Jemena Electricity Networks (Vic) Ltd

2016-20 Electricity Distribution Price Review Regulatory Proposal

Revocation and substitution submission

Attachment 8-4 IJM Consulting - Audit report of JEN's compliance with Electricity Safety 2010 Regulations

Public



IJM CONSULTING PTY LTD

17 December 2015

Jemena Electricity Networks (Vic) Ltd 321 Ferntree Gully Road Mount Waverley, Vic 3149

To Whom It May Concern:

Re: Review of JEN's 2011-14 ESV Annual Vegetation Management Audit and 2015 Spot Audit – Compliance with Electric Line Clearance 2010 in Relation to Structural Limbs.

Introduction

IJM Consulting Pty Ltd was contracted by Jemena Electricity Network (JEN) to conduct a review and prepare a statement in accordance with the Scope of Works dated 20th November 2015 and a telephone briefing of 23rd November 2015.

IJM Consulting acknowledges that as part of the support documentation to Jemena's Scope of Works a copy of the Federal Court of Australia Practice Note CM7 "Expert Witnesses in Proceedings in the Federal Court of Australia" was provided and that it has been read and understood.

Scope of Works

Engagement Deliverables

Part A

JEN requests that you review the audit reports (and underlying data) your organisation prepared for each of JEN's annual ESV audits for 2011-2014 and advise whether the audits indicated compliance by JEN with then applicable 2010 regulations in relation to structural limbs.

To provide this opinion, Jen requests your organisation undertake a detailed desktop review of the audit findings and data underpinning the annual ESV audits for 2011 – 2014 (note that no field work is requested for this item).

Part B

Undertake a new audit with fieldwork of JEN's network area (based on a representative sample size of 100) and advise whether:

- a) the audit shows compliance by JEN with the 2010 regulations in relation to structural limbs;
- b) in your professional opinion, any structural limbs on the audited trees are likely, over the period 2016-2020 to grow onto the clearance Zone identified in the 2010 Regulations.

Reviewers Note:

The Scope of Works was taken from the original email, letter and attachments sent out to IJM Consulting on Friday 20th November 2015.

Part B b) was not accepted by IJM Consulting Pty Ltd as the Company considered that to deliver this component of the Scope of Works it would require a Qualified Arborist, therefore the results of the fieldwork shows a snapshot in time against the requirement within the Electricity Safety (Electric Line Clearance) Regulations 2010.

Qualifications & Experience

IJM Consulting has been in existence since 18 November 1999 working as a Consulting Company to the Electrical & Gas Distribution Businesses and Energy Safe Victoria.

Prior to establishing IJM Consulting the Principal of the Company (Ian McDonald) was employed in the industry for 30 years commencing in 1969 with the State Electricity Commission of Victoria until 1992, and 2 subsequent companies (Eastern Energy & TXU) who acquired the Eastern segment of the State from the Victorian State Government.

My Resume is attached showing the areas worked and skills gained.

Yours sincerely,

Ian McDonald

Company Principal

Jemena Electricity Networks

Report 2015

IJM Consulting Pty Ltd

Consultants to the Gas & Electricity Industry

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Part A - Audit Year 2011

Jemena Electricity Networks Bushfire Mitigation Plan 2011/12 and Electric Line Clearance Management Plan 2011/12 were used as the base reference documents to outline the Company's standard of performance, and activities undertaken to comply with the intent of the Electricity Safety (Electric Line Clearance) Regulations 2010. It was the implementation of these documents and Jemena Electricity Networks (JEN's) delivery to their content against the Electricity Safety (Electric Line Clearance) Regulations 2010 in the field that was the focus of the Bushfire Mitigation Audit in 2011

Vegetation Inspection Cycle

In 2011 the Vegetation Management Company (VMC) Select Solutions (a division of AusNet Services), inspected the clearance space in accordance with the following cycles:

- The HBRA spans are to be assessed annually in a timely manner to allow all clearing to be completed prior to the declaration of the fire danger period;
- The LBRA all spans are to be assessed at a maximum of 3 years, however during the transition period the cycle is progressively reducing to achieve a 2-year cycle.

Vegetation Cutting & Removal Cycle

At the time of the audit (4th September 2011) the Vegetation Management Company cut the clearance space in accordance with the following cycles:

- In the HBRA all spans to be cut annually in a timely manner to allow all clearing to be completed prior to the declaration of the fire danger period;
- In the LBRA all spans to be cut at a maximum of 3 years, however during the transition period the cycle is progressively reducing to achieve a 2-year cycle.

In general, vegetation-clearing works within JEN is performed on a three (3) year cycle dependent on the area and the dynamics of the preceding environmental conditions. The audit revealed that Jemena was achieving their inspection cycles.

Management of Vegetation within the Clearance Space for Covered Conductors (ABC)

JEN had Exemption under Regulation 10 of the Electricity Act (Electric Line Clearance) Regulations 2010 which allows vegetation within the clearance space for covered conductors (ABC) until the 31st December 2013 in line with their granted Transitional Plan. The Program for compliance with clause 2.1.2 of this exemption (cyclic clearing – aerial bundled cable or insulated cable – all areas) is shown below:

Period Ending	Percentage of Total	Percentage of Total Spans
	Spans to be Actioned	Compliant with the Code
30 June 2011	100	0
31 December 2011	78	22
30 June 2012	54	46
31 December 2012	40	60
30 June 2013	28	72
31 December 2013	0	100

To support the achievement of the Transitional Plan JEN had, at the time of the audit, introduced a process of ensuring the clearance space is maintained around service cable & ABC Other Responsible Person (ORP) or customer's responsibility. This involved the VMC, as part of the routine inspection of JEN assets identifies a service line as having trees within the clearance space, a brochure and defect notice is placed in that customer's letterbox advising them of their responsibilities.

Results of the Field Audit / Database Check

The field audit in 2011 was carried out in two parts with vegetation spans chosen at random from the Company's database.

Part 1 Comprised an audit of 76 sites covering the HBRA:

- Vegetation Spans Non-Compliant with the Regulations, Electricity Suppliers Responsibility 2; and
- Vegetation Spans Non-Compliant with the Regulations, Other Authorities Responsibility Nil.

Part 2 Comprised an audit of 31 sites covering the LBRA:

- Vegetation Spans Non-Compliant with the Regulations, Electricity Suppliers Responsibility Nil; and
- Vegetation Spans Non-Compliant with the Regulations, Other Authorities Responsibility 2.

Factual finding:

The 2011 audit by IJM Consulting was conducted early in the pre-summer cutting season (September 2011) where it revealed that the easements subject to the audit throughout JEN's operational area were:

- In the HBRA being managed in accordance with the Electricity Safety (Electric Line Clearance)
 Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance
 Management Plan 2011/12. The 2 sites found non-compliant were on service cables JEN's
 responsibility to clear, and the auditor confirmed that they were scheduled for cutting before the
 commencement of the Fire Danger Period.
- In the LBRA being managed in accordance with the Electricity Safety (Electric Line Clearance)
 Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance
 Management Plan 2011/12. The 2 sites found non-compliant were on service cables customer responsible to clear and both sites had been issued with defects.

JEN had established and gained agreement with ESV for transitional arrangements to comply with the Electricity Safety (Electric Line Clearance) Regulations 2010 and arrangements provide for full compliance by 31st December 2013. During the transitional period they were therefore operating outside the new/changed obligations imposed under the 2010 Regulations.

The easements throughout the network area subject to audit were cleared to the requirements of the Electricity Safety (Electric Line Clearance) Regulations 2010, Code of Practice for Electric lines however vegetation around customer service cables required further attention.

Reviewers Note:

The factual findings above have been determined from conducting a detailed desktop and field audit in September 2011, and reviewing the desktop audit, field audit notes, and the final report prepared for Energy Safe Victoria.

IJM Consulting is unable to determine from the material reviewed if the non- conforming sites found during the 2011 audit included structural limbs or light vegetation within the clearance space although it was the practice of the auditor to highlight major non-conformances for urgent attention and limbs of >130mm would have constituted a major non-conformance.

Part A - Audit Year 2012

Jemena Electricity Networks Bushfire Mitigation Plan 2012/13 and Electric Line Clearance Management Plan 2012/13 were used as the base reference documents to outline the Company's standard of performance, and activities undertaken to comply with the intent of the Electricity Safety (Electric Line Clearance) Regulations 2010. It was the implementation of these documents and JEN's delivery to their content against the Electricity Safety (Electric Line Clearance) Regulations 2010 in the field that was the focus of the Bushfire Mitigation Audit in 2012.

Vegetation Inspection Cycle

In 2012 the Vegetation Management Company (VMC) Select Solutions inspected the clearance space in accordance with the following cycles:

- In the HBRA Select Solutions carried out an annual inspection with the aim of cutting/clearing all vegetation that had the potential to encroach into the clearance space during the Fire Danger Period. The vegetation coded PT1 (formerly code 55) and PT30 (formerly code 56) were prioritised in the lead up to the Fire Danger Period however PT365's were also addressed as they had the potential to encroach into the clearance space before the next inspection cycle;
- In the LBRA an annual inspection was carried out with the aim of cutting 50% of the area (trees that were JEN's responsibility), each year as the Company used a 2 year cutting cycle. During this audit period Select Solutions was also carrying out a program ("Step Up",) which was the implementation of the transitional program under an agreement with ESV. The Step Up program targeted the LBRA as the HBRA is cleared annually.

JEN does not differentiate with their cyclic cutting across the HBRA and LBRA in relation to bare and covered conductors.

Vegetation Cutting & Removal Cycle

At the time of the audit (21st September 2012), the transition plan period to achieve full code clearance in line with the Regulations for vegetation clearing works within the HBRA was targeted for completion by end of June 2013, and in the LBRA by end of December 2013. As at the time of the audit JEN was approximately 5% behind their target for cyclic clearing across the LBRA.

The HBRA cyclic clearing commenced in September and the status report of feeders completed was not available for the auditors so was not included in the audit report therefore I am unable to comment on the HBRA status for the 2012/13 year.

A review of JEN's tree clearing work schedule showed that JEN's VMC would achieve all clearing works in line with the transitional plan and complete the pre-summer clearing by the 1st November 2012.

Results of the Field Audit / Database Check

The field audit in 2012 was carried out in three (3) parts with vegetation spans chosen at random from the Company's database.

Part 1 Comprised of an audit of 104 sites covering 78 HBRA and 26 LBRA spans:

- Vegetation Spans Non-Compliant with the Regulations, Electricity Suppliers Responsibility 6 (HBRA x 3 & LBRA x 3)
- Vegetation Spans Non-Compliant with the Regulations, ORP's 5 (HBRA x 3 & LBRA x 2)

<u>Part 2</u> Comprised an audit of 52 additional sites in the LBRA downloaded from the vegetation database showing inspection and cutting complete. These sites were then visited and an assessment was made from this sample on the ability of the Company to achieve code clearance and meet regulatory requirements for the Fire Danger Period:

- Vegetation Spans Non-Compliant with the Regulations, Electricity Suppliers Responsibility 5
- Vegetation Spans Non-Compliant with the Regulations, ORP's 26

It should be noted that the 26 non-compliant ORP's vegetation all related to services.

<u>Part 3</u> Comprised an audit of 57 additional sites in the HBRA downloaded from the vegetation database showing pre-summer inspection and cutting complete. These sites were then visited and an assessment was made from this sample on the ability of the Company to achieve code clearance and meet regulatory requirements for the Fire Danger Period:

- Vegetation Spans Non-Compliant with the Regulations, Following Pre-summer HBRA Cut Nil
- Vegetation Spans Non-Compliant with the Regulations, ORP's Nil

At the time of the audit Jemena was developing a process to improve the management of customers whose trees were impacting overhead service. This included a three letter notification process similar to that used for defective Private Overhead Electric Lines (POEL's). This was designed to address incidents involving service conductor failure due to contact with trees.

Factual finding:

The 2012 audit by IJM Consulting was conducted early in the pre-summer cutting season (September 2012), where it revealed the easements subject to the audit throughout JEN's operational area that:

- Of the 57 spans audited to confirm the effectiveness of JEN's 2012 cyclic and pre-summer inspection and cutting programs in the HBRA, there were no spans found non-compliant with the Electricity Safety (Electric Line Clearance) Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance Management Plan 2012/13.
- Of the 52 spans audited to confirm the effectiveness of JEN's 2012 cyclic inspection and cutting programs in the LBRA, there were 5 spans (3 mains and 2 services), JEN's responsibility to cut, and 26 services ORP's to cut found non-compliant within the Electricity Safety (Electric Line Clearance) Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance Management Plan 2012/13.
- Of the 64 spans audited to confirm JEN's 2012 general preparedness covering inspection and cutting programs in the HBRA, 6 spans were found non-compliant (3 mains JEN's responsibility to cut and 3 services ORP's to cut) within the Electricity Safety (Electric Line Clearance) Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance Management Plan 2012/13.
- Of the 26 spans audited to confirm JEN's 2012 general preparedness covering inspection and cutting programs in the LBRA, 5 spans were found non-compliant (3 mains JEN's responsibility to cut and 2 services ORP's to cut) within the Electricity Safety (Electric Line Clearance) Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance Management Plan 2012/13.

JEN had established and gained agreement with ESV for transitional arrangements to comply with the Electricity Safety (Electric Line Clearance) Regulations 2010 and arrangements provide for full compliance by 31st December 2013. During the transitional period they were therefore operating outside the new/changed obligations imposed under the 2010 Regulations.

The easements throughout the network area subject to audit were cleared to the requirements of the Code with the items found outside the code confirmed by the auditor as programmed for cutting.

The 2012 audit clearly highlighted vegetation around service cables (customer responsibility), remained the major issue to be addressed. In my opinion the implementation of their new service clearance management program would make an impact on service clearance in the future and significantly reduce non-conformances in this area of their operation.

Reviewers Note:

The factual findings above have been determined from conducting a detailed desktop and field audit in September 2012, and reviewing the desktop audit, field audit notes, and the final report prepared for Energy Safe Victoria.

IJM Consulting is unable to determine from the material reviewed if the non- conforming sites found during the 2012 audit included structural limbs or light vegetation within the clearance space although it was the practice of the auditor to highlight major non-conformances for urgent attention and limbs of >130mm would have constituted a major non-conformance.

Part A - Audit Year 2013

Jemena Electricity Networks Bushfire Mitigation Plan 2013/14 and Electric Line Clearance Management Plan 2013/14 were used as the base reference documents to outline the Company's standard of performance, and activities undertaken to comply with the intent of the Electricity Safety (Electric Line Clearance) Regulations 2010. It was the implementation of these documents and JEN's delivery to their content against the Electricity Safety (Electric Line Clearance) Regulations 2010 in the field that was the focus of the Bushfire Mitigation Audit in 2013.

Vegetation Inspection Cycle

In 2013 the Vegetation Management Company (VMC) Select Solutions inspected the clearance space in accordance with the following cycles:

- In the HBRA Select Solutions carried out an annual inspection with the aim of cutting/clearing all vegetation that had the ability to encroach into the clearance space during the Fire Danger Period. The vegetation coded PT1 and PT30 were used to prioritise the work in the lead up to the Fire Danger Period, however PT365's were again addressed due to their potential to encroach into the clearance space before the next inspection cycle. In addition an annual program was introduced to include a separate cyclic component which was aimed at reducing the workload in the pre-summer part of the program from early April to mid-June. Priority spans (PT1 & PT30) were to be cleared during the cyclic program reducing the number of priority spans to be cleared during the pre-summer program from mid-August to late October;
- In the LBRA all spans are assessed at a maximum of 2 years, however JEN was still working within the transition period progressively reducing inspection/cutting time to achieve the required 2 year cycle.

During 2013 JEN engaged an ORP Liaison Officer (LO) to monitor Other Responsible Persons (ORP) non-conforming vegetation issues on behalf of JEN;

- The LO was required to liaise with ORP's with a view to assist, monitor and report on progress and effectiveness of their vegetation management programs to the Asset Inspection and Vegetation Contract Coordinator;
- The LO was also to monitor customer responsibility service wires on behalf of JEN. If a branch
 25mm or more in diameter is in constant contact with the service line, and the insulation is still
 undamaged, the VMC is to initiate the Vegetation Service Defect Notification and Reporting process.

JEN does not differentiate with the cyclic cutting across HBRA and LBRA in relation to bare and covered conductors.

Vegetation Cutting & Removal Cycle

At the time of the audit 20th September 2013 JEN had an established program for the transition to compliance that aligned with the conditions of the exemption granted by ESV on 18th February 2011:

- Cyclic Clearing Aerial Bundled Cable or Insulated Cable all areas Target: 30 June 2013 72% compliant to code Actual as at 28th August 2013 96% (ahead of target);
- Cyclic Clearing Powerlines other than Aerial Bundled Cable or Insulated Cable LBRA Target: 30
 June 2013 80% compliant to code Actual as at 28th August 2013 96% (ahead of target);
- Cyclic Clearing Powerlines other than Aerial Bundled Cable or Insulated Cable HBRA Target: 30
 June 2013 100% compliant to code completed.

HBRA cyclic clearing commenced in April 2013. All of the PT1 & PT30 spans were actioned as part of the program. Apart from the Sunbury feeders, all of the PT365 spans were also actioned. PT 365 spans which were identified within the Sunbury feeders as part of the cyclic program were planned to be actioned in conjunction with the HBRA Pre Summer Program.

The status of the cutting program for 2013 at the time of audit was:

- HBRA cyclic cutting 100%;
- HBRA pre-summer 26%;
- LBRA (as at the end of August 2013) JEN was approximately 4% ahead of target for cyclic clearing.

Results of the Field Audit / Database Check

The field audit in 2013 was carried out in two (2) parts covering a total of 139 spans that were chosen at random from the Company's database.

Part 1 Comprised an audit of 106 HBRA spans which resulted in:

- Vegetation Spans Non-Compliant with the Regulations, Electricity Suppliers Responsibility 1;
- Vegetation Spans Non-Compliant with the Regulations, ORP's 2.

The 1 site found non-compliant that was JEN's Responsibility to cut was a P30, and was scheduled for cutting as part of that years' pre-summer clearing to be completed before the commencement of the Fire Danger Period. The 2 ORP sites found were customer services that had defect notices issued.

Part 2 Comprised an audit of 36 LBRA spans which resulted in:

- Vegetation Spans Non-Compliant with the Regulations, Electricity Suppliers Responsibility Nil;
- Vegetation Spans Non-Compliant with the Regulations, ORP's 2

The 2 ORP sites found non-compliant were customer services which had defect notices issued.

Factual finding:

The 2013 audit by IJM Consulting was conducted early in the pre-summer cutting season (September 2013) where it revealed that the easements subject to the audit throughout JEN's operational area were:

- Being managed in the HBRA in accordance with the Electricity Safety (Electric Line Clearance)
 Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance
 Management Plan 2013/14. The 1 site found non-compliant was a P30 JEN's responsibility to clear, and the auditor confirmed that it was scheduled for cutting before the commencement of the Fire
 Danger Period. The 2 ORP sites found were customer services (defect notices had been issued);
- Being managed in the LBRA in accordance with the Electricity Safety (Electric Line Clearance)
 Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance
 Management Plan 2013/14. The audit found no non-compliant sites JEN's responsibility to clear, and
 2 on service cables Customers responsibility to clear (defect notices had been issued).

At the time of the audit the Company was on track to achieve full compliance by 31st December 2013 in line with the agreement with ESV for transitional arrangements to comply with the Electricity Safety (Electric Line Clearance) Regulations 2010. During the transitional period they were therefore operating outside the new/changed obligations imposed under the 2010 Regulations.

Due to the audit being carried out early in the lead up to the Fire Danger Period all non-conforming vegetation sites found outside the 2010 Code were confirmed by the auditor as programmed for cutting. The easements throughout the network area subject to audit were cleared to the requirements of the Electricity Safety (Electric Line Clearance) Regulations 2010 Code.

The 2013 audit highlighted that vegetation around service cables customer responsibility was being addressed through the implementation of the new ORP service clearance management program.

Reviewers Note:

The factual findings above have been determined from conducting a detailed desktop and field audit in September 2013, and reviewing the desktop audit, field audit notes and the final report prepared for Energy Safe Victoria.

IJM Consulting is unable to determine from the material reviewed if the non-conforming sites found during the 2013 audit included structural limbs or light vegetation within the clearance space although it was the practice of the auditor to highlight major non-conformances for urgent attention and limbs of >130mm would have constituted a major non-conformance.

Part A - Audit Year 2014

Jemena's Electric Line Clearance Management Plan 2014/15 was used as the base reference document to outline the Company's standard of performance, and activities undertaken to comply with the intent of the Electricity Safety (Electric Line Clearance) Regulations 2010. It was the implementation of these documents and JEN's delivery to their content against the Electricity Safety (Electric Line Clearance) Regulations 2010 in the field that was the focus of the Bushfire Mitigation Audit in 2014.

Jemena and ESV provided the auditor with a briefing prior to the commencement of the audit as the 2014 audit had a methodology audit change with no desktop audit conducted but concentrating on an extensive field audit.

Vegetation Inspection Cycle

This item was not included in the Scope of Works for the 2014 Bushfire Mitigation (BFM) Clearance of Lines Audit therefore I am unable to comment.

The exemption granted by ESV for JEN's transitional program was completed on 31 December 2013 therefore both HBRA and LBRA inspection and cutting programs were operating on normal cyclic programs.

Vegetation Cutting & Removal Cycle

This item was not included in the Scope of Works for the 2014 BFM Clearance of Lines Audit therefore I am unable to comment.

Results of the Field Audit / Database Check

The field audit in 2014 was carried out in two (2) parts covering a total of 422 spans that were chosen at random from the Company's database.

Part 1 Comprised an audit of 213 HBRA spans which resulted in:

- Vegetation Spans Non-Compliant with the Regulations, Electricity Suppliers Responsibility 4
- Vegetation Spans Non-Compliant with the Regulations, ORP's 9

Part 2 Comprised an audit of 209 LBRA spans which resulted in:

- Vegetation Spans Non-Compliant with the Regulations, Electricity Suppliers Responsibility 11
- Vegetation Spans Non-Compliant with the Regulations, ORP's -100

Factual finding:

The 2014 audit by IJM Consulting was conducted early in the pre-summer cutting season (September 2014) where it revealed that the easements subject to the audit throughout JEN's operational area were:

- Being managed in the HBRA in accordance with the Electricity Safety (Electric Line Clearance) Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance Management Plan 2014/15. The 4 sites found non-compliant were 2 x P1 JEN's responsibility to clear from the mains and 2 services that JEN was responsible for clearing with all sites programmed for clearing. The 9 ORP sites found non-compliant were all customers' services and defect notices had been issued.
- Being managed In the LBRA in accordance with the Electricity Safety (Electric Line Clearance) Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance Management Plan 2014/15. The audit found of the 111 non-compliant sites, 55 were vegetation in the clearance space (Council responsibility to clear), 45 were vegetation touching service cables (customers responsibility to clear), and defect notices had been issued.

There was also 1 site where vegetation was in the mains clearance space (JEN's responsibility), and 10 where vegetation was in contact with services (JEN's responsibility to clear). The Auditor confirmed that the work was programmed to be completed by the commencement of the Fire Danger Period (Nominal date of 1 November 2014).

Reviewers Note:

The factual findings above have been determined from conducting a detailed desktop and field audit in September 2014, and reviewing the desktop audit, field audit notes and the final report prepared for Energy Safe Victoria.

IJM Consulting is unable to determine from the material reviewed if the non-conforming sites found during the 2014 audit included structural limbs or light vegetation within the clearance space although it was the practice of the auditor to highlight major non-conformances for urgent attention and limbs of >130mm would have constituted a major non-conformance.

Part B - Audit Year 2015

Field Audit Methodology

The field audit was carried out over two days following the completion of JEN's cutting program for the 2015/16 Fire Danger Period. This was carried out by auditing the clearances achieved in four (4) main areas that Jemena Electricity Networks was responsible for and these were chosen at random covering the areas of:

- HBRA Mickleham Jemena Electricity Responsibility to Clear;
- HBRA Bulla Jemena Electricity Responsibility to Clear;
- LBRA Diggers Rest Township Jemena Electricity Responsibility to Clear;
- Sunbury Township Jemena Electricity Responsibility to Clear.

Before entering the audit area the auditor picked 8 or 9 sites in each area taking approximately 3 spans in each of these sites where vegetation was evident. This was carried out over the 4 areas chosen.

Results of the Field Audit

This field audit for JEN was carried out in two (2) parts covering a total of 100 spans that were chosen at random from the Company's Network.

Part 1 Comprised an audit of 50 HBRA spans which resulted in:

- Vegetation Spans Non-Compliant with the Regulations, Electricity Suppliers Responsibility Nil
- Vegetation Spans Non-Compliant with the Regulations, ORP's Nil

Part 2 Comprised an audit of 50 LBRA spans which resulted in:

- Vegetation Spans Non-Compliant with the Regulations, Electricity Suppliers Responsibility 2
- Vegetation Spans Non-Compliant with the Regulations, ORP's 3

Factual Finding:

The 2015 field audit by IJM Consulting was conducted after the completion of the 2015/16 pre-summer cutting for the Fire Danger Period:

HBRA

- In the HBRA the sites audited highlighted that JEN has complied with vegetation clearances required within the Electricity Safety (Electric Line Clearance) Regulations 2010, and Code of Practice for Electric lines. No sites were found to be non-compliant.
- In the majority of sites audited excellent clearances were being achieved to ensure the clearance space remained free of vegetation for multiple seasons;
- The covered conductors (customer services) within the sites audited were cleared to code and showed evidence of cutting or the lines had been placed underground;
- There was evidence throughout the area that pre-summer cutting had taken place this year;
- The move by the Company to onsite substation sites, and the removal of long stretches of low voltage has also made an impact on vegetation clearances;
- The CFA fire hazard mapping does not appear to have kept up with reclassifications covering the
 urban sprawl that is occurring in the Mickleham and Bulla areas. This urban sprawl may meet the
 CFA criteria for reclassification from HBRA to LBRA.

In my opinion should the Company achieve the same standard of cutting throughout the remaining unaudited segments of the HBRA within JEN's operational area then Jemena Electricity Networks has cleared to the intent of the Electricity Safety (Electric Line Clearance) Regulations 2010.

LBRA

- The LBRA is being managed in accordance with the Electricity Safety (Electric Line Clearance)
 Regulations 2010, Code of Practice for Electric lines, and Jemena's Electric Line Clearance
 Management Plan 2015/16. The audit found 2 non-compliant sites (JEN's responsibility to clear), and
 3 on service cables (Customers responsibility to clear).
- The LBRA in general has not been cut to the same standard as the HBRA with reduced vegetation to line clearances being achieved, however the majority of sites audited complied with vegetation clearances required within the Electricity Safety (Electric Line Clearance) Regulations 2010. The clearances are consistent with normal industry practice and understandable given the different risk profile being addressed.
- Although this audit was carried out to determine compliance to the Electricity Safety (Electric Line Clearance) Regulations 2010 & Code of Practise special notice was taken by the auditor to determine if structural limbs, as described in Electricity Safety (Electric Line Clearance) Regulations 2015 schedule 1 - Code of Practise for Electric Lines, contravened this requirement. No sites were found.

In my opinion should the Company achieve the same standard of cutting throughout the remaining unaudited segments of the LBRA (JEN's responsibility to cut), then they are conforming to the intent of the Electricity Safety (Electric Line Clearance) Regulations 2010 with minor Code 56 (P30) infringements occurring.

Reviewers Note:

Although the 2015 audit covered a small sample of the network it did demonstrate that Jemena's line clearance program is working with no noncompliant sites found in the HBR0,A and only 2 minor sites in the LBRA (on the limit with the potential to grow into the clearance space during the current fire danger period), which were JEN's responsibility to cut. This is an outstanding result that in my opinion demonstrates that JEN was complying with the intent of Electricity Safety (Electric Line Clearance) Regulations 2010.

Statement

This statement relates to Jemena Electricity Network's compliance to the Electricity Safety (Electric Line Clearance) Regulations 2010.

Jemena Electricity Network has in general retained the proven strategies, procedures and processes implemented by the State Electricity Commission following the Ash Wednesday fires. They have only changed to comply with Regulations or to implement efficiencies to their Vegetation Management.

The Company has progressively moved to achieve total compliance with the Code of Practice within the Electricity Safety (Electric Line Clearance) Regulations 2010 for removal of all vegetation within the clearance space over the past 5 years. This has been achieved through implementation of their inspection and cutting programs. Where there has been a need to implement a process to achieve their aim they have not hesitated to proceed, (an example of this is the appointment of the ORP Liaison Officer to monitor ORP's non-conforming vegetation issues).

The Company has, during the period of this Statement (2011 – 2015), achieved compliance in their responsible areas before the commencement of the Fire Danger Periods. This has not been the case for ORP areas as there is still considerable work to be done across the Network before this can be achieved.

Reviewers Note:

This statement has been made after reviewing the BFM audit results for four (4) years (2011 - 2014), and the knowledge gained conducting annual BFM Audits on JEN's operational area since 2003, in addition to the actual results from a sample field audit conducted in November 2015.

I have made all the inquiries that I believe are desirable and appropriate and that no matters of significance that I regard as relevant have, to my knowledge, been withheld from the report.

All information outlined in the report is factual unless otherwise stated as the opinion of the auditor.

Reviewer's Signature:

Ian McDonald

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Date: 1st December 2015

Line Clearance Audit Jemena Electricity Networks

Field Audit

IJM Consulting Pty Ltd

Consultants to the Gas & Electricity Industry

Totals	100	50	0	0	20		8
TOTAL Field Audit Results - Jemena Electricity Network 2015 Clearance of Lines Audit	Total Sites Audited in the Field	Total Sites Audited in the HBRA	Vegetation Spans Non Compliant with the Regulations - HBRA Electricity Suppliers Responsibility	Vegetation Spans Non Compliant with the Regulations - HBRA Other Responsible Person	Total Sites Audited in the LBRA	Vegetation Spans Non Compliant with the Regulations - LBRA Electricity Suppliers Responsibility	Vegetation Spans Non Compliant with the Regulations - LBRA Other Responsible Person

Comments

- The HBRA area audited showed excellent clearances were being achieved to ensure the clearance space remained free of vegetation for multiple season;
 - There were no sites found in the HBRA that were not cleared to the Electricity Safety (Electric Line Clearance) Regulations 2010 & Code of Practise;
- The covered conductors (customer services) within the sites audited were cleared to code and showed evidence of cutting or the lines have been placed underground;
 - There was evidence throughout the area that pre-summer cutting has taken place this year,
- The move by the Company to onsite substation sites and the removal of long stretches of low voltage has also made an impact on vegetation clearances;
- The CFA fire hazard mapping does not appear to have kept up with reclassifications covering the urban sprawl that is occurring in the Mickleham and Bulla areas. This urban sprawl may meet the CFA criteria for reclassification from HBRA to LBRA.

 - The sites audited in the HBRA highlighted that JEN has complied with the Electricity Safety (Electric Line Clearance) Regulations 2010;
- In the auditors opinion should the Company achieve the same standard of cutting throughout the remaining unaudited segments of the HBRA then JEN has cleared to the intent of the Electricity Safety (Electric Line Clearance) Regulations 2010.
 - Jemena established and gained agreement with ESV for a transitional period with established target dates and clearance percentages to comply with the Electricity Safety (Electric Line Clearance) Regulations 2010. These arrangements provided for full compliance by 31 December 2013 and this target has been met.

- In the auditors opinion should the Company achieve the same standard of cutting throughout the remaining unaudited segments of the LBRA (JEN's responsibility to cut) then JEN has cleared to the intent of the equired within the Electricity Safety (Electric Line Clearance) Regulations 2010. The clearances are consistent with normal industry practice and understandable given the different risk profile being addressed. The LBRA in general has not been cut to the same standard as the HBRA with reduced vegetation to line clearances being achieved, however the majority of sites audited complied with vegetation clearances Electricity Safety (Electric Line Clearance) Regulations 2010 with minor code 56 (P30) infringements occurring throughout their operational area. 10 7
 - It should be noted that no declared areas were audited. 12
- Although this audit was carried out to determine compliance to the Electricity Safety (Electric Line Clearance) Regulations 2010 & Code of Practise special notice was taken by the auditor to determine if structural limbs, as described in Electricity Safety (Electric Line Clearance) Regulations 2015 schedule 1 - Code of Practise For Electric Lines, contravened this requirement. No sites were found.

General Comment Covering HBRA & LBRA (Jemena Electricity Responsibility to clear)

Although the 2015 audit covered a small sample of the network it did demonstrate that Jemena's line clearance program is working with no noncompliant sites found in the HBRA and only 2 minor sites in the LBRA (on the limit with the potential to grow into the clearance space during the current fire danger period), which were JEN's responsibility to cut. This is an outstanding result that in the auditor's opinion demonstrates that JEN was complying with the intent of Electricity Safety (Electric Line Clearance) Regulations 2010. 1 of 1

M Constitution	
JIMI CONSULING	
Auditing Codes Used by Auditor	by Auditor
Tree Clearing	
Code - 55 (P1)	Vegetation within the clearance space and touching the conductor
Code - 56 (P30)	Vegetation within the clearance space or with the potential to grow into the clearance space during the current fire danger period.
Code - CC	No vegetation within the span
Check -	Vegetation within the span but very immature (estimated as 3 years growth before it would enter the clearance space)
Code - CYR	Vegetation outside the clearance space that will grow into space before the next pre summer inspection (Estimate requiring cutting now)
Code - NYR	Vegetation outside the clearance space that will require cutting before the next fire season
Pole top Assets	
Check -	To assist with checking the database of an item you would expect JEN to have programmed (e.g. Programmed date of an unserviceable pole for changing or staking)
Warning -	An item found during the field audit that should be identified on the database and programmed for correction (could cause an outage or fire).
Note:	An item of interest that would assist with checking the database
Photo - JEN 1.	A photo exists to support the item identified
Deteriorating crossarm	A defective crossarm that still has life left but should be identified on the database
Deteriorated crossarm	A defective crossarm that requires changing now.
NOTES: 1 The column headed Are 2 For clarity this audit rep	NOTES: 1 The column headed Are Spans Vegetation Clearance Compliant; ORP is used to identify all council and private trees 2 For clarity this audit report shows both the auditors Tree Clearing Codes (Code 55 & 56) and Jemena Electricity Networks tree clearing code (P1 & P30).
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17/12/2015

Jemena Electricity Operational Area

ne Clearance Audit - HBRA

Line	Line Clearance Audit - HBRA	udit - HBRA								
Site	CAMM NO ST	STREET	STREET NAME	COUNCIL	VOLT	Audit Defects Code	Are Spans Vegetation Clearance Compliant - JEN's Responsibility	Are Spans Vegetation Clearance Compliant -	Description Photo No.	to No.
Mick	leham Area	- Jemena Ele	Mickleham Area - Jemena Electricity Responsibility to Clear	to Clear						
-	A144416	Craigiebu	Craigieburn Road	City of Hume Council	22 HV		Yes	N/A	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
2	A054703	Craigiebt		City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
8	A054701	Craigiebi	Craigieburn Road	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
4	4 A035300	Konagad	P	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
5	5 A035297	Konagad		City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
9	6 A035294	Konagad	Konagaderra Road	City of Hume Council	22 HV/LV (S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
7	A039747	Mt Ridley Road	y Road	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
00	A035613	Mt Ridley Road		City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
6	A035612	Mt Ridley Road		City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
10	A035636	Bardwell Drive	II Drive	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
11	A035640	Bardwell Drive	II Drive	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
12	12 A038858	Bardwell Drive	II Drive	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
13	A038890	Parkland	Parkland Crescent	City of Hume Council	22 HV(S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
14	14 A035629	50 Parkland	Parkland Crescent	City of Hume Council	22 HV(S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
15	15 A035629	730 Parkland	Parkland Crescent	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
16	100	200	Road	City of Hume Council	22 HV(5/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
17		100 Kinnear Road	Road	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
18	18 A018469	12	Road	City of Hume Council	22 HV(S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
19	19 A014926	Whites Lane	Lane	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
20	20 A035240	Whites Lane	Lane	City of Hume Council	22 HV/LV (S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
21	A035241	Whites Lane	Lane	City of Hume Council	22 HV/LV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
22	A054385	Cookes road	road	City of Hume Council	22 HV(S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
23	A054382	Cookes road	road	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
24	24 A054380	Cookes road	road	City of Hume Council	22 HV(S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
25	25 A120875	Olives Road	oad	City of Hume Council	22 HV(S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
25	25 Sites Audited									
		Vegetati	ion Spans Non Compliant	Vegetation Spans Non Compliant with the Regulations in the HBRA - Electricity Suppliers Responsibility	ectricity Supplier	s Responsibility		0		
		Vegetati	ion Spans Non Compliant	Vegetation Spans Non Compliant with the Regulations in the HBRA - Other Responsible Person	ther Responsible	Person		0		

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Jemena Electricity Operational Area

Line Clearance Audit - HBRA

Line Cl	Line Clearance Audit - HBKA	- JIDNY	HDRA							
Site CA	CAMM NO S	STREET	STREET NAME	COUNCIL	VOLT	Audit Defects Code	Are Spans Vegetation Clearance Compliant - JEN's Responsibility	Are Spans Vegetation Clearance Compliant -	Description Photo N	Photo No.
Bulla A	rrea - Jem	ıena Ele	Bulla Area - Jemena Electricity Responsibility to Clear	ar						
1 A1	A136879	50 (Greens Road	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
2 A0	A021500		Greens Road	City of Hume Council	22 HV (S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
3 A1	A130867	09	Greens Road	City of Hume Council	22 HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
4 A0	A022906	150		City of Hume Council	22 HV (S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
5 Ao	A022901	165	Wildwood Road	City of Hume Council	22 HV (S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
6 A0	A021949	120	Wildwood Road	City of Hume Council	22 HV (S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
7 A0	A029147			City of Hume Council	22 HV/LV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
8 · A0	A021938		Somerton Road	City of Hume Council	22 HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
9 A0	A021937	1395	Somerton Road	City of Hume Council	17		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
10 A0	A021934			City of Hume Council	22 HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
11 A0	A089913			City of Hume Council	66/22 HV (S/S)		Yes	Yes	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
12 A0	A039915			City of Hume Council	66/22 HV		Yes	N/A	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
13 AC	A039916			City of Hume Council	66/22 HV	The second second	Yes	N/A	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
	A004788			City of Hume Council	22 HV (S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
15 AC	15 A004785	35 (City of Hume Council	22 HV		Yes	N/A	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
16 AC	16 A004782			City of Hume Council	22 HV (S/S)		Yes	Yes	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
17 A004751	104751	en l	Road	City of Hume Council	22 HV (S/S)		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
18 AC	18 A004762	165		City of Hume Council	22 HV		Yes	N/A	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
19 AC	A004769	19		City of Hume Council	1.7		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
20 A005091	105091			City of Hume Council	22 HV		Yes	N/A	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
21 A005082	305082			City of Hume Council	22 HV (S/S)		Yes	Yes	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
22 AC	A005083	25	Morefield Court	City of Hume Council	22 HV (S/S)		Yes	Yes	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
23 AC	23 A004506	215	Duncans Lane	City of Hume Council	22 HV (S/S)	THE WASHINGTON	Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
24 AC	A004508	225	Duncans Lane	City of Hume Council	22 HV	The state of the s	Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
25 00	25 0045513	270	Duncans Lane	City of Hume Council	22 HV		Yes	N/A	Cleared to the 2010 Regulation (Code Clearance)	
25 Si	25 Sites Audited									
			Vegetation Spans Non Compliant	Vegetation Spans Non Compliant with the Regulations in the HBRA - Electricity Suppliers Responsibility	lectricity Supplie	rs Responsibility		0		
			Vegetation Spans Non Compliant	Vegetation Soans Non Compliant with the Regulations in the HBRA - Other Responsible Person	Other Responsible	Person		0		
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Jemena Electricity Operational Area

Line Clearance Audit - LBRA Non Declared

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Site CAN	CAMM NO NO NO	ET STREET NAME	COUNCIL	VOLT	Audit Defects Code	Are Spans Vegetation Clearance Compliant - JEN's Responsibility	Are Spans Vegetation Clearance Compliant -	Description P	Photo No.
Diggers	Rest Towns	Diggers Rest Township - Jemena Electricity Responsibility to Clear	onsibility to Clear						
1 A111927	1927	Precious Road	Melton City Council	ΓΛ		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
2 A071975	1975 35		Melton City Council	Service Ex LV	Code 55 (P1)	Yes	No	Service through 2 Trees JEN's cut Customers requires cutting	JEN 1
3 A11	A111928 20) Precious Road	Melton City Council	IV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
4 A11			Melton City Council	LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
5 A130			Melton City Council	//		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
1000		fly.	Melton City Council	١٨		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
	H		Melton City Council	LV ABC		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
8 A14.			Melton City Council	LV ABC		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
			Melton City Council	LV ABC		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance) - POA Service Box Cover Missing	bo
10 A13	A133262 7		Melton City Council	2]		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
11 A11	A119562 13	1000	Melton City Council	ΓΛ		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
12 A119564			Melton City Council	IV.	Code 55 (P1)	Yes	No	Mains clear, Customer services Requires cutting to house 27	JEN 2
13 A119557		Г	Melton City Council	ΓΛ		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
14 A119556	9556 12		Melton City Council	ΓΛ		Yes	Yes	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
15 A133293	H		Melton City Council	۲۸		Yes	Yes	Evidence of recent cut - Cleared to the 2010 Regulation (Code Clearance)	
16 A118847			Melton City Council	LV ABC	Code 56 (P30)	No	Yes	Tree in middle of span on limit potential to grow into clearance	JEN 3
17 A11		禮	Melton City Council	LV ABC		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
18 A11			Melton City Council	LV ABC		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
19 A01			Melton City Council	ΓΛ		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
20 A01	A010266 6	Colour Road	Melton City Council	ΙN		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
21 A00	A004268 28	8 Colour Road	Melton City Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
22 A01	A010268 7	, Mullock Road	Melton City Council	LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
23 A010269	12 12	2 Mullock Road	Melton City Council	ΓΛ		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
24 A010270		4 Mullock Road	Melton City Council	ΓΛ		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
25 A119581	9581 2	Glitter Road	Melton City Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)	
25 Site	25 Sites Audited								,
		Vegetation Spar	Vegetation Spans Non Compliant with the Regulations - Electricity Suppliers Responsibility	- Electricity Supp	liers Responsibili	£,	1		
							·		
		Vegetation Spans Non Complian	Vegetation Spans Non Compliant with the Regulations - Other Responsible Person	usible Person			7		

17/12/2015

Jemena Electricity Operational Area

Line Clearance Audit - LBRA Non Declared

rine	Clearance	Audit -	rille creat affice Addit - LBNA NOIL Decidied						
Site No	CAMM NO	STREET	STREET NAME	COUNCIL	VOLT	Audit Defects Code	Are Spans Vegetation Clearance Compliant - JEN's Responsibility	Are Spans Vegetation Clearance Compliant -	Description Photo No.
Sunb	ury Towns	ship - Je	Sunbury Township - Jemena Electricity Responsibility to Clear	ity to Clear					
1	A001524	201	Reservoir Road	City of Hume Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance) Service Recently Cut - JENS Resp.
2 ,	A001523			City of Hume Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
3	A001542	183	Reservoir Road	City of Hume Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
4 4	A001579	2	Richardson Avenue	City of Hume Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
5 /	A001581	9	Richardson Avenue	City of Hume Council	ΓΛ		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
9	A001568	12		City of Hume Council	LV		Yes	No	Mains clear, Customer services Requires cutting to house 11 JEN 4
7	A001583			City of Hume Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
8	A001601	99		City of Hume Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
6	A072781		Heysen sen Drive	City of Hume Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
10	10 A007628	B		City of Hume Council	HA/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
11	A001597		Melba Avenue	City of Hume Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
12	12 A074002	31	Melba Avenue	City of Hume Council	ΓΛ		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
13	13 A074067	30	Lindsay Avenue	City of Hume Council	HV/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
14 ,	14 A074047			City of Hume Council	HV/LV	Code 56 (P30)	No	Yes	Tree in middle of span on limit potential to grow into clearance
15	15 A074045		Lindsay Avenue	City of Hume Council	HA/LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
16	16 A074044			City of Hume Council	LV ABC		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
17	17 A074043			City of Hume Council	LV ABC		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
18	18 A102227	10		City of Hume Council	LV ABC		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
19	19 A006345		Dobell Street	City of Hume Council	LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
20	20 A004144	19	Dobell Street	City of Hume Council	ΓΛ		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
21 /	A004147	7	Dobell Street	City of Hume Council	LV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
22	A138291	5	Lambert Avenue	City of Hume Council	IV		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
23	A004179	6	Lambert Avenue	City of Hume Council	٨٦		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
24	A004172	13	Lambert Avenue	City of Hume Council	۸٦		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
25	A004174	2	Nolan Court	City of Hume Council	ΓΛ		Yes	Yes	Cleared to the 2010 Regulation (Code Clearance)
25	25 Sites Audited	þ							
			Vegetation Spans N	Vegetation Spans Non Compliant with the Regulations - Electricity Suppliers Responsibility	- Electricity Sup	pliers Responsibilit	.,	1	
				Section of the last of the las	O C				
			Vegetation Spans Non Compliant	Vegetation Spans Non Compliant With the Regulations - Other Responsible Person	isible Person			7	

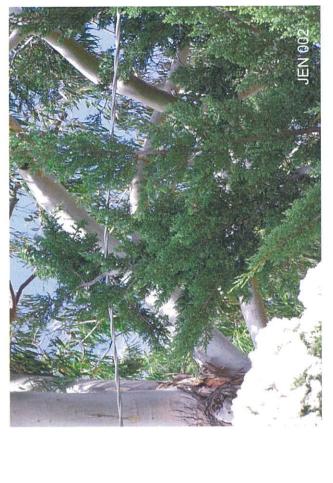
Line Clearance Audit Jemena Electricity Networks

Photos

IJM Consulting Pty Ltd

Consultants to the Gas & Electricity Industry

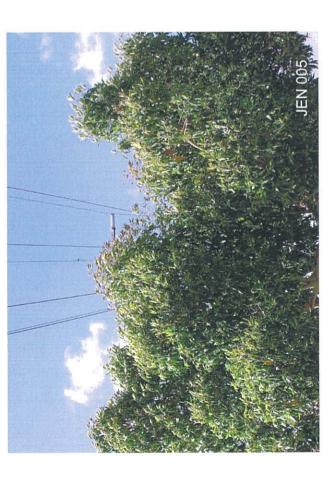
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