



**Transmission
Operations
Australia**

BUSHFIRE MITIGATION STRATEGY PLAN 2014-2019

Electricity Safety (Bushfire Mitigation) Regulations 2013



1st JULY 2014 – 30th JUNE 2019

Administrator: Manager Network Compliance		Document Owner: Eric Lindner Chief Executive Officer	
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Document Revision History			
Issue	Revision Summary	Reviewer	Date
1	Submitted to ESV	Bushfire Mitigation Manager	27/6/2014
2	Plan amended to include information relating to auditor training and qualification requirements (Section 8.6). Minor amendments to Appendices G & H	Bushfire Mitigation Manager	17/7/2014

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1 COMPLIANCE INFORMATION

The purpose of this section is to provide assistance to quickly identify the specific items required in Regulation 7 of the “Electricity Safety (Bushfire Mitigation) Regulations 2013”.

Reg.	7 - Prescribed particulars for bushfire mitigation plans—major electricity companies.	 Transmission Operations Australia Plan
7(1)(a)	the name, address and telephone number of the major electricity company;	Contacts & Approvals
7(1)(b)	the position, address and telephone number of the person who was responsible for the preparation of the plan;	Contacts & Approvals
7(1)(c)	the position, address and telephone number of the persons who are responsible for carrying out the plan;	Contacts & Approvals
7(1)(d)	the telephone number of the major electricity company’s control room so that persons in the room can be contacted in an emergency that requires action by the major electricity company to mitigate the danger of bushfire;	Contacts & Approvals
7(1)(e)	the bushfire mitigation policy of the major electricity company to minimise the risk of fire ignition from its supply network;	Section 5
7(1)(f)	the objectives of the plan to achieve the mitigation of fire danger arising from the major electricity company’s supply network;	Section 4
7(1)(g)	a description, map or plan of the land to which the bushfire mitigation plan applies;	Section 2.2
7(1)(h)	the preventative strategies and programs to be adopted by the major electricity company to minimise the risk of the major electricity company’s supply networks starting fires;	Section 5
7(1)(i)	a plan for inspection that ensures that – (i) the parts of the major electricity company’s supply network in hazardous bushfire risk areas are inspected at intervals not exceeding 37 months from the date of the previous inspection; and the parts of the major electricity company’s supply network in other areas are inspected at specified intervals not exceeding 61 months from the date of the previous inspection;	Section 5.2
7(1)(j)	details of the processes and procedures for ensuring that each person who is assigned to carry out inspections referred to in paragraph (i) and of private electric lines has satisfactorily completed a training course approved by Energy Safe Victoria and is competent to carry out such inspections;	Section 5.7
7(1)(k)	details of the processes and procedures for ensuring that persons (other than persons referred to in paragraph (j) who carry out or will carry out functions under the plan are competent to do so;	Section 5.7
7(1)(l)	the operation and maintenance plans for the major electricity company’s supply network— (i) in the event of a fire; and (ii) during a total fire ban day; and (iii) during a fire danger period;	Section 5.9 Section 5.11 Section 5.12

7(1)(m)	the investigations, analysis and methodology to be adopted by the major electricity company for the mitigation of the risk of fire ignition from its supply network;	<u>Section 6</u>
7(1)(n)	<p>details of the processes and procedures by which the major electricity company will—</p> <ul style="list-style-type: none"> (i) monitor the implementation of the bushfire mitigation plan; and (ii) audit the implementation of the plan; and (iii) identify any deficiencies in the plan or the plan's implementation; and (iv) change the plan and the plan's implementation to rectify any deficiencies identified under subparagraph (iii); and (v) monitor the effectiveness of inspections carried out under the plan; and (vi) audit the effectiveness of inspections carried out under the plan; 	<p><u>Section 8</u></p> <p><u>Section 8.6</u></p> <p><u>Section 8.6 & Section 9</u></p> <p><u>Section 9</u></p> <p><u>Section 6</u></p> <p><u>Section 8.6</u></p>
7(1)(o)	the policy of the major electricity company in relation to the assistance to be provided to fire control authorities in the investigation of fires near the major electricity company's supply network;	<u>Section 5.10</u>
7(1)(p)	<p>details of processes and procedures for enhancing public awareness of—</p> <ul style="list-style-type: none"> (i) the responsibilities of the owners of private overhead electric lines that are above the surface of the land in relation to maintenance and mitigation of bushfire danger; (ii) the obligation of the major electricity company to inspect private overhead electric lines that are above the surface of the land within its distribution area. 	Not Applicable
7(1)(q)	a description of the measures to be used to assess the performance of the major electricity company under the plan.	<u>Section 6 & Section 8</u>

1.1 Legislation

Section 113A (1) of the Electricity Safety Act 1998 (incorporating amendments as at 1 January 2012) requires that a major electricity company must prepare and submit to Energy Safe Victoria, for acceptance under this Division, a plan for the company's proposals for mitigation of bushfire in relation to the company's supply network at the end of each period of 5 years commencing on the later of –

- a) the date when the accepted bushfire mitigation plan is first accepted under this Division; or
- b) the date of the most recent acceptance of a revision of the accepted bushfire mitigation plan submitted under this Division.

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In accordance with the Electricity Safety (Bushfire Mitigation) Regulations 2013 this Bushfire Mitigation plan provides the prescribed particulars as specified in Regulation 7.

This plan is located on Transmission Operations Australia's (TOA) Intranet site and can be sourced on TOA's public internet website also.

A copy of the current accepted bushfire mitigation plan will be available for inspection at the company's principal office in the State of Victoria during ordinary business hours.

This plan is a living document and will evolve as the fire danger period approaches each year. Appendices to this document will be reviewed and additional information may be added to the appendices as it becomes available.

2 INTRODUCTION

2.1 Transmission Operations Australia

During July 2012 Power Asset Holdings Ltd and Cheung Kong Infrastructure Holdings Ltd established a joint venture company called Transmission Operations Australia (TOA) TOA has been formed with the primary intention of developing transmission assets in Australia.

TOA's first project is to build, own and operate electrical transmission assets connecting the Mt Mercer Wind Farm (MMWF) to the Victorian Transmission Network.

Powercor Network Services Pty Ltd was engaged by TOA to design, construct and maintain the MMWF grid connection assets. The grid connection assets include 22 km of overhead transmission powerline and the Elaine Terminal Station.

The Elaine Terminal Station (ELTS) is located in close proximity to an existing 220 kV transmission network owned and operated by SP Ausnet.

Construction of both the 132kV transmission powerline and the Elaine Terminal Station commenced in early 2013 Commissioning of the station was completed in October 2013.

2.2 Mount Mercer Wind Farm

Meridian Energy Australia – a wholly owned subsidiary of Meridian Energy Limited – has constructed the Mount Mercer Wind Farm. The wind farm is to be situated on a 2600ha site located at Mount Mercer, 30 kilometres south of Ballarat in western Victoria Australia.

The wind farm consists of 64 Repower MM92 wind turbines providing a total installed capacity of 131 megawatts.

Overall the MMWF is expected to generate approximately 395,000 megawatt hours of electricity each year providing power to approximately 74,000 households resulting in a reduction of around 510,000 tonnes of carbon dioxide.

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Figure 1 - Location of the ELTS, near the township of Elaine

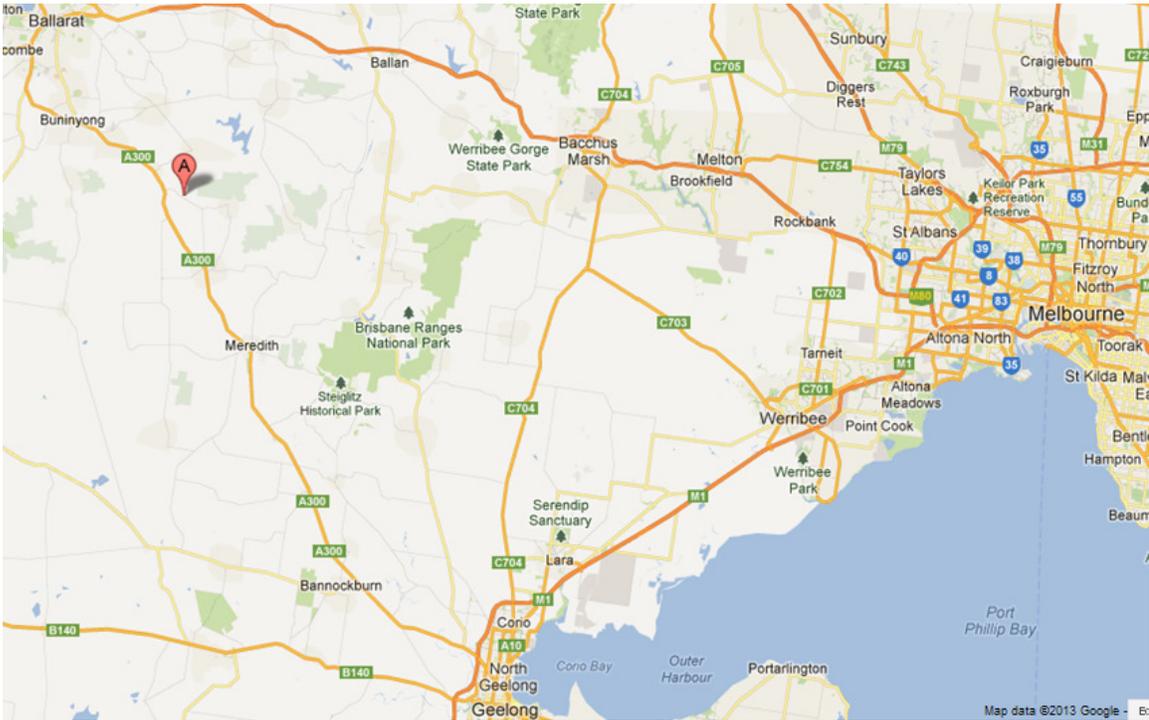
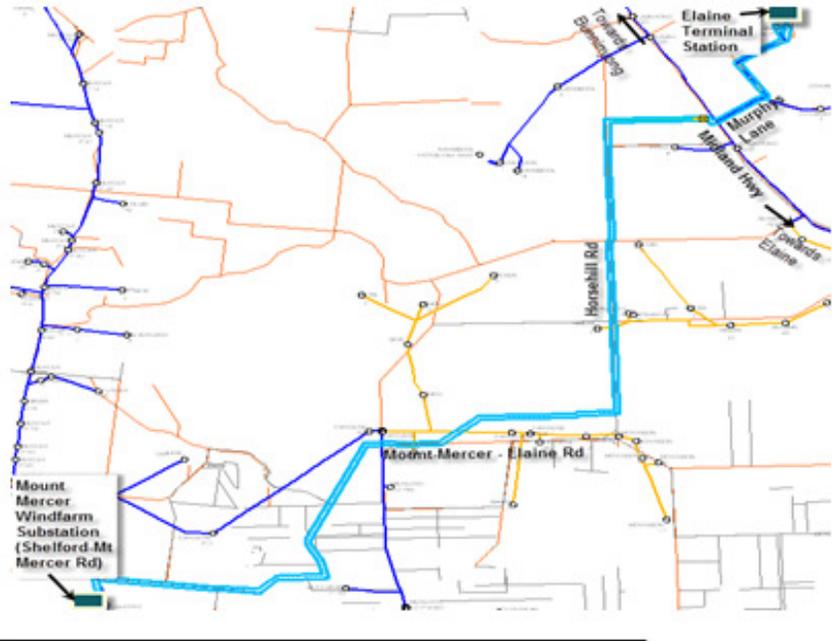


Figure 2 - TOA approved transmission line corridor from MMWF to ELTS



Internet link to Mt Mercer Wind Farm <http://mtmercerwindfarm.com.au/>

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3 SCOPE

The Transmission Operations Australia bushfire mitigation (BFM) program includes asset inspection, maintenance, construction, replacement, vegetation management, performance monitoring and auditing. The planning and scheduling of this program is based principally on the system of asset inspection and maintenance reporting supported by a program of audits.

This program will be managed by Powercor's Electricity Networks business unit as per a utility support services contract with TOA, however TOA is the ultimate owner of the strategy plan.

This strategy plan applies to and is limited to TOA electricity transmission network assets within the TOA electricity transmission network.

Since their conception electricity networks in particular have been a known source of fire ignition. As a consequence a considerable amount of research and investigation continues into the causes of ignition which therefore enables preventative actions to be taken.

The TOA BFM strategy plan makes reference to other plans, manuals, standards, policies, procedures and work instructions, when combined with this plan, cover all of the activities that contribute to the overall reduction of bushfire risk.

Other key documents include:

- The TOTAL FIRE BAN (TFB) DAY ACTION PLAN - refer Appendix A
- The TOA Vegetation Management Plan (VMP) - refer Appendix B
- The Asset Management Plans
- Electricity Safety Management Scheme (ESMS)
- Technical Standards (covering design & construction of assets)
- Maintenance Policies
- TOA Operational Procedures

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4 KEY OBJECTIVES

The key objectives of this plan are to effectively define TOA's management of bushfire-related risks associated with the transmission of high voltage electricity whilst ensuring public safety, safety of TOA personnel, contractors and assets in addition to sustaining the reliability of electricity supply.

4.1 Key Objectives

- Minimise the risk of fire starts originating from TOA transmission network assets
- Achieve compliance with the relevant legislative and regulatory requirements while providing flexibility within the business to encourage innovation, continuous improvement and the effective use of resources
- Describe TOA's approach to the management of bushfires caused by electricity assets
- Reference the policies and procedures relating to bushfire mitigation activities into one reference document
- Demonstrate a high level of commitment to meeting bushfire mitigation responsibilities

4.2 Management Structure Overview

TOA has a formal management structure for the implementation and control of BFM related activities. This structure has clearly assigned authorities and responsibilities associated with each position. It takes into account the inter-relationships between those that manage, perform, record, verify and report bushfire mitigation activities and has been set up to maintain independence of reporting and monitoring tasks.

5 POLICY

TOA has developed asset management plans, policies and standards to meet transmission network asset management requirements.

These areas include:

- Bushfire Mitigation
- Asset Management

An asset management plan has been developed to ensure that appropriate strategies, plans and systems are in place to manage the transmission assets owned by TOA.

(refer to Appendix G) ELTS to Mt Mercer Wind Farm 132 KV Transmission Line Asset Management Plan.

5.1 Bushfire Mitigation

In general terms, the TOA bushfire mitigation policy is to execute a bushfire mitigation management strategy that complies with legislative requirements is cost effective, mitigates fire risk and builds a harmonious balance for community safety.

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TOA aim to:

- Minimise the risk of fire ignitions from TOA's transmission network assets.
- Meet the requirements of the Act, Regulations and Code
- Regularly review and develop management programs, processes, practices, methods and implement efficiencies for the benefit of customers and other stakeholders
- Minimise the frequency and length of disruptions to the customer
- Be committed to the safety of the community, as a whole, and any personnel engaged in the provision of services

5.2 Monitoring Asset Condition

Preventative maintenance strategies have been created for TOA's transmission assets. These are detailed within TOA's maintenance policies for the plant, station and transmission lines.

Asset inspection is conducted in accordance with the TOA Asset Maintenance Policy for 132 kV Transmission Line (from ELTS to Mt Mercer Wind Farm). **(refer to Appendix H)**

5.3 Asset Maintenance

A Network Asset Maintenance Policy has been developed to ensure the application of a priority rating system that contributes to providing a reliable electricity supply network, maintains employee and public safety, mitigates the risk of fire ignition and enables regulatory compliance. **(refer to Appendix I)** Asset Maintenance Priority Policy for Transmission Operations Australia.

5.4 Remedial Maintenance

In addition to planned tasks, maintenance may also be identified from the following:

- Reports from contractors
- Reports from the general public

5.5 Non Cyclic Maintenance

Maintenance found out of cycle is reported on the following form:

- **Form 18 – 20 – F0002** - Miscellaneous Maintenance Report

Non Cyclic Maintenance items are then managed and repaired under the same processes and procedures as used for items identified in the cyclic asset inspection program.

5.6 Vegetation Management

TOA's vegetation activities are managed by Powercor who engage the services of a vegetation management contractor. Vegetation management is conducted in accordance with TOA's Vegetation Management Plan (VMP)

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TOA's VMP is to be submitted to ESV for approval as prescribed by the Electricity Safety (Electric Line Clearance) Regulations 2010. The plan outlines management processes, programs and cycles for maintaining clearances between vegetation and transmission network assets. (refer to **Appendix B**)

TOA's vegetation management contractor will carry out an annual vegetation inspection program across the TOA transmission network.

5.7 Training

TOA's training and authorisation requirements adhere to VESI, refer to www.vesi.com.au

5.7.1 Asset Inspection

Asset Inspectors working on the TOA network are required to hold a Certificate II in Asset Inspection (Course Code: 22109VIC).

The RTO providing training for the Certificate II needs to be approved by ESV. Current qualifications have been obtained through Federation Training which is an ESV approved trainer (ESV reference: G61045, 19 October 2011).

Note: Course 22109VIC expires on 30 June 2015 and it is assumed that ESV will approve the national qualification UET201612 – Certificate II in ESI – Asset Inspection which future Asset Inspectors will be trained to.

The VESI Skills and Training Matrix stipulate the requirements and frequency of refresher training for asset inspectors. The matrix is available at www.vesi.com.au

5.7.2 Refresher Training Regime for Asset Inspectors

The VESI Skills and Training Matrix stipulate the requirements and frequency of refresher training for asset inspectors. The matrix is available at www.vesi.com.au

5.7.3 Vegetation Management

All training requirements for vegetation management are covered in the Vegetation Management Plan in **Appendix B**.

5.7.4 Line-Worker

The VESI Skills and Training Matrix stipulate the qualifications and refresher training for a Lineworker. The employing company is required to organise training to the standards referred to in the matrix. The employing company will keep records of all training undertaken.

Lineworker apprentices are engaged in bushfire mitigation activities from time to time. This provides experience in a broad range of tasks. When companies engage apprentices they work under the VESI Apprentice Supervision Guidelines as published on the VESI website. www.vesi.com.au

Formal training of apprentices, in linework, is conducted by a RTO and this training is supported "on the job" by designated mentors and tradespersons.

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5.8 Liaison With Other Organisations

On behalf of TOA, Powercor has a procedure for coordinating BFM activities and emergency procedures with relevant organisations which may include any of the following:

- Energy Safe Victoria (ESV)
- Country Fire Authority (CFA)
- State Emergency Service (SES)
- Department of Environment & Primary Industries (DEPI)
- Department of State Development, Business and Innovation (DSDBI)
- Victoria Police (VICPOL)
- Municipalities
- Bureau of Meteorology (BOM)
- Other Distribution/Transmission Network Operators

Communication processes for BFM related activities are managed in accordance with:

- Procedure **05 – P840** – Coordinating Bushfire Mitigation with other Organisations

5.9 Emergencies

Requests for resources to assist fire agencies are coordinated by the Network Controller, from TOA's Operations Control Centre.

Fire emergencies are communicated directly to the Operations Control Centre via a direct phone number for emergency services organisations. Fault Crews are then promptly dispatched according to the information received.

TOA will work with the relevant fire control agency to provide safe access to a fire or accident scene involving TOA assets. This may include de-energisation of electrical assets upon request.

Actions to be undertaken in the event of a major event or emergency are contained in:

- Manual **14-40-M0001** – Incident Reporting & Investigation Manual
- Manual **10 – C800** – Crisis and Emergency System Management Manual
- Manual **13-40-M0002** – Event Command Organisation Manual

5.10 Assistance Provided To Fire Agencies

There are two fire fighting services, operating within TOA's service area:

- The DEPI are responsible for state forests and parks.
- The CFA is responsible for all other rural areas e.g. private property and is resourced largely by volunteers.

TOA will provide assistance and work with the relevant fire control agency in the investigation of fires near TOA's transmission network.

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On behalf of TOA, Powercor's Emergency Management Liaison Officers (EMLOs) are available to attend fire agency command centres and provide information or assistance with issues relating to TOA transmission assets.

5.11 Total Fire Ban Days

TOA have developed a TFB Day Action Plan (TFBDAP) which is invoked on TFB days. The TFBDAP contains TOA BFM strategies which are applied on declared TFB days and days of extreme fire weather conditions. These strategies are designed to minimise the risk of a fire ignition being caused by TOA's transmission network.

The TFBDAP is implemented under the direction of the Manager Control with assistance from the BFM Coordinator. For a copy of the TFBDAP (**refer Appendix A**).

- For works involving welding, cutting, grinding, or use of naked flame permits from the appropriate organisation (e.g. CFA and DEPI) are used and adhered to.
- For works on days other than TFB days the conditions provided in **Appendix E** will be adhered to.

5.12 Declared Fire Danger Period

During the Declared Fire Danger Period TOA will continue with normal operation and maintenance of TOA's electrical assets. The majority of TOA's Operational and Maintenance activities are configured to be undertaken for the full 12 months of the year, irrespective of Declared Fire Danger Periods.

There are however some activities that are specific to the Declared Fire Danger period. These include:

1. Vehicle Movement Off-road (**refer to Appendix D**)
2. Use of Flame /spark omitting equipment (**refer to Appendix E**)
3. Fire Fighting Equipment to be carried (**refer to Appendix D**)

5.13 Fire Management

In the event of a fire on TOA's transmission network, the operational and maintenance activities will include:

- Receiving notification from or supplying notification to the relevant fire control agency regarding a fire event.
- Liaison with the relevant fire control agency regarding appropriate actions.
- Dispatching field crews for fault rectification or as directed/requested by the relevant fire control agency.
- Deployment of Emergency Management Liaison Officers if required to any Incident Control Centre established by the relevant fire control authority.
- Managing the fire event in accordance with Powercor's Event Command Organisation Manual (**13-40-M0002**) and Incident Reporting & Investigation Manual (**11-M700**).

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6 FIRE INVESTIGATION

As part of continuous improvement towards the mitigation of bushfires, TOA investigates incidents of fire ignition caused by electricity assets. Detailed analysis of asset failure trends are also carried out in order to develop policy improvements and enhanced preventative actions.

Any fire starts initiated by TOA assets will be reported to ESV, as per ESV reporting guidelines. The Network Control Room identifies any fire starts from outage information or from external advice and notifies the Network Availability Officer (NAO) who investigates each situation according to the information provided. The NAO then sends completed reports to the Manager Risk Management for checking and collation and forwarding to ESV as per the ESV reporting guidelines.

The following manual and policy cover the reporting requirements for fire starts:

- Manual **14-40-M0001** – Incident Reporting & Investigation Manual
- Policy **18-80-CP0007** – ESMS Reporting to Energy Safe Victoria (ESV) and Fire Start Reporting to AER

6.1 Fire Starts

Reporting on Ground Fires and Pole Fires will be done as they occur and subsequently reported to ESV. Reporting of fire starts is carried out in accordance with:

- Policy **18-80-CP0007** – ESMS Reporting to Energy Safe Victoria (ESV) and Fire Start Reporting to the Australian Energy Regulator (AER); and
- Manual **14-40-M0001** – Incident Reporting & Investigation Manual

6.2 Asset Failures

As part of continuous improvement towards the mitigation of bushfires, Powercor on behalf of TOA investigates incidents of fire ignition which are attributed to TOA's electricity assets. Analysis of asset failure trends will also be carried out in order to develop improvements to maintenance policies, technical standards and enhanced preventative actions.

Investigation of failed assets is performed and carried out by the Asset Investigations & Reliability section.

An Asset Failure Review Committee has been charged with reviewing asset failures and consists of representatives from Asset Investigations & Reliability, Lines Maintenance, Bushfire Mitigation, Plant and Stations Maintenance, Compliance and Safety, Technical Standards, Asset Inspection Contractor (Electrix), Works Practices and field resources from across the business. TOA's asset failures will be reviewed as part of this committee.

The committee meets quarterly to review asset failure investigations whilst considering opportunities to improve the management of the assets of interest and mitigate future failures.

The following procedure covers the reporting, analysis and investigation of fires and failed assets:

- Procedure **05 – P880** – Asset Failure Investigation and Reporting

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Investigation results and recommendations form the basis for review of relevant technical standards, works practices, maintenance policies and the initiation of any special asset inspection/replacement/modification programs. Policy reviews are managed by Powercor's Lines section for the TOA transmission network.

7 PROGRAM TIMING

The inspection program dates are determined by the maintenance plan, in accordance with the relevant asset policy and are generated from SAP. **(refer to Appendix I)** Asset Maintenance Priority Policy for Transmission Operations Australia.

Remedial maintenance and asset replacement/modification is completed accordance with the priority classification policy. **(refer to Appendix H)** TOA Asset Maintenance Policy for 132 kV Transmission Line (from ELTS to Mt Mercer Wind Farm).

TOA have produced a set of BFM program milestones which specify the completion dates required for key BFM activities. The BFM program milestones that relate to TOA are:

- Submission of the Transmission Network Vegetation Management Plan to ESV
- Submission of the Transmission Bushfire Mitigation Strategy Plan to ESV
- Complete any annual inspection programs contained within Vegetation Management Plan **(refer to Appendix C)**

8 REPORTING AND MONITORING

TOA has a reporting process which ensures that all levels of the BFM management structure, including executive management levels and ESV, are informed of the status of the company's preparedness.

The reporting process incorporates requirements:

- Prior to the Declared Fire Danger period
- On Total Fire Ban days

Reporting and monitoring arrangements for TFB days are contained in the TFB DAP **(refer to Appendix A)**.

8.1 BFM Status

On behalf of TOA, Powercor will produce a pre-summer BFM status report to monitor the implementation of the BFM plan.

It is provided to senior management, including the TOA CEO, various people involved in BFM activities, and ESV. The report is also loaded onto TOA's intranet site for viewing by all TOA personnel.

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8.2 Asset Inspection

The Asset Inspection program is monitored by the Maintenance Planner.

8.3 Maintenance

The Senior Maintenance Planner checks any outstanding items and follows up with the Program Manager Asset Maintenance, to ensure action in accordance to the following work instruction;

- Work Instruction **05 W214** – Management of Maintenance Items Outside Policy

8.4 Vegetation Clearance

TOA's vegetation management contractor is required to provide a status report of all hazardous bushfire risk area spans at the completion of the annual inspection. This information can be used to monitor and audit performance.

8.5 ESV Reporting

TOA's reporting schedule of BFM activities to ESV is listed below.

- Annual Transmission Vegetation Management Plan (submitted by 31st March)
- Transmission BFM Strategy Plan (submitted every 5 years)
- BFM Status Report (reported annually prior to declared fire season)
- Ground and Pole Fire starts (reported as they occur)
- Fire Start Statistics (reported to ESV as per the ESV reporting requirements)

Reporting on issues found through ESV audit processes is carried out on request.

8.6 Audits

TOA utilizes a Guideline: **12-15-G0026** - Define Audit and Inspection Requirements MATRIX, to provide support information for the process of preparing audit and inspection programmes conducted on it's network.

Considering the range of audit and inspection programmes conducted across the organisation, each programme is required to determine:

- the scope of review or focus area
- the classification of review activity as Audit or Inspection
- the training/competency/qualification requirements of the auditors/inspectors executing the programme
- the frequency of review activities
- the method of selecting or prioritising the items/aspects to review

Various other audits are undertaken on TOA assets, these include;

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- Audits undertaken by the Audit and Compliance Group which facilitate sample audits of completed projects ensuring that the relevant technical standards and design specifications have been achieved in the finished project.
- TOA's asset inspection contractor will establish a self-audit program specifying the frequency and scope of audits that they will manage and maintain. The audit program will require a follow up audit of all inspectors where substandard work is identified. An intensified audit program will then be established for that inspector until the attainment of satisfactory results
- TOA through Powercor has an independent audit program for monitoring the performance of asset inspectors. The Asset Maintenance Compliance Officer is responsible for performing this function.
- Monitoring and auditing of the effectiveness of inspections and the competence of persons assigned to carry out inspections under the plan shall be done by monitoring and auditing the adherence to works practices which demonstrate skills and knowledge in Asset Inspection.
- Vegetation audits are carried out in accordance with TOA VMP (**refer to Appendix B**)

9 REVIEWING

The TOA BFM Strategy Plan is reviewed each year. Any deficiencies identified from this review will require adjustments and improvements to be completed to better meet the implementation and objectives of the plan.

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10 APPENDICES

APPENDIX A - TOA TFB DAY ACTION PLAN

APPENDIX B - TOA VEGETATION MANAGEMENT PLAN

APPENDIX C - TOA BFM PROGRAM MILESTONES

APPENDIX D - VEHICLE FIRE EQUIPMENT & VEHICLE MOVEMENT

APPENDIX E - DECLARED FIRE DANGER PERIOD - BUSHFIRE MITIGATION
REQUIREMENTS

APPENDIX F - INSPECTING POWERLINES ON YOUR PROPERTY BROCHURE

APPENDIX G – ELTS TO MT MERCER WIND FARM 132 KV TRANSMISSION LINE ASSET
MANAGEMENT PLAN

APPENDIX H – ASSET MAINTENANCE POLICY FOR 132 KV TRANSMISSION LINE
FROM ELTS TO MT MERCER WIND FARM

APPENDIX I – ASSET MAINTENANCE PRIORITY POLICY FOR TRANSMISSION
OPERATIONS AUSTRALIA

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Document No: TOA-BFM-001	Issue: 2	Issue Date: 17 / 07 / 2014	Page 18 of 18