

FRV Ref: 0038-383029212-163

1 September 2021

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

Via email: [REDACTED]

Dear Ms Williams,

**RE: Draft Report into Ausnet Services Wood Pole Management – Fire Rescue Victoria Submission.**

Please find attached Fire Rescue Victoria's (FRV) 'Public consultation submission form' for the Draft Report into Ausnet Services' Wood Pole Management.

Fire Rescue Victoria has read and evaluated the report with a particular focus on risk associated with pole management and fire causation and mitigation.

FRV thanks Energy Safe Victoria for the opportunity to submit a submission.

Yours sincerely,



**Ken G. Block**  
Fire Rescue Commissioner



**Martin Braid AFSM**  
Deputy Commissioner

*Encl.*

cc: [consultation@energysafe.vic.gov.au](mailto:consultation@energysafe.vic.gov.au)

# Public consultation submission form

## For the Draft Report into AusNet Services' Wood Pole Management Practices

### Public consultation

ESV is committed to providing an opportunity for the Victorian public to comment on its investigations into the management of wood poles. This is an important step in providing community confidence in the safety of the electricity distribution network across Victoria.

### Have your say

ESV invites interested parties to make a submission on the [Draft Report into AusNet Services Wood Pole Management](#).

Please use this submission form to provide your feedback. Email your completed submission form along with any other relevant supporting documentation to [consultation@energysafe.vic.gov.au](mailto:consultation@energysafe.vic.gov.au).

or

Post your submission to:

Energy Safe Victoria  
Consultation Response  
PO Box 262  
Collins St West VIC 8007

The closing date for submissions is Wednesday 1 September 2021.

All submissions and comments received by ESV in relation to his consultation are considered public documents and will be published on ESV's website. In line with [ESV's Privacy Policy](#), any personal information contained in the submissions will be redacted to protect the privacy of individuals.

### About you

An organisation	
Name of organisation	Fire Rescue Victoria
Contact name	Martin Braid Deputy Commissioner
Phone	[REDACTED]
Email address	[REDACTED]

An individual	
Full name	Martin Braid Deputy Commissioner
Phone	[REDACTED]
Email address	[REDACTED]

## Your submission

- Are you clear what the purpose of the AusNet Services Wood Pole Management, Public Technical Report is?  
 Yes  No
- Does the report give you enough information about what ESV's role is in ensuring the asset management practices of the Victorian Major Electrical Companies (MECs) deliver sustainable safety outcomes for the community in the long term?  
 Yes  No
- Does the report give you enough information about how ESV has investigated the wood pole management systems and practices in place at AusNet Services?  
 Yes  No
- Does the report give you enough information about what happens with the findings of ESV's investigation of AusNet Services' wood pole management systems and practices?  
 Yes  No
- Please list any issue or concern with the draft AusNet Services Wood Pole Management, Public Technical Report.

**Observation 1.** Table # 1 Page 7. ESV or regulators prescribe material type of pole for replacement (concrete). The report states 62% of new poles installed are concrete which makes the assumption that Ausnet and other MECs are still installing wood poles. Is this supported for best practice for bushfire mitigation risk and what is ESV's strategy to address or monitor.?

**Observation 2.** FRV are unable to find definitions for third party damage to poles (figure 7).

If there is a larger percentage of third party failures, is there scope to lessen the risk from third party damage and include in asset management systems or plans. Can third party damage be broken down further?

**Observation 3.** FRV would like to comment that the report does not show relationship from bushfire causation data regarding compromised or damaged poles. Does this include damaged poles, electric line contact with vegetation and arching and sparking ect? Is this something that is broken down in the BMP? Page 17 Table # 4 refers to the inspection interval in HBRAs and FRV would be interested in the assessment of the changes.

**Observation 4.** Does the risk of fire related failure or causation increase from poles that have had remedial maintenance works implemented?

**Observation 5.** Figure # 4 page 10 indicates there is an increasing number of deteriorating poles in the population and indicates additional interventions may be required. What is the inspection regime on the poles and does it warrant an increase in inspections?

**Observation 6.** Pole Characteristics and performance – Is there further elaboration on why Ausnet replaces on average earlier with wood poles than other networks? Can the report define why Ausnet has less pole failures than other MECs table 5 page 19? Can this help drive best practice across the MEC's?

- **What changes would you like to see in the draft AusNet Services Wood Pole Management, Public Technical Report to address your issue or concern?**
- Considerations around comparison to other MECs that have been investigated in the past. Findings on why Ausnet may have a smaller or larger percentage of failure or success related to practices.
- Consideration of observations raised by FRV to aid in fire related risk mitigation.
- Data highlighting relationship between bushfire and compromised or damaged poles.
- Does the risk of fire related failure or causation increase from poles that have had remedial maintenance works implemented?

## Who we are

We are Victoria's safety regulator for electricity, gas and pipelines.

Our role is to ensure that Victorian gas and electricity industries are safe and meet community expectations. We are also responsible for licensing and registering electricians and educating the community about energy safety.

More information is available on the Energy Safe Victoria website: [www.esv.vic.gov.au](http://www.esv.vic.gov.au)