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Feedback for Draft NENS 003 – 2006 National Guidelines for Safe Access to Electrical and Mechanical Apparatus [Draft NENS 003]

The Australian Energy Council (AEC) welcomes the opportunity to make the attached submission to Energy Networks Australia (ENA) on the review of the Draft NENS 003 – 2006 National Guidelines for Safe Access to Electrical and Mechanical Apparatus.

The Australian Energy Council is the industry body representing 21 electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. These businesses collectively generate the overwhelming majority of electricity in Australia and sell gas and electricity to over 10 million homes and businesses.

AEC acknowledges that ENA is the peak national body representing Australia's gas distribution, and electricity transmission and distribution companies and that ENA develops guidelines such as *NENS 003* in support of their members. *NENS 003* is written/ intended for transmission and distribution entities, therefore utilises such terminology and processes and has little direct comparison/ application with our generation business terminology and processes.

Any questions about our submission should be addressed to Carol Tran, Data and Statistical Analyst by email to Carol.Tran@energycouncil.com.au by telephone on (03) 9205 3106.

Yours sincerely,



Ben Skinner
General Manager, Policy & Research
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Background:

Documented below is AEC's feedback for *Draft NENS 003*. AEC acknowledges that new generation from renewables needs to be factored into Transmission and Distribution processes and interfaces. Feedback is only provided where AEC is not supportive of suggested draft edits; AEC supports all other edited/ updated parts within the draft. In general, it is noteworthy that the updated content within the document has improved its readability and has added some important steps related to the changing industry factors and practices.

For ease of reference, feedback items are numbered.

Feedback items:**Application**

This guideline provides principles and responsibilities for network operators, control authorities, service providers and contractors for access to apparatus associated with the generation, transmission and distribution of electricity.

- 01** AEC opposes the linking of generation directly to *Draft NENS 003*, due to the differences in terminology, processes, hazards and risks.

Section 3.5.1 (d)

An access authority is not required for work on an in-service high voltage cable or its attachments under the following conditions –

- (i) *if the work involves making direct contact with the metallic high voltage cable sheath or armouring, it shall only be carried out on those high voltage cables (or portions of high voltage cables) which are within the earth grid of a substation; or*
- (ii) *in locations remote from a substation, control measures shall be taken in accordance with approved procedures to prevent earth potential rise of transferred earth potentials on the high voltage cable sheath.*

- 02** AEC would not support work with, or interference of, live HV cables under any situation. If a need arose to do this live and a risk assessment supported it, AEC members' processes dictate that an authorisation to access is required for this type of scenario. AEC members' safe work system would allow for a 'permit' to be authorised that did not have an isolation sheet attached but would remain as a signed authorisation to perform the work activity with the included risk assessment process. AEC's position is that give the risks associated with HV work that all HV work whether energised or de-energised should have a relevant access authority to authorise the work on behalf of the person in control of electrical equipment.

New Appendix G: Operating Protocols Between Control Authorities

G1.2 Operational Protocols (b)

Operating protocols for the interface coordination of safe access shall use and align to this guideline.

- 03** AEC is not comfortable with the wording “shall use and align” within this clause, should this guideline remain applicable to generators. AEC would prefer *Draft NENS 003* utilise wording that accepts and respects the differences in protocols between authorities i.e. generators. AEC does not support the development of an accepted set of protocols to manage the different entity interfaces and such protocols need to be acceptable for all parties.