

Mr George Gallen
Principal Policy Officer
Building and Energy Division
Department of Mines, Industry Regulation and Safety

2 October 2019

Dear Mr Gallen,

Subject: PROPOSED AMENDMENTS TO THE ELECTRICITY (NETWORK SAFETY) REGULATIONS 2015

Thank you for inviting Engineers Australia to review and comment on the text of proposed amendments to these important regulations which cover public and worker safety, as well as property safety, in respect of electricity utility network design, construction, operation and maintenance.

Engineers Australia notes this regulation review has not resulted in the proposed reinstatement of the requirement that each network operator's Electricity Network Safety Management System (ENSMS, or "safety case") must be submitted and approved or accepted by the Director Energy Safety (the regulator) as was provided for in the Electricity (Supply Standards and System Safety) Regulations 2001 (and is also a requirement in the equivalent gas industry regulations).

We believe the failure to reinstate these key requirements which effectively apply in all other Australian jurisdictions is an omission from the proposed amendments. Engineers Australia considers the current regulations are not satisfactory from a regulatory perspective and this compromises the ENSMS from a people and property safety perspective.

Based on the Proposed Amendments to the Electricity (Network Safety) Regulations 2015, as they stand, Engineers Australia has no objections or suggestions regards any of the proposed amendments.

Yours sincerely



Susan Kreemer Pickford FIEAust CPEng EngExec NER
General Manager, WA