



Our Ref: SAC20\_009

4 March 2020

██████████  
RIS Submissions  
Risk, Regulatory Planning and Policy  
Energy Safe Victoria  
PO Box 262  
Collins St West, Victoria 8007

Dear ██████████,

**REQUEST FOR COMMENTS REMAKE OF THE ELECTRICITY SAFETY (ELECTRIC LINE CLEARANCE) REGULATIONS 2020**

Thank you for the opportunity to comment on the following documents associated with the remake of the Electricity Safety (Electric Line Clearance) Regulations 2020:

- Regulatory Impact Statement: Electricity Safety (Electric Line Clearance) Regulations 2020; and
- Exposure Draft - Electricity Safety (Electric Line Clearance) Regulations 2020

Transmission Operations Australia and Transmissions Operations Australia 2 (TOA-TOA2) provides the following comments for ESV's consideration.

**Electricity Safety (Electric Line Clearance) Regulations 2020- Exposed Draft**

Section 8 of the Code of Practice for Electric Line Clearance requires trees adjacent to the transmission line to be managed to avoid, as far as practicable, a tree entering the minimum clearance space (MCS) around that line if the tree falls.

The MCS is defined in section 30, supported by a table of clearances for nominal transmission voltages and 2 figures illustrated in schedule 2 of the code.



TOA-TOA2 suggests that the drafted regulations could be amended to provide clarity and better alignment of the content of section 8 and 30 and the illustrated figures in schedule 2.

### **Recommendation**

TOA-TOA2 proposes the following amendment to section 8 and 30 of the drafted regulations.

### **8 Owner or operator of transmission line must manage trees around minimum clearance space**

*A responsible person who owns or operates a transmission line must—*

- (a) manage trees below the transmission line to mitigate, as far as practicable, the fire risks associated with the fuel load below the transmission line; and*
- (b) manage trees adjacent to the transmission line to avoid, as far as practicable, a tree entering the ~~minimum clearance space~~ **line of fall tree hazard space** around that line if the tree falls.*

### **30 Transmission lines**

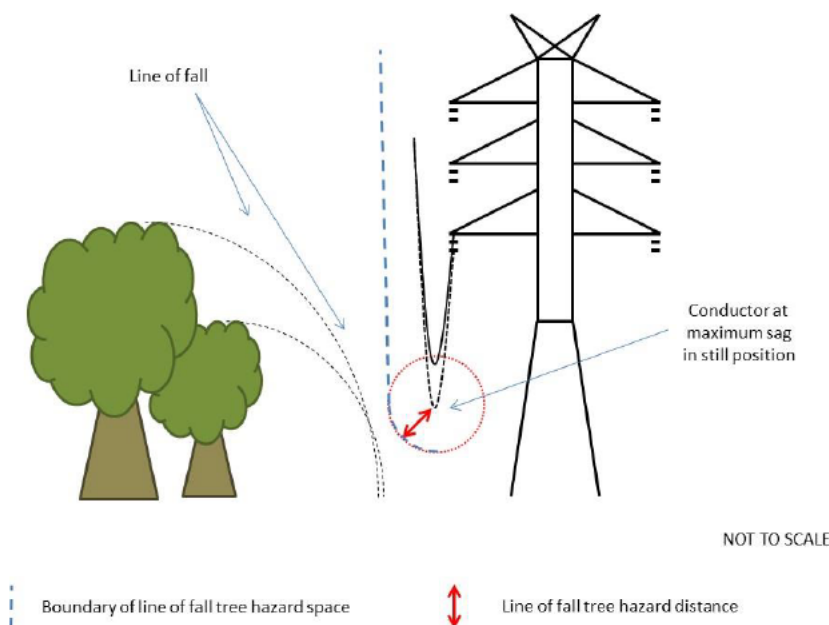
(1) The minimum clearance space for a span of a transmission line is—

- (a) the space that is bound by the horizontal limits determined in accordance with subclause (2) and that, between those limits, extends downward from the level of the line for the applicable vertical distance; and
- (b) the space above that space.

(2) The horizontal limits of the minimum clearance space are reached by extending horizontally from the transmission line to the left and right of the line for the applicable horizontal distance.

- (3) The line of fall tree hazard space for a span of transmission line is –
- (a) the space bounded by a circle centred on the conductor at maximum sag in the still position with radius equal to the applicable line of fall tree hazard distance; and
  - (b) the space above that space.
- (4) For a transmission line of a nominal voltage that is specified in an item in Column 1 of the following table—
- (a) the applicable horizontal distance is the sum of—
    - (i) the distance specified in Column 2 for the [REDACTED]
    - (ii) an additional distance that allows for conductor sag and sway; and
  - (b) the applicable vertical distance is the sum of—
    - (i) the distance specified in Column 3 for that item; and
    - (ii) an additional distance that allows for conductor sag and sway.
  - (c) the applicable line of fall tree hazard distance is –
    - (i) The distance specified in Column 3 for that item.

The figure below illustrates the line of fall tree hazard space as described above.





**Transmission  
Operations  
Australia**



**Transmission  
Operations  
Australia 2**

It is understood that comments to the Regulatory Impact Statement: Electricity Safety (Electric Line Clearance) Regulations 2020 and the Exposed Draft – Electricity Safety (Electric Line Clearance) Regulations 2020 will be discussed at the ELCCC prior to the finalisation of the Electricity Safety (Electric Line Clearance) Regulations 2020.

Thank you again for the opportunity to comment on the Regulatory Impact Statement and the Exposed Draft – Electricity Safety (Electric Line Clearance) Regulations 2020.

Please contact me on [REDACTED] or email [REDACTED] should you have any queries.

Yours sincerely

[REDACTED]

[REDACTED]

**Network Safety Manager**