

Update on Legislation, Rules and Guides

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Topics

- 1. Rules & General
- 2. Newsletters
- 3. Guides (EEA)
- 4. Guides (Regulator)
- 5. Legislation
- 6. Conclusions

1. Rules & General

SM-EI

- SM-EI review is progressing (all three Parts)
- First industry consultation completed in May
- SM-EI consultation workshops held in April and key issues identified
- Substantial feedback and many submissions received

SM-EI ctd

- EEA/SSPG is grateful for all comment received and it has all been reviewed
- Significant additional amendment since first draft
- Second industry consultation drafts being prepared.
- Will be signed off by SSPG at Nov meeting and issued for comment early Dec.

SM-EI ctd

- Any need for more workshops?
- Submissions will close early/mid Feb (SSPG meets 18th Feb)
 - All changes v 2009/10 edition
 - Changes second consult v first consult
- Publication expected mid 2015.
- Electronic version will be available, as well as printed version

SM-EI ctd

- Key changes since first consult draft;
 - Definition of 'should', 'responsible employee (safety)'/ 'supervisor' & 'working position'
 - Language
 - Temporary earthing of overhead lines
 - Pole climbing
 - Need to include rules for live LV
 - Switchgear with no visible break
 - Arc flash

Key Topic Workshops (July)

- As a result of issues raised during initial SM-EI consultation, key topic workshops were facilitated in late July
- Key topics
 - Isolation, proving and earthing of overhead lines, and the establishment of EPZ
 - Practices for pole climbing, and climbing other structures

Isolation and Earthing

- Workshops reviewed practices for isolation and earthing of overhead conductors
 - Correct isolation, testing and earthing stressed as the primary control
 - Worksite earthing to be 'as close as practicable' to 'working position' and progressively moved closer as circumstances allow

Isolation and Earthing ctd

- Similar to 2004 SM-EI but with emphasis on creating EPZ when it can be
- Look for amended wording in S6 of SM-EI

Poles Access

- Standard practice within ESI for work on poles identified as attaching only when at working position, i.e. getting to and from working position and changing position being done without attachment.
- Standard practice identified as being able to work on top of top crossarm with attachment around crossarm

Poles Access ctd

- One company requires attachment at all times once leaving the ladder
- Another two companies adopting attachment at all times (recent fall from pole accidents)
- New H&S at Work Act requires 'reasonably practicable' steps
- WorkSafe focusing on prevention of falls.

Poles Access ctd

- Consensus of workshops is;
 - Free climbing up and down ladder, using standard ladder practices
 - Attachment (using pole strap/no free fall potential) when working from ladder
 - Attachment at all times once planning to move from ladder (from mid 2016)
 - No free fall potential permissible when using pole strap

Pole Access ctd

- Implications:
 - Two forms of attachment if intending to leave ladder
 - One form must be able to manage free fall
 - Must have second person if free fall potential
 - May not be possible to work on top of top crossarm

Pole Access ctd

- Acceptable solutions needed
 - Need feedback on attachment practices that work
- The industry needs to manage the risk of falls

Interpretations

- Several interpretations relating to SM-EI have been published in the previous 12 months. These are available on the EEA website.
 - Application of SM-EI to High Loads on Roads
 - ECP 34 addresses high loads on roads
 - SM-EI (and MADs) does not apply to high loads except for ESI employees lifting wires
 - Refer to EEA Guide for high loads

Interpretations ctd

- Use of Mobile Tower Scaffolds for Access to Broadband Overhead Cables
 - ECP 34 applies rather than SM-EI
 - Contractors should be encouraged to seek line owner consent for work <4m (If contractor considers their employees competent they do not have to seek permission)
 - ESI companies should offer responsive service.

Interpretations ctd

- Management of Vegetation Workers Under An Access Permit
 - SM-EI rule 3.412 allows recipient to appoint a supervisor and leave the site
 - Supervisor must be competent for AP
 - For the workparty to work on the equipment, the AP must be 'issued'
 - Earthing applies as per SM-EI S6 and EEA Guide

Interpretations ctd

- Isolation of Private HV Lines (Pending)
 - This interpretation is currently with EnergySafety for comment
 - Deals with requests for isolation of private HV lines hard tapped to network
 - SSPG proposed response is that
 - Network Co should offer to contract to do the work
 - Network Co should inform private line owners of their duties under the ESRs
 - When line is disconnected provide a 'statement' that line is disconnected and will not be reconnected

Interpretations ctd

- Private line is preferably cut away for the work
- When reconnection is requested the private line must be verified as compliant with ESRs, i.e. certified design, current periodic inspection report, ESC, CofC
- Review inspection report and ensure defects have been corrected.
- Note also EEA Guide for Safety Checking of Private Overhead Lines (Discussion Document)
- EnergySafety response will be provided when received

Clarifications

- April Safety Rules Newsletter section 7.3
 - Insulating gloves in an EPZ
 - Supervision of trainees
 - SWER line earthing
- June Safety Rules Newsletter sections 8 & 9
 - Marking LV disconnections at installations
 - Working on conductors

2. Newsletters

Newsletter

- Safety Rules Newsletters published in April 2014 and June 2014.
 - Available on EEA website.
 - Ensure all users of SM-EI are provided with a copy or access.
- Will be new Safety Rules Newsletter accompanying SM-EI consultation draft

3. Guides

Manual Re-Closing

- Guide is revised
- Substantially follows the approach given in the UK ENA Standard 06 *Post Trip Manual Re-Closing of High Voltage Electrical Distribution Circuits*
- Guide takes a risk assessment approach to determining the interval before a manual reclose should be attempted.

ESI Use of Mobile Plant

- New Guide
- Provides information about;
 - Acceptable practice for field-users for avoiding electrical hazards while using mobile plant/vehicles near live conductors for both overhead lines and in switchyards.
 - Acceptable management standards and practice in support of field users.
 - Guidance on maintenance of mobile plant.

Field Auditing of Live Work

- The *Guide to Field Auditing of Live Line Work* has been reviewed and updated;
 - Revised definitions for ‘de-energised’, ‘insulating live line rope’ and ‘live work rope’.
 - Teams that have not done any live line work for 6 months or more to be audited
 - Non-compliances to be reported.

Field Auditing of Live Work ctd

- Additional auditor competence requirements.
- New requirement for supervisor to assist the auditor with the audit process if it can be achieved without impacting safety.
- Provision of annual audit statistics to the EEA confirmed
- Class and scoring provisions in Appendix B corrected.

Reviewed and Republished Guides

- Two Guides have been reviewed and republished with minimal or no amendment
 - Assurances Advisory Bulletin
 - Principles for Permit Areas

Guides for Consultation

- ECP 46 has been reviewed by NCLW and is currently posted on EEA website for industry consultation.
 - Comments required by 7th Nov
- *Guide for Work on De-Energised Distribution Overhead Lines* will be reviewed before publication of SM-EI.

4. Guides Issued by Regulator

Regulator Guides

- BPG for *Mobile Elevating Work Platforms*
 - Users need to review
 - Use relevant US's for training
- BPG for *Preventing and Responding to Workplace Bullying*
- HSNOCOP 63 *Management and Handling of Used Oil*
- EPA *Guide to Gas Cylinders*

5. Amendments to Legislation

Workplace Legislation

- WorkSafe Act established WorkSafe in Dec 2013
- HSE Act amended in Dec 2013
 - Introduced provisions for mining and tunnelling (Tunnelling controls apply to ESI when tunnel under construction)
 - Will be replaced by H&S at Work Act in 2015

New Workplace Legislation

- H&S Reform Bill currently with Select Committee
 - New Select Committee to be formed
 - Not known how Select Committee will want to handle submissions already received or yet to be heard.
 - Select Committee report date very open
 - Indications are for H&S at Work Act to come into force around 1 Oct 2015
 - EEA is planning workshops

New Workplace Legislation ctd

- Regulations to support H&S at Work Act will come into force on same date as the Act
 - Tranche 1 regulations were covered in a MBIE discussion paper and are;
 - general risk and workplace management
 - worker participation, engagement and representation
 - work involving asbestos
 - work involving hazardous substances; and
 - major hazard facilities.

New Workplace Legislation ctd

- Tranche 2 regulations are the balance of the current regulations and will be rolled over under the new Act, then reviewed.
- Regulations will also follow model Australian regulations
- Website established to provide updates and give guidance on the new legislation
(www.legislation.govt.nz/bill/government/2014/0192/latest/DLM5976660.html?src=qs)

Electricity and Gas Regulations

- Both amended in past 12 months
- ESRs and GSMRs contain a number of technical amendments, many of relevance to the ESI
 - ESR 100(d) (added in Dec 2013) is being clarified with EnergySafety re rules for LV work on ESI assets. (Keep using SM-EI for LV work. Revised SM-EI will contain more guidance on LV, particularly live LV)

Building

- Building Amendment Act
 - Advances implementation of dam safety legislation (Due to come into force 1 July 2015)

6. Conclusion

Conclusion

- Note additional consultation on SM-EI review, and provide comments
- Note policy for attachment at all times on poles from mid 2016
- Note pending comment on management of private lines