

From: [REDACTED]
Sent: Friday, 3 September 2021 3:45 PM
To: Consultation
Cc: [REDACTED]
Subject: AusNet Services Wood Pole Management

Please accept this as a late submission

Apologies for the delay. You'll note I'd sought further information from ESV some two weeks prior to the close date, only to receive clarifications this Wednesday (which we felt should be in the Report in the first place).

Surely, the report (even for public consumption), could've just stated what the changes were, as your Head of Electrical Network Infrastructure described below.

Engaging with the MEC's on its own, is not necessarily going to provide a good outcome for the community. May I suggest respectfully and in defence of the community I live in, that ESV stop "approving" and "rubber stamping" outdated and dangerous work practices.

Serious question: Has ESV engaged independently with other people (outside of the MEC's) who have industry knowledge? I'm talking here as to structural / mechanical knowledge?

The current situation which sees MEC's use the defence of "ESV approve our plans", so "what more should we do" is not going to result in "as far as practicable" safety practices or outcomes. The AER Uncertainty appendix Dec 2020 (attached) even uses ESV as a potential trigger for a cost pass through event when it states:

Page 19: "Should ESV make further recommendations or otherwise require action in relation to our pole management practices, we need to ensure we are able to recover our costs of responding to these recommendations or requirements and complying with our safety obligations."

Page 21: "whilst we have appropriately management our pole assets to date, we cannot prevent ESV recommending that more stringent practices are required in order for us to continue to operate and maintain our network to minimise, as far as possible, any risk to the safety of our customers, damage to their property, and any bushfire danger. Given the risks posed to our customers and the wider community, it would be inappropriate not to put such recommendations into practice"

ESV's submission to the AER Feb 2021 (also attached) states :

"ESV does not accept that Powercor's pole management practices were best practice during the 2016-2020 period", and that

"ESV intends to hold Powercor to account for delivering, as a minimum, the total pole intervention volume accepted by the AER in determining the Powercor's final revenue allowance for the 2021-26 price period by having Powercor commit to this volume within its BMP."

Whilst Powercor (some 12 months into the PMIP program) failed to convince the AER as to the need for increases pole interventions, it has not convinced ourselves nor the wider community that the proposed pole replacements as forecast are adequate and meet community expectations of a network maintained safely, as far as practicable.

Kind Regards

[REDACTED]
General Manager - Products

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