

Class D lineworkers and Class C cable jointers: guidance and effective supervision requirements

Consultation paper, September 2025

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Summary

Electrical lineworkers (**lineworkers**) and cable jointers carry out critical work in relation to the construction and maintenance of electricity supply networks and rail networks.

The *Electricity Safety Act 1998* (Vic) (**Act**) requires lineworkers and cable jointers to be licensed to do certain classes of linework.¹ This requirement exists to promote the safety of workers and the public by ensuring all electrical linework is completed by appropriately qualified persons.

The accompanying *Electricity Safety (Registration and Licensing) Regulations 2020* (Vic) (**Regulations**) prescribe the classes of linework that require a licence. They are cable jointing (**Class C**) and linework (**Class D**) on a major electricity company (**MEC**) distribution supply network, linework on a traction supply network (**Class R**), and linework on a transmission supply network (**Class T**).

In addition to the Act and the Regulations, the Electricity Safety Exemptions Order 2020 (**Exemptions Order**) permits Class D lineworkers and Class C cable jointers to do other electrical work which they are not licensed to do if certain conditions are met.

We initially worked with a group of industry representatives to develop guidance materials for Class D lineworkers and Class C cable jointers. However, during this work, some representatives raised concerns with aspects of the regulatory framework, which required further exploration.

In later targeted discussions with industry representatives we heard that a particular area of ambiguity is what work Class C cable jointers may do with high voltage underground electric cables which are raised up poles. We are seeking feedback on questions about this, to inform our development of guidance materials.

We are also seeking feedback on the requirement under the Exemptions Order for Class D lineworkers and Class C cable jointers to be supervised by licensed electricians when they are working on underground consumer mains.

Your feedback will help us to identify whether there are any further opportunities to support the lineworker and cable jointer sectors. We are open to all relevant feedback to aid our understanding of the current and future needs of the sectors.

¹ While the regulatory framework captures cable jointing as a class of linework, we recognise cable jointing as a distinct, specialised field. We reference cable jointers as Class C cable jointers rather than Class C lineworkers in this paper for this reason.

How to provide feedback

Interested parties are invited to provide written submissions addressing our questions by **12:00 pm (noon) on Monday 27 October 2025**. You can submit on as many or as few questions as you wish.

Submissions can be emailed to consultation@energysafe.vic.gov.au or posted to:

Consultations
Energy Safe Victoria
PO Box 262
Collins Street West, Victoria 8007

All submissions will be treated as public and assumed able to be published on our website unless the submitter requests confidentiality. Any information that is commercially sensitive or confidential should be clearly marked. Names and other personal information will be removed from submissions prior to publication.

We are also open to meeting with individual stakeholders to discuss specific feedback.

If you have any questions or would like to arrange a meeting, please contact us at consultations@energysafe.vic.gov.au.

Consolidated list of questions for consultation

As a guide for submissions, we have included some questions in this document, which are consolidated here for ease of reference. However, we are happy to receive any relevant comments.

Section 2.1 – Class D lineworkers and Class C cable jointers working on underground cables above ground

1. Are Class C cable jointers doing work tasks with high voltage MEC underground electric cables above ground? If they are, specify what work tasks.
2. If you answered yes to 1, are Class C cable jointers adequately trained and qualified to do this work safely? Provide details.
3. If you answered yes to 1, would there be unsafe outcomes or other practical implications if cable jointers were not permitted to do this work? Provide details.
4. Have you experienced any issues or lack of clarity regarding the distinction between what work tasks Class D lineworkers and Class C cable jointers are licensed to do? If so, provide examples.
5. Further to guidance on what work Class C cable jointers may do with underground cables above ground, is additional guidance needed on the licensing framework for Class D lineworkers and Class C cable jointers? If so, provide details.

Section 2.2 – Effective supervision requirements for Class D lineworkers and Class C cable jointers

6. Are Class D lineworkers and Class C cable jointers appropriately skilled and experienced to safely undertake work on underground consumer mains without the supervision of a licensed electrician? Refer to specific work tasks in your answer and provide details.

- 7. Are there any practical issues or challenges resulting from the requirement for Class D lineworkers and/or Class C cable jointers to be under the effective supervision of a licensed electrician when they are jointing, transition jointing, terminating or connecting underground consumer mains? Provide details.**
- 8. Are there any safety risks if Class D lineworkers and/or Class C cable jointers perform jointing, transition jointing, terminating or connecting of underground consumer mains without the effective supervision of a licensed electrician? Provide details.**
- 9. Do you have any other comments on the Exemptions Order as it applies to Class D lineworkers and Class C cable jointers?**
- 10. Do you have any comments on the requirements for a COES to be completed when Class D lineworkers or Class C cable jointers carry out work on underground consumer mains in accordance with the Exemptions Order? Provide details.**

1 Background

This chapter summarises the licensing framework for lineworkers and cable jointers. It also outlines our previous consultation and engagement with industry representatives about the issues affecting the lineworker and cable jointing sectors.

1.1 Overview of the licensing framework

Requirement to be licensed for certain classes of linework

Lineworkers and cable jointers have been required to hold a licence issued by Energy Safe under the Act and Regulations to carry out electrical linework in Victoria since 2021. Electrical linework as defined in the Act is the construction, alteration, repair, maintenance or disassembly of a part of an electricity supply network, which includes electric lines, substations, circuits and any other thing required to transmit, distribute or supply electricity.²

The Regulations specify four (4) classes of electrical linework that require a licence:

- Class D – linework on a MEC distribution supply network
- Class T – linework on a MEC transmission supply network
- Class R – linework on a traction supply network
- Class C – cable jointing work on a MEC distribution supply network.³

The Regulations also specify two (2) limited lineworker licence classes: Supervised Class R, which we no longer issue, and Restricted Class C, which we issue only in very limited circumstances.⁴

We may issue a licence to a person to carry out a certain class of electrical linework if they hold the necessary qualifications or if their standard of qualifications, proficiency and experience is of an equivalent standard to the required qualifications.⁵

Exemptions relating to electrical installation work

Licensed lineworkers and cable jointers are also allowed to do certain electrical installation work, so long as certain conditions are met. The type of electrical installation work allowed with conditions are outlined in the Exemptions Order, with a common condition being that the work is done under the effective supervision of a licensed electrician.

Effective supervision as defined in the Exemptions Order means:

- being present at the site of the electrical work to the extent necessary to ensure that the work is being correctly performed and carried out in accordance with the Act and the Regulations relating to the work and the operation of electrical installations and supply networks; and
- being aware of the details of the electrical work being performed and giving detailed instructions and directions with respect to the electrical work.⁶

² Section 3 of the Act.

³ Regulation 20 and Part A of Schedule 3 of the Regulations.

⁴ Regulation 32 and 33 of the Regulations; Energy Safe's policies regarding the issuing of, and refusal to grant, Class R(S) and Class C(R) licences are available on our website at [lineworker's licence](#).

⁵ Regulation 31 of the Regulations.

⁶ Section 4 of the Exemptions Order.

The supervising electrician is deemed to be the person carrying out the electrical installation work and is required to complete and give a certificate of electrical safety (COES) for the work.⁷

1.2 Previous consultation and engagement

The introduction of licensing for lineworkers and cable jointers

The introduction of licensing for lineworkers and cable jointers was subject to a Regulatory Impact Statement (**RIS**) process. There was widespread acknowledgement of the need for reform to further improve the safety of electrical work, including through clearer and more robust licensing requirements.

However, various issues were raised by stakeholders. Several major companies raised concerns with the proposed licensing of lineworkers, including the scope of cable jointing activities. Stakeholders expressed varied and divergent views about the language, definitions and what should constitute linework for each of the classes of linework specified in the Regulations.

In response, we proposed ongoing stakeholder engagement and the development of policy guidance to support the implementation of the licensing requirements in the Regulations.

Initial engagement with industry representatives

Following the introduction of the licensing requirements, we convened a working group with industry representatives. Participants included representatives from the Electrical Trades Union (**ETU**), the Victorian Electricity Supply Industry (**VESI**), Zinfra, Downer Group, Metro Trains, and Yarra Trams.

The working group sought to develop guidelines on key tasks done by Class D lineworkers and Class C cable jointers, outlining what each licence class was allowed to do in relation to those tasks and any conditions pursuant to the Exemptions Order. However, there were differing views about what tasks Class D lineworkers and Class C cable jointers are licensed to do. Concerns were also expressed regarding the workability of the requirement under the Exemptions Order for Class D lineworkers and Class C cable jointers to be supervised by licensed electricians when doing certain electrical installation work.

Further targeted discussions with industry representatives

We held further targeted discussions with industry representatives to seek feedback about the need for guidance materials and to further understand the issues and differing views.⁸

We heard that the key areas of concern are:

- cross-over or demarcation of work between Class D lineworkers and Class C cable jointers when underground cables are being worked on above ground
- when Class D lineworkers and Class C cable jointers must be effectively supervised by a licensed electrician.

We heard that Class T and Class R lineworkers have a good understanding of, and are not experiencing issues with, the licensing framework. Industry representatives told us these licence classes do not need guidance materials.

We explore the key areas of concern in more detail in chapter 2.

⁷ Sections 41B(1) and 45A of the Act.

⁸ We met with representatives from the ETU, VESI, CPUE, AusNet, Jemena, Zinfra, and Metro Trains. We were unable to make contact with relevant representatives from Yarra Trams or Downer Group.

2 Discussion

This chapter provides greater detail about what we heard during the targeted discussions with industry representatives (see chapter 1) and seeks feedback on key issues.

2.1 Class D lineworkers and Class C cable jointers working on underground cables above ground

What we heard during targeted discussions

Industry representatives told us that a grey area is what work Class C cable jointers are licensed to do when working with underground electric cables above ground. In particular, what work, if any, they can do with high voltage underground electric cables which are raised up poles. They told us that this is unclear from the Regulations, and they would benefit from guidance on this.

We heard that some industry participants have interpreted the Regulations to permit Class C cable jointers to do the following electrical linework when raising and connecting MEC high voltage underground electric cables on poles:

- Terminating the high voltage underground electric cable at the lowest connection point on the high voltage cable head pole, where:
 - The lowest connection point is the demarcation point between the underground network and the overhead network.
- Connecting the terminated high voltage underground electric cable to a piece of de-energised equipment, for example:
 - an earthing system
 - a surge diverter
 - a switching device that is not connected to overhead conductors and cannot be energised without deliberate intervention.

Industry representatives told us that Class C cable jointers are appropriately trained and skilled to safely do this work with high voltage underground electric cables above ground. Some also told us that if Class C cable jointers were not permitted to do this work with high voltage underground electric cables, it could result in a cable being left hanging, which could be perceived as unsafe.

What the Regulations say

Schedule 3 of the Regulations describes the electrical linework that can be carried out by each licence class. The Schedule says that Class D lineworkers and Class C cable jointers can work on underground electric cables above ground as outlined in Table 1 with defined terms as noted below the table (see Appendix A for further details).

The Schedule says that class D lineworkers are licensed to connect and disconnect underground electric cables with any above ground parts of a MEC distribution supply network. The Schedule specifies that Class C cable jointers are licensed to connect underground electric cables to the de-energised load side terminals of low voltage pole mounted switchgear. This is the only aboveground work on underground cables that is specifically called out in the Schedule as being within the remit of Class C cable jointers. Importantly, we note the Schedule does not expressly allow Class C cable jointers to do raising, terminating, and connecting of high voltage underground electric cables on poles – the type of work the industry representatives told us Class C cable jointers are doing.

Table 1: Description of linework that can be carried out on underground electric cables above ground by Class D lineworkers and Class C cable jointers

Class	Description
Class D lineworker	- Jointing, terminating and connecting underground service cables to other parts of an underground MEC distribution supply network ordinarily operated at a voltage exceeding extra low voltage but not exceeding low voltage. - Connecting and disconnecting underground electric cables with any above ground parts of a MEC distribution supply network.
Class C cable jointer	Connecting of underground electric cables to the de-energised load side terminals of low voltage pole mounted switchgear on a MEC distribution supply network.

The Schedule also defines the following relevant terms:

- **Connecting**—the mechanical and electrical connection of electrical cables to each other or to another conductor or electrical equipment in a manner capable of receiving an electric current but does not include jointing.
- **Distribution supply network**—a supply network ordinarily operated at a nominal voltage exceeding extra low voltage but not exceeding 66 000 volts.
- **Jointing**—the joining together of two or more insulated underground electric cables in a manner that meets the specification and construction of the cables being joined.
- **MEC distribution supply network**—a distribution supply network owned or operated by a Major Electricity Company.
- **Terminating**—making ready the end of an insulated underground electric cable in a manner suitable for connection to electrical equipment.
- **Transition jointing**—the joining of two or more cables of differing specification or construction in a manner that maintains, as far as practicable, the characteristics of both cable types.
- **Underground electric cable**—a conductor placed under the ground and includes any part of the conductor that is at or above the surface of the ground.
- **Underground service cable**—an underground electric cable that—(a) has a cross sectional area no greater than 50 millimetres; and (b) is the final span or section of an underground MEC distribution supply network used to connect a premises to electricity supply.

Discussion questions

We welcome your answers to the following questions, which will assist us in formulating guidance for Class D lineworkers and Class C cable jointers:

Questions for consultation
1. Are Class C cable jointers doing work tasks with high voltage MEC underground electric cables above ground? If they are, specify what work tasks.
2. If you answered yes to 1, are Class C cable jointers adequately trained and qualified to do this work safely? Provide details.
3. If you answered yes to 1, would there be unsafe outcomes or other practical implications if cable jointers were not permitted to do this work? Provide details.
4. Have you experienced any issues or lack of clarity regarding the distinction between what work tasks Class D lineworkers and Class C cable jointers are licensed to do? If so, provide examples.
5. Further to guidance on what work Class C cable jointers may do with underground cables above ground, is additional guidance needed on the licensing framework for Class D lineworkers and Class C cable jointers? If so, provide details.

2.2 Effective supervision requirements for Class D lineworkers and Class C cable jointers

What we heard during targeted discussions

Industry representatives raised concerns with the requirement under the Exemptions Order for Class D lineworkers and Class C cable jointers to be effectively supervised by a licensed electrician when working on underground consumer mains.

They told us that disconnecting and connecting of consumer mains in service pits and kiosks is a necessary component of the work of Class D lineworkers and Class C cable jointers. Industry representatives said Class D lineworkers and Class C cable jointers are appropriately trained to perform this work safely. Requiring them to be supervised by a licensed electrician is unnecessary and unduly burdensome.

What the Act, Regulations and Exemptions Order say

Work on consumer mains is electrical installation work

Consumer mains are the conductors between the point of supply and the main switchboard.⁹

Under the Act, a person must not carry out electrical installation work unless they are licensed as an electrical installation worker in respect of that class of work.¹⁰

Work on all or part of a consumer mains is prescribed electrical installation work.¹¹ Whereas repair or replacement of a single component part of a consumer mains is not prescribed work.¹²

Class D lineworkers and Class C cable jointers can carry out work on consumer mains only under effective supervision

The Exemptions Order permits Class D lineworkers and Class C cable jointers to carry out work on underground consumer mains if they are under the effective supervision of a licensed electrician (see Appendix B for more details).¹³

The Exemptions are as follows:

- Exemption 14D – Class D lineworkers may carry out jointing, transition jointing, terminating or connecting of underground consumer mains under the effective supervision of a licensed electrician.
- Exemption 15B – Class C cable jointers may carry out jointing, transition jointing, terminating and connecting of underground cables—which includes an underground consumer mains—under the effective supervision of a licensed electrician.

Class D lineworkers and Class C cable jointers would not otherwise be able to work on consumer mains because it is electrical installation work for which they are not licensed (see discussion below).

Work on consumer mains is electrical installation work requiring a COES

The person who is responsible for carrying out electrical installation work must ensure that a COES is completed for the work.¹⁴ The COES must contain a certificate of compliance completed by the

⁹ Section 4 of the Exemptions Order.

¹⁰ Section 38(a) of the Act.

¹¹ Regulation 249(1)(1) of the Electricity Safety (General) Regulations 2019.

¹² Regulation 249(1)(4) of the Electricity Safety (General) Regulations 2019.

¹³ Exemption 14D (Class D lineworkers) and Exemption 15B (Class C cable jointers) of the Exemptions Order.

¹⁴ Section 45A(1) of the Act.

licensed electrical installation worker who carried out the work.¹⁵ For prescribed electrical installation work, the COES must also contain a certificate of inspection of the installation work completed by a licensed electrical inspector.¹⁶

Where Class D lineworkers and Class C cable jointers carry out work on underground consumer mains in accordance with the Exemptions Order, the licensed electrician who supervises the work is deemed to be the person who carried out the electrical installation work and is responsible for the COES.

Discussion questions

We are seeking to better understand how the requirement for Class D lineworkers and Class C cable jointers to be effectively supervised by a licensed electrician when working on underground consumer mains is working in practice. We want to understand the practical implications of this and the COES requirements.

We welcome your feedback on the following questions regarding the effective supervision of Class D lineworkers and Class C cable jointers undertaking work on consumer mains:

Questions for consultation
6. Are Class D lineworkers and Class C cable jointers appropriately skilled and experienced to safely undertake work on underground consumer mains without the supervision of a licensed electrician? Refer to specific work tasks in your answer and provide details.
7. Are there any practical issues or challenges resulting from the requirement for Class D lineworkers and/or Class C cable jointers to be under the effective supervision of a licensed electrician when they are jointing, transition jointing, terminating or connecting underground consumer mains? Provide details.
8. Are there any safety risks if Class D lineworkers and/or Class C cable jointers perform jointing, transition jointing, terminating or connecting of underground consumer mains without the effective supervision of a licensed electrician? Provide details.
9. Do you have any other comments on the Exemptions Order as it applies to Class D lineworkers and Class C cable jointers?
10. Do you have any comments on the requirements for a COES to be completed when Class D lineworkers or Class C cable jointers carry out work on underground consumer mains in accordance with the Exemptions Order? Provide details.

¹⁵ Section 44 of the Act.

¹⁶ Sections 45 and 45A(2) of the Act.

3 Next steps

Interested parties are invited to provide written submissions addressing our questions by **12:00 pm (noon) Monday 27 October 2025**. You can submit on as many or as few questions as you wish.

We'll use your feedback to refine the draft guidance statement and to understand whether additional actions are required in relation to the licensing framework for lineworkers and cable jointers.

As set out above, we are open to meeting with individual stakeholders to discuss specific feedback. If you would like to arrange a meeting, please contact us at consultations@energysafe.vic.gov.au.

Appendix A

Relevant parts of Schedule 3 of the Regulations, which outlines the description of electrical linework that can be carried out by each licence class holder, are reproduced in the Table A1. Bolded terms are defined terms in Schedule 3 of the Regulations as reproduced in Table A2.

Table A1: Description of electrical linework that can be carried out by Class D lineworkers and Class C cable jointers

Class	Description
Class D lineworkers	- electrical linework carried out on a MEC distribution supply network limited to— - the installation, maintenance, modification, stringing, tensioning, terminating, securing, connection and disconnection of overhead electrical conductors; and - the installation, maintenance, modification, securing, connection and disconnection of associated electrical distribution equipment; and - the connection and disconnection of pole mounted or ground type transformers with an MEC distribution supply network; - electrical linework limited to the jointing, terminating and connecting of underground service cables to other parts of an underground MEC distribution supply network ordinarily operated at a voltage exceeding extra low voltage but not exceeding low voltage; and - electrical linework limited to connecting and disconnecting underground electric cables with any above ground parts of an MEC distribution supply network.
Class C cable jointers	- electrical linework carried out on a MEC distribution supply network limited to the jointing, transition jointing, connecting or terminating of underground electric cables; and - electrical linework carried out on a MEC distribution supply network limited to the connecting of underground electric cables to the de-energised load side terminals of low voltage pole mounted switchgear; and - electrical linework carried out on a MEC distribution supply network limited to the jointing and terminating of high voltage aerial bundled cables.

Table A2: Defined terms

Term	Definition
Associated electrical distribution equipment	Any of the following— - pole mounted insulators - pole mounted switchgear including isolators, fuse switches, drop out switches, sectionalisers and surge arrestors - vibration dampers - crossarms.
Conductor	The whole or any part of a wire, cable or other thing used, or designed to be used, for the purpose of transmitting, distributing or supply electricity.

Connecting	In relation to an electrical cable, means the mechanical and electrical connection of electrical cables to each other or to another conductor or electrical equipment in a manner capable of receiving an electric current but does not include jointing.
Distribution supply network	A supply network ordinarily operated at a nominal voltage exceeding extra low voltage but not exceeding 66 000 volts.
Jointing	In relation to an electrical cable, means the joining together of two or more insulated underground electric cables in a manner that meets the specification and construction of the cables being joined.
MEC distribution supply network	A distribution supply network owned or operated by a Major Electricity Company.
Overhead electrical conductors	Conductors that are placed above the ground or water and in the open air.
Terminating	In relation to an electrical cable, means making ready the end of an insulated underground electric cable in a manner suitable for connection to electrical equipment.
Transition jointing	The joining of two or more cables of differing specification or construction in a manner that maintains, as far as practicable, the characteristics of both cable types.
Underground electric cable	A conductor placed under the ground and includes any part of the conductor that is at or above the surface of the ground.
Underground service cable	An underground electric cable that— • has a cross sectional area no greater than 50 millimetres; and • is the final span or section of an underground MEC distribution supply network used to connect a premises to electricity supply.

Appendix B

Relevant parts of the Exemptions Order which outlines the electrical installation work that can be carried out by Class D lineworkers and Class C cable jointers are reproduced in Table B1. Bolded terms are defined terms in the Exemptions Order as reproduced in Table B2.

Table B1: Electrical installation work that can be carried out by Class D lineworkers and Class C cable jointers

Exempt Person	Exemption
Class D lineworker	Sections 36 and 38(a) of the Act do not have effect in relation to a Class D lineworker who carries out the following work on electrical installations— A. the repair or replacement, for the purpose of restoring electricity supply to a consumer, of apparatus installed at the junction between a MEC's conductors and the consumer's conductors or on a panel provided solely for a MEC's metering and control equipment; B. work on high voltage aerial electric lines in an electrical installation and associated pole mounted and pad mounted substations and equipment; C. work on low voltage aerial electric lines in an electrical installation and associated equipment installed for the control or protection of those lines; D. the jointing, transition jointing, terminating or connecting of underground consumer mains. Conditions This exemption is subject to: (a) in the case of the exempt person carrying out the work referred to in paragraph (A), being authorised by a MEC or network infrastructure company to carry out electrical installation work of that type; and (b) the exempt person carrying out the electrical installation work under the effective supervision of a licensed electrician. Note: in accordance with sections 41B(1) and 45A of the Act, the supervising electrician is deemed to be the person carrying out the electrical installation work and is required to complete and give a certificate of electrical safety for the work.
Class C cable jointer	Sections 36 and 38(a) of the Act do not have effect in relation to a Class C cable jointer who carries out the following work on electrical installations— A. the repair or replacement, for the purpose of restoring electricity supply to a consumer, of apparatus installed at the junction between a MEC's conductors and the consumer's conductors; B. the jointing, transition jointing, terminating and connecting of underground cables. Conditions This exemption is subject to: (a) in the case of the exempt person carrying out the work referred to in paragraph (A), the exempt person being authorised by a MEC or network infrastructure company to carry out electrical installation work of that type; and

	(b) the exempt person carrying out the electrical installation work under the effective supervision of a licensed electrician. Note: in accordance with sections 41B(1) and 45A of the Act, the supervising electrician is deemed to be the person carrying out the electrical installation work and is required to complete and give a certificate of electrical safety for the work.
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Table B2: Defined terms

Term	Definition
Certificate of electrical safety	The certificate of electrical safety required to be completed and given under section 45A of the Act.
Consumer mains	The conductors between the point of supply and the main switchboard.
Effective supervision	In relation to electrical work means being present at the site of the electrical work to the extent necessary to ensure that the work is being correctly performed and carried out in accordance with the Act and the regulations relating to the work and the operation of electrical installations and supply networks, and being aware of the details of the electrical work being performed and giving detailed instructions and directions with respect to the electrical work.
Jointing	In relation to an electrical cable, means the joining together of two or more insulated underground electric cables in a manner that meets the specification and construction of the cables being joined.
Main switchboard	A switchboard from which the supply to the whole electrical installation can be controlled.
MEC	A major electricity company as defined in section 3 of the Act.
Network infrastructure company	A contractor who is engaged by a major electrical company to carry out electrical linework on the supply network of the major electricity company.
Terminating	In relation to an electrical cable, means making ready the end of an insulated underground electric cable in a manner suitable for connection to electrical equipment.
Transition jointing	The joining of two or more cables of differing specification or construction in a manner that maintains, as far as practicable, the characteristics of both cable types.
Underground electric cable	A conductor placed under the ground and includes any part of the conductor that is at or above the surface of the ground.