Transmission Operations Australia Pty Ltd and Transmission Operations Australia 2 Pty Ltd

TOA TOA2 Bushfire Mitigation Plan 2019 - 2024

Electricity Safety (Bushfire Mitigation) Regulations 2013





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Administrator: Manager Network Safety & Bushfire Mitigation

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TOA TOA2 Bushfire Mitigation Plan 2019 - 2024

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1	TOA 2014-2019 Plan submitted to ESV	Bushfire Mitigation Manager	27 June 2014
2	TOA 2014-2019 Plan submitted to ESV	Bushfire Mitigation Manager	18 July 2014
1	TOA2 2016-2021 Plan submitted to ESV	Bushfire Mitigation Manager	18 March 2016
2	 Re-format and merge of TOA 2014-2019 & TOA2 2016-2021 Bushfire Mitigation Plans TOA/TOA2 2019-2024 Plan submitted to ESV 	Bushfire Mitigation Manager	11 April 2019 22 July 2019
3	 Plan amended Section 2 (Regulation 7(1)(g) corrected to Reference Section 3.1 & 3.2 Plan amended to include most recent document numbers for referenced documentation Plan amended to include a revised revision and document history table Plan submitted to ESV inclusive of requested documents 	Bushfire Mitigation Manager	25 February 2020 March 2020

TOA TOA2 Bushfire Mitigation Plan 2019 - 2024 - TOA-TOA2

1 PLAN INTRODUCTION

1.1 CONTACTS & APPROVALS

Responsibility	Title	Address	Contact Details
BMP Responsible Organisation	Transmission Operations (Australia) - Transmission Operations (Australia)2	40 Market Street Melbourne, 3000 Victoria	Phone: 13 22 06
BMP Preparation	Senior Advisor Bushfire Mitigation	40 Market Street Melbourne, 3000 Victoria	Phone: 13 22 06
BMP Implementation	Manager Network Safety & Bushfire Mitigation	40 Market Street Melbourne, 3000 Victoria	Phone: 13 22 06
BMP Emergency Contact	Powercor Australia Pty Ltd	40 Market Street Melbourne, 3000 Victoria	Phone: 13 24 12 (24 x 7 emergencies and faults contact number for members of the public)

Prepared	Ву
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Approved By

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04.03.20

Date 00/03/2020

Endorsed By

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Australian Energy Operations
11 Tavistock Place, Melbourne



04/03/20

Date 00/03/2020

1.2 PLAN DEFINITIONS

Act: Electricity Safety Act 1998.

Fire Danger Period: a period declared under section 4 of the *Country Fire Authority Act 1958* to be a fire danger period.

Total Fire Ban Day: a day that has been declared to be a day of total fire ban under section 40(1) of the *Country Fire Authority Act 1958.*

For other definitions refer to the Act, Regulations and Code.

2 REGULATION 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".

Regulation	7 - Prescribed particulars for bushfire mitigation plans - major electricity companies.	TOA-TOA2 <i>Plan</i> Reference
7(1)(a)	the name, address and telephone number of the major electricity company;	Contacts
7(1)(b)	the position, address and telephone number of the person who was responsible for the preparation of the plan;	Contacts
7(1)(c)	the position, address and telephone number of the persons who are responsible for carrying out the plan;	Contacts
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
7(1)da	the telephone number of the major electricity company that members of the public can call in an emergency that requires action by the major electricity company to mitigate the danger of bushfire;	Contacts
7(1)(e)	the bushfire mitigation policy of the major electricity company to minimise the risk of fire ignition from its supply network;	Section 5.1
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 5.2
7(1)(g)	a description, map or plan of the land to which the bushfire mitigation plan applies;	Section 3.1 & 3.2
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 6
7(1)(i)	a plan for inspection that ensures that –	
	 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. 	Section 6.1
	(ii) the parts of the major electricity company's supply network	

Regulation	7 - Prescribed particulars for bushfire mitigation plans - major electricity companies.	TOA-TOA2 <i>Plan</i> Reference
	in other areas are inspected at specified intervals not exceeding 61 months from the date of the previous inspection.	
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 6.7
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 6.7
7(1)(I)	the operation and maintenance plans for the major electricity company's supply network—	
	(i) in the event of a fire(ii) during a total fire ban day(iii) during a fire danger period	Section 6.8 Section 6.10 Section 6.10
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;	Section 7
7(1)(n)	details of the processes and procedures by which the major electricity company will;	
	(i) monitor the implementation of the bushfire mitigation plan; and	Section 9
	(ii) audit the implementation of the plan; and	Section 9.6
	(iii) identify any deficiencies in the plan or the plan's implementation; and	Section 9.6 & 10
	(iv) change the plan and the plan's implementation to rectify any deficiencies identified under subparagraph (iii)	Section 10
	(v) monitor the effectiveness of inspections carried out under the plan; and	Section 9.6
	(vi) audit the effectiveness of inspections carried out under the plan.	Section 9.6
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;	Section 6.9
7(1)(q)	a description of the measures to be used to assess the performance	Section 7
	of the major electricity company under the plan.	Section 8 Section 9
		36611011 3

2.1 LEGISLATION

Section 113A (1) of the Electricity Safety Act 1998 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.

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

A copy of the accepted Transmission Operations Australia Pty Ltd and Transmission Operations Australia 2 Pty Ltd (TOA-TOA2) Bushfire Mitigation Plan (BMP) will be published on the website of Australian Energy Operations Pty Ltd¹.

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.

3 INTRODUCTION

3.1 Transmission Operations Australia Pty Ltd and Transmission Operations Australia 2 Pty Ltd

During July 2012 Power Asset Holdings Ltd and Cheung Kong Infrastructure Holdings Ltd established a jointly owned company titled Transmission Operations Australia Pty Ltd (TOA) with the primary intention of developing transmission assets in Australia. Initially TOA undertook the design, construction, operation and maintenance of the transmission assets for the connection of the 131 MW Mt Mercer Wind Farm.

In 2015, Transmission Operations Australia 2 Pty Ltd (TOA2) was formed to design, construct, operate and maintain the transmission assets for the connection of the 240 MW Ararat Wind Farm.

In 2018 -2019, TOA undertook design and construction for the transmission assets to connect the 321 MW Moorabool Wind farm and the 80 MW Elaine Wind farm. During 2019, TOA will commence the operation and maintenance of the transmission assets connecting these wind farms. TOA-TOA2 infrastructure includes;

- Electrical transmission assets connecting the Mt Mercer Wind Farm (MMWF), the Moorabool Wind Farm (MOWF) and the Elaine Wind Farm (ELWF) to the Victorian Transmission Network, including:
 - Elaine Terminal Station (ELTS);
 - > 22km of 132kV transmission powerline connecting MMWF; and
 - > 29km of 132kV transmission powerline connecting MOWF.
- Electrical transmission assets connecting the Ararat Wind Farm (ARWF) to the Victorian Transmission Network including:
 - Ararat Terminal Station (ARTS); and
 - > 21km of 132kV transmission powerline connecting ARWF.

¹ Transmission Operations Australia Pty Ltd and Transmission Operations Australia 2 Pty Ltd are wholly owned subsidiaries of Australian Energy Operations Pty Ltd.

TOA-TOA2 resources and manages the design, construction, operations and maintenance of its network, plus manages the provision of its back office services through contractual arrangements with Beon Energy Solutions and CHED Services.

These service providers are part of the Victorian Power Networks (VPN) Group which also includes CitiPower and Powercor. These contractual arrangements enable TOA-TOA2 to utilise policies, procedures, resourcing and asset management systems of the VPN Group.

This document references the policies, procedures, resourcing and management systems of the VPN Group as those of Primary Service Providers.

3.2 WIND FARM LOCATIONS

Figure 1 - Location of the wind farms connected to the transmission network via TOA-TOA2 transmission assets. The TOA-TOA2 transmission lines connecting the Mt Mercer, Ararat and the Moorabool wind farms are located in areas classified as Hazardous Bushfire Risk Areas (HBRA).



4 SCOPE

As outlined in Section 3.1, this document references the Bushfire Mitigation Plan framework, documents, resourcing and organisational responsibilities of the VPN Group as those of "Primary Service Providers".

The TOA-TOA2 bushfire mitigation program includes asset inspection, maintenance, construction, asset 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.

TOA-TOA2 is responsible for the Bushfire Mitigation Plan (BMP) which outlines the bushfire mitigation program to be managed by TOA-TOA2 Primary Service Providers. This plan applies to and is limited to TOA-TOA2 electricity transmission network assets within the TOA-TOA2 electricity transmission network.

The TOA-TOA2 BMP makes reference to other plans, manuals, standards, policies, procedures and work instructions. When combined with this plan they jointly support 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
- TOA-TOA2 2019 to 2020 Electric Line Clearance (Vegetation) Management Plan,
- Asset Management Plans
- Electricity Safety Management Scheme (ESMS) and Safety Case

- Technical Standards (covering design & construction of assets)
- Maintenance Policies
- TOA-TOA2 Operational Procedures

5 BFM POLICY & OBJECTIVES

5.1 BFM Policy

To minimise the risk of fire starts from its electrical assets as far as reasonably practicable by complying with legislative and regulatory requirements, whilst allowing flexibility within the business to encourage innovation, continuous improvement and the efficient use of resources.

5.2 OBJECTIVES

- Minimise the risk of fire starts originating from TOA-TOA2 transmission network assets with an aspiration of zero fire starts.
- 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.
- Define TOA-TOA2's approach to the management of the risk of bushfires caused by electricity assets.
- Demonstrate a high level of commitment to meeting bushfire mitigation responsibilities.

5.3 Management Structure Overview

TOA-TOA2 Primary Service Providers have 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. TOA-TOA2 policies and plans including the BMP are governed via TOA-TOA2 management and the Primary Service Providers structure.

6 POLICY

6.1 ASSET MANAGEMENT PLAN

TOA-TOA2 Primary Service Providers have developed asset management plans, policies and standards to meet transmission network asset management requirements including bushfire mitigation.

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-TOA2.

- Asset Management Plan for the 132kV Transmission Line from ELTS to Mount Mercer Wind Farm Issue no. 1.2
- Asset Management Plan for the 132kV Transmission Line from ARTS to Ararat Wind Farm Issue no. 1.0

6.2 Monitoring Asset Condition

Preventative maintenance strategies have been created for TOA-TOA2 transmission assets. These are detailed within TOA-TOA2 maintenance policies for plant, station and transmission lines.

- Asset Maintenance policy for 132kV Transmission Line (from ELTS to Mt Mercer Wind Farm) Issue no. 1.2
- Asset Maintenance policy for 132kV Transmission Line (from ARTS to Ararat Wind Farm)
 Issue no. 1.0

6.3 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.

- Asset Maintenance Priority Policy for Transmission Operations Australia Issue no. 1.1
- Asset Maintenance Priority Policy for Transmission Operations Australia 2 Issue no. 1.0

6.4 Non Cyclic Maintenance

In addition to maintenance found during cyclic inspection, maintenance may also be identified from the following:

- Reports from TOA-TOA2 Primary Service Providers and employees
- Reports from the general public

Maintenance found out of cyclic inspection by employees or TOA-TOA2 Primary Service Providers is reported using the "Report IT" mobile application. 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.

6.5 FAULTS/FAULT FOLLOW-UP

Repairs to defects identified through the TOA-TOA2 Primary Service Providers Network Faults/Outage process are managed in accordance with:

• Procedure 07- 20 - P00013 Manage Network Faults

Temporary repairs to defects identified through the TOA-TOA2 Primary Service Providers Network Faults/Outages process may be flagged for follow up. These defects are managed in accordance with:

• Procedure 07- 20 - G0013 Manage Fault Follow-up and Repair

6.6 VEGETATION MANAGEMENT

TOA-TOA2 Primary Service Providers manage the vegetation management program in accordance with the following documents:

TOA-TOA2 2019 to 2020 Electric Line Clearance (Vegetation) Management Plan

The TOA-TOA2 2019 to 2020 Electric Line Clearance (Vegetation) Management Plan is submitted to ESV for approval as prescribed by the Electricity Safety (Electric Line Clearance) Regulations 2015. The plan outlines management processes, programs and cycles for maintaining clearances between vegetation and transmission network assets.

TOA-TOA2 Primary Service Providers will carry out an annual vegetation inspection program across the TOA-TOA2 transmission network.

6.7 COMPETENCY & TRAINING

TOA-TOA2 Primary Service Providers ensure that persons who carry out or will carry out functions under the plan are competent to do so. Refer to information in the TOA-TOA2 ESMS 2016 (Section 2 - Management Structure).

TOA-TOA2 Primary Service Providers have developed a Guideline which outlines the qualification, training and licensing requirements for persons undertaking activities on, or requiring access to the TOA-TOA2 Electricity Transmission Network.

Guideline - JEQA4UJ443MT-173-28 Guideline Technical Training

Personnel training records and authorisations are kept in the Primary Service Providers database, which can be reviewed by TOA-TOA2. In addition the "ESI Worker", is a mobile program application which provides an industry-consistent record of an individual's training, authorisations and network inductions applicable to work in the Electricity Supply Industry (ESI).

The program assists ESI workers to demonstrate their compliance to a Network Operator's training and authority requirements whilst enabling a competent deployment of skilled resources across jurisdictions, especially in times of mutual aid requests.

The training programs for specific job roles in key bushfire mitigation activities are described below:

6.7.1 Asset Inspection

As per ESV's Training Approval Statement, Asset Inspectors working on the TOA-TOA2 network are required to hold a Certificate II in Asset Inspection or subsequent version.

• Course Code: UET20612

The Victorian Electricity Supply Industry (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

6.7.2 Vegetation Management

All training requirements for vegetation management are covered in the TOA-TOA2 2019 to 2020 Electric Line Clearance (Vegetation) Management Plan.

6.7.3 Line Worker

The VESI Skills and Training Matrix stipulate the qualifications and refresher training for a Line worker. TOA-TOA2 Primary Service Providers are required to organise training to the standards referred to in the matrix and keep records of all training undertaken.

On occasion TOA-TOA2's Primary Service Providers apprentice line workers are engaged in bushfire mitigation activities. This provides experience in a broad range of tasks. When TOA-TOA2 Primary Service Providers 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 line work, is conducted by a Registered Training Organisation (RTO) and this training is supported "on the job" by designated mentors and tradespersons.

6.8 Liaison With Other Organisations

TOA-TOA2 Primary Service Providers have 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, Land, Water & Planning (DELWP)
- 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 - JEQA4UJ443MT-185-28490 Incident Management Procedure

6.9 EMERGENCIES

Requests for TOA-TOA2 Primary Service Providers resources to assist fire agencies are coordinated by the Network Controller, at the TOA-TOA2 Primary Service Providers 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.

The TOA-TOA2 Primary Service Providers will work with the relevant fire control agency to provide safe access to a fire or emergency management scene involving TOA-TOA2 assets. This may include deenergisation of electrical assets upon request.

Actions to be undertaken in the event of a major event or emergency are contained in the following TOA-TOA2 Primary Service Providers documents:

- Procedure JEQA4UJ443MT-185-28490 Incident Management Procedure
- Manual JEQA4UJ443MT-154-111 Event Command Organisation Manual

6.10 Assistance Provided To Fire Agencies

There are two firefighting services operating within the TOA-TOA2 service area:

- The Department of Environment, Land, Water & Planning (DELWP) is responsible for state forests and parks.
- The Country Fire Authority (CFA) is responsible for all other rural areas e.g. private property and is resourced largely by volunteers.

The TOA-TOA2 Primary Service Providers will provide assistance and work with the relevant fire control agency involved in the investigation of fires near TOA-TOA2 transmission network.

If required TOA-TOA2 Primary Service Providers will supply Emergency Management Liaison Officers (EMLOs) to attend fire agency incident command centers and provide information or assistance with issues relating to TOA-TOA2 transmission assets.

6.11 TOTAL FIRE BAN DAYS

TOA-TOA2 Primary Service Providers have developed a Total Fire Ban Day Action Plan (TFBDAP) which is invoked on Total Fire Ban (TFB) days. The TFBDAP contains Bushfire Mitigation strategies which are applied on declared days of TFB. These strategies are designed to minimise the risk of a fire ignition being caused by TOA-TOA2 transmission network.

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

6.12 DECLARED FIRE DANGER PERIOD

During the Declared Fire Danger Period TOA-TOA2 Primary Service Providers will continue with normal operation and maintenance of TOA-TOA2 electrical assets. The majority of TOA-TOA2 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 with specific requirements during the Declared Fire Danger period. These include:

- Vehicle Fire Equipment and Movement Requirements (refer to Appendix B)
- Declared Fire Danger Period Bushfire Mitigation Requirements (refer to Appendix C)
- Fire Fighting Equipment to be carried (refer to Appendix B)

6.13 FIRE MANAGEMENT

In the event of a fire on TOA-TOA2 transmission network, the TOA-TOA2 Primary Service Providers 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.
- When requested deploy an Emergency Management Liaison Officer (EMLO) to an Incident Control Centre established by the relevant fire control authority.
- Managing the fire event in accordance with TOA-TOA2 Primary Service Providers:
 - Manual JEQA4UJ443MT-154-111 Event Command Organisation Manual
 - Procedure JEQA4UJ443MT-185-28490 Incident Management Procedure

7 FIRE INVESTIGATION

As part of continuous improvement towards the mitigation of bushfires, TOA-TOA2 Primary Service Providers investigate incidents of fire ignition caused by electricity assets. Detailed analyses of asset failure trends are also carried out in order to develop policy improvements and enhanced preventative actions.

Any fire starts initiated by TOA-TOA2 assets will be reported by TOA-TOA2 to ESV, as per ESV reporting guidelines. The TOA-TOA2 Primary Service Providers Network Control Room identifies any fire starts from outage information or from external advice and notifies the Network Availability Officer (NAO) who collects information regarding each event.

The NAO is required to compile and send a report through to the Network Safety and Bushfire Mitigation Group in preparation for reporting to ESV in accordance with the ESV reporting guidelines.

The following TOA-TOA2 Primary Service Providers procedure and policy cover the reporting requirements for fire starts:

- Procedure JEQA4UJ443MT-185-28490 Incident Management Procedure
- Policy 18-80-CP0007 ESMS Reporting to Energy Safe Victoria (ESV) and Fire Start Reporting to Australian Energy Regulator (AER)

7.1 FIRE STARTS

Ground Fires and Pole Fires will be reported as they occur to ESV by TOA-TOA2 Primary Service Providers. Reporting of fire starts is carried out in accordance with the following TOA-TOA2 Primary Service Providers procedure and policy:

- Procedure JEQA4UJ443MT-185-28490 Incident Management Procedure
- Policy 18-80-CP0007 ESMS Reporting to Energy Safe Victoria (ESV) and Fire Start Reporting to Australian Energy Regulator (AER)

7.2 ASSET FAILURES

As part of continuous improvement towards the mitigation of bushfires, TOA-TOA2 Primary Service Providers investigate incidents of fire ignition which are attributed to TOA-TOA2 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 TOA-TOA2 Primary Service Providers Asset Investigation Group.

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 Primary Service Providers businesses.

The committee meets quarterly to review asset failure investigations. This committee will also be responsible for reviewing TOA-TOA2 asset failures and recommending opportunities to improve the management of the assets of interest and mitigate future failures.

The following TOA-TOA2 Primary Service Providers procedure covers the reporting, analysis and investigation of fires and failed assets:

Procedure - JEQA4UJ443M-150-379 Asset Failure Investigation and Reporting

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 the TOA-TOA2 Primary Service Providers Asset Management Group.

8 PROGRAM TIMING

The inspection program dates are determined by the maintenance plan, in accordance with the relevant TOA-TOA2 asset policy and are generated from SAP.

Remedial maintenance and asset replacement/modification is completed accordance with

Policy - 1005-0021 TOA-TOA2 Asset Maintenance Priority Policy

TOA-TOA2 Primary Service Providers have produced a set of BMP program milestones which specify the completion dates required for key BFM activities (refer to Appendix D).

The BMP program milestones that relate to TOA-TOA2 are:

- Submission of the Transmission Network Vegetation Management Plan to ESV
- Submission of the TOA-TOA2 Bushfire Mitigation Strategy Plan 2019-2024 to ESV
- Completion of TOA-TOA2 annual vegetation management inspections.

9 REPORTING AND MONITORING

TOA-TOA2 Primary Service Providers have a reporting process which ensures that all levels of the BFM management structure, including TOA-TOA2 CEO and ESV, are informed of the status of TOA-TOA2 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 Total Fire Ban Day Action Plan (refer to Appendix A).

9.1 BFM STATUS

TOA-TOA2 Primary Service Providers will produce a monthly BFM status report to monitor the implementation of the BFM plan. The report frequency is increased to weekly during the declared fire danger period.

The BFM status report will be provided to senior management, including TOA-TOA2 CEO and to various stakeholders involved in BFM activities including ESV.

9.2 ASSET INSPECTION

The TOA-TOA2 Asset Inspection program is monitored by TOA-TOA2 Primary Service Providers Asset Inspection Team. An automated daily exception report is generated from SAP and distributed by e-mail to relevant employees who monitor the program. The Asset Inspection Team also investigates any poles overdue for inspection to ensure appropriate action has been taken.

9.3 MAINTENANCE

TOA-TOA2's Primary Service Providers automatically generate a daily Priority 1 maintenance report. The Priority 1 report is generated from OMS and distributed via e-mail to relevant stakeholders. Both the Asset Inspection Officer and the Outage Coordinator check the report for any outstanding items ensuring prompt action.

An automated daily Priority 2 exception report is generated from SAP and distributed via e-mail to alert relevant stakeholders of defects that are overdue for rectification or close to becoming overdue.

The Senior Program Planner investigates any outstanding defects and follows up with the Asset Maintenance Program Manager, who in turn takes action in accordance with the following TOA-TOA2 Primary Service Provider policy:

 Policy - JEQA4UJ443MT-158-543 Management of Maintenance Items Outside Policy Timeframes

9.4 VEGETATION CLEARANCE

At the completion of the annual inspection, TOA-TOA2 Primary Service Providers will provide a status report to the TOA-TOA2 CEO highlighting any hazardous bushfire risk area spans. This information will be used to monitor and audit performance.

9.5 ESV REPORTING

TOA-TOA2 Primary Service Providers reporting schedule of BFM activities to ESV is listed below.

- TOA-TOA2's 2019 To 2020 Electric Line Clearance (Vegetation) Management Plan
- Bushfire Mitigation Plan (submitted every 5 years)
- BFM Status Report (reported monthly then weekly during the declared fire danger period)
- 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.

9.6 AUDITS

TOA-TOA2 Primary Service Providers have produced a policy document covering auditing and inspection program requirements, which sets out the requirements of all audits and inspection programs;

Policy - JEQA4UJ443MT-175-29 Audit and Inspection Programme Requirements

Various audits undertaken on TOA-TOA2 assets include;

- Audits undertaken by the Primary Service Providers Field Audit and Quality Group which facilitate sample audits of completed maintenance projects ensuring that the relevant technical standards and design specifications have been achieved.
- Auditing of TOA-TOA2 asset inspection program is included in the overall auditing program currently conducted by TOA-TOA2 Primary Service Providers.
- TOA-TOA2 Primary Service Providers have an independent audit program for monitoring the
 performance of asset inspectors. The Maintenance Services team 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-TOA2's 2019 to 2020 Electric Line Clearance (Vegetation) Management Plan
- A program of system audits is also conducted by TOA-TOA2's Primary Service Providers Audit Services Group inclusive of BFM management programs and processes.

10 REVIEWING

The TOA-TOA2 BFM Strategy Plan is reviewed periodically. Any deficiencies identified from this review will require adjustments and improvements to be made to the plan to better meet the implementation and objectives of the plan. The outcomes of the review and required improvements will be reported to the TOA-TOA2 CEO.

11 APPENDICES

APPENDIX A - TOA-TOA2 TOTAL FIRE BAN DAY ACTION PLAN 2019-2024

APPENDIX B - TOA-TOA2 VEHICLE FIRE EQUIPMENT & VEHICLE MOVEMENT REQUIREMENTS

APPENDIX C - TOA-TOA2 DECLARED FIRE DANGER PERIOD - BUSHFIRE MITIGATION REQUIREMENTS

APPENDIX D - TOA-TOA2 BFM PROGRAM MILESTONES