

[REDACTED]

From: [REDACTED] [REDACTED]@saputo.com>
Sent: Wednesday, 18 September 2019 4:38 PM
To: Consultation
Subject: RE: electricity general regulations 2019 consultation paper

Thankyou, I guess I didn't understand the driver for why the certification is required to be independent. Why can't the HV designer certify their own work, has a large number of installations been found to be inadequately designed?

In QLD, Electrical design generally has to be RPEQ certified however this doesn't need to be independent, it can be the original designer to my knowledge.

We are taking part of QLD's engineering design certification requirements but increasing the complexity.

The whole "competent person" complicates it as it seems to be driving towards the chartered engineering requirement which a lot of people won't agree with as who will actually be able to deem someone else as competent. There is no AS2067 specific training or certification so how can you say someone is competent?

I just think it complicates a process that doesn't seem to have any visible issues (to me) and those I work with.

I'll be interested to know what feedback you have from HV Designers.

Thanks

[REDACTED]

[REDACTED]

From: Consultation [<mailto:Consultation@energysafe.vic.gov.au>]
Sent: Wednesday, 18 September 2019 4:25 PM
To: [REDACTED] [REDACTED]@saputo.com>
Subject: FW: electricity general regulations 2019 consultation paper

Dear [REDACTED]

Thank you for your query regarding this proposed regulation. Apologies for the delay with getting back to you.

The requirement is set out in proposed regulation 205.

It is intended that a 'competent person' be required to certify in writing that the proposed high voltage installation will comply with the prescribed standards. In particular, AS 2067. This document must then be provided to the relevant electrical contractor or electrician before the contractor or electrician commences the electrical work.

Competent person is defined in proposed regulation 106 as follows:

"For the purposes of these regulations, a person is competent to perform a specific task if that person has acquired, whether through training, qualifications or experience (or a combination of these), the skills necessary to perform the task correctly".

A licensed electrical inspector could do the certification provided that the inspector is competent to do so in accordance with the above requirement. However, that inspector would then not be permitted to carry out the final inspection of the completed work.

The use of the word “independent” is intended to mean a person who was not involved in the original design of the work. It may be that we need to modify the regulations to make this clearer.

Please feel free to contact me if you have any further queries.

Kind regards

From: [redacted] [redacted]@saputo.com]
Sent: Wednesday, 11 September 2019 8:41 AM
To: [redacted]
Subject: electricity general regulations 2019 consultation paper

Morning [redacted], I was just reading through the consultation paper for the new electricity general regulations and wanted to query the item below.

What are the thoughts on what “independently certified” actually means and by who. Is the independent person a prescribed licensed inspector, or ESV or a separate engineering company?

Also what does certified mean? Are we saying it needs a chartered electrical engineer to sign it off the drawings or design calculations etc?

Thanks

[redacted]

- 3. Require that high-voltage installation work be independently certified for compliance with standards. ESV estimates that this requirement will apply to about 300 installations per year. It explains that the additional costs of verification work are relatively minor for larger businesses, which do the majority of such work, and that additional costs are between \$5,000 and \$10,000 per installation for smaller businesses. The combined cost is estimated to total \$1.134m annually over the next ten years.

Ensure that proposed high voltage installation work will comply with AS 2067 and AS/NZS 7000 when completed; but do not allow the designer to certify (i.e. no self-certification).	Additional inspection costs. The requirement would not apply to the repair or maintenance of a high voltage electrical installation where such a repair or such maintenance did not compromise the original design of that installation. The total additional cost is estimated to be less than \$1,134,375 annually.	unwarranted requirement. The current regulations do not require independent verification of compliance with standards for high voltage electrical installation work. This increases the dangers of that type of work. The proposed change would give greater independent assurance that high voltage installation work adhered to the relevant standards.
Require low voltage protection to	Additional connection costs for	Greater safety from matching

[redacted]

Engineering & Project Management Office



Saputo Dairy Australia Pty Ltd
Level 15, 2 Southbank Boulevard
Southbank, Victoria / Australia / 3006



Tel: [REDACTED] / Mob: [REDACTED]
www.mgc.com.au
www.saputo.com

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