

Electricity Safety Bill – consultation draft submission

Submission instructions

Thank you for taking the time to review the Electricity Safety Bill and provide feedback.

To help with coordinating the review and tracking of responses, please following these instructions.

- 1 Please use the Submission Response Details sheet below to provide a response, including any suggested improvements.
- 2 Only document a response to a clause where you have a concern or issue, or a suggested enhancement.
- 3 Document the clause number (e.g 22), subclause (e.g. (2)) and paragraph e.g. (a) (as appropriate, e.g. for 22(2)(a)) in the column provided for each issue/suggestion you have.
- 4 If you are happy with a clause, there is no need to document anything.
- 5 Where no response is documented for a clause, it will be considered as an indication that you are happy with the clause as is.
- 6 Where you have an electricity safety issue or concern that is not covered in the Bill, please document it in the columns provided, without a clause, subclause and paragraph specification.
- 7 If you have no issues, concerns or suggested enhancements, please email John Britten (john.britten@justice.tas.gov.au) and acknowledge that is the case by 5 pm 28 February 2020.

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Clause	Subclause	Para	Issue/Concern	Suggestion/Wording	Action (DoJ Use)
3	N/A	N/A	<p>The definition of ‘Electricity Entity’ has the same meaning as in the <i>Electricity Supply Industry Act 1995</i> (‘ESI Act’). The ESI Act doesn’t reflect current electricity market roles and doesn’t recognise the Metering Coordinator as a market participant.</p> <p>Metering Coordinators have a role to play in the development and delivery of safety provisions, as it may pertain to their obligation to deliver metering services under Chapter 7 of the National Electricity Rules. Aurora Energy notes that there is an opportunity for both the Bill and the ESI Act to provide clarity to the Metering Coordinators operating in Tasmania as to the rules and expectations on electrical contractors and metering providers when conducting meter installation and servicing.</p>	<p>The definition of Electricity Entity should be expanded to include the role of Metering Coordinator and the Bill should clarify their role in delivering safe meter installations.</p>	
107	N/A	N/A	<p>Definition of “retailer” in the Bill is too narrow and only includes “<i>a person licensed under the Electricity Supply Industry Act 1995 to sell electricity.</i>”</p> <p>This definition will not include Aurora Energy who are no longer licenced under the ESI Act but rather authorised to retail electricity under the National Energy Retail Law (as adopted in Tasmania).</p> <p>Without being recognised as a retailer, Aurora Energy may not be able to exercise necessary</p>	<p>The definition of retailer should be expanded to include any retailer authorised to retail electricity in Tasmania under the National Energy framework.</p>	

Clause	Subclause	Para	Issue/Concern	Suggestion/Wording	Action (DoJ Use)
			rights under the Bill, such as appointing a safety officer.		
177	2 (a)	(iv)	While the Bill provides that Regulations may be introduced which <i>“provide for the installation of electricity meters”</i> , there is no further guidance on what safety provisions may apply to the installation or servicing of electricity meters.	<p>Consider specifying in the Bill the matters that may be included in Regulations relating to the safe installation and servicing of meters.</p> <p>As a general point, it would be useful for market participants (particularly retailers and Metering Coordinators) to understand whether the Bill and any subsequent metering Regulations are intended to replace or support the current “Electricity Consumption Metering Safety Requirements” administered by the Department of Justice. If the Requirements are not to be replaced, how will the Bill and Regulations work alongside them?</p>	