



2 July 2024

Paulo De Quintal
Electrical Systems Inspections Manager
Western Power

Via email: Paulo.Dequintal@westernpower.com.au

Dear Paulo

Following multiple discussions with, and a considerable amount of feedback from, ECA WA's members, I would like to provide the following comments and suggestions on the recent changes to the Contractor Connect (CCS) and Service Connect (SAC) schemes.

Given that Western Power are undertaking a more comprehensive review of the CCS/SAC schemes, ECA WA strongly suggests Western Power postpones these three changes discussed below and instead implements all required changes to the schemes when the review is completed.

This would allow an orderly transition to the new rules of the schemes, rather than enduring multiple disruptions for industry and consumers as any new changes are implemented at different times.

Conversely, if safety considerations are the primary reason for proposed changes, Western Power should consider closing both programs until all participants are able to comply with any new requirements. Western Power crews could complete all the scheme connections, arguably at its own expense, during that period.

1. Use of a safety observer (mandatory appointment) whilst connecting into mini/uni-pillar (working LIVE). The safety observer would need to be a licensed electrician trained in UTEDRIS011 and hold current LV rescue and first aid/CPR accreditation.

ECA WA accepts the need for a safety observer, however, for the following reasons it does not agree with the requirement that a safety observer must be a qualified electrician:

- a) The safety observer's primary role is to provide CPR or LVR should the electrical worker performing connection be injured. In this unfortunate circumstance, the safety observer's only consideration would be to assist the injured worker. The observer would not be required to perform any electrical work.
- b) The safety observers are not required to be accredited for CCS or SACs. As a result, they are unable to perform any electrical work on the scheme in any event.
- c) There is an acknowledged critical shortage of electrical workers throughout the industry. Finding the large number of additional qualified electrical workers required to perform the safety observer role, will be virtually impossible.



- d) This requirement will be particularly problematic for one-man businesses who do not have access to a second qualified electrical worker, and for whom the cost of an employee may not be justified by the financial returns of working on the CCS/SACS programs. This may result in the closure of many small electrical businesses.
- e) Requiring two electrical workers to work on each connection will halve the capacity of CCS participants to complete connections. This will result in considerable delays in undertaking connections and will significantly increase the cost of each connection - both of which will have a negative impact on consumers.

2. Annual Service Connection accreditation is to be performed at PTS, (equivalent to all Western Power staff who perform this work).

ECA WA accepts this requirement for accredited scheme participants but not for safety observers. The safety observer would be on-site solely to perform safety duties not technical ones, and as such should not be required to complete the service accreditation training.

ECA WA also suggests that the annual service connection training should result in the abolition of the current annual field audit.

Industry would also request an extended transition period of at least 12 months to undertake this training, given the limited capacity of PTS to deliver the training.

This request follows the considerable delays that were experienced by industry when undertaking the recent SACS Accreditation training at PTS.

3. All existing scheme participants are to be trained in UTEDRIS011 (Install and maintain low voltage underground services) to ensure competency when connecting into mini/uni-pillars as well as underground service pits.

ECA WA again accepts this requirement for accredited scheme participants, but not for safety observers. As mentioned above, safety observers would be on-site solely to perform safety duties not technical ones, and as such should not be required to complete technical training such as the UTEDRIS011 unit.

ECA WA is pleased to see that completion of this training will allow accredited CCS participants to perform connections to underground service pits.

General Comments

ECA WA also seeks confirmation that at present, all Western Power staff performing connections on the CCS and SACS schemes are licensed electrical workers and that the safety observers are also licensed electrical workers.

ECA WA has anecdotal evidence that many of the CCS and SAC connections are not performed by, or observed by, Western Power staff who hold electrical worker licences.

Summary

ECA WA understands the need for the most thorough safety procedures and is, with some qualifications, supportive of both forms of the proposed training - although not for the safety observer.

ECA WA accepts the need for a safety observer, however it **strongly disagrees** with the requirement that the observer must be an electrical worker. ECA WA believes this role is a safety role, not a technical role, and can be done by a non-electrician who is appropriately trained in CPR and LVR, or if required, by an electrical apprentice.

However, in order to minimise disruption to both industry, business, homeowners and the wider community, ECA WA strongly suggests that Western Power complete its current comprehensive review of the CCS/SACs scheme **before implementing any changes** to the CCS/SACs schemes.

ECA WA strongly suggests Western Power postpones these initial three changes and instead implements all required changes to the system when the review is completed.

This would allow an orderly transition to the new rules of the scheme, rather than enduring multiple disruptions as any new changes are implemented at different times.

ECA WA looks forward to further consultation with Western Power on these important matters.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Aidan O'Grady', with a stylized flourish at the end.

Aidan O'Grady
General Manager Members Services and Training