

10 July 2024

Ms Leanne Hughson  
Chief Executive Officer  
Office of the CEO  
Energy Safe Victoria  
Level 5, Building 2  
4 Riverside Quay  
Southbank Victoria 3006

Jemena Limited  
ABN 95 052 167 405

Level 16, 567 Collins Street  
Melbourne, VIC 3000  
PO Box 16182  
Melbourne, VIC 3000  
T +61 3 9173 7000  
F +61 3 9173 7516  
[www.jemena.com.au](http://www.jemena.com.au)

Dear Leanne

**RE: Energy Infrastructure Safety Case Guidelines [DRAFT]**

Jemena is supportive of the requirements outlined in the draft energy infrastructure safety case guidelines and has the following comments:

- Section 1.2 “must identify **all** the hazards and risk”. Only foreseen (**known**) hazards and risks can be identified. Unknown risks cannot be identified.
- Section 1.2, Box 1.2, A hazard is anything. External hazards and risks need to be excluded from the definition. E.g. planes and vehicles. Need reference from an electrical prospective.
- Section 4.5, regarding the indicative assessment timeframes, a timeframe for a preliminary submission review should be included.
- Section 4.6, for a fixed submission of each five years, if the acceptance process takes longer within the 5 year period, it may result in the accepted ESMS to be in action for less than a 5 year period.
- Section 4.7.1, under table 4.2, add “please seek ESV advice on material versus immaterial items prior to revision / submission of the ESMS”.

If you require any further information please contact Alan Shu on 03 9173 8759.

Yours sincerely



**Michael Ciavarella**

Acting General Manager Asset & Operations - Electricity  
Jemena Electricity Networks