



15 July 2024

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Via email: Leanne.Hughson@energysafe.vic.gov.au

Re: Response to energy infrastructure safety case guidelines consultation

Origin appreciates the opportunity to provide feedback into Energy Safe Victoria's (ESV) consultation paper regarding draft energy infrastructure safety case guidelines. The purpose of this letter is to outline Origin LPG's position on the draft gas safety case guidelines (the Guidelines) and seek further clarification or raise an issue where necessary.

Declaration of a gas company

As per section 5 (s5) of the Gas Safety Act 1997 (the Act) the Governor in Council may declare any of the following a gas company:

- a) a person who is an owner or operator of a pipeline
- b) a person who is an owner or operator of a facility or service for the control of the conveyance of gas
- c) a person who is an owner or operator of a service for the sale by retail of gas (other than liquefied petroleum gas which is used or intended to be used for automotive purposes)

When an entity is declared a gas company, that entity has the responsibility of developing and maintaining a gas safety case (GSC) for its facility as well as implementing a rigorous compliance program. This to ensure business activities are conducted in a way that puts the health and safety of staff members and members of the public as the top priority. Implementing and maintaining a GSC is a resource intensive process to ensure the GSC is valid and that compliance is enforced, with that being said Origin LPG would seek further clarification around the following:

1. With the number of gas operators in Victoria who would fall under the definitions of s3 and s5, how are some gas operators exempt from the GSC requirements?
2. What are the thresholds used to determine which gas operators are designated a gas company?

Review of accepted safety case - every five years

Origin LPG seek clarification this section 2.2.1:

3. Please clarify when a GSC is due, basis the original submission date, and any intervening revisions (either material or immaterial), all of which have been accepted by ESV.

Material versus immaterial revisions

Origin LPG appreciate the ESV's differentiation between material and immaterial revisions but seek further clarification on:

4. Origin manages all changes, whether material or immaterial, through its Management of Change processes which are embedded into the GSC. With that in mind, could ESV please outline the reasoning for requiring the GSC to be updated for each immaterial change.

5. If a GSC revision is required for immaterial changes does this revision then need to be resubmitted and are gas companies required to wait for ESV approval for immaterial changes before implementing those changes?
6. Are ESV, as part of the guideline release, planning on providing a comprehensive and consistent list of what constitutes material and immaterial changes?

Timeframe for ESV decisions

As per section 4.5 Timeframe for Energy Safe Decisions and table 4.1 Potential Timeframes in the Guidelines, Origin LPG think these timeframes could be restrictive with respect to implementing business improvement and structural changes which could potentially impact operations from a safety or commercial perspective. Origin LPG would like to note that this is something that non declared gas operators do not need to comply with.

Can ESV please clarify:

7. The timeframe whereby provisional acceptance would be granted.
8. With regards to five yearly revisions, does the revised GSC need to be submitted to ESV and approved prior to the five year due date?
9. When a revised GSC is with ESV for assessment, does Origin LPG operate on the existing GSC or the revised GSC?

GSC submission file format

As per section 4.2 Formal Submission of the Guidelines, ESV have requested that any GSC submitted for review and approval should be provided in both .docx and .pdf formats. ESV also request that a marked-up version of the GSC be also submitted so that changes can be readily identified. Origin LPG seek to push back on these requirements for the following reasons:

- Origin LPG consider the GSC a controlled document and as such we do not release editable versions of our controlled documents externally. It is also not an industry norm to provide editable versions of controlled documents as we do not share such documents with any other Regulators.
- Origin LPG take a collaborative approach when both material or immaterial revisions of the GSC are required. The marked-up version could contain internal discussions and sensitive information that is not intended (at that stage) or appropriate for public/external parties, including Regulators. It also increases the risk of causing unnecessary confusion or misinterpretation.

Origin LPG would also like to point out that it is not a legislative requirement to provide either a .docx format or a marked-up version of the GSC.

10. Origin LPG request ESV to consider not including the requirement to provide .docx format and marked-up versions.

Should you have any questions or clarifications on the above matter, please contact Mike Murphy 03 9652 5253 or mike.murphy@originenergy.com.au.

Yours faithfully,



David Hamilton
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