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

CFA Headquarters

Marnie Williams  
Commissioner and Chairperson  
ESV Commission – Energy Safe Victoria  
Level 5, 4 Riverside Quay  
Southbank, VIC 3006

27 September 2022

Dear Ms Williams

**Re: United Energy Wood Pole Management – A review of sustainable wood pole safety outcomes – Draft Public Report 2022**

In response to an email communication received from the ESV Commissioner & Chairperson [7/09/2022] to CFA's Chief Executive Officer, inviting comment on ESV's Energy Safe Victoria's 'United Energy Wood Pole Management – A review of sustainable wood pole safety outcomes' Draft Public Report. CFA have reviewed the Report and provide the following comment.

Noting that CFA does not have expertise in relation to the analysis of factors considered as part of ESV's investigation into United Energy's pole management practices. However, whilst CFA acknowledges that wood pole management is challenging with resource implications for the asset owner and manager, an appropriate strategy for the safe management of wooden poles to mitigate bushfire risk is critical.

Monitoring, compliance, reporting, and enforcement are fundamental components of a quality management system. It is highly important that Major Electricity Companies implement strategy and practice to ensure the appropriate inspection (and inspector training), maintenance, and replacement regime of the wood pole populations, specifically those located within Hazardous Bushfire Risk Areas (HBRA).

CFA supports ESV's determination of appropriate enforcement action to ensure all Report findings are addressed to minimise risks to the safety of people, property damage and bushfire danger as far as practicable, pursuant to the *Electricity Safety Act 1998* and Regulations.

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

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

Yours Sincerely

*A. Andreou*

**Andrew Andreou – Head of Community Infrastructure  
Fire Risk, Research and Community Preparedness**