

1 May 2023

Mr Brian Massey  
Office of the Technical Regulator  
Department for Energy and Mining  
By email: demenergymarketreform@sa.gov.au

Dear Brian

**Re: *Proposed amendments - Electricity (General) Regulations 2012***

ElectraNet is the primary Transmission Network Service Provider (TNSP) and jurisdictional planner in the South Australian region of the National Electricity Market. ElectraNet operates a transmission network of approximately 5,600 km of principally 132kV and 275kV transmission lines.

We appreciate the opportunity to provide this submission on the proposed amendments to the Electricity (General) Regulations 2012 – the Regulations.

ElectraNet is currently developing approximately 200 km of 330Kv lines as part of Project Energy Connect which will directly connect the South Australian and New South Wales transmission systems. We note that the proposed amendments to the Electricity (General) Regulations 2012 include guidance for 330kV lines and appreciate the engagement with the Office of the Technical Regulator on this matter.

However, as you may be aware, we have previously raised concerns that, with the regulations as they are currently drafted, we require an exemption to maintain the network appropriately. As noted below it was our understanding that the language requiring this exemption would be addressed during this review.

On 6 June 2018 ElectraNet wrote to the Office of the Technical Regulator regarding ambiguity in the Regulations with respect to Approach Limits. Specifically:

- the ambiguity in the drafting of sections 64 to 67 of the Electricity (General) Regulations 2012 (SA) (Regulations);
- the conflict between the requirements of the Regulations and the corresponding requirements in the applicable Australian Standards (Standards) and the industry guidelines which reflect those Standards (Guidelines);

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- if the approach limits in section 64(3) of the Regulations are intended to apply to ElectraNet (and our subcontractors) when undertaking certain works in maintaining and constructing our network;

Further that it was is apparent to ElectraNet (and many of our subcontractors) that there are a range of issues with the manner in which:

- sections 64(1) and (2) interact with sections 65 to 67 of the Regulations;
- the approach limits in section 64(3) (especially in regard to Approach limit D) interact with sections 65 to 67 of the Regulations;
- the approach limits in section 64(3) that are outlined for specific work practices in the various Standards and Guidelines.

ElectraNet also requested an exemption from certain aspects of the Regulations to allow ElectraNet to undertake:

- maintenance within the approach limits as set out in the Standards and Guidelines; and
- live line work (including maintenance of associated structures) as an exception to section 64 of the Regulations, but in accordance with section 67 of the Regulations and the Standards and Guidelines.

Subsequently on 28 September 2018 the Office of the Technical Regulator replied

- granting the necessary exemption subject to the requirement that ElectraNet and its contractors “comply with the requirements of ENA NENS 04-2006 National Guidelines for Safe Approach Distances to Electrical and Mechanical Apparatus that specifically relate to safe approach distances between persons and electrical apparatus.”;
- noting that a reference to AS/NZS 5804 High Voltage Live Working in the Regulations may be appropriate; and
- looking forward to addressing the matters raised during consultation at the next scheduled review of the legislation to avoid the need for further exemption.

It is not apparent that these matters have been addressed in the proposed amendments to the Regulations. Accordingly we look forward to constructively cooperating with you to address these matters during the current review of the Regulations.

If you have any questions regarding this submission please contact [REDACTED] in the first instance.

Yours sincerely  
[REDACTED]

**Manager Regulation**