AusNet

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Ian Burgwin
General Manager – Regulatory Operations
Energy Safe Victoria
Level 22/2 Southbank Blvd
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By email: consultations@energysafe.vic.gov.au

Dear Mr Burgwin,

Re: Consultation on lineworkers and cable jointers

AusNet welcomes the opportunity to provide feedback to Energy Safe Victoria (**Energy Safe**) on its consultation paper relating to guidance and effective supervision of Class D lineworkers and Class C cable jointers (**consultation**).

Leveraging AusNet's extensive experience in distribution network management and operations, including the safe implementation of lines and cable work, we support further guidance around Class D lineworkers and Class C cable jointers responsibilities and capabilities and a review of supervision requirements for these roles. We believe this will improve clarity and consistency of the application of the rules in the industry and apply a pragmatic approach to supervision of lines and cable jointing work.

We have provided answers to the consultation questions in the Appendix. By way of summary, the key matters for Energy Safe's consideration are as follows:

- Class C cable jointers already conduct above ground works that interface with underground high voltage (**HV**) major electricity company (**MEC**) cabling works, and they are fully trained and skilled to deliver these works. We support Energy Safe clarifying in their guidance that Class C cable jointers should continue to conduct this work, outlining the type of above ground works that should be included in the scope of responsibilities. We believe that prohibiting cable jointers from above ground works would increase safety and operational risks, create resource constraints and raise costs for both service providers and customers.
- AusNet believes that Class D lineworkers and Class C cable jointers are sufficiently trained and skilled to work on underground consumer mains without supervision by a licensed electrician. Mandatory supervision is unlikely to deliver safety improvements and introduces complexities, duplication and higher costs to service providers and customers. We support a risk-based approach to supervision based on experiences and complexity of works, aligned with VESI and national training standards.
- We do not consider the Certificate of Electrical Safety (**COES**) is required when Class D lineworkers or Class C cable jointers carry out work connecting consumer mains. The existing safety training, controls and quality standards under which Class D lineworkers or Class C cable jointers operate should provide sufficient assurance of safety and quality, similar to all other electrical work that MECs carry out on a daily basis. We believe that COES would add additional costs to network service providers and customers without additional safety benefits.

We thank Energy Safe for the opportunity to provide feedback into the consultation. Please do not hesitate to contact me if you have any questions about our submission.

Yours sincerely

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[redacted]

AusNet

Appendix

Table 1: AusNet's response to consultation questions

QUESTION	RESPONSE
1. Are Class C cable jointers doing work tasks with HV MEC underground electric cables above ground? **If they are, specify what work tasks.**	Yes, Class C cable jointers conduct tasks with HV MEC underground electric cables above ground. AusNet considers that the above ground tasks that are required when conducting underground tasks are within the scope of cable jointers' responsibilities and capabilities. These tasks include: • Jointing, terminating and maintaining HV MEC underground cables with interfaces with above ground equipment (e.g., substations and cable ends). • Jointing and terminating HV MEC aerial bundled cables, typically performed above ground on poles. • Testing, commissioning, fault finding and operating HV underground cables at above ground access points, including testing, and switching operations. • Connecting MEC underground electric cables to terminals of low voltage (**LV**) pole mounted switchgear. • Erecting public lighting poles and installing, repairing and replacing public lighting circuits supplied by network underground electric cables.
2. If you answered yes to 1, are Class C cable jointers adequately trained and qualified to do this work safely? **Provide details.**	Class C cable jointers are adequately trained and qualified to safely perform unrestricted jointing, terminating, testing and maintenance tasks on HV MEC underground electric cables, including above ground work as this is within the scope of their training and work (as described in our response to question 1). Class C cable jointers complete the national Certificate III in ESI – Distribution Underground (UET30821), which includes both theoretical and practical components. In Victoria, the course is highly prescriptive which provides consistency in competencies across cable jointers. The training covers HV cable jointing, terminating, testing and maintenance including above ground tasks at cable terminations, joints, substations, pole mounted switchgear and public lighting installations. The training incorporates strict adherence to work health and safety regulations, codes of practice, and VESI standards. Cable jointers are taught safe work methods, risk management and environmental requirements, and to operate plant and equipment safely near live electrical apparatus. Supervision requirements are embedded in the training and reinforced by VESI. Ongoing refresher training and competency assessments are standard practice to prevent 'competency fade' and maintain high safety performance. Details of the training can be found here: • https://training.gov.au/Training/Details/UET30821 • https://vesi.com.au/skills-and-training/.
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.**	Prohibiting cable jointers from performing above ground tasks with HV MEC underground electric cables would likely result in an increase in safety and operational risks while also increasing costs to service providers and customers. These are explained in more detail: • **Increased safety risk** - cable jointers are trained for, and have expertise in, managing the specific safety hazards associated with HV cables, including above ground interfaces and live electrical apparatus. Isolating the above ground work to other less qualified personnel who are not skilled in the same hazards inherent in work with HV underground cables would likely increase the risk of safety incidents and installations that are of lower

	quality and unsafe. There is no safety reason to isolate the above ground tasks as Class C cable jointers are trained, capable and aware of safety hazards involved in completing underground works. • **Resource constraints** – AusNet and the energy sector are already experiencing skills shortages. Limiting tasks that qualified cable jointers can carry out while completing a job would require additional resourcing in an already limited resource pool. It would also require coordination of multiple resources to complete a job which adds complexity and would likely impact timeliness of operations. • **Disruption to operations** – If cable jointers were not able to complete the above ground tasks, this would require additional resourcing and more coordination between multiple resources (as opposed to a single resource that does all the tasks at the same time). The requirement to arrange and coordinate additional resourcing would likely lead to delays in maintenance, network upgrades and fault response, ultimately resulting in poorer services and higher costs for customers. • **Higher costs** – the above mentioned impacts would ultimately lead to higher cost to AusNet's customers, without additional benefits and with potentially higher safety risk and poorer service. This includes higher cost of network management and operations which are passed onto customers, as well as higher direct costs for jobs that are customer funded.
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.**	AusNet and AusNet's service providers have experienced situations where the lack of clarity around what above ground tasks Class C cable jointers can result in uncertainty and job delays. For example: • Uncertainty has arisen during network upgrades or fault repairs where the installation and maintenance of public lighting circuits supplied by underground cables sometimes falls into a grey area between the two licence classes, resulting in delays while management clarifies responsibilities. • In some cases, work has been paused or required additional resources during above ground works where there was uncertainty around whether cable jointers were allowed to conduct the work, despite having the capability and training to do so. This has resulted in increased costs and complexity of jobs, due to lack of certainty. We support Energy Safe clarifying that Class C cable jointers can conduct above ground interface works, such as substations or pole mounted switchgear, which reduces the need to engage a Class D linesperson for that element of a job.
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.**	We encourage Energy Safe to consider the following: • Clarification that the standing of poles is not electrically licensed work and that this extends to the standing of public lighting columns and fixing of associated hardware. • Clarification that metering tasks are unlicensed work and that this extends to Class C cable jointers where they hold the relevant Units of Competency for energy metering. Class C cable jointers undertake 'UETDRDU007 Install and maintain underground public lighting and Class D lineworkers undertake 'UETDRIS013 Install and maintain public lighting systems or previous equivalents', which includes the above tasks.
6. Are Class D lineworkers and Class C cable jointers appropriately skilled and experienced to safely	Class D lineworkers and Class C cable jointers are appropriately skilled and experienced to safely undertake work on underground consumer mains without the supervision of a licensed electrician. In addition, the scope of work of some underground consumer mains (e.g., new connections installed with the

undertake work on underground consumer mains without the supervision of a licensed electrician? **Refer to specific work tasks in your answer and provide details.**	use of energised network assets) are not within the training or skill set of licenced electricians, which limits their ability to supervise the work and could lead to less safe outcomes if supervision is mandatory. Class C cable jointers are trained and qualified to perform unrestricted jointing, terminating, testing and maintenance of both HV and LV underground cables, including underground consumer mains. Their training (such as UET30821 Certificate III in ESI – Distribution Underground) covers all relevant safety protocols, including work health and safety regulations, risk management and safe work methods for underground assets. They are also proficient in essential safety procedures, such as testing of connections to LV electricity networks, which is critical for verifying the integrity and safety of underground cable installations. Class D lineworkers may undertake limited cable jointing tasks on underground consumer mains if they hold the relevant national unit UETDRIS011 – Install and maintain LV underground services which is mandatory training in Victoria and forms part of the lineworkers qualification. This allows them to complete the connection, repair and replacement of service cables and hardware between the customer's connection point to the MEC cables inside a pillar or pit, including testing of connections to LV MEC networks where required. These capabilities and expertise are sufficient to conduct the necessary work on underground consumer mains and any related above ground work without the mandatory supervision of licenced electricians. Supervision should be applied using a risk-based approach based on experience and complexity of the work, consistent with the VESI framework and the national training requirements. This would lead to more efficient outcomes and resourcing, improving network operations and reducing unnecessary costs to customers.
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.**	As explained in our response to question 6, the capabilities and expertise of Class C cable jointers and Class D linesworkers are sufficient to conduct the necessary work on underground consumer mains without the mandatory supervision of licenced electricians. Mandatory supervision requires additional resourcing, coordination and costs, without safety or operational benefits. Supervision should be determined using a risk-based approach based on experience and complexity of the work, consistent with the VESI framework and the national training requirements. This would lead to more efficient outcomes and resourcing, improving network operations and reducing unnecessary costs to customers. Additionally, where the licenced electricians do not have training or skills in the work undertaken by the cable jointers or linesworkers, mandatory supervision requirements can create heighted safety risk and are impractical to implement.
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.**	Consistent with our responses to questions 6 and 7, we support a risk-based approach to supervision based on experience and complexity of the work, consistent with the VESI framework and the national training requirements. Under a risk-based framework, Class D lineworkers and Class C cable who are trained, skilled and experienced in the work, and operate within their training and licences, would be expected to conduct their work without supervision by a licenced electrician without impact to safety. Conversely, where the licenced electricians do not have training or skills in the work undertaken by the cable jointers or linesworkers, mandatory supervision requirements can create heighted safety risk.

9. Do you have any other comments on the Exemptions Order as it applies to Class D lineworkers and Class C cable jointers?	N/A
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.**	We do not consider the COES is required when Class D lineworkers or Class C cable jointers carry out work on underground consumer mains and related above ground works. The existing safety training, controls and quality standards under which Class D lineworkers or Class C cable jointers operate should provide sufficient assurance of safety and quality, similar to all other electrical work that MECs carry out. MECs have extensive experience and expertise in electrical work, including in customer connections which is evidence in high safety performance over decades. Removing the requirement to undertake a COES would result in significant cost savings for customers, while maintaining safety and quality standards.