

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Lineworkers and Cable Joints Termination
Date: Wednesday, 17 September 2025 4:39:28 PM
Attachments: [REDACTED]

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Hi,

Section 2.1

Question 1 - Yes Cable Jointers on the Citipower network are Currently Working on High Voltage MEC underground cables above the ground.

List of tasks

- Installation of HV cables on poles - Dressing/securing the HV cable up the pole, (through Live LV if Required - Matting the LV OH lines as applicable)
- Installation of the HV cluster Bracket/LA's if required
- Trifurcation of the HV cable and termination onto the LA's
- Termination of HV ABC cables

Question 2. Cable Jointers are adequately trained to complete these Works.
Cable jointers/Lineworkers hold the same Core units of their apprenticeships as follows

CPCCLDG3001	Licence to perform dogging
TLILIC0005	Licence to operate a boom-type elevating work platform (boom length 11 metres or more)
UEECD0007	Apply work health and safety regulations, codes and practices in the workplace
UEECD0019	Fabricate, assemble and dismantle utilities industry components*
UEECD0044	Solve problems in multiple path circuits*
UEECD0046	Solve problems in single path circuits*
UEECD0051	Use drawings, diagrams, schedules, standards, codes and specifications*
UEEEL0020	Solve problems in low voltage a.c. circuits*
UEEEL0021	Solve problems in magnetic and electromagnetic devices*
UETDREL001	Apply environmental requirements
UETDREL004	Operate plant and equipment in the vicinity of live electrical apparatus*
UETDREL005	Work safely in the vicinity of live electrical apparatus*
UETDRIS008	Install and maintain electrical apparatus*

In addition to these Cores UG jointers are also trained in the Jointing and terminating Live Low voltage Underground cables, this training involves the use of matting techniques and the identification of different potentials and or second points of contacts.

Question 3. - Yes, if cable jointers are no longer permitted to undertake this works the Safety implications will be high. OH Line workers are concerned only with OH lines only. There have been numerous instances of UG cables on the Citipower network being damaged during installation by OH workers. The bending radius is not maintained and the cable is not dressed up neatly/to the correct measurements leaving HV cables with reduced clearances and not to our standards. - See attached images of HV cable heads completed by UG Jointers

Question 4. Yes there is a major lack of distinction with the OH/UG license and the delineations. For HV we have used the LA bracket as the line. UG work up to this and the OH connection (HV droppers and line connection) done by OH. LV is very confusing. Underground jointers historically used to complete Terminations above ground and connected the cable live into Switches ect. We now need clarity on what the de energised load side of a connection is. If we are running an LV ect out of a substation up a pole to a new switch technically we are the line side and the OH are the load side. UG jointers should have the ability to make any live connections/disconnection of any UG cable to any part of the network (as we historically used to prior to licensing). We install and maintain these cables, we understand their limits and capabilities more than an OH lineworker.

Question 5 - Especially in the Citipower network more scope needs to be given to a class C Jointers. Historically prior to the priveristation of the Citipower network all works undertaken in the CBD was done by cable jointers, Currently we are still required by OH to make and break live connections within Wall boxes, Pillars, public lighting poles ect as the cables are old paper insulated cables and they do not have the knowledge/skill set to work on them safely. We have had instances recently of cables failing inside these wall boxes while being manipulated by OH responding to FAULTS, Most OH are used to working with Plastic cables and are unaware of the dangers of the Paper lead insulated cables on the UG Citipower network.

Section 2.2

Question 6 - Underground jointers are highly trained in working with Consumer mains. We IR test cables every day, we fault location, repair and restore faults daily. Understanding the IR results/Continuity of a UG cable is second nature. we install and maintain UG cables that power full areas not just a single installation. The risk associated with completing these tasks are far greater than that of a single premises. We are trained and to work live and conduct NST testing which electricians are not allowed to do.

Question 7 - requiring a line worker or Cable jointer to be under the supervision of a licenced electrician is pointless, the training provided by our networks which we refresh far outweighs the input an Electrician can provide. From personnel experience dealing with the replacement of consumer mains ect the REC that is engaged looks to us for guidance, not the other way round.

Question 8 - No I don't believe any safety risk are present by us completing these works. It would only add to costs charged to a customer from having their REC onsite

Question 10. A documented NST test proves this installation has been connected in accordance to VESI requirements. This in itself sits outside a COES as an additional level of protection. we already have LEIs onsite to conduct testing in more complex scenarios.

The issue with the industry is everything is OH focused. Anyone has worked within a complex MEC network which is predominately underground understands how highly skilled the underground cable jointers are. I would say are far greater skilled than the OH lineworkers, and the discussion regarding restricting highly skilled jointers from completing their tasks is one that will lead to greater risk to the unskilled people who will be forced to pick up the work.

Thank you

[REDACTED]
Citipower / Powercor Network Services
35 Rooney St, Burnley 3121
Phone: [REDACTED]
Mobile: [REDACTED]
Email: [REDACTED]

OUR VALUES: Live Safely, Make it easy for your customer. Be the best you can be. Be community minded. Drive and embrace change. Succeed together.

From: [REDACTED]
To: [Consultation](#)
Subject: RE: Consultation for lineworkers and cable jointers
Date: Monday, 29 September 2025 5:04:14 PM
Attachments: [image001.png](#)

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Hi ESV,

Please see my answers to questions set out in the published consultation in blue. Please note this is supplementary to my colleagues earlier email so it may seem repetitive in some text and also note this was drafted over a few days between shifts.

Section 2.1:

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.

Yes, Class C cable jointers employed in the CitiPower Pty network regularly perform tasks on high voltage MEC cables above ground.

Class C cable jointers undertake the following “above ground” tasks;

- Install, maintain, replace and test HV cables on poles, which include the erection, dressing, attaching and securing the HV cable up the pole or structure (Through Live Low voltage and/or DC if required, with the appropriate matting/insulating as required)
- Install HV cluster brackets, Lighting arrestors, sheath voltage limiters, possum proofing of ‘Cable head poles’ as required.
- Trifurcation and Termination of HV XLPE and PILC (MIND) cables to LA Brackets as per CP’s GE tech standard.
- Termination of HV ABC Screened and non-screened (legacy systems).
- Attachment of HV test leads to conduct PD, TD and VLF testing of HV cables which terminate on CHPs.
- Maintenance of 66kV terminations by means of shrink-back repair kits assembled by the terminations manufacturer or the augmentation of cross bonding leads.

2. If you answered yes to 1, are Class C cable jointers adequately trained and qualified to do this work safely? Provide details.

Yes, class C cable jointers are adequately trained to complete these tasks. Class C cable jointers and class D line workers study the same core units during their apprenticeships and hold them throughout their careers.

These units have been outlined in my colleague’s previous e-mail.

In addition to the core units outlined class C cable jointers are trained in the jointing and terminating of energized low voltage XLPE cables, with a few CitiPower jointers trained in jointing and terminating energised PILC cables.

This further increases class C cable jointers ability to ensure adequate matting techniques are employed during tasks on poles and in my opinion further enhances class C cable jointers ability to identify second points of contact in all tasks above ground, on or below.

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

Yes. Prohibiting class C cable jointers from working above ground would jeopardise the safety and integrity of the

asset and personnel. By restricting class C cable jointers from carry out these works above ground you shift the workload and responsibility onto an individual with less training, experience, knowledge, and attention-to-detail regarding XLPE, PILC and EPR cables. I understand Class D line workers may hold a "competency" in performing certain HV XLPE tasks, but they are not adequately trained in doing so. This is no fault of their own, it's just what the education system inside the power industry has become.

There have been many documented and un-documented of cables being damaged in Victoria by class D line workers, to mention a few we have had new HV cables (not yet energised) drilled into on poles when line workers were mounting cross arms, centre phases kinked due to class D line workers trying to 'set' the cores onto the LA bracket, cables coiled around a pole because they were too long for the new pole being stood (no prior consultation with UG crews), LA studs sheered due to excessive use of Impact drivers, seized studs due to no anti-seize applied, no KOZ bracket installed 300mm below the crutch allowing the cables to sag and concertina, The snapping of studs on HSL terminations.

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

Since licences were brought into force there has been a major lack of distinction regarding the delineation between OH and UG. For HV the LA bracket has been used, UG work up to the LA bracket and OH complete the connection between the LA bracket and the OH line. Prior to licencing, UG completed everything (with higher quality).

LV is still confusing. Jointers have historically been able to connect into FSDs to either a live or de-energised line or load side of the switch however since licencing we require clarity on what is a "de-energised load side" is as if the FSD is supplied via an UG cable from a substation then the UG cable is the Line side. as mentioned earlier by my colleague, Jointers should have their previous abilities reinstated and be allowed to make any live connections or disconnections of any and all UG cables across the network. Again as we will point out, CP Jointers Install, maintain and operates these cables everyday. We understand their limits and capabilities far more than any OH line worker.

Section 2.2:

6. Are Class D line workers 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.

Underground jointers are highly trained in working with Consumer mains. We IR test cables every day, we fault location, repair and restore faults daily. Understanding the IR results/Continuity of a UG cable is second nature. we install and maintain UG cables that power high-rises, public lighting, traffic lights all the way up to suburbs, not just a single premises. The risk associated with completing these tasks are far greater than that of a single premises. We are trained to work live and conduct NST testing which electricians are not trained nor authorised to do.

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.

Requiring a qualified line worker or cable jointer to operate under the supervision of a licensed electrician is not only unnecessary but also undermines the specialised expertise of both trades. The training and ongoing refresher programs delivered by the networks are highly rigorous and tailored to the complexities of our high-voltage and low-voltage distribution systems. They far exceed the scope of knowledge an electrician could realistically contribute to this matter. From real world field experience, particularly with consumer mains replacements and similar works, it is often the case that the engaged REC seeks guidance from the jointers or line workers, rather than the other way around. This highlights the imbalance in relevant expertise between the two roles. To mandate supervision by an electrician in such circumstances can therefore be seen as slightly insulting to the professionalism of lineworkers and cable jointers. These trades have long been recognised within the industry for their specialised skills, high safety standards, and ability to carry out complex network tasks that fall well outside the usual training or experience of a licensed electrician. In practice, electrician oversight in this area adds no tangible safety or operational benefit, but instead risks diminishing the standing of highly trained network personnel.

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.

No. There are no additional safety risks if Class D lineworkers or Class C cable jointers perform any works on consumers mains without the supervision of an REC. On the contrary, requiring such supervision would be counterproductive, as it places oversight in the hands of individuals who often lack the specialised training relevant to the task and a waste of money to those who the costs would be forwarded onto i.e. the customer.

9. Do you have any other comments on the Exemptions Order as it applies to Class D lineworkers and Class C cable jointers?

No I do not have any further comments.

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.

I would support the requirement of a Coes form to be completed in these circumstances documented NST already provides assurance that the installation has been connected in accordance with VESI requirements. This test verifies polarity, continuity, and integrity at the point of supply and in doing so serves as an additional level of protection outside of the COES framework. In more complex scenarios such as multi-occs an Licensed Electrical Inspectors (LEIs) is already engaged and present to conduct the necessary verification and testing.

That said, I agree that a coes should still be completed. The coes provides a consistent regulatory record, formalises the compliance outcome and ensures alignment with statutory requirements for consumer mains work. In practice, combining the documented NST with a COES delivers both technical assurance and regulatory accountability, strengthening confidence in the integrity and safety of the installation.

The power industry has historically maintained a strong focus on overhead line work; however, this does not reflect the increasing reliance on complex underground networks, particularly within the CBD . Cable jointers operating in Citipower possess highly specialised skills that are essential for the safe and reliable operation of our critical infrastructure. Proposals to restrict or diminish the scope of work a jointers can perform would not only create unnecessary risk to network assets and personnel but would also undervalue a trade (i'd argue profession) that is fundamental to the future of power generation, transmission, and distribution. A balanced recognition of both line worker and cable jointer competencies is essential to support a resilient and modernised network.

I encourage ESV and all regulators to continually reach out as they have done, to those of us who work in these professions. The power industry is a highly complex machine and the insights of experienced persons in the industry can provide on how regulatory setting play out in practise is invaluable. Ongoing consultations with jointers, lineworkers, electrical fitters, protection testers and meter technicians ensures safety, reliability and practicality remain at the centre of regulatory decision making.

Respectfully

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Mobile: [REDACTED]

E-mail: [REDACTED]

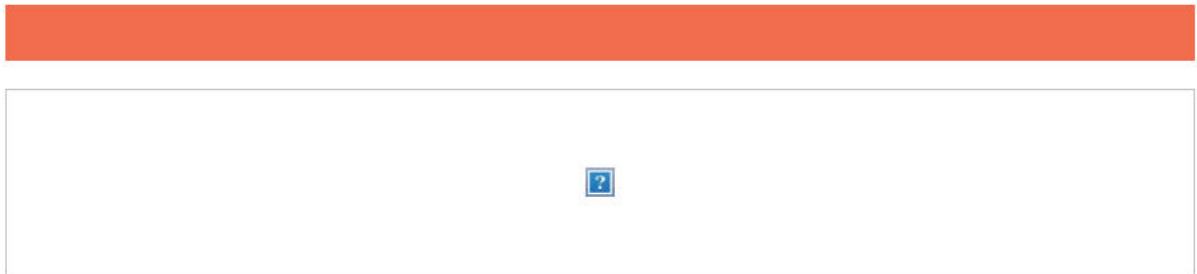


From: Energy Safe Victoria <consultation@energysafe.vic.gov.au>

Sent: Wednesday, 17 September 2025 2:47 PM

To: [REDACTED]

Subject: Consultation for lineworkers and cable jointers



Consultation for lineworkers and cable jointers

Energy Safe Victoria is consulting about matters impacting Class D lineworkers and Class C cable jointers.

We want to hear from you

We are interested in your feedback on two key topics:

- **Guidance:** work tasks being done by Class D lineworkers and Class C cable jointers. This includes what work Class C cable jointers are doing with high voltage underground electric cables above ground. Your feedback on this will help us understand what guidance materials are needed.
- **Effective supervision:** the requirement for Class D lineworkers and Class C cable jointers to be under the effective supervision of a licensed electrician when working on underground consumer mains (as required by the Electrical Safety Exemptions Order 2020 (Exemptions Order)). Feedback on this topic will help us understand how the exemptions order is working in practice.

How to make a submission

You can read more about these topics and our questions in the consultation paper. You can access it on our [consultation webpage](#). We welcome a submission from you about feedback on any or all of these matters.

To make a submission or for any questions, please email consultation@energysafe.vic.gov.au.

You can also reach out to your HSR for more information.

All submissions will be treated as public and able to be published on our website unless clearly marked as confidential.

Feedback on the consultation paper closes Monday 27 October at 12pm (noon).

Energy Safe. Always.



Level 22, 2 Southbank Boulevard, Southbank VIC 3006 | Ph: (03) 9203 9700
energysafe.vic.gov.au | info@energysafe.vic.gov.au

This email was sent by Energy Safe Victoria, Level 22, 2 Southbank Boulevard, Southbank Vic 3006 to [REDACTED]

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From: [REDACTED]
To: [Consultation](#)
Cc: [REDACTED]
Subject: Class D lineworkers and Class C cable jointers: guidance and effective supervision Part 1
Date: Tuesday, 14 October 2025 5:59:52 PM
Attachments: [ESV Cable Jointer Guidance 1.docx](#)

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Hello,

Please find attached my response as requested to the Class D lineworkers and Class C cable jointers: guidance and effective supervision requirements.

I have been a Cable Jointer (ex SEC) in the VESI environment for 38 years and an Overhead Liworker for 30 years. I am currently [REDACTED]

[REDACTED] and would like to be kept informed of any ongoing Cable Jointing discussions into the future as we hear nothing from either our union or our company as to any direction changes or operational issues.

I am also happy to make myself available at any stage to be involved with any meetings you may have in relation to Cable Jointing issues involving other stake holders and interested bodies moving forward as I am very passionate about obtaining the best result for the Cable Jointing fraternity but understand that it must be done fairly so as not to disadvantage anyone else.

Thanks

[REDACTED]

[REDACTED]

Cable Jointer/Line Worker

[REDACTED]

[REDACTED]

[REDACTED]

Ph: [REDACTED]

ESV response

CLASS D LINEWORKERS AND CLASS C CABLE JOINTERS WORKING ON UNDERGROUND CABLE ABOVE GROUND

2.1/1

Are Class C Cable Jointers doing work tasks with high voltage MEC underground electric cables above ground?

If so specify what work tasks.

Yes they are. Cable Jointers do not dictate where or what HV UG cables are run to or terminated to but are still required to do the task of terminating regardless of the structure, pole, switch gear or transformer. Our work is dictated by what the task is NOT where it is. We then put systems and processes in place including training to mitigate any risk to the jointer and keep them safe in what ever environment that may be.

I have been required to perform cable jointing and terminating task in all sorts of locations such as,

On a pier over water, under a pier over water, down in a tunnel for a mining company, up poles, on scaffolding, from an EPV, cable structures, in terminal and zone substations, 30 meters in the air on a cable tray at Alcoa in the middle of the Otways to the middle of Melbourne CBD, from the highest point in Victoria at Cabramurra in the snowy scheme to working on the Baselink VIC to TAS underwater cable, in trenches and jointing pits. So as you can see the type and location of work is vast and on each occasion the work was performed safely and with out incident due to the training we undertake and the procedures we follow. It doesn't, matter where the jointing task is, it only matters that we do it safely and ensure we do not do work where on equipment we are not trained, authorised or licensed to do.

We are required to run and install cable on poles/cable support structures/ zone sub transformers/cable trays (All Above Ground) and trenches/Tunnels/HV pits and banks of conduits.

During installing UG cables on poles we need to ensure the correct pulling tension is not exceeded when installing otherwise damage can occur effecting the structural integrity of the cable causing the cable to fault.

We also ensure cable bending radius is not exceeded as this is detrimental to the safe operation of the cable also and could leading to cable failure if incorrectly installed.

We ensure correct cable clamping system used on poles and structures are correctly spaced and tensioned to ensure the cable is supported so as to eliminate any damage to cable and does not come away from pole.

We ensure the cable is installed properly at base of pole and correct embedment material(right type and size of sand) is used around cable as per regulations.

The correct amount of sand and cable protection is used at the base of the pole (cover slab) so as to protect the cable and mitigate a cable strike by third party as per regulations.

We install the correct type and size cover guard over the cable on the pole in alignment with electrical regs.

We ensure the correct cable destination labels and BYD signs are installed onto pole correctly.

Some other tasks we perform on HV cable and termination at the top of the pole are listed below but not limited to.

- Dress HV cable up pole
- Terminate UG cable in the air
- Cable screens terminated and connected correctly to earth cable.
- Install earth cable
- Install LA Bracket
- Set and bolt cable to LA
- HV cable Identification Test (Prove HV Phasing)
- HV cable Insulation Resistance Test
- HV Partial Discharge test
- HV Tan Delta test
- HV VLF test
- Repair faulted terminations on poles
- Work on HV ABC terms at top of poles
- HV Hybrid cable works on poles.
- Remove/Reattach HV UG cables from pole when replacing a pole.
- Work on Aerial Supervisory Cable on poles.
- Earthing HV UG cable terminations in preparation to issuing an Electrical Access Permit.(this done up through bare live lv conductors that require matting in some situations.

2.1/2

Are class c cable jointers adequately trained and qualified to do this work safely.Details below.

Yes they are

They have been for as long as there has been Cable Jointers which goes back to the start of the SEC. I am unsure what the motivation is to raise this particular issue now but if we need to have a review of the VESI training standards then it needs to apply to both lineworker electrical streams (oh&ug) to determine any deficiencies.

Cable Jointers are required to be Cert III qualified in UET30821 Distribution Underground. This training involves but not limited to the following examples of modules in the qualification and VESI refresher training that demonstrates training and qualifications to perform this work on poles.

- Cert III qualification in underground Distribution
- UETDRDU016 Lay power cables is the national code for the vocational competency unit "Lay power cables" in Australia, which covers the skills and

knowledge required to safely install power cables within the electricity supply industry (ESI) in trenches, cable ducts, cable tray, cable structures, cable pits and poles.

- UETDREL005 work safely in the vicinity of live electrical apparatus, incorporates working safely at heights (reference to pole work)
- UETDRDU009 Install, test and verify distribution underground cable installations(reference to pole work)
- UETDRU013 Joint, terminate and maintain high voltage underground cables.(reference to pole work)
- Uetdreis008 Install and maintain electrical apparatus incorporates working at heights
- Jointers have completed matting up LV course as part of their cable jointing apprenticeship to allow them to work up through live LV safely.
- As per VESI Cable Jinter Apprentice Supervision Guidelines pole works HV pole termination/live assets on pole.
- As per VESI Cable Jinter Apprentice Supervision Guidelines working aloft.
-
- Powercor Standard Work Practice Install HV cable on pole and term.

Yearly and Three Yearly VESI refresher training on

- SAD's (Safe Approach Distance) to live LV&HV on poles and structures and electrical apparatus.
- Safe to Approach structures training for approaching and and working on conductive poles and SWER structures.
- EWP escape procedure.
- EWP rescue procedure.
- Pole Top rescue procedure.
- Panel rescue procedure.
- Trench rescue procedure
- First Aid and CPR
- Live Low Voltage Work-Ground Level
- Making LV Dead
- Safe To Climb
- Working on energised low voltage underground electrical apparatus.(includes conductive structures procedure-cables on conductive poles and structures).
- VESI Safety Framework
- ESI Safety rules for working on, near or in the vicinity of electrical apparatus UETDRMP002
- Perform high voltage field switching to a given schedule URTDRIS017
- Perform low voltage field switching to a given schedule UETDRIS018
- Install, test and verify distribution underground cable installations UETDRDU009

2.1/3

Would there be unsafe outcomes or other practical implications if cable jointers were not permitted to do this work.

Yes.

If cable jointers were not permitted to perform this task then HV cables would not be terminated in Powercor as they have a standard work practices that states that the HV cable is to be partially prepared on the ground but the final lugging off, taping and connection of the cable termination is to be done in position at the LA bracket in the air at the top of the pole by cable jointers.

Jointers are trained and have an understanding of the cable bending radius and pulling tensions require for a safe installation of cable not only in trenches but also up poles and structures which ensures the cable is installed correctly thus eliminating any unsafe and costly cable failures on poles.

In the case of HV Hybrid underground cable or HV ABC if jointers were unable to do this work then these types of cables which are installed on poles would not be able to be repaired due to not having access to them.

Also when performing cable fault locating or cable diagnostic testing if the Jointer/Tester does not have access to the cable termination at top of pole then the test could not be conducted, leaving customers off supply indefinitely which is unacceptable due to the fact that most of our zone substation feeder exit cables that supply the community run out to cable head poles, and you could also add Hospitals significant businesses and emergency services to that list who are fed via underground cables to cable head poles that jointers require access to facilitate emergency repairs.

2.1/4

Have you experienced any issues or lack of clarity regarding the distinction between what work tasks class D line-workers and class C cables jointers are licensed to do, if so provide details.

Yes I have.

Example#1

On two occasions OH line workers were sent out to a distribution pillar that was hit by a car. They proceeded to make temp repairs on LV 240mm underground cable mains and pillar installation disregarding electrical regulations putting the community at risk. When I tried to discuss the short comings of doing un-licensed work with the responsible oh line worker I was told " the cable is above ground so I can work on it" this person obviously does not understand the licensing rules.

Example#2

OH line workers sent to a MEC pillar on a customers property where they proceeded to make repairs to a service cable which they can do but it was in a metallic structure that was alive which means that they needed to adhere to safe work procedure which requires this work to be done by someone who has live jointing authority and is trained in ground level rescue procedures as required in the green book under rescue procedures which oh line workers do not have.

Example#3

At numerous locations I have evidence of underground cables being left on poles after either a pole change or x-arm change which are left in a unsafe manner being bent 360 deg around the x-arm to reduce the height of the cable on the pole. I have attached photos below demonstrating some of the quality issues I have mentioned throughout this response.

Example#4

At wye river I was asked to attend a HV cable fault on a cable Head pole termination where 12 months earlier a crew of OH line workers had been given the task to re-do the UG cable termination on a maintenance file to eliminate the bush fire risk in the area which is extreme in the otways. When I arrived at the fault I found that the termination that had been put into service 12 months earlier had failed and had dropped burning debris and molten metal all around the base of the pole achieving the opposite to what the intention of the maintenance work was to do and stop bushfires in a very vulnerable part of the state. Luckily the failure occurred in winter and the risk at the time was low and was contained to a small grass fire. The result could have been catastrophic in the wrong weather conditions. This work demonstrated a serious lack of knowledge in cable preparation and terminating introducing an unacceptable risk.

Example#5

The [REDACTED] will not send out an Underground Jointer as a first responder to what is clearly an underground fault instead they send out an OH line worker to go to site first to evaluate?? then eventually passing the job to an underground jointer which delays the repair time by hours due to this process. This leaves our customers without power for an extended period of time vulnerable to the elements, no heating or cooling unnecessarily (sometimes as long as 50 hours). It seems if you are connected to the grid via UG cables that you receive a poorer service than those connected to an OH supply.

Example#6

Conflict over UG public lighting schemes, as nowhere does it state that an OH line worker can attend underground retic PL faults or maintenance, pull cable or repair in pits. All it says is that an OH line worker can work on underground service cable but must be below 50mm cable and is the last span from mec supply network used to supply a premise.

Premise=House or dwelling is not a pl pole.

Example#7

There has been work such as replacing UG pits, Pillar lids, Cabinet Doors, kiosk s/s earthing, customer UG supply reconfigure, and other tasks which isolated are not much but all come from skills learnt in the UG Cable Jointing course but is completed by OH line workers. This stuff is very ambiguous and needs re-defining as nowhere in the oh line worker training does it allow them to work on these installations.

Example#8

The testing and energising of an UG mains service greater than 50mm to an installation which needs to be tested and passed which is jointing work prior to commissioning but has been in the past given to OH crews to complete. They are not trained in this procedure and cannot work on cables over 50mm.

Example#9

The installation of UG cables onto Hybrid poles in rural areas (otways) where the top connection of the UG cable onto the edo unit was completed so poorly that we now are returning to all of these sites to do remediation work due to these existing terms burning off and breaking again creating a fire hazard. The work was completed by a OH line worker crew.

2.1/5

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 line workers and class C cable jointers? If so provide details.

Yes

But

The answer to this is all. Any underground cable whether it is underground or above ground shall be worked on by a Cable Jointer as per electrical licensing we just need to ensure they have safe access to whatever structure they are attached to. The OH line workers can connect and disconnect ONLY that's it.

Ensure that the matting of LV conductors' course is still in the curriculum at the apprentice training centre to arm the new UG apprentices with a skill that is both beneficial and vital to the safe access to HV cables by teams on poles.

2.2

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.

Yes. Jointers and Line workers regularly need to access and work upon consumer mains at the following locations.

- Pits- consumer mains connected directly to the incoming service cable via IPC.
- Pillars- Some areas of the network use service type pillars instead of pits. These pillars have fused consumer mains cables within them, and jointers need to rebuild these pillars for faults and maintenance purposes (Work in these pillars by cable jointers only).
- Kiosks and indoor substations- larger consumer mains connected to circuit breakers or fuse disconnect switches (Work performed by jointers only).
- Meter boards to perform disconnections and connections with relevant supply tests, pre and post commissioning.

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.

Yes.

- The REC is often unfamiliar or unwilling to work with our apparatus.
- The REC is not available or able to attend
- Operationally inefficient. Supply restoration times would increase significantly with respect to faults.

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.

No, this has been standard practice for over 40 years.

9. Do you have any other comments on the Exemptions Order as it applies to Class D lineworkers and Class C cable jointers?

Yes.

In table B1 point B. It states that Class D lineworker is able to work in Pad Mount subs and on equipment. This should only be the case if you have a restricter jointing license in rural areas (until 2030) or fully qualified cable jointer in metropolitan area as Cable Jointers are the one trained and qualified and licensed to work in these installations (Pad mount and kiosk s/s). If it is an oh ss then a oh lineworker completed the work or if it is a ground type then either could complete the works. (the work is dependant on the cable size as per the licensing regs) This is another of the ambiguous statements that needs to be looked at to reconcile the differences between cable jointing and oh line work.

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.

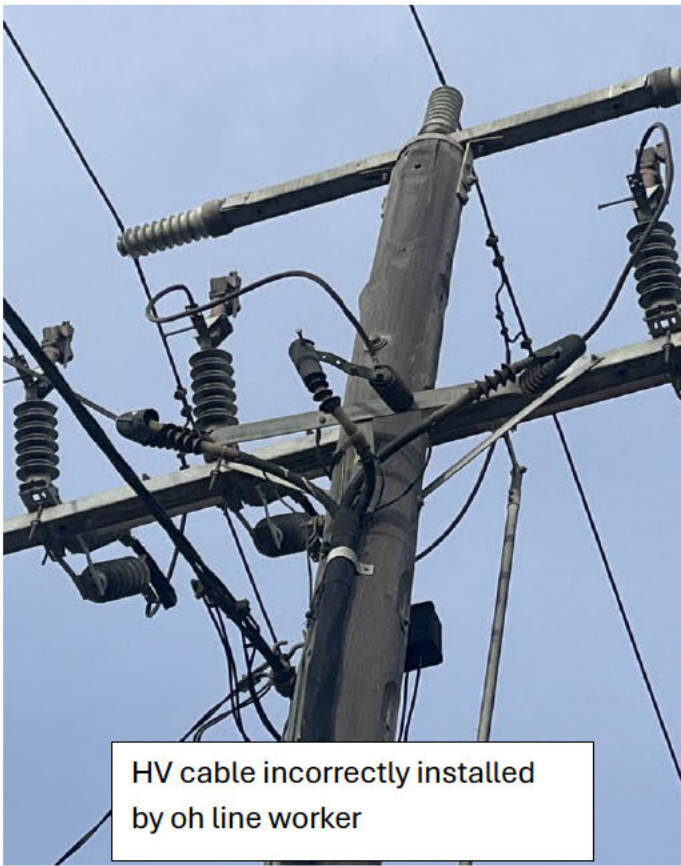
Yes.

I think that as it stands now where the electrician runs his mains into a pad mount ss and lugs them off under the supervision of an MEC cable jointer, who then receives a COES from the electrician at which time the cable jointer bolts the customers cable to the ss customer connection point ready for the LEI to test and commission the new circuit. This way the electrician does not make contact with any MEC equipment and the jointer ensure s the cable is bolted correctly to the customer supply point in the ss.

Below you will find some photographic examples I have added to support some of my claims relating to poor workmanship that I have come across due to unlicensed workers completing tasks that jointers should have done on poles.

All so in the photos are some of the structures jointers need to access to complete jointing tasks.

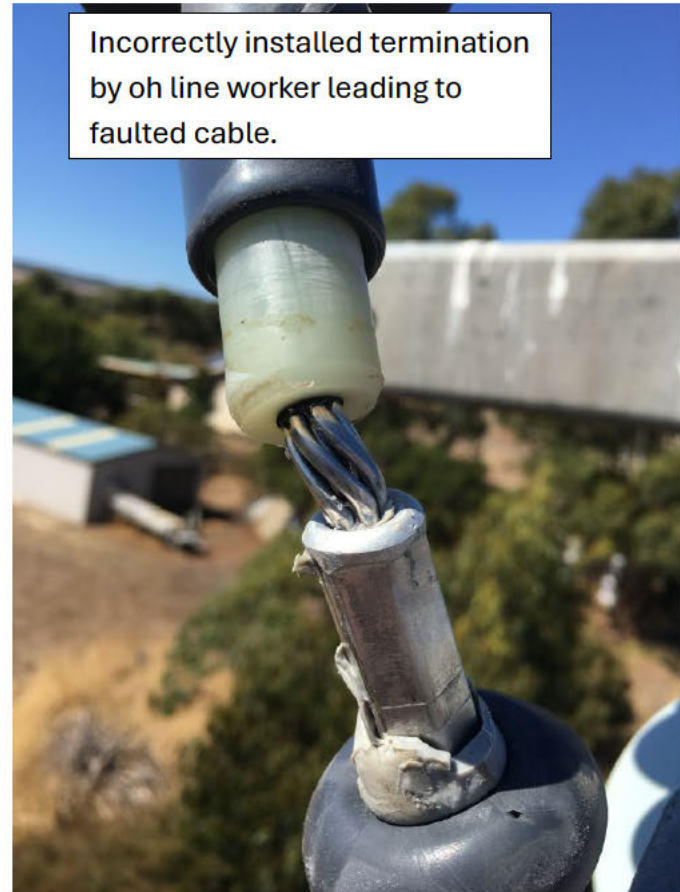
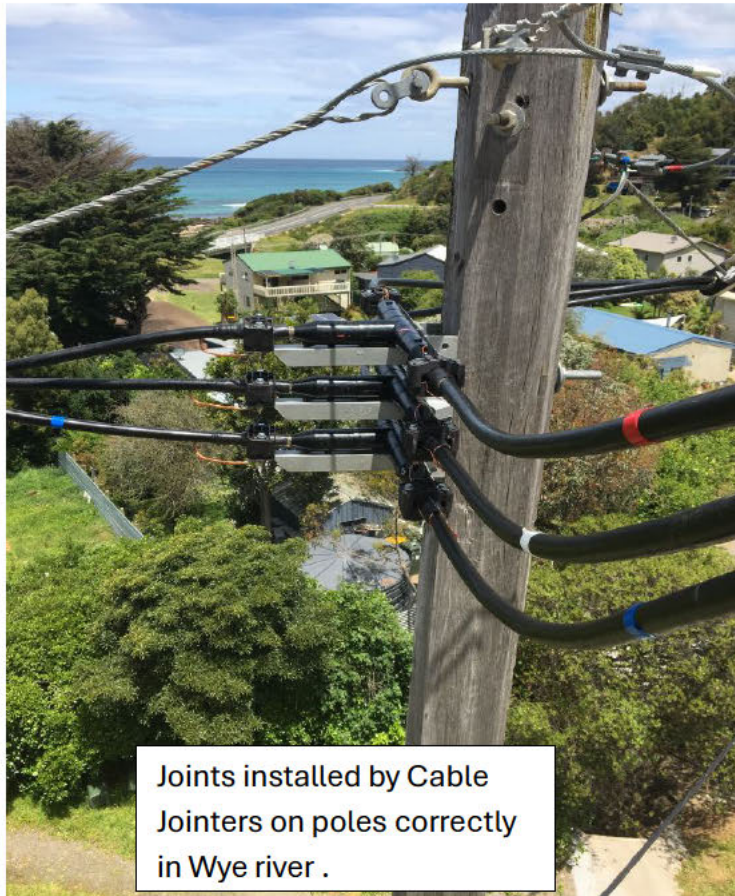
I am happy to answer any questions in relation to the photos if it is unclear.

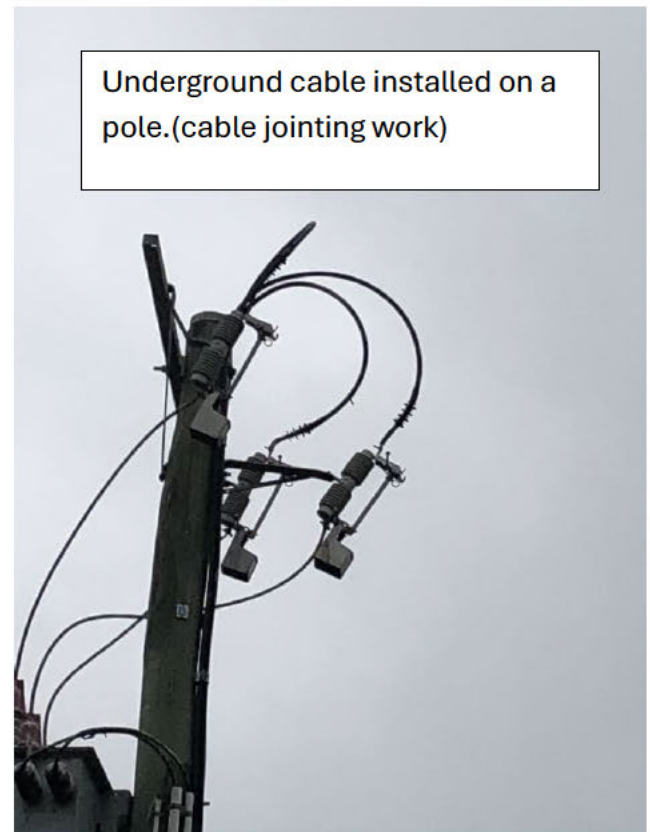
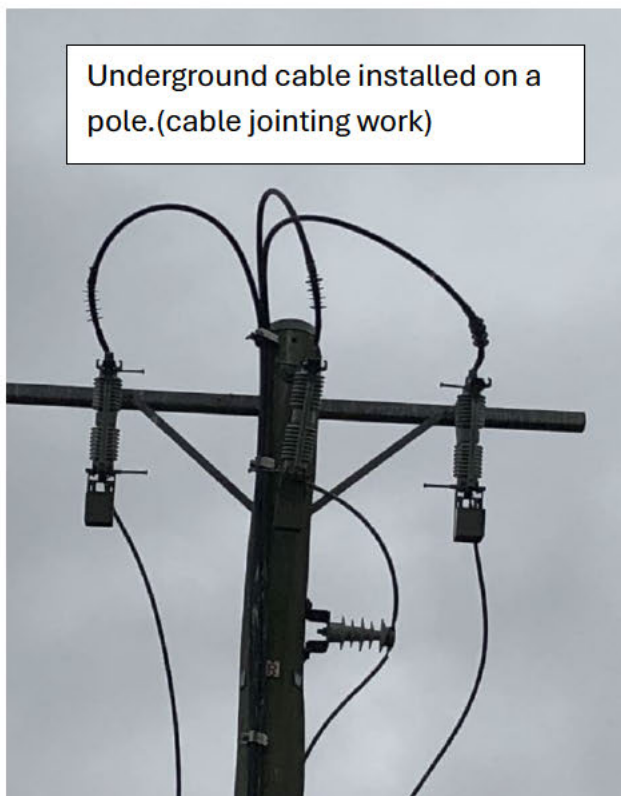
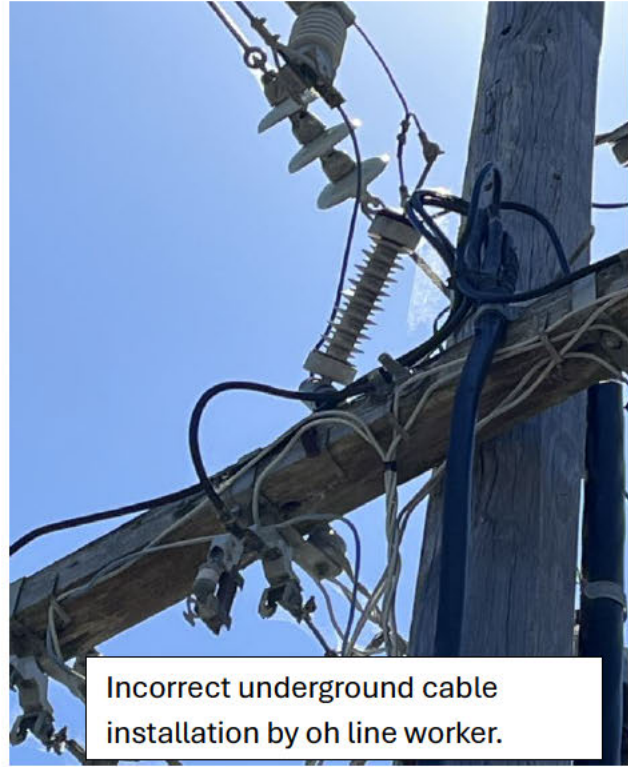
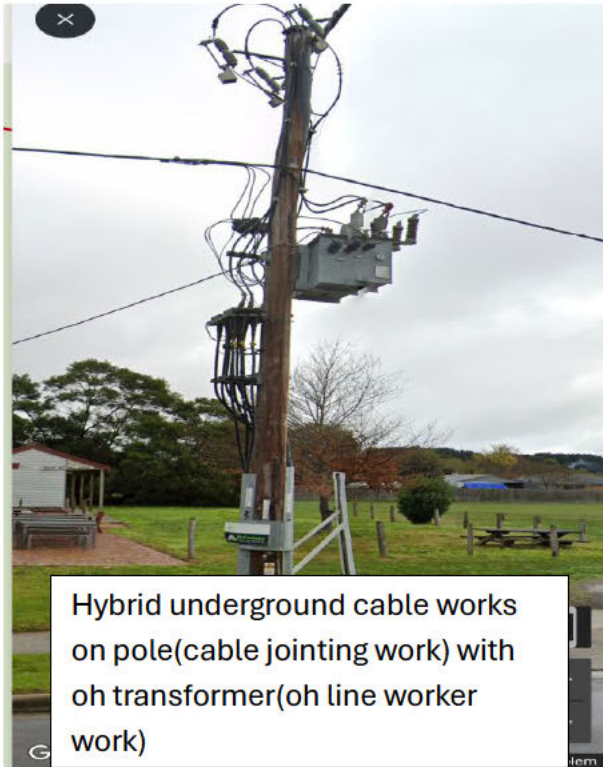


HV cable incorrectly installed
by oh line worker



Underground incorrectly installed and
over bent by oh line worker





Below you will find some photographic examples I have added to support some of my claims relating to poor workmanship that I have come across due to unlicensed workers completing tasks that jointers should have done on poles.

All so in the photos are some of the structures jointers need to access to complete jointing tasks.

I am happy to answer any questions in relation to the photos if it is unclear.



Cable jointing work.



Underground cable incorrectly clamped to wooden pole by oh line worker crew.



Underground cable incorrectly clamped to wooden pole by oh line worker crew.



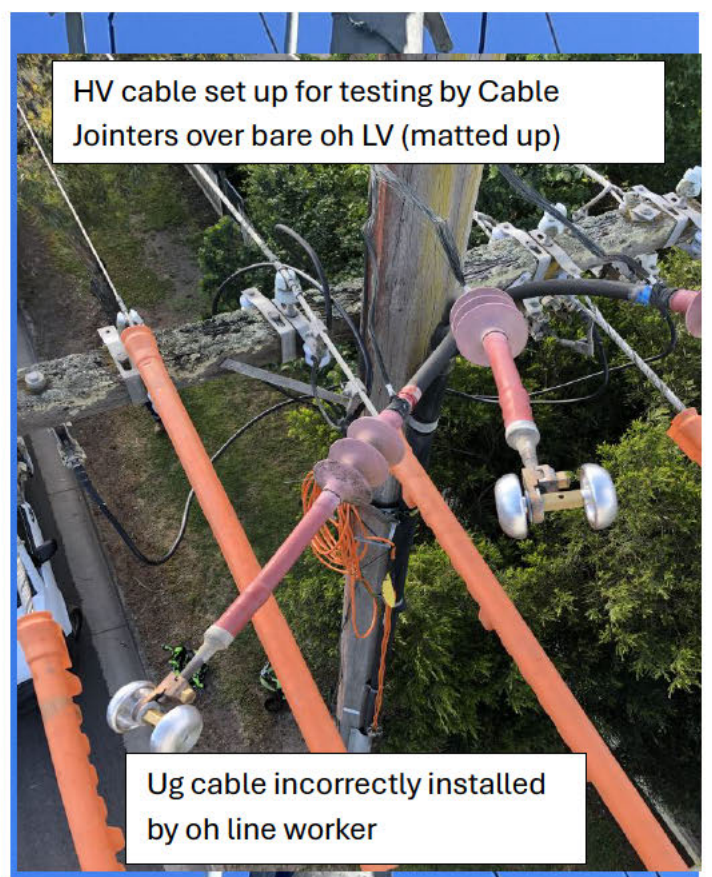
HV ABC Terminated by Cable Jointers



Incorrect ug cable destination labels installed by oh line worker.



Underground cable fault at Wye River due to incorrect cable termination done by oh line worker



HV cable set up for testing by Cable Jointers over bare oh LV (matted up)

Ug cable incorrectly installed by oh line worker

From: [REDACTED]
To: [Consultation](#)
Subject: ESV licence D & C Questions
Date: Monday, 20 October 2025 11:56:58 AM

Caution: EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

To Whom It Concern,

I'm writing this email as a form of feedback from a licenced Distribution Linesman and Cable Joiner.

I'm happy for the questions to be publicly shared but can you not use my name in any public publications, thank you.

2.1 Questions

2.1.1 - Yes, cable jointers are carrying out works with hv MEC UG cable above ground. Such as; raising terminated hv cable heads up overhead poles through live lv conductors, attaching brackets to hold the hv cable to the pole, fixing faulted cable on hv cable (whether its at the term or mid-length) while still attached to the pole. All these tasks can, and usual, be performed between live lv conductors.

2.1.2 - Yes and no, the older jointers have been shown in the past how to work around live lv conductors but with the newer jointers that are coming out of trade school, they haven't been taught how to work around, or matt up, live exposed lv conductors.

2.1.3 - One of the practical implications with not letting cable jointers perform these tasks would be possibly damaging the term while stringing the cable head up the pole. From experience the lack of understanding on bend radius with overhead linesmen have caused faults in the past. This can be fixed by having a jointer onsite when erecting the cable.

2.1.4 - Yes, I have asked management several times since the licencing has come through to see what a lineman and cable joiner are able to do. And I haven't been able to find it on your site until this consultation email came out. I'm more interested in specific tasks each can carry out, if there is a list of such tasks I would greatly appreciate seeing it, whether it's sent to me or pointed in the right direction.

2.2 Questions

2.2.6 - Yes we are, we are trained in insulation and continuity tests, refreshed every year with our testing of connections refreshers. Everytime we work at an underground pit this would require a licensed electrician. This would be extremely difficult to organise, more and more houses are going underground which results in more pits. Finding an electrician to be available at the same time as a fault truck to be onsite to disconnect/reconnect a customer from a pit would result in the customer being off for longer which has the negative effects of abuse to the workers onsite.

2.2.7 - There is no need for an electrician to be onsite/supervising as we perform all our commissioning test on the customer mains and then do confirmation tests such as nst test, polarity test, sequence tests and load tests at the meter after a connection. By having an electrician there you'll be taking work away from linesman/cable jointers that we have been carrying out safely for years and have someone stand around costing the customer, to do nothing.

Would you please get back to me with the tasks a licenced distribution linemen, cable joiner and an electrical fitter are able to carry out on the distribution network in victoria, or at least where i can find the information, it would be greatly appreciated.

I hope these answers have helped.

Thanks,



From: [REDACTED]
To: [Consultation](#)
Subject: Lineworkers and cable jointers consultation
Date: Sunday, 26 October 2025 10:01:29 AM
Attachments: [image7.jpeg](#)
[image9.jpeg](#)
[image11.jpeg](#)
[image13.jpeg](#)

Caution: EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hi, I am a cable jointer based out the [REDACTED] depot.
In response to the question of cable jointers installing HV cables onto poles.

As a cable jointer during my apprenticeship I completed the following units:
UETDRDU002 Inspect underground electrical apparatus
UETDRDU009 Install, test and verify underground cable installations
UETDRDU013 Joint, terminate and maintain high voltage underground polymeric cable
UETDREL004 Operate plant and equipment in the vicinity of live electrical apparatus
UETDREL005 Work safely in the vicinity of live electrical apparatus
UETDRIS008 Install and maintain electrical apparatus

I also completed matting up LV training and am refreshed as well as Safe approach distances training in which I am also refreshed.
With this training and skills as well as in the field training I completed throughout my apprenticeship, I am able to competently and safely install HV cables onto poles and terminate them as per our safe work practices and manufacturers standards to ensure a safe and correctly functioning termination/overall installation.

When it comes to OH line workers installing these cables they do not have any of the units associated with working with or installing HV cables (or LV cables). I have seen multiple instances of HV cables that have clearly been installed by OH line workers where bending radius' have been exceeded and resulted in failure of the terminations. Cables that have been bent at incorrect angles and placed extreme stress onto the cables and terminations where heat shrink seals are cracked internally or conductors have been bent at right angles. Also cables that are covered with PVC electrical tape derating the insulation of the termination, all clear markers that a cable jointer was not involved in the installation of the cables. (Please see attached images)

I have also attended faults where the cables have not been reinstated correctly after a pole replacement and faulted at the base of the pole due to them being backfilled with crushed rock. Not surrounded by sand with slabs on top and warning tape above. This is a problem with both HV and LV cables. Also during these pole replacements, cables may be replaced on the pole at extreme angles again placing stress on terminations and the cables. Once again clear markers a cable jointer was not present during the reinstatement of these cables.

It is my view that O/H line workers should not be installing these cables onto poles as they are not trained in how to tear the cables or the requirements of how they are to be left.

Separately, but along similar lines to the original question I would like to bring up two questions:

As part of my apprenticeship I completed the units, UETDRDU007 Install and maintain underground public lighting and UETDRDU009 Install, test and verify underground cable

installations

I am not aware if O/H line workers complete the lighting unit as part of their apprenticeship. I know they do not complete the cable installation units.

O/H line workers are involved in replacing UG public lighting columns. I have attended multiple public lighting faults where cables have not been correctly reinstated and have then faulted after being backfilled with crushed rock. I have also been sent to a column replaced by O/H line workers that had no earth installed, how this column passed a final NST test as part of the commissioning process I do not know. It is also a danger to public safety if the neutral has been burnt through and there is no earth on the column.

My question is why are O/H line workers involved in the replacement of apparatus installed, tested, maintained and verified by cable jointers?

My second question is as follows;

As part of my apprenticeship I completed the following units:

UETDRDU002 Inspect underground electrical apparatus

UETDRDU009 Install, test and verify underground cable installations

UETDRDU011 Joint, terminate and maintain energised low voltage underground polymeric cable

UETDRDU015 Joint, terminate and maintain low voltage underground polymeric cables

I also have panel rescue training in which I am refreshed.

I have attended multiple pillar LV pillar faults in which they have been attended previously by O/H line workers and have once again faulted. Most commonly due to poor connections on the LV pillar links which are required to be set at a certain torque or cables being bent hard against each other, degrading the insulation and eventually burning into one another. I have also attended multiple pillar faults where the base or lid has been replaced at the incorrect depth or unable to be closed properly, creating a public safety hazard. More often than not bollards are also not installed at these pillars, allowing them to be damaged once more by vehicles. Bedding sand around the cables is also more often than not replaced by dirt, not meeting standards. (Please see attached images for one of the more egregious examples I have come across)

Are the line workers who have attended these faults and worked on these pillars trained appropriately to work on these live installations? Are they trained appropriately to repair these installations? Is it against their licensing restrictions to work on these installations?

Regards,

[Redacted Signature]

☐	☐	☐	☐	☐	☐	☐
☐	☐	☐				

