaking on-site inspections and audits of their systems.

ESV would like to highlight that any future proposal to reduce regulated timeframes must ensure safety is not compromised. Specifically, it must ensure that any safety related issues that may occur during the process of installation and commissioning of the electrical assets are adequately addressed. ESV suggests it may be beneficial for the proposed regulation to acknowledge or recognise that the DB may be obliged under safety legislation to stop the process when a safety issue is identified; and in such circumstances connection service standards may not be met. Such safety issues may be identified during audits or at the connection stage and must be rectified before energization of the electricity assets.

Additionally ESV would like to mention that timely responses in the design plan review and design approval process (stage 3) are essential to ensure the infrastructure installation works can be effectively planned to avoid co-ordination issues between different assets such as gas, telecommunications, water and electricity. Proper coordination is required so that more deeply buried assets are not being installed after shallower assets so risk disturbing and potentially damaging, shallower assets that have already been installed and inspected.

ESV also notes that the consultation paper states that *“DELWP notes that stakeholders may....have other suggestions for addressing these issues that do not involve regulating timeframes. While this is not the focus of this consultation, stakeholders may raise such issues for DELWP’s information if they consider these issues relevant.”*

Therefore an alternate consideration (other than regulating timeframes) that ESV believes would assist in addressing these issues would be for the industry to develop and implement a well-defined Urban Residential Development (URD) auditing standard. Any auditing standard should include clear and transparent acceptable (pass/fail) tolerances, in order to provide an easily understood and consistent standard for approving newly constructed URD developments for connection ‘tie-in’ to the electricity network. Removing the existing ambiguity and subjectivity from the URD audit assessment will also assist in improving the timely delivery of new housing developments.

Should you have any queries regarding this matter, please contact Gavin Jackson, Team Leader, Safety Systems Assurance by email gavin.jackson@energysafe.vic.gov.au or telephone (03) 9203 9753.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian Burgwin', written in a cursive style.

Ian Burgwin
GENERAL MANAGER
ELECTRICAL SAFETY AND TECHNICAL REGULATION