



Powering Business Worldwide

Eaton
Eaton Industries Pty Ltd
10 Kent Road,
Mascot NSW 2020
Ph: +61 2 9693 9333
Fax: +61 2 9693 1258
www.eatonelectric.com.au

22nd of May 2020

██████████
General Manager – Risk, Regulatory Planning and Policy
Energy Safe Victoria (ESV)

By email: consultation@energysafe.vic.gov.au

Dear ██████████

See below Eaton's response to ESV's letter sent on the 8th of April 2020 seeking comment regarding the *Extending the Prohibition on Certain Models of RCBOs* Regulatory Impact Statement (RIS).

Since ESV's market intervention, the market in Victoria has insisted on RCBO pricing offered prior to the prohibition notice which means that the cost of the RCBO prohibition has been borne by suppliers of otherwise compliant product.

Eaton provided information to Australian Industry Group (AI Group) regarding the significant cost impact to Eaton due to ESV's market intervention which was aggregated with other suppliers' data in an earlier AI Group submission to ESV. We would be prepared to release specific information to ESV on a confidential basis.

Eaton believes there's no net community benefit from ESV's market intervention. The prohibition mistakenly targets products rather than poor installation practices of, lack of competency of, or poor testing and verification of installations by electrical contractors, and / or poor inspection processes by electrical inspectors.

Eaton does not support a change to the product standards AS/NZS61009.1 or AS/NZS3190. The IEC Technical Committee and the equivalent Australian / New Zealand joint national committee EL-004 have both reviewed the issue and found it to be an installation issue, not a product issue.

However, Eaton does support changes currently in progress via committee EL-001 to the installation standard, AS/NZS3000, to remove the exemption for testing RCDs (including RCBOs) when supply is not available. This will ensure there is a mandatory requirement to test the installation and verify the correct and continued operation of the RCDs.

Eaton proposes that ESV consider withdrawing the prohibition from the date of application of that amendment of AS/NZS3000, giving effect to the removal of the exemption for testing in the absence of supply.

Alternatively, should the prohibition remain in place, Eaton suggests that ESV consider amending it to exclude those RCBOs with an incoming neutral connected by 'pigtail' type

arrangement, as it is difficult to misunderstand the installation and therefore these devices should not fall within the scope of the prohibition.

Eaton understands that AI Group is preparing a submission on behalf of industry and supports the recommendations therein.

Sincerely,

[REDACTED]

Product Marketing Manager – LV Assemblies & Circuit Protection

mobile: [REDACTED]

[REDACTED]