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Our patron, Her Excellency the Honourable Linda Dessau AC, Governor of Victoria

Office of CEO/CO | State Headquarters

24 August 2021

Marnie Williams
Commissioner and Chairperson
Energy Safe Victoria

By Email: consultation@energysafe.vic.gov.au.

Dear Ms Williams

AusNet Services Wood Pole Management Investigation - Draft Report for consultation

Thank you for providing CFA an opportunity to review the documents relating to the AusNet Services Wood Pole Management Public Technical Report 2021. CFA have reviewed the Draft Report and wish to provide the following comment.

Whilst CFA encourages continued review, refinement and improvements to systems and processes it believes that the changes proposed by AusNet to its inspection frequency wooden poles could have a detrimental impact upon the safety of the Victorian community and reliability of electrical supply.

The proposed changes that reduce the frequency of inspections has the potential to increase in unassisted wood pole failure, as issues may not be identified in a timely manner.

Increases in wood pole failure could have detrimental impacts on bushfire and electrocution risk, as well as the interruption of supply.

CFA acknowledges, via this report, that the past AusNet Services' wood pole management practices have resulted in the lowest level of unassisted wood pole failure rates of all Victorian Major Electrical Companies (MECs). AusNet should be commended for its previous performances.

CFA recommends that all MECs be encouraged to achieve similarly low wood pole failure rates as AusNet has achieved.

CFA notes the aging of electrical wooden poles, with the potential for unassisted failure likely to increase. Given the increase in age profile and potentially an increase in unserviceable wooden poles that consideration should be given to increasing the frequency of inspection, rather than a reduction in frequency.

CFA recommends that before a reduction in wood pole inspections occurs that a thorough assessment be undertaken to ensure that any potential changes do not have an adverse impact upon public safety and the reliability of the electrical network. This assessment needs to consider current and future pole infrastructure.

CFA supports the recommendations that Energy Safety Victoria (ESV) has placed upon AusNet, in particular the following recommendations:

- AusNet develop a wood pole management improvement plan to address all recommendations and findings in the investigation report.
- AusNet to demonstrate how its current asset inspection approach to pole management and frequency of pole inspection in hazardous bushfire risk areas (HBRA) meets the general duties under section 98 of the Electricity Safety Act.
- AusNet to demonstrate that its Bushfire Mitigation Plan has alignment between the inspection cycle, training and maintenance.

CFA offers support to ESV on this and other bushfire fire related matters.

If you would like additional information, please contact [REDACTED] on [REDACTED] or email to [REDACTED].

Yours sincerely,



Natalie MacDonald
Chief Executive Officer