

From: [REDACTED]
To: [REDACTED]
Subject: Corangamite Shire Submission to Proposed Electricity Safety (General) Regulations
Date: Wednesday, 11 December 2019 7:54:25 AM
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RIS submissions
Risk, Regulatory Planning and Policy
Energy Safe Victoria
PO Box 262
Collins St West, Victoria 8007

To whom it may concern,

Re: Corangamite Shire provide the following Submission to Proposed Electricity Safety (Electric Line Clearance) Regulations 2020

Corangamite Shire is a large rural Shire of 4200km² located in Victoria's south-west and stretches from Skipton in the north to the Southern Ocean in the south. There are 11 rural townships within the Shire, being Camperdown, Port Campbell, Terang, Noorat, Princetown, Derrinallum, Darlington, Lismore, Skipton, Cobden and Timboon. Corangamite Shire is currently responsible for Electric Line Clearance in Camperdown and its tree assets are impacted by electric line clearance pruning by other companies in other townships. Council are also a first point of contact when the community are not satisfied with the works being completed by other responsible parties (major electricity companies) on trees within urban and rural areas. The Corangamite Regional Landfill is an important waste management facility for the state of Victoria.

Corangamite Shire supports the regular review of the Electricity Safety (General) Regulations and changes that are made to support community safety and efficient delivery of services. Council has a number of concerns with the existing regulations and proposed changes which are outlined below.

- Objective of the regulation Part 1, Regulation1
Council support this approach and believe this has been a missing component of the process for managing trees around powerlines. Street trees in rural towns are often heavily damaged from excessive pruning and long timeframes between pruning cycles. Management Plans Part 1, Regulation 9(2)
Council believe that the requirement for a responsible person should also be adjusted to be on a five year. This is supported by the fact that the issues

which apply for major electricity companies also applies to other responsible persons. In addition to this the level, amount and risk of pruning undertaken by particularly municipalities is far less than major electricity companies. It would also appear from the examples provided that major fires have occurred due to major electric companies and not other responsible person areas. Council contract are also typically aligned to the regulation updates and therefore major changes are not required between regulation updates.

- Indigenous Vegetation Schedule 1, Part1, Regulation 16(3). Also linked to Schedule 1, Part 1, Regulation 5A

Council agree with this change, however think it should be strengthened to include Trees within an urban area and specifically provide timeframes for pruning cycles. Council has experienced significant damage to street trees by contractors working for major electricity companies who have a pruning cycle that is often greater than 3 years. Council has also been informed that in some rural areas the pruning cycle is 5 years unless complaints are received. These extended pruning cycles result in extensive pruning of street trees which reduced the amenity of the town and increases maintenance costs for Council. A number of towns in our municipality are in high rainfall areas and therefore trees have been cut back to a 1m stump. This is not a desirable outcome for the community.

- Increase Tree Management Requirements Schedule 1, Part 1, Regulation 1

Council are unsure how this will be defined and complied with given the need for this exemption can be self- determined and with different priorities between the major electricity companies and municipalities who own the tree assets and amenity value they provide to the community.

New requirements

- Site clean-up timeframes (eg prior to declared fire danger period)

Council has experienced issues with contractors not removing trimmed materials for extended periods (upto 5 weeks) as standard practice and in some cases never returning to make good the area. This increases the fire risk and creates unnecessary concerns from the community about the standard of work being provided. It is understandable that some retention of material can have a time advantage however this timeframe requires management as the electric line clearance responsibility appears to end once the vegetation is on the ground and not when it is removed. Five weeks after our fire danger often sees Corangamite shire in the middle of January when these piles of tree limbs are being removed, which is the height of our fire danger period.

- Replacement of inappropriate trees in urban areas

Should the regulations also provide some guidance and provision for the development of management plans for specific areas (eg towns) where trees that are inappropriate around powerlines can be replaced with appropriate species. This would need to be at the cost of the major electricity supplier and responsible person, with the agreement between the tree asset owner, interested parties and public consultation. This process has the ability to

reduce long term costs for electric line clearance management to major electricity companies and significantly reduce the workload over time.

Council thank ESV for providing the opportunity to make this submission and hope that the information provided can be considered in the next phase of the regulations development. If you require further information on this submission of Corangamite Shire Council please feel free to contact me.

Sincerely

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