



**EnergyAustralia**

LIGHT THE WAY

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Dear Commissioners

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### ESV Energy Infrastructure Safety Case Guideline

EnergyAustralia is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory, of which around 22k customers are supported under our hardship program (EnergyAssist). EnergyAustralia owns, contracts, and operates a diversified energy generation portfolio that includes coal, gas, battery storage, demand response, solar, and wind assets. Combined, these assets comprise 4,500MW of generation capacity.

EnergyAustralia welcomes the opportunity to comment on the draft Energy Infrastructure Safety Case Guideline (*the guideline*). We have historically advocated for a guideline to ensure Safety Case applications are populated correctly and we therefore appreciate the assurance the guideline will provide when producing our Safety Cases; however, there are elements in the guideline that we believe are too onerous and should be reconsidered to more reasonably align the time/resource investment with the potential impact.

Our primary concern with *the guideline* is the expectation that any revisions to an approved Safety Case merits the same level of approval, both from the participating organisation and the ESV. In particular, our concern is on minor (and in our opinion, inconsequential) amendments, such as the update of an employee's title, requiring the same submission and assessment process as an initial Safety Case application or an amendment with tangible ramifications to the operation of an approved Safety Case (e.g. operational process change).

While we acknowledge the onerous requirements for submitting a Safety Case have been developed to ensure the ESV are satisfied that the organisation has accurately assessed and agreed to what they have outlined in their application, we do not believe a change in the title of an employee listed in an organisation's Safety Case automatically necessitates an amendment, and subsequent re-assessment of it. **We suggest the guideline differentiate between the changes that would justify a revision/re-assessment;** for example, revision is required where a change to a person listed in the Safety Case impacts their responsibility assigned in the Safety Case.

As an additional consideration, we believe that it would be reasonable for **any revision/ re-assessment to a Safety Case to coincide with a new 5-year approval process**, considering the revision and re-assessment follow the same requirements as an initial application, and any change that followed would require a revision/ re-assessment.

If you would like to discuss this submission, please contact me on 03 9060 1361 or [travis.worsteling@energyaustralia.com.au](mailto:travis.worsteling@energyaustralia.com.au).

Regards

**Travis Worsteling**

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