

# IPART Review of Safety Management System Reporting Requirements

Submission on IPART Draft Electricity Networks Reporting Manual  
July 2018

## 1. TransGrid Submission

Table 1: TransGrid submission to IPART Draft Electricity Networks Reporting Manual

IPART Draft Reporting Manual Reference	TransGrid Submission
1. Table A.6 Reliability and Quality of Supply	<p>TransGrid's view is that none of these measures are applicable to a TNSP. Could this please be confirmed in the title of the table or in a footnote if this is also IPART's understanding. If this is not IPART's understanding, TransGrid would welcome discussion with IPART on this matter.</p>
2. Table A.9 Safety impacts associated with protection of the environmental (sic)	<p>TransGrid believes that reporting of environmental damage is captured sufficiently through its other existing reporting requirements. There seems limited value in additional reporting and it does not appear to relate closely to the safety aspects of environmental damage criteria of the <i>Electricity Supply (Safety and Network Management) Regulation 2014</i>.</p> <p>TransGrid has obligations:</p> <ul style="list-style-type: none"><li>– under the <i>Protection of the Environment Operations Act 1997</i> (POEO Act) to report incidents that cause or potentially cause material harm to the environment, including harmful noise emissions</li><li>– to report incidents to the Office of Environment and Heritage (OEH) if TransGrid suspects that that it may have caused damage to an aboriginal object</li><li>– to report breaches of the Code of Practice for Authorised Network Operators if TransGrid believes, or it comes to TransGrid's attention, that TransGrid have not fully assessed the impacts for a particular project, and that omission has led to material harm to the environment</li><li>– to meet environmental planning requirements under the <i>Environmental Planning and Assessment Act 1979</i>, where applicable to TransGrid development.</li></ul> <p>In any of the above instances, if the relevant regulator believes a breach of an Act or Code has actually taken place, they can fine TransGrid or commence proceedings against TransGrid. This</p>

IPART Draft Reporting Manual Reference	TransGrid Submission
	<p>information is then made available to the public through the provision of the public registers.</p> <p>TransGrid also have two environment protections licences and an environmentally hazardous chemicals licence in place for which annual reporting is completed.</p> <p>TransGrid also completes National Greenhouse and Energy Reporting (NGER) reporting to the Department of Environment (Commonwealth).</p>
<p>3. Table A.10 Amendments and improvements to Formal Safety Assessments (FSA) or Associated Risk Treatments<sup>a</sup></p>	<p>Please reconsider the wording of Footnote 'a' of Table A.10 to better align with the Australian Standard AS 5577 – 2013: Electricity network safety management systems (AS 5577) requirement to reduce safety risks to as low as reasonably practicable (ALARP), where it is not reasonably practicable to eliminate safety risks so far as is reasonably practicable (SFAIRP). Changes to FSAs may also be required if it is identified that a hazard is no longer being managed to ALARP, not just SFAIRP.</p>
<p>4. Table A.11 Design, construction and commissioning</p>	<p>TransGrid considers that the measures “contestable designs certified” and “contestable installations reviewed” are not applicable to a TNSP. Could this please be confirmed through inclusion of a footnote if this is IPART’s understanding.</p>
<p>5.</p> <ul style="list-style-type: none"> <li>– Table A.13 Inspections (vegetation) Aerial/Ground based</li> <li>– Table C.2 Vegetation tasks</li> <li>– Table C.3 Asset tasks</li> </ul>	<p>It may be helpful for data interpretation purposes for there to be consistency between ‘bushfire risk category’ (refer Table A.13 and Table C.2), and ‘within bushfire prone areas’ and ‘outside bushfire prone areas’ (refer Table C.3).</p> <p>It is suggested to require the data in Table A.13, Table C.2 and Table C.3 to be expressed consistently on either a ‘bushfire risk category’ or ‘within bushfire prone areas’/‘outside bushfire prone areas’ basis, but not on a varying combination of both bases.</p>
<p>6. Table A.14 Authorised Persons Training and competency</p>	<p>TransGrid will report on the specific line items presented in Table A.14 Column 1 and Column 2 where possible. TransGrid may need to modify the presentation and naming of information reported in Column 1 and Column 2 to align with its training systems.</p>
<p>7. Table C.2 Vegetation tasks</p>	<p>Please define the terms ‘A1’, ‘A2’, ‘A3’, ‘A4’ and ‘Hazard trees’.</p>