

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

Decision paper and statement of reasons
July 2026

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1 Summary

This decision paper explains Energy Safe Victoria's position on how the electrical licensing and exemptions framework applies to Class D lineworkers and Class C cable jointers. It focuses on work involving underground electric cables (**UGC**) at above-ground interfaces and at the point of supply. It also considers the application of supervision and certificate of electrical safety (**COES**) requirements under the *Electricity Safety Exemptions Order 2020* (**Exemptions Order**).

We undertook targeted consultation to understand current industry practice and to identify areas of uncertainty in how the framework was being applied. The purpose of the consultation was to inform and clarify our interpretation of the existing legislative framework.

This includes circumstances where that work necessarily occurs above ground, such as where cables are raised onto poles, terminated and connected onto distribution network equipment. Stakeholders also identified ongoing uncertainty about the delineation between Class C cable jointing work and Class D linework at above-ground interfaces.

The consultation also highlighted practical difficulties in applying effective supervision and COES requirements under the Exemptions Order. These issues most commonly arise where Class D lineworkers and Class C cable jointers undertake work at or adjacent to the point of supply, including work on consumer mains and activities undertaken to restore electricity supply. Stakeholders generally considered that licensed electricians are not well placed to supervise this work and that existing network authorisation, testing and commissioning frameworks already provide appropriate safety assurance.

Having considered the consultation feedback, our key positions are that:

- Class C cable jointers are licensed to joint, transition joint, connect and terminate UGC, including both LV and HV UGC. This includes where the work occurs below ground or at above-ground transition points. For example, it includes where cables are raised onto poles, terminated and connected onto network equipment.
- Cable jointing work concludes at the point where the UGC is connected onto a suitable bracket, isolating device or switching equipment. From that point, connection to overhead distribution assets is Class D linework.
- Although clauses 14 and 15 of the Exemptions Order require effective supervision by a licensed electrician for some work by Class D lineworkers and Class C cable jointers, Energy Safe will not enforce compliance with that requirement in defined circumstances. This applies where the work forms part of network connection, maintenance or restoration, and is confined to the limited area where distribution network assets interface with consumer-owned electrical conductors. The work must be performed in accordance with applicable major electricity company (**MEC**) authorisation frameworks and Victorian Electricity Supply Industry (**VESI**) procedures.
- Similarly, Energy Safe will not require a COES be completed where work is limited to those defined network interface activities. Certificate requirements continue to apply to prescribed electrical installation work within a consumer's electrical installation beyond the point of supply.

These positions reflect our interpretation of the existing regulatory framework, informed by consultation feedback and established industry practice. They do not amend the *Electricity Safety Act 1998* (Vic) (**Act**), accompanying Regulations, or the Exemptions Order. Energy Safe will administer and enforce the framework consistently with the positions set out in this paper.

2 Background

2.1 Purpose and context

This paper explains our decisions following consultation on how the electrical licensing and exemptions framework applies to certain work undertaken by Class D lineworkers and Class C cable jointers.

It focuses on work involving UGC, particularly where those cables interface with above-ground network assets or are worked on at or near the point of supply. It also explains how the supervision and COES requirements apply under the Exemptions Order.

This paper does not change the law. It explains how we interpret and apply the existing framework in practice, having regard to the consultation feedback and established industry practice.

This paper should be read together with the consultation paper published in September 2025.¹ That paper provides more detail on the regulatory framework, the issues raised by industry, and the questions on which submissions were sought.

2.2 Regulatory framework

Licensing of lineworkers and cable jointers

Since 1 January 2021, electrical lineworkers and cable jointers must be licensed by Energy Safe to carry out electrical linework and cable jointing work in Victoria. The licensing framework is set out in the *Electricity Safety (Registration and Licensing) Regulations 2020* (**Regulations**).

The Regulations establish different classes of electrical lineworker licence and define the type and scope of work that may be carried out under each class. The two licence classes relevant to this paper are:

- **Class D lineworkers** – who carry out electrical linework on a MEC distribution supply network
- **Class C cable jointers** – who carry out electrical cable jointing work on a MEC distribution supply network.

The detailed description of the electrical linework that may be carried out by each licence class is set out in Schedule 3 of the Regulations. Relevant extracts are summarised in **Appendix A** for ease of reference.

Exemptions from standard electrician licensing rules

Under the Act, electrical installation work would normally need to be carried out by a licensed electrician. The Exemptions Order provides limited exemptions from those requirements. It allows Class D lineworkers and Class C cable jointers to carry out specified electrical installation work in defined circumstances, subject to conditions.

Under the Exemptions Order:

- Exempt work must be carried out under the effective supervision of a licensed electrician.
- The supervising electrician is deemed to be the person carrying out the work and is legally responsible for the work.

¹ The consultation paper is published on our website at www.energysafe.vic.gov.au/lineworkers-and-cable-jointers-consultation-paper

- The supervising electrician must issue a COES for the work.

How these supervision and certification requirements apply in practice for network interface work was a key issue raised during the consultation.

Exemptions considered in this paper

This paper considers those exemptions in the Exemptions Order that are most commonly relied upon when Class D lineworkers and Class C cable jointers perform work at or near the point of supply.

For Class D lineworkers, the relevant exemptions include:

- **Clause 14A:** 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
- **Clause 14D:** jointing, transition jointing, terminating or connecting of underground consumer mains.

For Class C cable jointers, the relevant exemptions include:

- **Clause 15A:** 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.
- **Clause 15B:** jointing, transition jointing, terminating or connecting of underground electric cables, including consumer mains.

These clauses are set out in full in **Appendix B**.

Authorisation requirements

For all of the exemptions listed above the Class C cable jointer or Class D lineworker must be under the effective supervision of a licensed electrician. For clauses 14A and 15A only, the worker must also be authorised by the relevant MEC or network infrastructure company to carry out the work.

2.3 Consultation

We undertook targeted engagement with industry representatives to inform the scope of public consultation. Public consultation ran from 16 September 2025 to 27 October 2025, and we consulted on two key areas:

- Areas of uncertainty regarding the work undertaken by Class C cable jointers and Class D lineworkers, particularly where UGC interface with above ground network assets.
- The practical operation of the effective supervision and COES requirements under the Exemptions Order when these licence holders work on underground consumer mains.

We received 8 submissions. Three were from MECs, being AusNet, Jemena and CitiPower, Powercor and United Energy (**CPPALUE**). Five were from individuals, including Class C cable jointers and joint licence holders.

All submissions have been published on our website at www.energysafe.vic.gov.au/consultations.

3 Issues and positions

This chapter summarises what we heard during the consultation and explains our response. Feedback was received from MECs, Class C cable jointers and joint licence holders. No submissions were received from other parts of the electrical industry. Further detailed information is available in the individual published submissions.

3.1 Scope of Class C cable jointing work at above-ground interfaces

Issue

Prior to consultation, we received feedback from industry representatives that there was uncertainty about what work Class C cable jointers are licensed to do when working with UGC above ground. In particular, what work, if any, they can do with HV UGC which are raised up poles. They told us that this was unclear from the Regulations, and they would benefit from guidance on this.

In response, in the consultation paper we asked questions about:

- the types of above-ground work being undertaken by Class C cable jointers
- whether they are trained and qualified to perform that work, and
- whether preventing Class C cable jointers from performing such work would lead to unsafe or impractical outcomes.

Summary of submissions

All respondents confirmed that Class C cable jointers routinely perform above-ground work with HV MEC UGC. This includes:

- raising cables onto poles, including dressing, attaching, and securing the cable
- completing cable terminations and connections above-ground
- installing associated hardware
- conducting testing.

CPPALUE and Jemena stated that Class C cable jointers have been working on poles, raising and terminating cables, for decades. They explained that typically for LV cables it involves terminating and connecting the cable into an LV isolating device. For HV cables, it involves terminating the cable and making a connection on a suitable bracket or directly to a HV switching device.

Most respondents considered that through the apprenticeship pathway and completion of the *Certificate III in ESI – Distribution Underground (UET30821)*, Class C cable jointers are adequately trained and qualified to safely perform this work. CPPALUE and Jemena both highlighted that the VESI determines the elective units for the apprenticeship, ensuring that the most appropriate and industry-relevant training is included.

Several respondents also noted that regular refresher training and competency assessments are standard practice, helping to prevent competency fade and maintain high safety performance. Some respondents, however, identified possible gaps in training coverage. One noted that while older Class C cable jointers were taught how to work around live LV conductors, including the use of insulating matting, some newer jointers may not have received this training. Another respondent emphasised the importance of ensuring this training remains part of the curriculum, as it is critical for safely accessing HV cables on poles.

There was strong consensus that preventing Class C cable jointers from performing this above-ground work would lead to unsafe and impractical outcomes, including:

- increased safety risks to workers and assets
- reduced asset integrity and network reliability
- delays to fault response, maintenance and restoration
- higher costs for businesses and consumers
- flow-on impacts to critical services reliant on electricity supply.

Discussion

Schedule 3 of the Regulations sets out the electrical linework that can be carried out by each licence class. For Class C cable jointers, paragraph C1 in Part A of Schedule 3 of the Regulations provides the primary description of cable jointing work on UGC. It is limited to jointing, transition jointing, connecting and terminating of UGC on a MEC distribution supply network.

Paragraph C2 in the same part expressly refers to one specific above-ground activity: connecting of UGC to the de-energised load side terminals of LV pole mounted switchgear. Considered in isolation, this provision could be read narrowly as implying that it is the only above-ground task that Class C cable jointers are authorised to perform. Such a reading gives rise to questions about whether other above-ground activities commonly associated with underground cable jointing – particularly the termination and connection of HV UGC on poles – fall within the licensed scope.

We do not consider that this narrow reading reflects the structure or intent of Schedule 3 when read as a whole. Paragraph C2 is not framed as an exhaustive statement of all above-ground cable jointing work. Rather, it identifies a specific example of underground cable jointing activity that necessarily interfaces with above-ground equipment. The scope of authorised work for Class C cable jointers is principally defined by paragraph C1, which is expressed in functional terms and is not limited by the physical location of the cable at the point where the work is performed.

Interpreting paragraph C2 as a strict limit on above-ground work would shift the licensing framework away from the type of work being undertaken and toward its physical location. This would be inconsistent with established industry practice and with how underground cable jointing is carried out in practice. The consultation confirmed that UGC, including HV UGC, are routinely terminated, connected and tested at above-ground locations as part of a single cable jointing task. Respondents also identified that separating these activities on the basis of location would introduce additional handovers and create safety and operational risks.

We have also considered the concerns raised by one respondent about potential variability in training for working around live LV conductors. These concerns do not alter our interpretation of the scope of licensed work. The licensing framework defines the types of work a licence holder may undertake. It does not remove the requirement for individuals to be appropriately trained, competent and authorised for specific tasks, nor does it displace employer and MEC obligations under work health and safety and industry authorisation frameworks.

Final position

We interpret paragraph C1 in Part A of Schedule 3 of the Regulations as authorising Class C cable jointers to carry out jointing, transition jointing, connecting and terminating of UGC, including both LV and HV UGC, regardless of whether that work occurs below ground or at above-ground interfaces with the distribution network.

In practice, cable jointing work is not limited to activities performed below ground. It extends to situations where UGC are brought above ground for termination or connection, including on poles, structures or associated equipment. This includes, for example, terminating and connecting a LV UGC into an isolating device and terminating and connecting a HV UGC to a suitable bracket or HV switching device.

This position clarifies our interpretation of the existing licensing framework. It does not amend the Regulations and does not remove the requirement for individuals to be appropriately trained, competent and authorised for the specific tasks they perform.

3.2 Delineation between Class D lineworkers and Class C cable jointers

Issue

As part of the consultation, we asked whether stakeholders had experienced issues or a lack of clarity regarding the distinction between the work tasks Class D lineworkers and Class C cable jointers are licensed to do.

This question reflected prior feedback that uncertainty at the interface between underground cable jointing work and linework – particularly where UGC are raised above ground to connect with distribution network assets – may be creating practical and operational difficulties.

Summary of submissions

Most respondents identified uncertainty regarding the boundary between the work undertaken by Class D lineworkers and Class C cable jointers. Examples were provided where ambiguity regarding above ground tasks had resulted in delays, additional resourcing requirements and increased costs.

Several respondents described similar delineation points in practice. Two respondents noted that, historically, the lightning arrester (**LA**) bracket has been treated as the delineation point for HV work: cable jointers perform work up to the LA bracket, and lineworkers complete the connection between the LA bracket and the overhead line.

Jemena and CPPALUE similarly expressed the view that cable jointing work concludes where the cable terminates on the pole, outside the safe approach distance of any bare overhead conductors. Another respondent suggested that the appropriate guidance is simply that Class C cable jointers can do all work on any UGC – whether above-ground or below ground – while Class D lineworkers can only connect and disconnect UGC.

Discussion

The licensing framework establishes distinct licence classes for linework and cable jointing work, reflecting different skill sets and areas of expertise. However, the consultation highlighted that, in practice, UGC must transition to above-ground locations before connecting to overhead assets.

We considered whether the licensing framework requires a strict or prescriptive delineation based on physical location. The Regulations do not identify a specific location-based demarcation point. Instead, they define licensed work by reference to the nature of the work being undertaken and the infrastructure involved.

We consider that a functional delineation based on the termination point of the UGC best reflects the intent of the licensing framework and established industry practice. This approach ensures continuity of responsibility for UGC integrity while clearly distinguishing cable jointing work from overhead linework.

Final position

We consider that Class C cable jointing work includes the jointing, transition jointing, terminating and connecting of UGC up to the point where the UGC is connected onto a suitable bracket, isolating device or switching equipment, including where that work occurs above ground.

In practice, cable jointing work commonly involves UGC being raised above ground for termination or connection on poles, structures or associated equipment. This includes activities such as raising, securing, terminating and connecting UGC to brackets, isolating devices or switching equipment.

From the point at which the UGC has been connected, Class D linework commences. Linework includes work undertaken to connect the termination point to the overhead distribution network and associated overhead conductors.

This delineation reflects established industry practice, provides clarity at above-ground interfaces and does not alter the scope of licensed work prescribed by the Regulations.

Class D lineworkers retain limited authority to joint, terminate, and connect LV underground service cables (cross-section up to 50 mm²) supplying premises.² General underground distribution cable jointing and termination remains the responsibility of Class C cable jointers.

3.3 Effective supervision under the Exemptions Order

Issue

Before consultation, industry representatives raised concerns about the requirement in the Exemptions Order for Class D lineworkers and Class C cable jointers to work under the effective supervision of a licensed electrician when carrying out certain electrical installation work, particularly work on underground consumer mains.

Accordingly, the consultation questions were framed primarily by reference to underground consumer mains, including:

- whether Class D lineworkers and Class C cable jointers are appropriately skilled and experienced to safely undertake work on underground consumer mains without electrician supervision
- whether there are practical issues or challenges associated with requiring such supervision
- whether safety risks arise if this work is performed without the effective supervision of a licensed electrician.

However, submissions commonly referred more broadly to *consumer mains* and to work undertaken at the interface between the electricity distribution network and a consumer's electrical installation, including work necessary to connect, disconnect, maintain or restore electricity supply.

The relevant exemptions and conditions arise under clauses 14 and 15 of the Exemptions Order, which are reproduced in full in Appendix B.

Summary of submissions

There was strong consensus among respondents that licensed Class D lineworkers and Class C cable jointers possess the skills, training and experience to safely undertake work on underground consumer mains without effective supervision by a licensed electrician.

Respondents described this work as a routine part of network operations, undertaken in contexts such as fault response, planned maintenance, new connections and supply restoration. It commonly occurs in locations including service pits, pillars, kiosks, substations and at meter panels, and frequently in proximity to energised network assets.

Submissions emphasised that this work is performed under comprehensive MEC authorisation frameworks and VESI procedures, including task-specific training, competency assessment, refresher training and network-specific testing and commissioning. Respondents submitted that these frameworks provide robust, work-specific safety assurance.

² Paragraph D2 in Part A of the Regulations.

Respondents consistently stated that licensed electricians are generally not trained or authorised to work on energised MEC assets, nor responsible for network commissioning or verification testing. As a result, they considered electricians to be poorly placed to supervise this category of work and cautioned that mandatory supervision could introduce new risks where the supervising electrician lacks relevant authorisation or network familiarity.

Operational impacts raised included reduced flexibility in fault response and maintenance, longer outages, delays in supply restoration, workforce constraints, and increased costs without corresponding safety benefits. Respondents pointed to long-standing safe practice under existing arrangements and submitted that electrician supervision provides no additional safety value in these circumstances.

Overall, submissions reflected a clear view that existing network authorisation, training and verification systems provide appropriate safety assurance, and that the supervision requirement is unnecessary, impractical and potentially counterproductive for network interface work.

Discussion

The effective supervision requirement in the Exemptions Order is intended to provide electrician oversight where work ordinarily undertaken on a consumer's electrical installation is performed by persons who are not licensed electricians. The supervision and certification framework is designed to ensure appropriate technical oversight and accountability for prescribed electrical installation work.

Clauses 14 and 15 of the Exemptions Order permit Class D lineworkers and Class C cable jointers to carry out specified electrical installation work, including work on consumer mains and the repair or replacement of apparatus at the junction between MEC conductors and consumer conductors for the purpose of restoring supply. Those exemptions are subject to conditions, including that the work be carried out under the effective supervision of a licensed electrician.

The consultation responses demonstrated that, in practice, work of this kind is undertaken by authorised Class D lineworkers and Class C cable jointers as part of network connection, maintenance and restoration processes, under established MEC authorisation frameworks and VESI procedures. This work frequently occurs in proximity to energised network assets and forms part of an integrated network operation for which licensed electricians are typically neither authorised nor operationally accountable.

Although consultation focused on underground consumer mains, the same considerations apply more broadly to work undertaken at the network–consumer interface, regardless of whether supply is underground or overhead. In each case, the work is undertaken by the same categories of authorised personnel, under the same network-specific safety systems, and with the same operational responsibilities.

Applying the supervision requirement literally in these defined circumstances would require oversight by individuals who may lack the relevant authorisation or competence for the work, without improving safety outcomes. Consultation evidence instead supports reliance on existing network-specific authorisation, training, testing and commissioning frameworks as providing appropriate safety assurance.

Accordingly, where work undertaken under clauses 14 or 15 is confined to activities at or adjacent to the network–consumer interface and forms part of network connection, maintenance or restoration operations, it is appropriate to treat that work as part of the network process rather than electrical installation work within a consumer's installation.

Final position

Energy Safe will not enforce compliance with the requirement for effective supervision by a licensed electrician under clauses 14 and 15 of the Exemptions Order where authorised Class D lineworkers or Class C cable jointers undertake work that:

- forms part of network connection, maintenance or restoration operations; and
- is confined to the limited area where distribution network assets interface with consumer-owned electrical conductors.

This position does not amend the Act, the Regulations or the Exemptions Order.

In these circumstances, Energy Safe considers that compliance with applicable network authorisation frameworks and VESI procedures, including relevant training, competency and verification requirements, provides appropriate assurance that work is performed safely.

Outside of these circumstances, the requirements of the Exemptions Order apply and must be complied with.

This issue has been referred to the Department of Energy, Environment and Climate Action (**DEECA**) for consideration as part of potential regulatory reform.

3.4 COES requirement under the Exemptions Order

Issue

Under the Exemptions Order, where Class D lineworkers and Class C cable jointers carry out specified electrical installation work under effective supervision, the supervising licensed electrician is deemed to be the person carrying out the work and is responsible for completing and giving a COES.

Through the consultation, we sought views on whether a COES should be required when Class D lineworkers and Class C cable jointers undertake work on underground consumer mains.

As with the supervision issue, submissions commonly referred more broadly to consumer mains and to work undertaken at the interface between the electricity distribution network and a consumer's electrical installation, including work necessary to connect, disconnect, maintain or restore electricity supply.

Summary of submissions

Most respondents considered that a COES should not be required when Class D lineworkers and Class C cable jointers work on underground consumer mains, and expressed the same view in relation to point-of-supply interface activities undertaken as part of network operations.

CPPALUE, AusNet and Jemena confirmed the long-standing practice of not issuing a COES for such work. They noted that MEC workers have safely performed consumer mains tasks for decades, under established VESI training, authorisation and testing frameworks. As such, the requirement for a COES would be unnecessary, duplicative, and inconsistent with long-standing, safe operational practice.

Respondents emphasised that existing network-specific verification processes — including neutral service testing (NST), polarity and continuity testing — provide appropriate technical assurance that installations are safe to energise following consumer mains and point-of-supply interface work. These processes were described as more relevant to network interface work than the COES framework, which is designed for prescribed electrical installation work within a consumer's installation.

Respondents also highlighted that COES obligations arise only because the supervising electrician is deemed to be the person carrying out the work under the Exemptions Order. In circumstances where licensed electricians are neither authorised to work on energised network assets nor responsible for

commissioning or verification testing, respondents considered it inappropriate for them to certify such work.

Requiring a COES in these circumstances was described as duplicative, administratively burdensome and misaligned with operational accountability, without delivering additional safety benefit. One respondent supported COES issuance purely to create a regulatory record, while acknowledging it would not improve safety outcomes.

Discussion

Under the Act, a COES is required for prescribed electrical installation work as a means of providing formal assurance that the work has been performed safely and in compliance with applicable standards, and of allocating responsibility to the person who carried out (or is deemed to have carried out) the work.

Under clauses 14 and 15 of the Exemptions Order, COES obligations arise only because work is taken to be carried out under effective supervision of a licensed electrician. As discussed in section 3.3, consultation and established industry practice demonstrate that consumer mains and other point of supply interface work is undertaken by authorised Class D lineworkers and Class C cable jointers as part of integrated network connection, maintenance and restoration operations, under comprehensive MEC authorisation frameworks and VESI procedures.

This work is verified through network-specific testing and commissioning processes and occurs in operational contexts where licensed electricians are typically not authorised or accountable. In these defined circumstances, requiring a COES would not enhance safety, would duplicate existing assurance mechanisms, and would misalign certification responsibility with control of the work.

Energy Safe also considers it inconsistent to require a COES where, as outlined in section 3.3, compliance with the effective supervision requirement will not be expected in practice. In these circumstances, the COES framework does not serve its intended regulatory purpose.

Final position

Energy Safe will not enforce compliance with the requirement to give a COES under clauses 14 and 15 of the Exemptions Order where authorised Class D lineworkers or Class C cable jointers undertake work that:

- forms part of network connection, maintenance or restoration operations; and
- is confined to the limited area where distribution network assets interface with consumer-owned electrical conductors.

This position does not amend the Act, the Regulations or the Exemptions Order.

In these circumstances, Energy Safe considers that compliance with applicable network verification and commissioning processes, including polarity, continuity and network service testing, provides appropriate assurance that the work has been performed safely.

Outside of these circumstances, the requirements of the Exemptions Order apply and must be complied with.

Where work extends beyond the network–consumer interface into prescribed electrical installation work within a consumer’s installation, a COES is required and must be issued by the licensed electrical installation worker responsible for that work.

This issue has been referred to DEECA for consideration as part of potential regulatory reform.

3.5 Public lighting and metering work

Issue

Public lighting and metering work were not matters specifically addressed in our consultation paper. However, several respondents recommended that additional clarification be provided to stakeholders regarding the application of the existing licensing framework to these tasks.

Summary of submissions

CPPALUE, AusNet and Jemena recommended clarifying that the standing of poles, including public lighting columns, is not electrically licensed work. Jemena also noted that this may include energising and testing luminaires. These stakeholders noted that Class D lineworkers and Class C cable jointers each undertake VESI-selected public lighting units (*UETDRDU007 Install and maintain underground public lighting* and *UETDRIS013 Install and maintain public lighting systems*), which prepare them for this work.

These stakeholders also suggested clarifying that metering tasks are unlicensed work, provided the worker holds the appropriate units of competency. This includes Class C cable jointers who are trained in energy metering.

Beyond identifying these areas where clarification was sought, respondents did not provide further detail or context, including analysis of how the relevant exemption provisions operate or evidence supporting a different regulatory approach.

Discussion

Public lighting work undertaken by Class C cable jointers and Class D lineworkers is addressed through existing exemptions under the Exemptions Order.³

Public lighting competency units are agreed electives for Class C cable jointers and Class D lineworkers, meaning both classes complete this unit.⁴ Under Exemptions Order 38, Class D lineworkers and Class C cable jointers may undertake public lighting work attached to a MEC's or railway company's supply network without the usual licensing or contractor requirements, provided they are authorised by the MEC or railway company. However, work by Class C cable jointers and Class D lineworkers on non-MEC or non-railway public lighting must be effectively supervised by a licensed electrician.⁵

Metering work undertaken by Class D lineworkers and, in defined circumstances, Class C cable jointers is also addressed under existing exemptions in Exemptions Order 31. Those provisions permit metering work on network-owned metering equipment, or equipment connected to network-owned metering, subject to specified training, authorisation and verification requirements. These requirements operate alongside VESI procedures, which provide detailed controls for metering safety and commissioning.

We consider that no additional interpretive position is required in relation to public lighting or metering work as part of this decision paper.

³ Clauses 38 and 39 of the Exemptions Order

⁴ See <https://vesi.com.au/skills-and-training/>

⁵ Clause 39 of the Exemptions Order

3.6 Definition of distribution supply network

Issue

The definition of a distribution supply network was not a matter raised by us as part of the consultation questions. However, one stakeholder proactively raised concerns about whether the current definition adequately reflects contemporary electricity distribution network arrangements in Victoria.

Summary of submissions

CCPULAE submitted that the current definition of a distribution supply network, which is limited to voltages of up to 66 kV, no longer reflects modern network design in Victoria. They noted they are now required to develop and operate 132/66 kV substations to meet contemporary demand. These assets form part of the distribution supply network, despite exceeding the regulatory voltage threshold.

CPPALUE cautioned that retaining the 66 kV limit could create practical and regulatory barriers, including preventing Class D lineworkers from working on assets that are clearly distribution network infrastructure. They suggested the current voltage-based definition be reviewed to ensure it aligns with current and emerging network practice.

Discussion

We acknowledge the issue raised by CPPALUE and recognise that contemporary electricity network design and operation have evolved since the current definition of a distribution supply network was established.

We accept that assets such as 132/66 kV substations may be owned and operated by distribution businesses, managed under distribution safety management systems, and worked on by distribution-authorised personnel, despite exceeding the 66 kV threshold reflected in the regulatory definition.

We also note that other jurisdictions take different approaches to defining distribution networks, including functional or asset-based models rather than fixed voltage limits.

However, the definition of a distribution supply network is prescribed in the Regulations and the Exemptions Order. While administrative guidance can assist with consistent application of the existing framework, any substantive change to the definition would require policy consideration and regulatory amendment.

Accordingly, we consider that this issue is more appropriately addressed through broader regulatory reform processes rather than through interpretive guidance arising from this consultation.

Final position

We consider that the stakeholder submission raises a legitimate issue about the alignment of the current definition of a distribution supply network with contemporary network practices in Victoria.

While this decision paper does not propose to resolve that issue, we acknowledge the concerns raised and agree that the matter warrants further consideration at a policy level.

Accordingly:

- we will continue to administer and apply the existing definition of a distribution supply network as set out in the Regulations and the Exemptions Order; and
- the issue has been raised with the DEECA for consideration as part of broader work on regulatory reform and modernisation of the electricity safety framework.

This approach recognises the practical issues identified by industry, while ensuring that any change to the definition is progressed through the appropriate policy and legislative processes.

3.7 Classes of lineworkers

Issue

Although the consultation did not specifically seek views on the structure or nomenclature of licence classes, a small number of submissions raised concerns about whether the current classification of cable jointers as Class C lineworkers appropriately reflects the specialised nature of cable jointing work.

Summary of submissions

CPPALUE and Jemena submitted that the term ‘Class C Lineworker’ does not appropriately reflect the level of technical expertise and specialisation required for cable jointing work. They observed that the terminology may be perceived as diminishing the standing of cable jointers when compared to licensing arrangements in other jurisdictions.

Submissions did not suggest that the current classification limits authorised work, creates operational barriers, or gives rise to safety concerns. The issue raised was primarily one of classification, terminology and professional recognition.

Discussion

Victoria’s electrical licensing framework regulates cable jointing as a class of electrical linework, with cable jointers licensed as Class C lineworkers. This structure was designed to group related network competencies within a single licensing scheme for regulatory clarity and safety oversight, rather than to imply a hierarchy or relative level of expertise between licence classes.

We acknowledge that other Australian jurisdictions adopt different approaches. For example, Queensland issues separate electrical jointer and electrical linesperson licences, while the Northern Territory provides specific endorsements for cable jointing and linework on an electrical worker licence.⁶ These models demonstrate alternative frameworks for recognising specialisation within electricity supply industry roles.

However, submissions did not identify deficiencies in the Victorian framework in relation to safety outcomes, competency assurance or regulatory coverage. Nor was evidence provided that a change in licence class terminology or structure would address an identified regulatory risk or inefficiency. In this context, the issue relates to professional recognition and regulatory design, rather than a demonstrated deficiency in the current licensing framework.

We also note that broader reviews of electrical licensing and occupational regulation are currently underway at both the Victorian and Commonwealth levels, including work associated with the Victorian Energy Safety Roadmap⁷ and the Commonwealth Government’s consultation on National licensing for electrical occupations.⁸ These processes may provide a more appropriate forum for considering structural or nomenclature changes across jurisdictions, should government elect to progress such matters.

Final position

We acknowledge the concerns raised by submitters regarding the classification and terminology applied to cable jointers under the current licensing framework.

⁶ See Regulation 33 of the *Electrical Safety Regulation 2013* (QLD) and Regulation 19 of the *Electrical Safety Regulations 2024* (NT).

⁷ Department of Energy, Environment and Climate Action (2025), [Energy Safety Roadmap](#), Victorian Government website, accessed 19 June 2026.

⁸ The Treasury (Cth) (2025), [National licensing for electrical occupations](#), Treasury website, accessed 19 June 2026.

The classification of cable jointers as Class C lineworkers is established through the legislative and regulatory framework, including the licensing regulations. Energy Safe does not have authority to change licence classes or nomenclature through administrative interpretation.

Accordingly, this decision paper does not seek to resolve the issue. Any change to licence class structure or terminology would require policy development and regulatory amendment and is a matter for Government consideration.

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
14. 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.
15. 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.