




MASTER
ELECTRICIANS
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Amendments to the Electricity Regulations 2012

Improving Safety, Lifting Industry Standards.

 27th April 2023

Introduction

Master Electricians Australia (MEA) is the trade association representing electrical contractors recognised by industry, government and the community as the electrical industry's leading business partner, knowledge source and advocate. Our website is www.masterelectricians.com.au

Funding contribution to the Energy Security Board – 44E

MEA are supportive of mechanisms to ensure appropriate funding of bodies such as the Energy Security Board to ensure that they can perform their functions adequately. The addition of the AESB levy is not problematic, however as matter of good practice MEA has concerns that wording “*costs determined by the Minister*” is a Henry the VIII clause¹ and the quantum of the AESB could be increased at the whim of a future Minister if politically expedient adding costs to consumers and business. MEA is not suggesting that the current administration or Minister would do so, but if there was another formula or calculation that could be included to define how it is calculated it may be more transparent.

Caravan and Event Safety - 5

MEA is fully supportive of this change, to bring caravans and similar public event and demountable buildings under the classifications of electrical installations.

Connection Testing and Inspection Procedures - 54

MEA is supportive of this change in adding “the approved procedures of the *metering provider* and the *OTR*” to the procedures of the DNSP as being valid testing and inspection instruments.

It is the view of MEA and other Industry participants, that there is insufficient transparency around the process of achieving a connection through the multitude of siloed entities involved, leading to confusion, cost and delay in connections to the network. Whilst this may not be able to be addressed in this instrument, it is worth noting with a view to alignment with other regulation.

Recording of Testing Results for Electrical Installations on Electronic COC – 55A

MEA is supportive of the changes in this amendment to record test results before the energisation of an installation, a positive obligation to provide the ECOC to the OTR and the owner of installation. Serious consideration should be given to the adjustment of the design of

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https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Scrutiny_of_Bills/Completed_inquiries/work41/c05

this platform to be able to record test results and submit them in real time in the interests of efficiency.

As discussed in the public forum on the 26th of April, our members and others within industry are frustrated that SAPN still do accept ECOC's electronically, and have a paper driven process that is inefficient, non-compliant with regulation, and cost & time intensive. Even if the rectification of this issue is not in the purview of this regulatory instrument, MEA believe that DEM and related departments should look to engage with industry to rectify this situation and bring the submission of compliance documentation up to best practice.

Issuing of Electronic COC for Other Electrical Work – 56

MEA supports this amendment.

Rescue and Resuscitation Training - 68

MEA is supportive of this amendment, as it supports the current discussions around CPD and licensing reform.

Testing Instrument Record Keeping - 69

MEA is supportive of this amendment and its focus on being forward looking and not retrospective in keeping results on already purchased equipment.

Clarification of Reporting Requirements Under Safety, Reliability and Maintenance Technical Management Plans - 73

MEA is supportive of this amendment to require an “exempted” electrical worker/person working under a Safety, Reliability, and Maintenance Technical Management Plan to still report compliance in some manner.

As highlighted by the department personnel in discussions in the public forum of the 26th, this does not fix the existing loophole in the licensing regulations of “indent” installations that are not connected to the grid being able to have unlicensed electrical workers perform electrical installation work. To that end we believe that DEM and the relevant government departments (CBS, OTR, and SafeWork) should work to align the different pieces of legislation and regulation to close this loophole, in the interests of public safety.

330 KV Transmission Line Approach Limits

MEA supports this amendment.

Administrative Matters

MEA supports this amendment.

Conclusion

MEA applauds the SA Government for its commitment to review and improvement of legislation and the leading role it has taken with innovation for electrical distribution policy in the energy transformation challenge. In line with our comments in the body of this consultation, MEA believe though that urgent alignment work needs to be undertaken between energy policy (DEM) and licensing (CBS), regulation (OTR) and safety (SafeWork) to complement the new industry landscape and bring it up to best practice. MEA stand ready to work collaboratively with the SA Government to meet this challenge.

