Bushfire Mitigation Plan

CitiPower Pty Ltd
CP-PL-0009

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Document Control

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Version	Amendment Overview	Author
1	Initial version Reformatted into new plan template, superseding: • CitiPower Bushfire Mitigation Plan 2019-2024 (05-M800), version 5, dated 9/12/2019.	David Matassoni Network Management Systems and Bushfire Mitigation Manager Dated: Dec 3, 2024
1.1	Refer to Appendix I for detailed list of amendments in this revision responding to Energy Safe 's evaluation to v1 dated 25 June 2025 and any PAL BMP Energy Safe evaluation response dated 13 May, 18 June, 18 July, 22 July and 31 July 2025 that may also be applied across the CP BMP. Version 1.1 was the draft (unsigned) issued to Energy Safe on the 26 Aug, 2025	David Matassoni Network Management Systems and Bushfire Mitigation Manager Dated: 26 Aug, 2025
1.2	Refer to Appendix I for detailed list of amendments in this revision to include any additional feedback from Energy Safe 's Powercor Safety Case Evaluation Panel evaluation for v11.1 dated 10 September 2025, that may also be applied across the CP BMP.	David Matassoni Network Management Systems and Bushfire Mitigation Manager Dated: Sept 29, 2025
1.3	Refer to Appendix I for detailed list of amendments in this revision following Energy Safe CP BMP evaluation assessment received dated 4 April 2026.	David Matassoni Network Management Systems and Bushfire Mitigation Manager Dated: Jun 4, 2026
1.4	Refer to Appendix I for detailed list of amendments in this revision following Energy Safe CP BMP evaluation assessment received dated 29 July 2026. ***New and/or updated requirements are to be applied immediately from the date of publication***	David Matassoni Network Management Systems and Bushfire Mitigation Manager David Matassoni David Matassoni (Aug 21, 2026 10:52:02 GMT+10) Aug 21, 2026

- Any proposed change to this document, regardless of its materiality, must be submitted to Energy Safe for acceptance prior to it being formally internally approved and implemented.

- Provisional internal approval must be obtained before submitting to Energy Safe.

- Energy Safe acceptance of proposed changes must be coordinated via the Network Risk and Assurance Manager.

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1. Plan Introduction

1.1 Contacts

Table 1: Contacts

Responsibility	Title	Address	Contact Details
BMP Responsible Organisation	CitiPower Pty Ltd, ACN 064 651 056	40 Market Street Melbourne, 3000 Victoria	Phone: 13 22 06
BMP Preparation	Network Risk and Assurance Manager	40 Market Street Melbourne, 3000 Victoria	Phone: 13 22 06 General enquiry | CitiPower & Powercor NetworkSafety@powercor.com.au
BMP Carrying Out	Network Risk and Assurance Manager	40 Market Street Melbourne, 3000 Victoria	Phone: 13 22 06 General enquiry | CitiPower & Powercor NetworkSafety@powercor.com.au
BMP Emergency Contact			Phone: 13 12 80 (24 x 7 emergencies and faults contact number for members of the public)

1.2 Regulation Compliance Information

Table 2 provides a cross reference of the sections of the CitiPower Bushfire Mitigation Plan (BMP), to the specific items required in Regulation 7 of the "*Electricity Safety (Bushfire Mitigation) Regulations 2023*".

Table 2: Regulation Compliance Information

Regulation	7 – Prescribed particulars for bushfire mitigation plans – major electricity companies.	CitiPower Plan Reference
7(1)(a)	the name, address and telephone number of the major electricity company;	Section 1.1
7(1)(b)	the position, address, email address and telephone number of the person who was responsible for the preparation of the plan;	Section 1.1
7(1)(c)	the position, address, email address and telephone number of the persons who are responsible for carrying out the plan;	Section 1.1
7(1)(d)	the email address (if any) and 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;	Section 1.1
7(1)(e)	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;	Section 1.1
7(1)(f)	the bushfire mitigation policy of the major electricity company to minimise the risk of fire ignition from its supply network;	Section 3.1

Regulation	7 – Prescribed particulars for bushfire mitigation plans – major electricity companies.	CitiPower Plan Reference
7(1)(g)	the objectives of the plan to achieve the mitigation of fire danger arising from the major electricity company's supply network;	Section 3.2
7(1)(h)	a description, map or plan of the land to which the bushfire mitigation plan applies;	Sections 2.2 & 4.2
7(1)(i)	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)(j)	details of the preventative strategies and programs referred to in paragraph (i) (including details in relation to timing and location) by which the major electricity company will ensure that, in its supply network, each polyphase electric line originating from every zone substation specified in Schedule 1 has the required capacity;	Not Applicable
7(1)(k)	details of testing that will be undertaken before the specified bushfire risk period each year by which the major electricity company will ensure that its supply network can operate to meet the required capacity in relation to each polyphase electric line in accordance with paragraph (j);	Not Applicable
7(1)(l)	details of the preventative strategies and programs referred to in paragraph (i) (including details in relation to timing and location) by which the major electricity company will ensure that, within an electric line construction area, each electric line with a nominal voltage of between 1 kV and 22 kV that is constructed, or is wholly or substantially replaced, in its supply network is a covered or underground electric line;	Not Applicable
7(1)(m)	details of the preventative strategies and programs referred to in paragraph (i) by which the major electricity company will ensure that, in its supply network, each low voltage overhead electrical cable or wire that is constructed after the commencement of these Regulations in a hazardous bushfire risk area is insulated;	Not Applicable
7(1)(n)	details of the processes and procedures by which the major electricity company will ensure that the major electricity company installs and maintains in operation an Automatic Circuit Recloser in relation to each SWER line in its supply network;	Not Applicable
7(1)(o)	a plan for inspection that ensures that: a) 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. b) the parts of the major electricity company's supply network in other areas are inspected at specified intervals not exceeding 61 months from the date of the previous inspection.	Section 6.1
7(1)(p)	details of the processes and procedures for ensuring that each person who is assigned to carry out inspections referred to in paragraph (o) and of private electric lines a) has satisfactorily completed a training course approved by Energy Safe Victoria; and b) is competent to carry out such inspections;	Section 6.10

Regulation	7 – Prescribed particulars for bushfire mitigation plans – major electricity companies.	CitiPower Plan Reference
7(1)(q)	details of the processes and procedures for ensuring that persons (other than persons referred to in paragraph (p)) who carry out or will carry out functions under the plan are competent to do so;	Section 6.10
7(1)(r)	the operation and maintenance plans for the major electricity company's supply network: a) in the event of a fire b) during a total fire ban day c) during a fire danger period	Section 6.11 to Section 6.16
7(1)(s)	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 8 Section 9.2 Section 9.3
7(1)(t)	details of the processes and procedures by which the major electricity company will; a) monitor the implementation of the bushfire mitigation plan; and b) audit the implementation of the plan; and c) identify any deficiencies in the plan or the plan's implementation; and d) change the plan and the plan's implementation to rectify any deficiencies identified under subparagraph (iii) e) monitor the effectiveness of inspections carried out under the plan; and f) audit the effectiveness of inspections carried out under the plan; and g) before the specified bushfire risk period each year, report to Energy Safe Victoria the results of testing undertaken in that year in accordance with regulation (k);	 Section 10.1 Section 10.2 Section 11 Section 11 Section 10.1 Section 10.2 Not Applicable
7(1)(u)	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 6.11
7(1)(v)	details of processes and procedures for enhancing public awareness of; a) the responsibilities of the owners of private electric lines that are above the surface of the land in relation to maintenance and mitigation of bushfire danger; and b) the obligation of the major electricity company to inspect private electric lines that are above the surface of the land within its distribution area.	 Section 6.12 Section 6.6
7(1)(w)	a description of the measures to be used to assess the performance of the major electricity company under the plan.	Section 9
7(2)	In subregulation (1)(l),covered, in relation to an electric line, means that a system of insulation is installed on any bare open wire forming part of the electric line.	Not Applicable
7(3)	In subregulation (1)(m)— electrical cable or wire means the whole or any part of a cable, wire or similar thing used or to be used for the	Not Applicable

Regulation	7 – Prescribed particulars for bushfire mitigation plans – major electricity companies.	CitiPower Plan Reference
	purpose of transmitting, distributing or supplying electricity, but does not include— (a) any thing enclosing or supporting the cable, wire or similar thing; or (b) a cable, wire or similar thing directly used in converting electrical energy into another form of energy; *Insulated*, in relation to an electrical cable or wire, means an electrical cable or wire that is separated from any adjoining conductive material by a permanently affixed protective layer of non-conductive material.	
7(4)	In subregulation (1)(o), supply network does not include a terminal station, a zone substation or any part of the major electricity company's underground supply network that is below the surface of the land.	Section 6.1.2
15 Exemptions	(1) Energy Safe Victoria may, in writing, exempt a major electricity company from any requirements of these Regulations. (2) An exemption under subdelegation (1) may specify conditions to which the exemption is subject	CitiPower confirm there are no exemptions and conditions of exemptions from any of the requirements of the regulations.

Where amendments to the BMP are required by the *Electricity Safety Act 1998*, a revised BMP will be submitted to Energy Safe for acceptance.

1.3 Referenced Documents

All Incorporated Documents listed in Appendix G form part of the BMP. All other documents referenced throughout this plan including the documents referenced in the Incorporated Documents, do not form part of the BMP.

2. Introduction

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 (Energy Safe) a plan every 5 years for the mitigation of bushfire in relation to the company's supply network.

In accordance with the *Electricity Safety (Bushfire Mitigation) Regulations 2023* this BMP provides the prescribed particulars as specified in Regulation 7.

A copy of the current accepted BMP will be available for inspection:

a) on the company's intranet site

b) at the company's principal office in the State during ordinary business hours

c) on the company's website.

2.2 CitiPower

CitiPower Pty Ltd (CitiPower) operates the electricity distribution network in Melbourne's central business district and inner suburbs. Statistics regarding the CitiPower distribution network are shown in Table 3.

Table 3: CitiPower Distribution Network Statistics

Attribute	Statistic
Network area	157 square kilometres
Length of overhead lines	2,254 km
Underground lines	2,329 km
Number of poles and towers	57,618
Number of zone substation transformers	86
Number of distribution substation transformers	5,153
Total number of customers	339,861
Customer density	2,218 per square kilometre
Network availability	99.996%

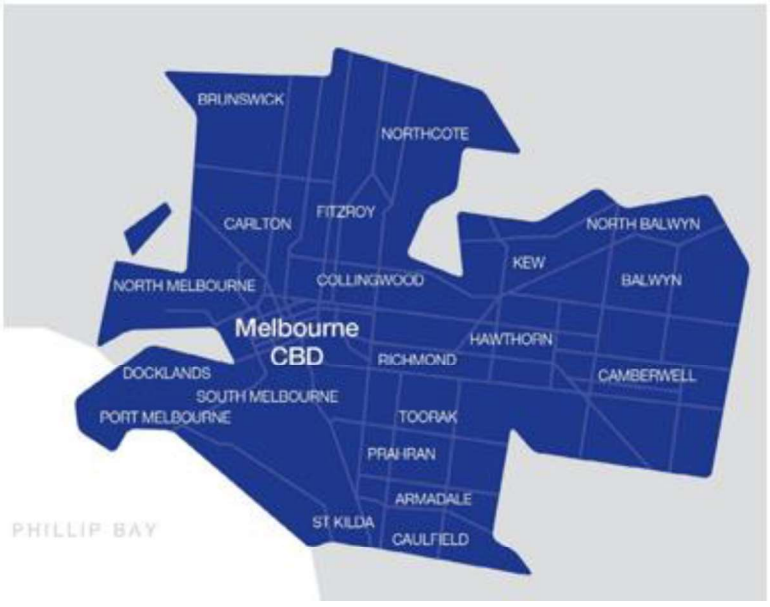


Figure 1: CitiPower Distribution Area

3. Bushfire Mitigation Policy & Objectives

3.1 Bushfire Mitigation Policy

In accordance with the Bushfire Mitigation Policy (PO-0003) (refer Appendix H), CitiPower is committed to providing our customers with safe, reliable and affordable electricity network services through the application of an effective asset management framework. We are committed to bushfire mitigation activities and making our communities safer. Therefore, we design, construct, commission, operate, maintain, and decommission the network to minimise As Far As Practicable (AFAP) the bushfire danger arising from the electricity network.

3.2 Objectives

The objectives of this BMP are to:

- Minimise the risk of fire starts from electrical assets.
- 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 CitiPower's approach to the management of the risk of bushfires caused by electricity assets.
- Reference the policies and procedures that explain how CitiPower achieves the commitments in the BMP in a single document.
- Demonstrate a high level of commitment to meeting bushfire mitigation responsibilities.

4. Document Scope

4.1 Bushfire Mitigation Framework

CitiPower's bushfire mitigation framework is shown in Figure 2 and demonstrates a comprehensive and whole of business approach. The proactive planning and scheduling of this program is based principally on a whole of asset life approach that includes design, construction, operation, maintenance and decommissioning. The annual governance systems of vegetation and asset inspection and maintenance activities are supported by a regime of reporting and auditing.

The continuous improvement elements encompass a large body of proactive capital works, trialling and adoption of new technologies, and our response to audit outcomes.

The response aspects of the plan include our operational processes to faults and Total Fire Ban (TFB) days, asset failure investigations, and fire start reporting.

The framework also has a significant aspect of proactive stakeholder management, including Private Electric Line (PEL) owners, Councils (vegetation management), other agencies, specific community messaging and our ongoing interface with customers.

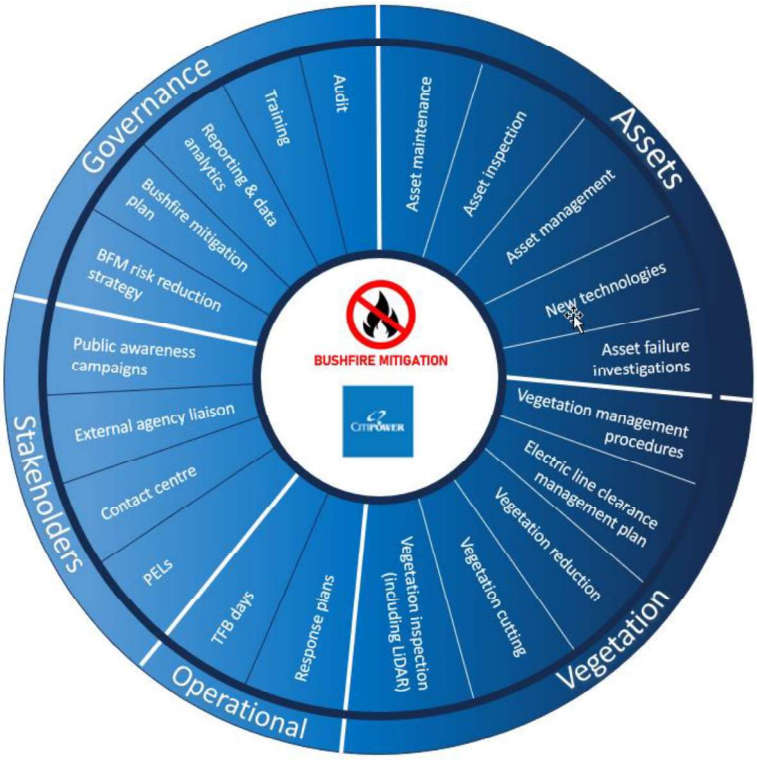


Figure 2: Bushfire Mitigation Framework

This BMP applies to assets across CitiPower's supply network that could ignite a fire. Since electricity networks were first constructed, they have presented a potential source of fire ignition. As a result, extensive investigation has been undertaken, and continues, to identify causes and support preventative action.

This BMP forms part of CitiPower's Electricity Safety Management Scheme (ESMS) pursuant to section 113D of the *Electricity Safety Act 1998*.

4.2 Electrical Network Map

The CitiPower HV overhead network is shown in Figure 3 and is colour coded as follows:

66kV Sub-transmission Lines
22kV lines
11kV lines
6.6kV lines

To maintain clarity, the LV overhead network has not been shown. Full network details are available from CitiPower's Geographical Information System (GIS).

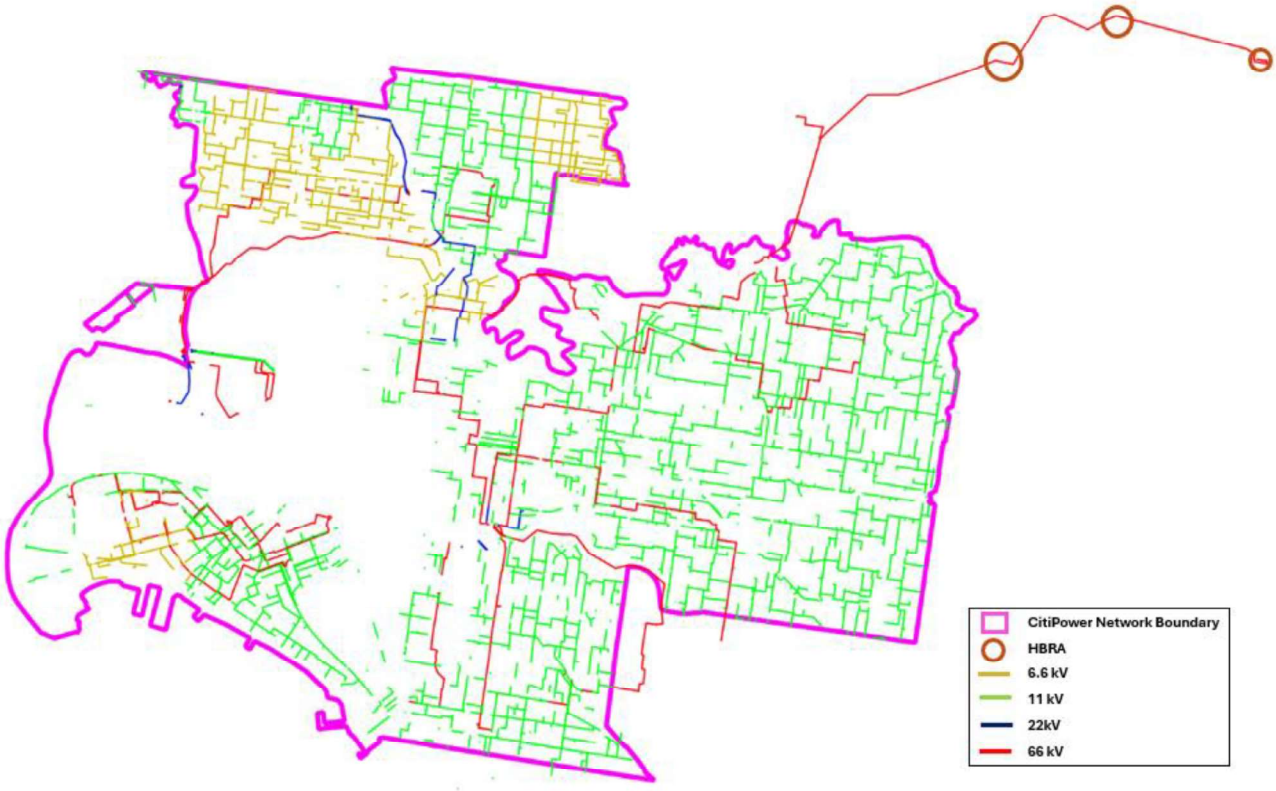


Figure 3: CitiPower Overhead Network

4.3 Bushfire Risk Areas

All CitiPower network assets located within the CitiPower Network boundary are in Low Bushfire Risk Areas (LBRA) as shown in Figure 3. There is a section of the Templestowe Terminal Station (TSTS) to Deepdene (L) 66kV line that traverses outside the CitiPower network boundary through LBRA and small sections of Hazardous Bushfire Risk Areas (HBRA), which forms part of shared asset with other Major Electricity Companies (MECs) as shown in Figure 4 and Figure 5. These areas are updated as part of the Country Fire Authority (CFA) Fire Hazard Mapping Project and will change as areas are reviewed by the CFA across the state.

CitiPower's LBRA network is considered lower risk for fire ignition leading to bushfire, as assessed by the Country Fire Authority (CFA), because it is largely limited to irrigated land and built-up towns with small, well-maintained blocks and insufficient ground fuel to sustain a fire. Additional bushfire mitigation controls have however been implemented for the small section of CitiPower's HBRA network.

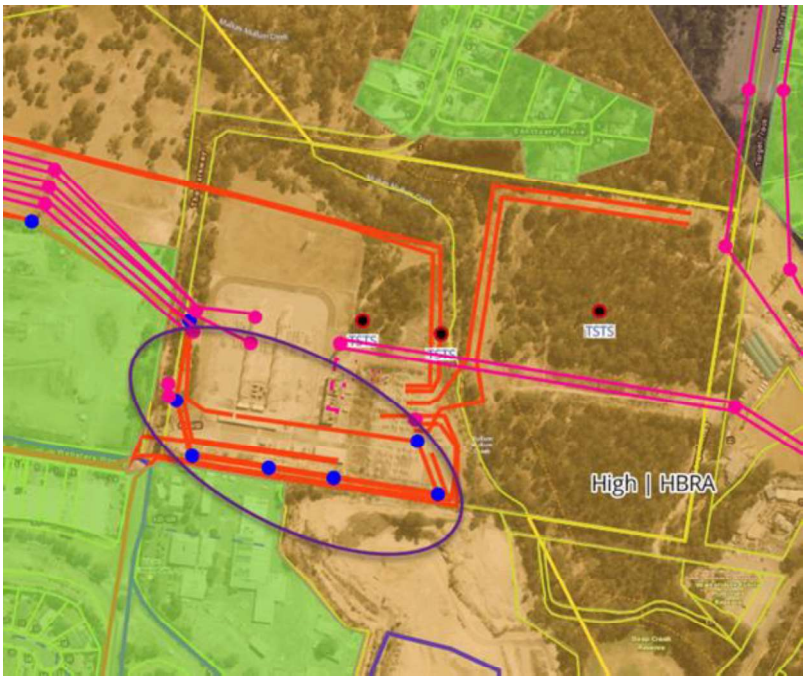


Figure 4: Section of TSTS-L 66kV sub transmission line (CitiPower Poles)

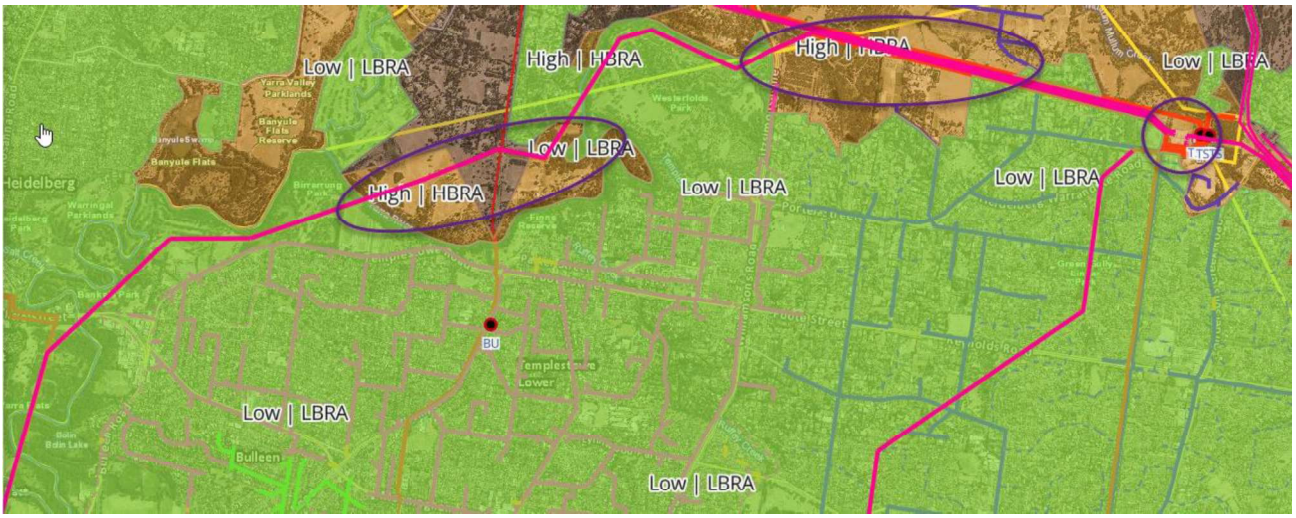


Figure 5: Section of TSTS-L 66kV sub transmission line (AusNet Towers)

The TSTS-L 66kV sub transmission assets outside the CitiPower Network boundary separated by LBRA and HBRA, including the shared assets with other MECs are outlined in Table 4.

Table 4: TSTS-L 66kV sub transmission assets

Structure	LBRA	HBRA	Ownership
Poles - Inside TSTS yard		5	CitiPower
Poles - Outside TSTS yard		1	CitiPower
Towers (Shared Asset)	28	11	AusNet

5. Management Structure

The implementation and control of bushfire mitigation related activities are discharged via many roles throughout CitiPower. Each role has a position description which lists the key activities. The carrying out of bushfire related activities contained within this Plan is overseen by the Network Risk and Assurance Manager.

The Bushfire Mitigation Committee provides the governance and oversight of the systems and activities undertaken by CitiPower in achieving its key commitments to reducing the bushfire risk as far as practicable. The Committee:

- Reviews LBRA and HBRA fire start network performance and bushfire incidents.
- Monitors delivery of bushfire risk critical control reviews.
- Reviews bushfire mitigation assurance findings and actions.
- Reviews performance of LBRA and HBRA asset inspection, maintenance and vegetation management activities.
- Monitors delivery of key risk reduction improvement initiatives and proactive asset replacement programs.
- Identifies improvement opportunities.
- Ensures that developments having a relevance to fire risk reduction are adequately supported.

The Committee management structure consists of key executive and line management, and business representatives who, as part of their responsibilities, have a significant role in outworking the various bushfire mitigation functions and key activities.

6. Bushfire Mitigation Strategies and Programs

CitiPower has developed policies, strategies, frameworks, plans, procedures, and work instructions to support its bushfire mitigation activities. These are described in the following sections.

6.1 Fire Start Performance Summary

CitiPower's network performance for ground and asset related fire ignition has been very low for the past 5-years, with no significant events or asset failures experienced as shown in Figure 6. CitiPower's F Factor scheme (Ignition Risk Units (IRU)) performance continues to perform well with a very small number of fire incidents resulting from asset failures and external contacts, which is consistent with the low bushfire risk network and reflected in the annual Australian Energy Regulator (AER) results and measures.

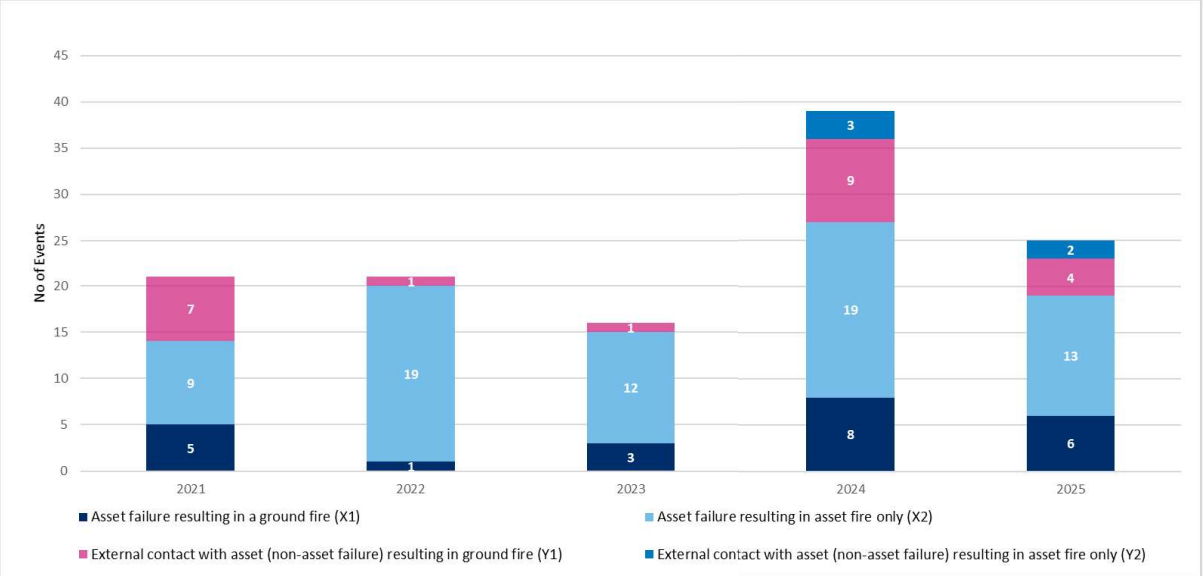


Figure 6: Ground and asset fire performance

CitiPower's top three asset failure categories causing ground and asset fire ignition are shown in Figure 7 include:

- Pole top structures - crossarm (leakage) and LV FOLCBs
- Overhead conductor and connections (specifically connections)
- Service lines.

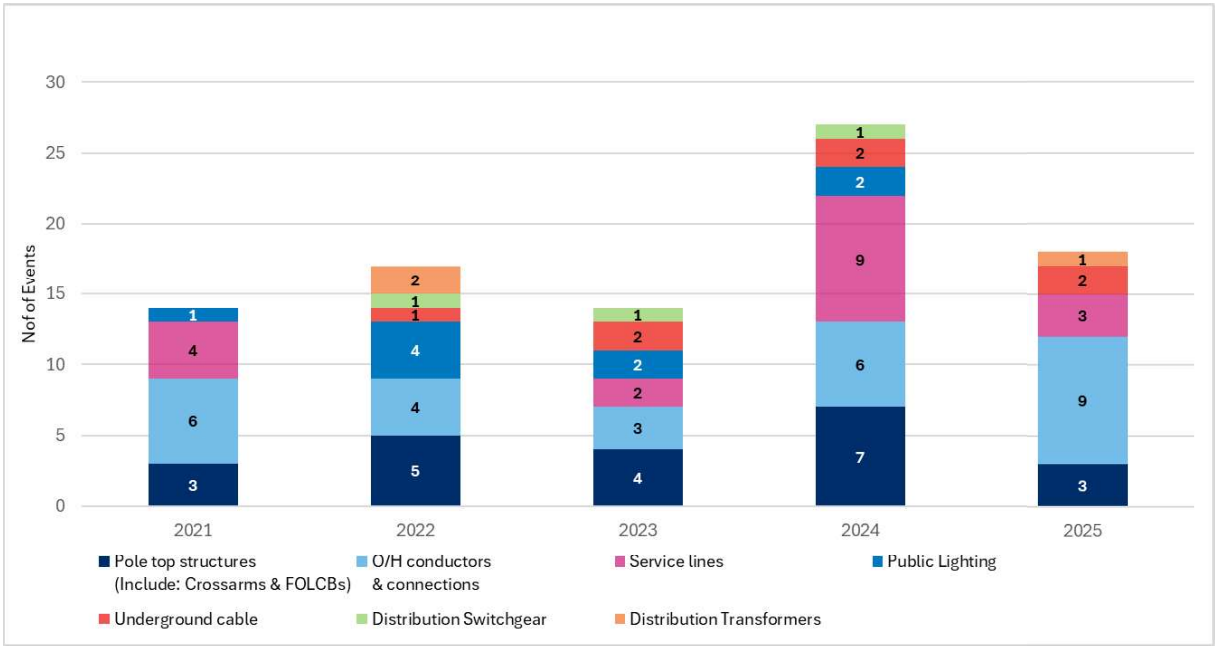


Figure 7: Top 7 asset failure categories for ground and asset fire start events

CitiPower will undertake proactive intervention programs for asset categories where this is identified as practicable. Assessments of the leading asset categories in Figure 7 have previously concluded that the benefit of implementing a proactive program would be disproportionate to the level of risk reduction achieved. CitiPower will continue to monitor and assess network performance for fire ignitions annually and will reassess whether additional preventative strategies and programs become practicable where monitoring shows an increasing trend in fire ignitions.

CitiPower will continue to rely on its inspection and maintenance procedures as the key controls for condition monitoring, inspection, assessment and replacement of assets to optimise asset performance.

In relation to fire ignition performance arising from external contact (refer Figure 8), the contributing factors consist of:

- Vegetation blow in / outside clearance space being the majority
- Vehicle (third party) contacts
- Plant / equipment (third party) contacts

CitiPower have the following controls in place to mitigate fire ignition from these causes:

- Vegetation Management – inspection and cutting programs
- Look up and live/ No Go Zone procedures
- Asset design and maintenance procedures

CitiPower will continue to monitor and assess network performance for fire ignitions and will take action where it is determined to be practicable to do so.

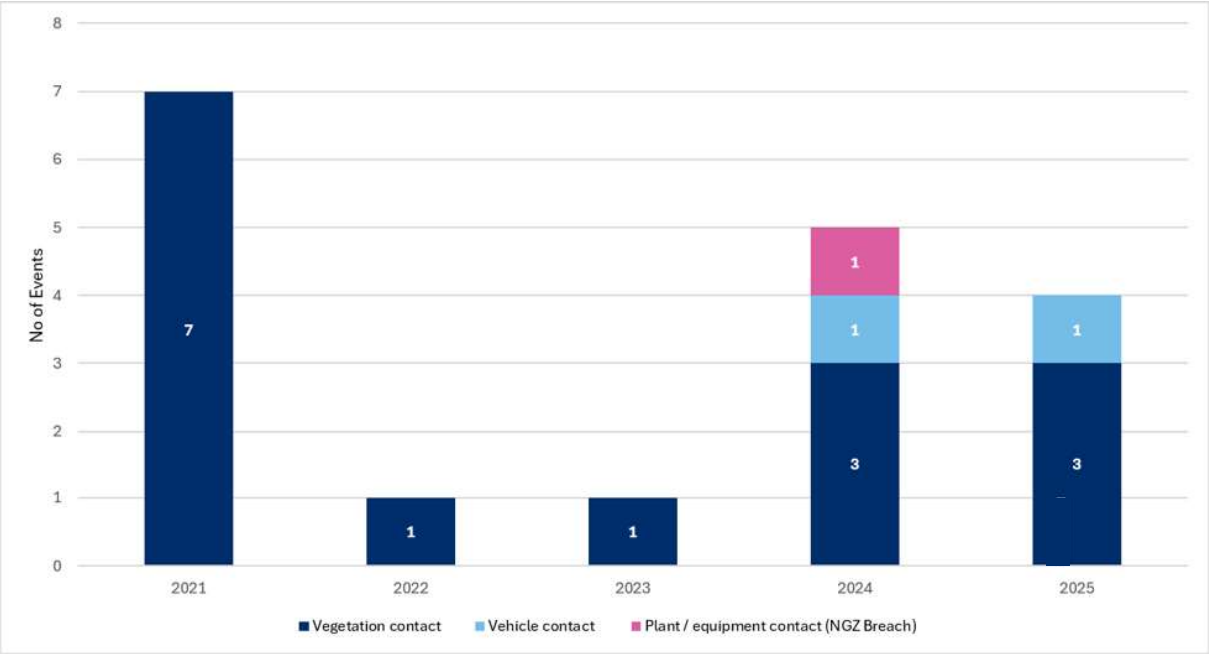


Figure 8: External contacts resulting in fire ignition

6.2 Monitoring Asset Condition

Preventative maintenance strategies have been created for all CitiPower's zone substations, sub-transmission and distribution assets. These strategies were developed from Reliability Centred Maintenance (RCM) methodologies and involve undertaking on-condition tasks based on a program of condition monitoring of the electrical network assets. The RCM rules are configured in CitiPower's Asset Management Enterprise System, SAP, which automatically generates time-based work orders for inspection and maintenance planning.

Operational procedures for developing, reviewing and implementing asset maintenance plans, procedures and policies are set out in:

- Developing, Updating or Retiring an Asset Management Plan (PR-0009). This procedure outlines the process/actions to be followed when an Asset Management Plan (AMP) or Maintenance Policy / Procedure related to electrical network assets is reviewed or a new AMP or Maintenance Procedure is developed.
- Electricity Safety Management Scheme.

These documents outline how CitiPower identifies needs, develops, and manages policies and provides a systematic process through the identification of strategic, operational and program/project level risks to:

- determine accountability for risks
- provide an assessment of controls and the control environment
- analyse and evaluate risks
- manage the risks to AFAP levels.

The inspection and assessment of the condition of all parts of the supply network assets are included in the scope of the inspection as described in section 6.1.1 and 6.1.2, excluding terminal stations, zone substations and parts of the underground supply network that are below ground level. In accordance with the Asset Inspection Manual (CPPAL-MA-0450) measurements and records are taken to assess the asset condition. Identified defects shall be assigned the designated defect priority and rectified as detailed within the Maintenance Defect Priority Standard (CPPAL-ST-5060.01) [ID].

The Maintenance Procedure- Poles and Towers (PR-5062.01) [ID] details the scheduled inspection and maintenance required for poles and towers to ensure all assets are inspected on the supply network at least every 37 or 61-months. This procedure includes the process to manage the inspection of poles and towers where the asset is inaccessible during its inspection cycle, until the full inspection is completed for compliance.

All CitiPower shared assets with other MECs are inspected in accordance with this Plan.

CitiPower will inform Energy Safe, on a quarterly basis, of any proposed changes to maintenance documents referenced within the BMP that have a material effect on the way in which CitiPower manages its BFM activities. Should any proposed changes result in a need to update the BMP, a revised BMP will be submitted to Energy Safe for review and acceptance as described in section 1.2.

6.2.1 Pole and Tower Inspection

The majority of CitiPower's network assets are located in LBRA, and the inspection of poles and towers is carried out on a 5-year full inspection cycle. All HBRA poles and towers are inspected on a 3-year full inspection cycle.

CitiPower's Added Controls Serviceable (AC Serviceable) poles were inspected on a 2-year (+/- six-month) interval for full inspection and a 1-year (+/- six-month) interval for above ground only inspection.

CitiPower is implementing a 1-year (+ one month) full inspection cycle for all AC Serviceable poles, and all AC Serviceable poles to be compliant with the 1-year (+ one-month) full inspection cycle from 30 June 2027.

The transition to the new 1-year (+ one-month) full inspection cycle for all AC Serviceable poles began on 1 January 2026.

Pole and tower inspection is carried out in a dedicated program conducted over the cycles (referred to as cyclic inspections) summarised in Table 5.

Table 5: Asset Inspection Cycle

Asset Type	Type of Inspection	Inspection Frequency		
		LBRA	HBRA	Tolerance
All serviceable poles	Full inspection	5 years	3 years	+ one month
AC serviceable poles[1]	Full inspection	1 year	1 year	+ one month
Towers	Full inspection	5 years	3 years	+ one month
	Close inspection	5 years	5 years	+ one month
PELs	Full Inspection	5 years	3 years	+ one month

[1] AC Serviceable Poles are referred to as Limited Life poles in SAP records.

Poles

A full inspection (including inspection of above-ground assets) undertaken by asset inspectors on site, shall include the inspection of electrical assets between poles and/or other structures to include these key activities:

- assessment of pole condition from ground level to two metres above
- visual assessment of pole condition from two metres above ground level to the top of the pole using binoculars
- an aerial view of the top face of all wooden crossarms is undertaken using a pole-cam or drone to assess the crossarm condition. Other associated defects that are clearly visible in the photograph will also be identified and reported.
- assessment of pole condition below ground level
- identifying wood destroying insects
- undertaking of preservative treatment of hardwood poles
- assessment of the surrounding area for safety issues.

Towers

A full inspection (including inspection of above-ground assets) undertaken by asset inspectors on site, shall include the inspection of electrical assets between towers and/or other structures to include these key activities:

- visual assessment of all components of a tower and its attachments from ground level to the top of the tower
- assessment of tower footing condition below ground.

A close inspection shall include a close-range detailed inspection and assessment of all above ground components of the tower.

Further information relating to the full inspection of poles and towers is defined within the Maintenance Procedure - Poles and Towers (PR-5062.01) [ID].

Operational instructions for the inspection, testing and assessment of assets are contained in the Asset Inspection Manual (CPPAL-MA-0450). This manual describes the various types of electrical assets and the observations or tests necessary to identify and assess their condition. It also gives a detailed description of items that need to be identified for replacement or repair. The manual sets out criteria for categorising the priority for remedial maintenance actions, and the reporting and information recording requirements.

Operational instructions for the inspection of poles and towers located in inaccessible locations are contained within the Inaccessible Asset Procedure (SRCE-447194848-40030) which allows for a risk assessment to be undertaken if the

asset is not accessible. The risk assessment considers when access is expected to become available for the inspection and a workflow for the inspection to be completed.

The Asset Inspection Officer is responsible for preparation of the asset inspection program using maintenance plans established within SAP and monitoring of the performance of the asset inspectors in adhering to the program. Each maintenance plan covers all the poles and towers within a specific electrically isolatable section of the network. The management of maintenance plans are contained within the Asset Inspection Procedure (18–20–P0002).

6.2.2 Above Ground Asset Inspection

In addition to the inspection of poles and towers, other above ground assets are also inspected as summarised in Table 6. The Asset Inspection Manual (CPPAL-MA-0450) details all relevant work instructions except for indoor substations, which are detailed in the Maintenance Procedure - Distribution Transformers (CPPAL-PR-5071.01). Identified defects are assigned repair priorities as detailed within the Maintenance Defect Priority Standard (CPPAL-ST-5060.01) [ID].

Table 6: Other Above Ground Asset Inspection Cycles

Asset Type	Inspection Timeframes	
	HBRA	LBRA
Pole type substations and switchgear Pole type substations are visually inspected for condition. Clearances are visually assessed and measured where required with an approved device. Pole mounted switchgear are visually inspected.	Not Applicable	5-years (+ one month)
LV services LV services are visually inspected for condition using stabilised binoculars. Clearances are visually assessed and measured where required with an approved device.	Not Applicable	5-years (+ one month)
Conductors Conductors and associated hardware (such as spreaders and spacers) are visually inspected for condition using stabilised binoculars. Clearances are visually assessed and measured where required with an approved device.	3 years (+ one month)	5-years (+ one month)
LV pillars LV pillars are visually inspected for condition.	Not Applicable	5-years (+ one month)
Ground type substations Ground type substations are visually inspected for condition.	Not Applicable	6-months
Indoor substations Indoor substations are visually inspected and maintained by the completion of inspection tasks to identify defects.	Not Applicable	2-years (+/- 3 months)
Kiosk substations and switching cabinets Kiosk substations and switching cabinets are visually inspected for condition.	Not Applicable	6-months
Pole top assemblies Pole top assemblies are inspected for condition from the ground using stabilised binoculars as well as an elevated camera where required. The inspection extends from two metres above ground to the pole top and includes assessment of all pole top assets including conductors, insulators, cross-arms, attachments, pole mounted plant and equipment etc.	3 years (+ one month)	5-years (+ one month)

6.2.3 Resistograph Non-Destructive Wood Pole Inspection

In July 2024, CitiPower implemented the Resistograph (RESI) drill to replace the traditional intrusive drilling (13mm drill) used in the current sound, dig and drill (SDD) method as part of the normal wood pole cyclic full inspection testing to assess wood pole condition.

The RESI drill works as a resistograph to measure timber resistance from wood poles to detect rot and decay in determining the sound wood thickness of the outer timber.

CitiPower has adopted the use of the RESI drill as an alternative to WoodScan, using a 4-Point method for inspection. The 4-point methodology requires the inspection and measurement at 4 locations 90° apart and using the average of the 4 measurements to calculate the section modulus of the pole.

For wood poles, where the serviceability condition has been assessed as unserviceable following the full inspection (sound, dig and drill) using the RESI drill, additional tests using the 4-point method is undertaken to confirm the veracity of the serviceability assessment.

In HBRA, this additional test will not alter the assessed unserviceable condition of the pole but will support confirming the priority rating and timeframe to replace or reinforce the pole.

In LBRA, the final pole serviceability assessment, based on all test results, is permitted to alter from the initial unserviceable classification by no more than one serviceability step. The rule for applying this allowance is documented in Serviceability Assessment of Poles (CPPAL-ST-5062.01).

Operational instructions for the use of the RESI drill for the internal inspection of wood poles (drilling) to determine the condition assessment of assets are contained in the Asset Inspection Manual (CPPAL-MA-0450).

6.2.4 LiDAR Conductor Clearance Inspections

In line with the annual aerial Light Detection and Ranging (LiDAR) inspection surveys, CitiPower has leveraged remote sensing and software tools to generate a 3D digital model of assets and the surrounding environment data to identify potential conductor clearance breaches as described in the Maintenance Procedure – Conductors Aerial Line Clearances (PR-5064.02).

The LiDAR methodology and approach is used to assess overhead conductor clearances at the pole or in-span to ensure minimum clearances are maintained for the following scenarios:

- Conductor to Ground clearances
- Pole Top and Midspan Circuit to Circuit Clearances
- Pole top and Midspan Phase-to-Phase Clearances
- HV/Sub-transmission Phase-to-phase Clearances on all T-on, T-off and two-way T-offs.

The LiDAR excludes capturing conductor clearances from buildings and structures.

As the use of LiDAR technology for determining potential conductor clearance breaches is in its early days of maturity, the LiDAR methodology will be used to complement the existing CitiPower cyclic ground-based inspections by asset inspectors for identification of potential conductor clearance defects.

6.2.5 Thermal Imaging

Thermal imaging technology is used to assist identify assets exhibiting elevated temperatures or causing leakage currents. The adoption of this technology can assist in preventing asset failures which could result in a fire start.

The thermographic inspection program includes inspection of zone substations, all sub-transmission lines, distribution overhead HV feeders and distribution plant at intervals as detailed in Table 7.

Table 7: Thermographic inspection program intervals

Asset Description	Interval	
	HBRA	LBRA
Sub Transmission lines	Yearly	Yearly
Distribution overhead HV feeders	Not Applicable	3-yearly
F & G Switchgear (RMUs incorporating a fuse switch)	Not Applicable	Yearly
Indoor Substations	Not Applicable	2 Yearly +3 months
Indoor Substations with LV Oil Circuit breakers	Not Applicable	Yearly +3 months
Zone substation (phase and earth connections)	Not Applicable	Yearly

Thermal imaging is undertaken using vehicle or aerial mounted equipment for overhead network assets.

Operational procedures for conducting thermal imaging inspections are contained within the Maintenance Procedure – Distribution Thermographic Inspection (CPPAL-PR-5060.01) and the Maintenance Procedure – ZSS Thermographic Inspection (CPPAL-PR-5060.03). The process for prioritising defects identified through thermal imaging are contained within the Maintenance Procedure – Distribution Thermographic Inspection (CPPAL-PR-5060.01), the Maintenance Procedure – ZSS Thermographic Inspection (CPPAL-PR-5060.03) and the Maintenance Defect Priority Standard (CPPAL-ST-5060.01) [ID].

6.3 Priority Classifications

The defect priority classification applies to all defects found on the supply network. Asset defects identified by the inspection program or reported from internal or external sources are assessed for their associated risk and prioritised for remedial action.

The Maintenance Defect Priority Standard (CPPAL-ST-5060.01) [ID] details the application of defect ratings and timeframes associated with inspection and maintenance requirements of the various network assets.

All identified defects will be recorded, monitored and reported through the creation of notifications within the SAP maintenance management system.

This standard sets out the criteria for classification of defects as shown in Table 8.

Table 8: Defect Classification

Allocation	Symbol	Allocated to items assessed to be at risk of failure within the following timeframes[1]	Need to be actioned within[1]
Priority 1	P1	0 – 42 days	24 hours
Fault Follow Up 42 Days	FFU42	> 42 days	42 days
Priority 42	P42	42 days – 32 weeks	42 days
Priority 2	P2	32 weeks - 3 years	32 weeks
Priority 3	P3	> 3 years	3 years
Priority Opportunistic	POPP	Not applicable	No set timeframe – actioned on an opportunity basis
Priority Notification for Information	PN	Not applicable	No set timeframe - information record only

[1] Note: all time periods mentioned in the table are based on calendar days.

6.4 Remedial Maintenance

CitiPower's maintenance programs are generated from a number of different sources, the main one being the asset inspection program (refer Section 6.1).

Maintenance defects can also be raised via:

- Employees or contractors
- Customer calls
- BFM vegetation inspections/audits
- The "Report It" Application.

Refer Section 10.2 for more information on audits.

Defect Management

Maintenance works identified through the inspection program, audits or raised by customers are issued for remediation. Resources are scheduled to match the needs of the issued projects to achieve the required response times. The defect priority and rectification timeframes are detailed in Section 6.2.

Faults/Fault Follow-up

Operational procedures for the repair of defects identified through the Network Faults/Outage process, including temporary repairs are contained within the following documents:

- The Manage Network Faults Procedure (JEQA4UJ443MT-149-83) sets out the process to be followed by the respective faults teams to monitor system outages, to accept, dispatch and repair network faults
- The Manage Fault Follow-Up and Repair Guideline (JEQA4UJ443MT-149-115) ensures all items coded for fault follow-up are issued to the appropriate work group, scheduled for completion and actioned within the prescribed timeframes.
- The Network Fault Dispatch Guideline (JEQA4UJ443MT-149-543) provides a clear guideline for respective responsible personnel (Dispatchers, Field Crews and Fault Management) to manage faults and related work activities in outage management systems and dispatch tasks to field crews to undertake fault rectification and related tasks.

Customer fault calls are received by the CitiPower Customer Contact Centre 24 hours a day, 7 days a week. Likewise, fault calls can also be received by CitiPower's System Control Centre directly from asset inspectors, operators, and emergency services. The Dispatch Group has responsibility for prioritising trouble orders and assigning to field crews. Trouble orders are prioritised as either high, medium, or low using the following principles:

- Safety of the public and our workforce.
- Customer satisfaction.
- Supply reliability and quality.
- Field crew workload management – including stand-down impacts.

There are two trouble order classifications:

- No-service (NS) which relate directly to supply issues including all supply fail, part supply fail, dim lights, and intermittent supply.
- In-service (IS) which include faults which may or may not have supply impacts such as wires down, car hit pole, wire low, animal on asset etc.

Priorities assigned to NS trouble orders are usually based on the number of customers impacted as shown in Table 9, however, the priority of the order can change based on the customer type, customer request or the specific risk, such as:

- jobs that represent a significant threat to corporate reputation or there is immediate safety risk to the public or employees (priority is assigned as High)
- the customer is a single premise commercial business (priority is assigned Medium).

Table 9: NS Trouble Order Priority Assignment

Customers Affected	Priority	Dispatch Timeframes
1	Low	Next available crew after any medium jobs between 7:00am-11:30pm
2-10	Medium	Next available crew after any high priority
>10	High	Immediate

Priorities assigned to IS trouble orders are based on the type of fault, the information in the trouble order and additional information collected during validation. Where there is an immediate risk to public or employee safety, these trouble orders are assigned a high priority.

Where the fault crew have undertaken partial or temporary repairs a Fault Follow-Up repair action is created. All items assigned for Fault Follow-Up are issued to the appropriate work group, scheduled for completion, and actioned within 42 days.

Audits/Observations

Asset defects identified during audits/observations are communicated in accordance with the particular audit process.

Non-Cyclic Maintenance

Maintenance items found out of cycle are reported using the "Report It" Application where defects are prioritised and attended to within the timeframes specified in Table 8.

6.5 Asset Replacement/Modification for Specific Assets

CitiPower has several maintenance procedures and policies that govern the replacement and modification of its assets. These include:

- High Voltage Fuses Policy (D-320): High voltage fuse failures can result in fire starts. HV fuses are inspected as part of the cyclic asset inspection program.
- Distribution Surge Arresters Policy (D-540): Surge arresters protect electrical assets from damage which may otherwise result in a fire start. Surge arrestors are inspected as part of the cyclic asset inspection program.
- Maintenance Procedure - Pole Top Assembly (PR-5063.01):
  - Crossarm failures may result in conductors or other associated assets falling to the ground which may result in a fire start. Crossarms and securing hardware, which include crossarm braces, kingbolts and anti-split bolts are inspected as part of the cyclic asset inspection program.
  - Defective high voltage insulators may lead to wooden crossarm and pole fires. These failures may also lead to conductors or other hardware falling to the ground which may result in a fire start. Bird covers provide insulation

between live and conductive parts of structures, which prevent bird and animal related faults which may also result in fire starts. These assets are inspected as part of the cyclic asset inspection program.

- Maintenance Procedure - Poles and Towers (PR-5062.01) [ID]:
  - Poles and towers classified as unserviceable need to be actioned by replacement or repair within the prescribed timeframes. Failure to do so may result in the pole or tower failing and starting a fire. Unserviceable poles and towers are identified as part of the cyclic asset inspection program.
  - Permanent reinforcement systems maintain the functional performance of a wooden pole. Reinforcement systems that fail to perform their intended function may lead to the pole failing and starting a fire. Permanent reinforcement systems are inspected as part of the cyclic asset inspection program.
- Maintenance Procedure – Conductors and Connectors (PR-5064.01):
  - Conductor failures may result in fire starts. Overhead conductors are inspected as part of the cyclic asset inspection program.
  - Spreaders and spacers prevent conductor clashing and hence potential fire starts. These assets are inspected as part of the cyclic asset inspection program.

Defects identified via the above strategies are assigned repair priorities as detailed within the Maintenance Defect Priority Standard (CPPAL-ST-5060.01) [ID].

6.6 Vegetation Management

CitiPower is responsible for the management of vegetation around power lines and other electricity assets in the network. In some urban locations there are "Declared Areas", where the Councils are managers of public land and are responsible for keeping trees clear of electric lines.

CitiPower's vegetation activities are managed in accordance with the Electric Line Clearance (Vegetation) Management Plan.

CitiPower's accepted Electric Line Clearance (Vegetation) Management Plan outlines management processes, programs and cycles for maintaining clearances between vegetation and network assets.

6.7 Private Electric Lines

Inspections

CitiPower has an obligation under the *Electricity Safety Act 1998* to inspect Private Electric Lines (PELs) that are above the surface of land within its distribution area, other than any prescribed parts of those lines as defined in Regulation 9 of the *Electricity Safety (Bushfire Mitigation) Regulations 2023*. Point of Supply definitions are determined as per the *Electricity Safety Act 1998.* PELs are inspected to identify any defects, or infringing vegetation, which may affect the fire and/or electrical safety of the line.

Electricity Safety (Bushfire Mitigation) Regulations 2023

The *Electricity Safety (Bushfire Mitigation) Regulations* were amended in 2023, which included additional requirements associated with PELs:

- inspection of clearances
- hazard tree inspection by qualified arborists.

Inspections are undertaken to include the prescribed standards of inspection contained in section 11 of the *Electricity Safety (Bushfire Mitigation) Regulations 2023*.

CitiPower meets the required outcomes of regulation 11(1)(j), 11(1)(k) and 11(1)(l) by utilising the inspection techniques shown below.

1. The condition of hardwood PEL poles located in concrete is determined by drilling down at an angle to inspect the condition of the pole below concrete level to determine the millimetres of wood free of decay and the presence of termites.
2. The condition of treated pine PEL poles is determined by assessing the degree of external rot and also measurement of the pole girth.
3. The condition of steel PEL poles is determined by a visual inspection and a structural assessment using a ball pein hammer at or just below the ground level (up to 200mm excavation if possible) to ensure that the pole retains 75% of steel thickness in the corroded area when compared against a non-corroded area on the pole.

Operational procedures for CitiPower's PEL inspection program are contained within the following documents:

- Maintenance Procedure - Private Electric Lines (PR-5062.02).
- Asset Inspection Manual (CPPAL-MA-0450).

CitiPower's asset inspectors attempt to liaise with PEL owners regarding PEL inspection requirements before commencing any work. If the PEL owner is not home or is not spoken to, the asset inspector is required to leave a

pamphlet informing PEL owners that an inspection of their PEL was undertaken, a summary of inspection findings and general information regarding PELs including the requirement for CitiPower to inspect PELs as required under the *Electricity Safety Act 1998*. A copy of this pamphlet is contained in Appendix C.

The annual PEL mail out via post or digital (where available) ensures that all CitiPower customers who have a PEL will receive a letter and a brochure. The letter provides relevant information as well as our procedure on defective PELs. The brochure covers topics including ownership, responsibilities, maintenance, vegetation clearance, electrical safety, disconnection, and a guide to PEL inspection. The mail out of these normally occurs in October.

CitiPower notifies owners of up-coming PEL inspections, as required in the *Electricity Safety (Bushfire Mitigation) Regulations 2023*. These letters notify the owner which part of the line we will be inspecting and what will happen if defects are found (Refer Appendix D). Notice is given not less than 21 days and not more than 45 days before inspection.

Disconnection

Landowners, or occupiers, who are responsible for a defective PEL, are given up to 30 days to rectify vegetation infringements or other urgent defects. Every attempt is made to contact the customer by phone as soon as CitiPower becomes aware of the defect. If such defects are not corrected within this time the owner, or occupier, is given further written notice following which they are advised that the matter has been referred to Energy Safe as required.

CitiPower regularly contacts the responsible landowner, or occupier, by telephone to monitor the progress of corrective action. The requirements for reinspection of PELs referred to Energy Safe for non-compliance are contained within the Identification, Recording and Rectification of Defective PELs (LV) Procedure (JEQA4UJ443MT-158-503).

Any hazardous PEL found during inspections or as part of a fault response are disconnected to ensure fire and/or electrical safety. Supply is not restored until the installation is safe to reconnect.

When a disconnection is necessary, CitiPower's Customer Compliance Group notifies the customer and creates an entry in the Outage Management System (OMS), prompting the System Control Centre to dispatch a crew to disconnect supply.

Operational procedures for the identification and rectification of defective LV PEL are contained within the Identification, Recording and Rectification of Defective PELs (LV) Procedure (JEQA4UJ443MT-158-503).

6.8 New Technologies

CitiPower is committed to continuous improvement. This often involves trialling or developing new technologies such as the adoption of new network materials or the application of drones or artificial intelligence to improve inspection and maintenance practices, which if successful and meets AFAP requirements will be adopted as normal business practice. CitiPower will keep Energy Safe informed of new initiatives on a quarterly basis.

6.9 Asset Replacement Programs

CitiPower have no proactive asset replacement preventative strategies and programs identified for the supply network to minimise the risk of fire starts.

6.10 Conductor Clearances (T-On and T-Off Structures)

CitiPower has implemented an asset inspection-based program to identify, prioritise, and rectify conductor clearance defects to improve the management of conductor clearances.

This section should be read in-conjunction with section 6.1.4 which describes the implementation of CitiPower's LiDAR conductor clearance inspection methodology to support the management of conductor clearances at the pole or in-span to ensure minimum clearances are maintained.

In assessing these risks, CitiPower has considered the factors associated with designing, operating, constructing, and maintaining electricity networks in our differing environments, which potentially contribute to increasing the risk of fire ignition due to conductor clashing or flashover, to include:

- Changes in design and construction standards that have varied over the asset's life cycle.
- Incorrect inspection and maintenance practices for identifying conductor clearance breaches.
- Incorrect application of design and construction standards.
- Asset condition change or deterioration over time impacted by environmental conditions (weather, wind, ground subsidence etc).

CitiPower is committed to reducing the risk of fire ignition arising from conductor clashing or flashover associated with vertical clearance for crossing at T-on and T-off structures. All identified conductor clearance defects that could lead to clashing in accordance with the Asset Inspection Manual (CPPAL-MA-M450) shall be assigned the designated defect priority and rectified as detailed within the Maintenance Defect Priority Standard (CPPAL-ST-5060.01) [ID].

This is achieved by implementing the following high-level summary of key controls:

- For new assets, application of its design and construction standards to the requirements of *AS/NZS 7000:2016 Overhead Line Design*, to mitigate the risk and potential consequence(s) of a conductor clearance breach leading to a clash or flashover.
- The inspection and maintenance requirements to manage the identification, measurement, priority, and actions for potential conductor clearance breaches - setting out the reporting triggers and rectification time frames for clearances between conductors on the same or different circuits at all T-on and T-off structures. More information relating to the inspection and maintenance of conductor clearances is in the Maintenance Procedure – Conductors Aerial Line Clearances (PR-5064.02).
- Removal of high voltage T-on structures as a standard structure and can only be adopted, where no alternative design solution is viable, following the completion of a safety in design risk assessment and approval of a non-standard design as set out in the procedure.
- Inspection and measurement of vertical clearance for high voltage and sub-transmission (attached) crossings at T-on and T-off structures.
- Any leaning poles identified through the cyclic inspection program that have a T-on structure on the same pole or at the other side of the span will have their lean measured and recorded, and the clearance between conductors will be measured by an asset inspector. Where a clearance breach defect is identified in accordance with the Asset Inspection Manual (CPPAL-MA-M450), the actual defect will be recorded as a one-step higher priority defect, that is, the priority 2 (P2) will become a priority 42 (P42).

Conductor clearance defects with signs of clashing are assigned a P1 rating in HBRA and a P2 rating in LBRA, reflecting the lower bushfire ignition risk in LBRA.

CitiPower is committed to continuous improvement, as evidenced by the implementation and use of new technology to manage the risk associated with conductor clearance breaches, to complement our existing cyclic ground-based inspections by asset inspectors.

CitiPower's governance and assurance processes for monitoring and ensuring the effectiveness of controls, specifically relating to training and reporting, monitoring, and auditing, are contained within sections 6.10, 7 and 10.

6.11 Resourcing

CitiPower ensures appropriate resources are available to carry out the activities outlined in this plan.

A detailed asset inspection program, of the following year's work, is developed and provided to our Asset Inspection Group to enable them to plan their resource requirements to meet the program's needs.

CitiPower is responsible for the overall vegetation program management including LiDAR inspection with sub-contractor/s engaged to complete cutting tasks.

6.12 Training

CitiPower has an established and documented system to ensure that employees and contractors who are working on or near the electricity network are suitably competent and adequately trained to carry out their duties.

The key steps that CitiPower has in place to manage competency and training requirements are illustrated in Figure 9.

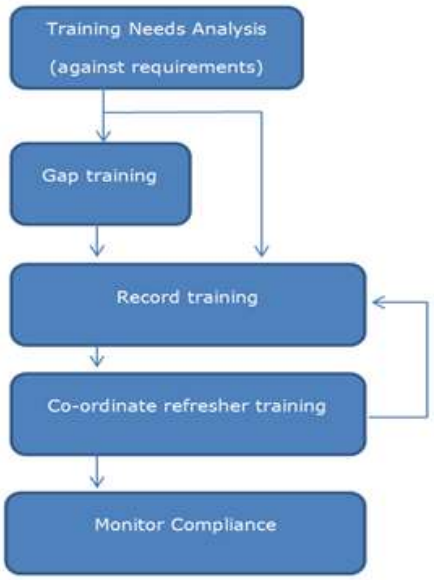


Figure 9: Competency and training process

In CitiPower, the training standards for workers who are working on or near the electricity network are established through the industry committee *VESI Skills and Training Reference Committee* for consistency within the State and nationally through Industry Reference Committees.

The VESI training standards set the agreed procedures, practices and processes to ensure consistency, compliance and transportability across MECs. The training standards incorporate training matrix and guidelines which:

- Detail competencies and qualifications for persons accessing VESI networks
- Establish common VESI training modules
- Detail the entry requirements to be recorded in the ESI Worker System.

This is detailed on the *VESI website (vesi.com.au)*.

If training is required specifically for CitiPower this is co-ordinated as Enterprise training for employees. For contractors, requirements for additional training would be included in a contract agreement.

Further detail can be found in the following documents:

- The Technical Training Compliance Policy (JEQA4UJ443MT-173-25) establishes the technical training requirements for all employees and service providers who work on or near the CitiPower Networks in accordance with the National competence and VESI standards. Any departures from these standards to meet business requirements shall be documented.
- The Technical Training Guideline (JEQA4UJ443MT-173-28) supports the technical training requirements by outlining the qualifications, training and licensing required for employees and service providers who will be undertaking work on or near the CitiPower's network.

All Asset Inspectors are required to meet the training requirements as specified in the *VESI Skills and Training Matrix.* These training requirements are confirmed by CitiPower when an application request is made for an Asset Inspector to work on the network.

Where the qualification (being Certificate II in ESI Asset Inspection and Testing UET20621 or subsequent version) has been attained in a State or Territory of Australia other than Victoria, induction to CitiPower's requirements (including our procedures) is conducted by a person holding a Certificate IV in Training and Assessment.

Ongoing competency

Audit processes are in place to ensure that there is consistent application of knowledge and skill to the standard of performance required for asset inspectors.

Asset Inspector audit findings are rated, and the cause of the finding identified. Depending on the audit findings additional learning and improvement opportunities such as the need for refresher training or mentoring of the Asset Inspector will be initiated to ensure the required competency is achieved.

Overall performance of the Asset Inspector is monitored whereby frequency rates of audits are determined based on their performance.

CitiPower adopted the Australian ESI Skills Passport in 2010. The Australian ESI Skills Passport system has enhanced the portability of the ESI workforce by mutual recognition of agreed training standards. Training is recorded in the passport and can be viewed to confirm currency of training for the task being undertaken. Further information can be located at www.esipassport.com.au.

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

Asset Inspection

All asset inspectors working on the CitiPower network are required to hold a *National Qualification Certificate II in Asset Inspection and Testing (UET20621)* or subsequent version, to satisfy the requirements set out in the *Electricity Safety (Bushfire Mitigation) Regulations 2023, regulation 7(1)(p)(i)*.

The *VESI Skills and Training Matrix* stipulates the requirements and frequency of refresher training for Asset Inspectors. The matrix is available at www.vesi.com.au.

Vegetation Management

All training requirements for vegetation management are covered in the Electric Line Clearance (Vegetation) Management Plan.

Line Work

The *VESI Skills and Training Matrix* stipulates the qualifications and refresher training for a line worker. The employing company is required to organise training to the standards referred to in the matrix. The employing company will keep records of all training undertaken.

Line worker apprentices are engaged in bushfire mitigation activities from time to time. This provides experience in a broad range of tasks. When companies 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.

Thermal Imaging Inspections

All thermographic inspectors working on the CitiPower network must hold a national qualification *Conduct surveys using Thermovision techniques (UETDRSB004)* or subsequent version. This qualification covers the skills and knowledge required to conduct thermovision surveys in the electricity supply industry (ESI).

Thermal imaging inspections are undertaken by suitably qualified and competent internal personnel, as defined by the Technical Officer role in the *VESI Skills and Training Matrix*. The matrix specifies role requirements and refresher training frequency and is available at *www.vesi.com.au*.

Technical Standards

CitiPower’s Plant and Standards Implementation group provide a monthly document management communication to all impacted employees and service providers regarding both new and updated design and construction of network assets / standards. If a significant new item of equipment or a significant new technical standard is being introduced, then specially convened information sessions will be conducted.

All service providers or other external persons associated with works on CitiPower assets can register with CitiPower to gain “read only” access to CitiPower’s technical standards.

Information sessions are also stored in the “Source” document portal on CitiPower’s Intranet System for future viewing.

6.13 Liaison with Other Organisations

CitiPower has a procedure for coordinating BFM activities and emergency procedures with relevant organisations which can include any of the following:

- Energy Safe
- CFA
- Fire Rescue Victoria (FRV)
- State Emergency Service (SES)
- Department of Energy, Environment and Climate Action (DEECA)
- Department of State Development, Business & Innovation (DSDBI)
- Municipalities
- Mutual Aid Plan Planning Committee (MAPPC)
- Bureau of Meteorology (BOM)
- Other Distribution/Transmission Network Operators.

Actions to be undertaken in the event of a major event or emergency are contained in the Incident Management Procedure (JEQA4UJ443MT-185-28490) and Crisis Management Plan (JEQA4UJ443MT-154-386)

These documents include the responsibilities for communications with emergency services and other relevant organisations during events such as:

- Loss of the System Control Centre
- Major supply outages
- Major plant faults
- Lack of supply capacity (load shedding)
- Fires and incidents.

6.14 Public Awareness

To maintain community awareness of bushfire hazards, CitiPower provides information to the public concerning various BFM activities. CitiPower is committed to enhancing public awareness of:

- the potential risks associated with PELs
- the risks of planting inappropriate vegetation near electrical lines
- vegetation species suitable for planting near powerlines
- PEL inspection timeframes
- other fire related matters.

As part of its Vegetation Management and PEL inspection programs, CitiPower makes the following information available to its customers, via the CitiPower website:

- Planting Trees Near Power Lines
- PELs - Understanding Your Responsibilities.

CitiPower prepares an annual BFM communications plan with a high-level objective of being recognised as an organisation which values genuine engagement with its key stakeholders and local communities.

The communications plan can be outworked using various channels including social media posts, traditional media releases, newspaper articles & advertisements, radio advertisements & interviews, TV interviews and face to face meetings with various stakeholders.

CitiPower releases an annual communication to Registered Electrical Contractors (RECs) within our service territory, to raise awareness and appreciation of the importance of PEL maintenance works and complying with the regulations and CitiPower's processes. Further information to support the RECs can be found through the CitiPower website Registered Electrical Contractor (REC) resources | CitiPower & Powercor and our REC helpline, which is available 24 hours a day, 7 days a week.

For details of communication with PEL owners refer to Section 6.6.

6.15 Assistance Provided to Fire Agencies

Fire Rescue Victoria (FRV) is the fire-fighting services, operating within CitiPower's service area.

CitiPower will provide assistance and work with the relevant fire control agency in the investigation of fires near our supply network.

CitiPower's Emergency Management Liaison Officers (EMLOs) are available to attend fire agency command centres and provide information or assistance with issues relating to our distribution assets. An EMLO is a person that acts as a go-between or the link between two organisations to communicate and coordinate their activities.

Emergencies

Any requests for resources to assist fire agencies are coordinated by the Network Controller, from CitiPower's System Control Centre.

Fire emergencies are communicated directly to the System Control Centre via a direct phone number for emergency services organisations. Fault Crews are then promptly dispatched according to the information received.

CitiPower will work with the relevant fire control agency to provide safe access to a fire or accident scene involving CitiPower assets. This can include de-energisation of electrical assets upon request.

Further detail of actions to be undertaken in the event of a major event or emergency are contained in the Incident Management Procedure (JEQA4UJ443MT-185-28490) and Crisis Management Plan (JEQA4UJ443MT-154-386)

CitiPower also has representation on the State Control Centre (SCC) electricity industry roster for EMLOs. An EMLO will provide the technical or subject matter expertise relating to the electricity industry and embeds an EMLO into the SCC to provide face-to-face coordination.

Information Exchange

There are several different forums for information exchange that take place between the fire agencies and CitiPower, including through engagements with Emergency Management Victoria.

In October each year prior to the fire danger period, the annual pre-season briefing is held by Emergency Management Victoria (EMV) at the State Control Centre to provide a briefing and forecast for the coming season. Information presented includes the likely severity of the season and identification of high-risk areas. This information day is attended by Victorian electricity distributors (including CitiPower), transmission operators and representatives from Energy Safe.

Information relating to fire season declaration dates is provided to CitiPower by FRV both through the receipt of Fire Season Declaration notices and also through discussions with FRV's Regional Community Safety Managers.

6.16 Total Fire Ban Days

CitiPower has a Total Fire Ban Day Action Plan (CP-PL-0009.1) [ID] which is invoked on TFB days. The plan contains BFM strategies to be employed on days of extreme fire weather conditions to minimise the risk of a fire ignition being caused by CitiPower's electricity network and is implemented under the direction of the Control Manager with assistance from the TFB Day Coordinator.

Most of the CitiPower electricity network is situated in LBRA, with small sections of 66kV line located in HBRA. Therefore, on days of TFB, no auto reclose suppressions or fault energy reduction measures are implemented, and defective PELs are not disconnected.

For works involving welding, cutting, grinding, or use of naked flame, permits from the appropriate organisation (e.g. FRV) are used and adhered to.

6.17 Declared Fire Danger Period

During the Declared Fire Danger Period, CitiPower will continue with normal operation of its electrical assets. CitiPower's 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 that are specific to the Declared Fire Danger period. These include:

1. Vehicle Movement Off-road (refer Appendix C).
2. Use of spark arresters on non-vehicular heat engines equipment such as hoggers, chainsaws and generators (refer Appendix C).
3. Fire Fighting Equipment to be carried (refer Appendix C).

6.18 Fire Management

In the event of a fire, CitiPower's operational and maintenance activities 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 as required.
- Dispatching field crews for fault rectification or as directed/requested by the relevant fire control agency.
- Deployment of EMLOs if required to any Incident Control Centre established by the relevant fire control authority.
- Managing the fire event as set out in the Incident Management Procedure (JEQA4UJ443MT-185-28490) and Crisis Management Plan (JEQA4UJ443MT-154-386).

7. Program Timing

CitiPower has produced a set of combined BFM program milestones which specify the completion dates required for key BFM activities. A copy of the BFM program milestones document is included in Appendix B.

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

Remedial maintenance and asset replacement/modification is completed in accordance with the priority classification referred to in Section 6.2 and the Maintenance Defect Priority Standard (CPPAL-ST-5060.01) [ID].

Timing of vegetation management activities are undertaken in accordance with CitiPower's Electric Line Clearance (Vegetation) Management Plan.

8. Fire Investigation

Any fire starts initiated by CitiPower assets are reported to Energy Safe in accordance with the *Energy Safe Incident and Safety Performance Reporting Guidelines - Major electricity companies*. The System Control Centre identifies any fire starts from outage information or from external advice and notifies the Network Availability Officer (NAO) who investigates each situation according to the information provided. The NAO then sends completed reports to the Network Risk & Assurance team for checking and collation and forwarding to Energy Safe in accordance with the *Energy Safe Incident and Safety Performance Reporting Guidelines - Major electricity companies*.

Fire start statistics and any material fires initiated by CitiPower's network are communicated at the annual BFM post season review.

Operational procedures for the reporting of fire starts are contained within:

- Incident Management Procedure (JEQA4UJ443MT-185-28490)
- Energy Safe /AER and Cintellate Incident Reporting Procedure (PR-0018)

The operational procedures for the reporting of fire starts are contained within the Incident Management Procedure (JEQA4UJ443MT-185-28490) and are in accordance with the requirements stipulated in *Energy Safe Incident and Safety Performance Reporting Guidelines - Major electricity companies* and the Energy Safe *Incident reporting and site preservation guidelines* located on the *Energy Safe website*: *Energy Safe Victoria | Energy Safe Victoria.*

The procedure ensures CitiPower meets its responsibilities to employees, customers, members of the public and regulatory requirements.

Any fire starts attributed to assets are investigated, analysed and reported in accordance with the Asset Failure Investigation and Reporting Procedure (PR-5060.01) as outlined in section 9.3.

9. Key Measures

9.1 Asset Maintenance and Vegetation Performance Measures

Asset Maintenance Performance

The Asset Maintenance Compliance Measure (AMCM) is a measure of line inspection and maintenance compliance.

The AMCM measures the completion performance of inspection and maintenance activities against policy targets.

An explanation of how the AMCM is calculated is provided in Appendix F.

The AMCM (HBRA) is required to be greater than or equal to 99.5% throughout the year. The objective is to maintain the AMCM at 100% throughout the fire declaration period and in instances where this is not achieved, actions will be implemented to improve our performance.

The AMCM (LBRA) is required to be greater than or equal to 99.5% throughout the year.

This key measure is monitored, recorded and reported monthly and reviewed by various internal business teams, including the quarterly Network Safety and Reliability and Bushfire Mitigation Committees.

Vegetation Performance

Vegetation compliance is measured as a discrete count of LBRA and HBRA Vegetation Priorities (VPs) outstanding clearance of encroaching vegetation, as reported to Energy Safe.

9.2 Fire Starts

Ground and Asset Fires

The recording of ground and asset fires associated with asset failures is a key measure used to monitor the efficacy and performance of CitiPower's BMP strategies and maintenance practices.

Performance against key measures is monitored, recorded and reported monthly. The Network Safety and Reliability Committee review this information along with any identified improvement opportunities on a quarterly basis. The targets are set annually based on the actual performance for the previous ten years directly preceding the year which the targets are being set and trended using a line of best fit using statistical analysis methods to enable the projection for each target.

Reporting of ground and asset fires is undertaken as they occur and reported to Energy Safe in accordance with the *Energy Safe Incident and Safety Performance Reporting Guidelines - Major electricity companies*. Reporting procedures are contained within the following documents:

- Incident Management Procedure (JEQA4UJ443MT-185-28490)
- Energy Safe /AER and Cintellate Incident Reporting Procedure (PR-0018).

F Factor scheme

CitiPower use the F Factor scheme (Ignition Risk Units (IRU)) as a key measure, along with CitiPower's ground and asset fire performance results to assess and improve how we minimise risk associated with fire starts. The IRU fire starts target used by CitiPower to monitor performance is set by the AER annually based on an average of fire starts over the previous 5-years on the CitiPower network.

These key measures are monitored, recorded and reported monthly and reviewed by various internal business teams, including the quarterly Network Safety and Reliability and Bushfire Mitigation Committees.

9.3 Asset Failures

The Asset Failure Investigation and Reporting Procedure (PR-5060.01) outlines the procedure for investigating asset failures. Asset failures and failure trends are analysed to identify potential improvements to maintenance procedures, technical standards, work practices and enhanced preventative actions which all contribute to risk management strategies. Investigation of failed assets is primarily the responsibility of the Network Asset Management team.

Where there is an asset failure that attributes to a fire ignition that is reportable in accordance with *regulation 28 of the Energy Safe Incident and Safety Performance Reporting Guidelines - Major electricity companies*, an 'Asset Failure Cause Assessment' or a 'Asset Failure Investigation Report' will be undertaken where the asset:

- has not performed as intended with an unknown mode of failure, failed in an unusual manner, or identifies a potential systemic issue; or
- failed involving any ground fire in Electricity Line Construction Areas; or
- failed involving any ground fire in LBRA/HBRA > 1000m^2 ; or
- failure is an unassisted wood pole failure (fire).

Any recommendations or actions identified through an asset failure assessment or investigation will be recorded in Cintellate and assigned to a responsible officer for management and close-out within a specified timeframe.

9.4 BFM Milestones

CitiPower has produced a set of BFM program milestones which specify the completion dates required for key BFM activities. These BFM activities are:

- Submit the Vegetation Management Plan (if required) to Energy Safe
- Conduct an annual BFM post season review
- Submit the BMP (if required) to Energy Safe
- Complete the annual internal compliance audit of the BMP
- Complete the PEL mail out to CitiPower customers.
- Conduct the annual summer pre-season briefing to Senior Management.

The achievement of these milestones is closely monitored and a copy of the BFM Program Milestones is attached in Appendix B.

10. Reporting, Monitoring and Auditing

10.1 Report and Monitoring

The Bushfire Mitigation Committee provides management and governance of the bushfire mitigation processes and fire season readiness activities, which include:

- Reviewing network LBRA and HBRA fire start and f-factor trends
- Reviewing the business's fire summer preparedness actions
- Reviewing the effectiveness of critical controls relating to bushfire risk management
- Reviewing the performance of LBRA and HBRA asset inspection, maintenance and vegetation management activities.
- Monitoring delivery of key risk reduction improvement initiatives and proactive asset replacement programs
- Proposing new initiatives and trials, monitor progress and actions
- Endorsing of bushfire related policy.

A quarterly report is prepared for the Bushfire Mitigation Committee to monitor bushfire performance (key measures), strategy, plans, maintenance programs, new technology and asset replacement improvement programs and

preparedness activities. There are no CitiPower LBRA fire summer preparedness actions or improvement programs identified.

Reporting processes are established which ensures that all levels of the BFM management structure, including executive management levels and Energy Safe, are informed of the status of the company's preparedness and fire performance.

The reporting process incorporates requirements:

- Prior to the Declared Fire Danger period
- During 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 (CP-PL-0009.1) [ID].

BFM Status Report

The BFM Status report, which includes the AMCM and outstanding vegetation in HBRA is used to monitor and review the CitiPower bushfire performance as contained within the BMP. This report measures the status of a range of BFM activities against policy or program targets. Reported activities include asset inspection (including PELs), priority maintenance and vegetation clearance programs.

It is provided to senior management and employees involved in BFM activities and Energy Safe.

The BFM Status report is compiled and reported monthly, outside the Declared Fire Danger Period and then reverts to weekly reporting during the Declared Fire Danger Period. The frequency of this reporting enables close monitoring by CitiPower management.

The frequency of this reporting is sufficient to enable the detection and rectification of any situation that could jeopardise the achievement of a state of full preparedness by the start of the Declared Fire Danger Period.

Asset Maintenance Compliance Measure

HBRA

CitiPower's strategy to manage the AMCM (HBRA) is to closely monitor the key inspection and maintenance programs associated with the at risk BFM program. The AMCM is compiled and reported monthly, outside the Declared Fire Danger Period and then reverts to weekly reporting during the Declared Fire Danger Period. This weekly reporting is provided to Energy Safe via OSIRIS. The AMCM (HBRA) is reported on quarterly basis at the Bushfire Mitigation Committee.

LBRA

CitiPower's strategy to manage the AMCM (LBRA) is to monitor the key inspection and maintenance programs. The AMCM (LBRA) is compiled monthly and reported on quarterly basis at the Bushfire Mitigation Committee.

Asset Inspection

The Asset Inspection program is monitored by the Asset Inspection Group.

An automated daily exception report is generated from SAP and distributed by e-mail to relevant employees who monitor the asset inspection program. The Asset Inspection Group investigates any overdue poles, towers and associated assets (including PEL poles) to ensure they are inspected and actions implemented to improve the process.

Maintenance

An automated daily Priority 1 report is generated from OMS and distributed to relevant employees by e-mail. The Operational Faults Manager checks any outstanding items to ensure the defects are rectified in accordance with the timeframes specified in the Maintenance Defect Priority Standard (CPPAL-ST-5060.01) [ID].

An automated daily Priority 42 & 2 exception report is generated from SAP and distributed by e-mail to alert relevant employees of defects that are overdue for rectification or close to becoming overdue. Operational procedures for the Maintenance Program Group to investigate outstanding defects and follow up actions are contained within the Maintenance Risk Assessment Procedure (SRCE 44719848-38420).

Vegetation Clearance

CitiPower produce a weekly report which is distributed to key stakeholders. This report provides program status updates on all LBRA and HBRA inspection and cutting vegetation management programs.

Status reporting on identified HBRA and rural LBRA VP1 and VP2s outstanding is included into the BFM Status Report.

Energy Safe

CitiPower's reporting schedule to Energy Safe, on its BFM activities, is listed below:

- Electric Line Clearance (Vegetation) Management Plan. (supplied every 5 years, minimum).
- BMP (supplied every 5 years, minimum).

- AMCM and Vegetation Compliance in HBRA (reported weekly during the Declared Fire Danger period).
- Vegetation clearance report for LBRA and HBRA on a weekly basis (period 1 September to 30 April) and monthly for all other times.
- Ground and asset fire starts (reported as they occur).
- Fire start statistics (reported to Energy Safe as per the Energy Safe reporting requirements).
- Safety Program Report (Quarterly).

Reporting on issues found through Energy Safe audit processes is carried out on request.

10.2 Auditing

CitiPower's Audit and Inspection Programme Requirements Policy (JEQA4UJ443MT-175-29) provides information for the preparation of audit and inspection programmes.

Considering the range of audit and inspection programmes conducted across the organisation, each programme is required to determine the:

- scope of review or focus area
- classification of review activity as Audit or Inspection
- training/competency/qualification requirements of the auditors/inspectors executing
- frequency of review activities
- method of selecting or prioritising the items/aspects to review.

CitiPower undertakes a program of system audits to validate the effectiveness of BFM processes, policies and systems used to manage or monitor BFM activities, these include:

- Internal audits of the maintenance management programs and processes which are carried out by Audit Services. These audits are conducted to an internal audit schedule.
- External audits conducted in the lead up to the fire danger period and concentrates on adherence to the BFM plan and the processes and procedures that support the plan.

Audit improvement recommendations are documented and followed up for completion.

Other audits undertaken are described below.

Asset Inspection Audits

CitiPower's Asset Inspection Group have in place self-audit programs that they manage and maintain. Any findings require a follow up audit of all inspectors where sub-standard work is identified. An intensified audit program is then established for that inspector until the attainment of satisfactory results.

Additionally, an independent third-party service provider is engaged to audit the performance of the asset inspectors at least once annually.

CitiPower's Asset Inspection Group monitor the results of their completed audits (including PEL inspections) and corrective actions proposed/undertaken as part their monthly asset inspection reporting.

Operational procedures relating to these audits are contained within the Audit and Inspection Programme Requirements Policy (JEQA4UJ443MT-175-29), and the Asset Inspection Audits procedure (SRCE-447194848-39784).

The Asset Inspection Audit Program incorporates a systematic and structured process to deliver thorough and consistent audits. The program has been developed using risk-based selection criteria, and evaluates key factors including the accuracy, completeness, adherence to procedures and the quality of inspection findings.

Process and technical audits are undertaken to ensure comprehensive coverage and adherence to the Asset Inspection Manual and inspection scope assessing for compliance to:

- CPPAL technical standards
- Company procedures and processes
- Statutory regulations, government acts and codes of practice
- Safety and hazards
- Works practices and accepted workmanship standards.

The Process audits are conducted with the inspector to evaluate the process of assessments during the inspection and the Technical audits evaluate the reported elements of the assessment after the inspection has been completed.

The selection of sample audits considers the previous month's inspections and use the *Australian Bureau of Statistics sample size calculator (abs.gov.au)* to derive the relevant number of audits based upon a 99% confidence level.

The guidelines outlined in Table 10 are followed when selecting assets to audit aimed at providing an increased focus on high - risk areas and critical assets.

Table 10: Selection of Audit Samples

Guideline	Description
Asset Inspectors	Each inspector shall be audited on at least four poles per quarter within a 12-month period as part of the sample audit program. If a particular asset inspector's error rate is found to be greater than 5% the sample size for that inspector shall be doubled and a follow - up audit will be carried out within two months. If the rate of error (of the follow up audit) falls below 5%, the sample size for auditing will revert to normal levels.
LBRA / HBRA	Audits are conducted in both LBRA and HBRA.
Material Types	The total percentage of wood (60%), steel (15%) and concrete (25%) inspections over the annual program will be taken into consideration with audit volumes.

Monitoring and auditing of the effectiveness of inspections and the competence of persons assigned to carry out inspections shall be done by monitoring and auditing the adherence to works practices which demonstrate skills and knowledge in Asset Inspection. The auditors undertaking these audits shall have the following competency:

- Certificate II in ESI – Asset Inspection and Testing
- Experienced in everyday asset inspection activities
- Current authority to work on the CitiPower network
- Current VESI refresher training
- Detailed knowledge and understanding of the Asset Inspection Manual and CitiPower policies and procedures for Asset Inspection
- Certificate IV in Workplace Assessment and Training (preferred).

CitiPower's Asset Inspection Group monitor the results of their completed audits (including PEL inspections) and corrective actions proposed/undertaken as part their monthly asset inspection reporting.

Maintenance Audits

Maintenance project field audits are undertaken by the Network Services Field Quality Assurance Group, who have an audit program that includes random audits of all recently completed projects, to ensure that the relevant technical standards and design specifications have been achieved in the completed project. Any additional audits are also completed upon request.

This structured audit program is based on a percentage (~3%) of all maintenance works completed in the CitiPower network by internal and external resources. Audits are conducted each month in all areas on works completed and is adjusted based on non-conformance trends identified.

The field auditors undertaking these audits have the following key knowledge and skill competencies necessary to perform the role:

- Detailed knowledge of distribution networks
- Detailed knowledge of overhead and underground policies, procedures and work practices
- Detailed knowledge of metering and servicing policies, procedures and work practices
- Strong stakeholder management skills.

Vegetation Audits

CitiPower's Vegetation Quality and Engagement Team audit the activities and effectiveness of our vegetation management contractor in accordance with a documented audit schedule. The field auditors require, as a minimum, the national competency 'Certificate II in ESI – Powerline Vegetation Control' qualification to undertake the auditing function.

The effectiveness of the vegetation management controls shall be assessed through a comprehensive annual audit program to assure compliance with the elements of the approved Electric Line Clearance (Vegetation) Management Plan.

The control effectiveness assessment audits undertaken to quantify the inspection / cutting performance use the following criteria metrics to rate the scale of effectiveness:

- The number of spans inspected
- The number of non-compliant vegetated spans identified / cut
- The number of spans in backlog
- The number of non-compliant spans includes spans that have become non-compliant since the last inspection.

Field audits are undertaken on a weekly basis, with reports prepared to confirm quality of inspection, cutting and degree of compliance.

The vegetation management contractor also has their own internal audit program which addresses two key issues:

- Accuracy of vegetation identification and classification.
- Vegetation trimming/removal to the requirements of the code within the *Electricity Safety (Electric Line Clearance) Regulations 2020*.

11. Reviewing

The CitiPower BMP will be reviewed to consider the network fire ignition risk and performance identified through the monitoring, review and identification of potential improvements. A change assessment will be undertaken to determine whether CitiPower is required to submit a revised BMP to Energy Safe in accordance with *section 107 of the Electricity Safety Act 1998*, and if required a revised BMP will be submitted to Energy Safe for acceptance of the proposed changes to the BMP. A review of the BMP will consider various inputs, some of which will include:

- Changes in regulations.
- Pre Summer Season Briefing – this briefing is held before the start of the fire declaration period. Attendees include CitiPower senior managers, corporate risk personnel, internal auditors, and key personnel involved in the BFM program. It provides an opportunity to report on preparedness of key BMP activities and to plan contingencies, if the need arises, to meet the requirements of the plan.
- Post Summer Season Debrief – this debrief is held at the end of the fire danger period to review performance. Attendees include CitiPower senior managers, corporate risk personnel, internal auditors, and key personnel involved in the BFM program. Presentations are delivered on the business's performance during the fire season in each of the key BFM activities. Improvement opportunities are discussed and included into the BMP if required.
- Actions and improvement opportunities identified through the Bushfire Mitigation Committee.
- Maintenance changes associated with Incorporated Documents.
- Proposed modifications to the supply network.
- Internal and external audit findings.
- Technology changes.

12. Referenced Documents

Table 11: Internal References

Title	Document No.
Asset Failure Investigation and Reporting	PR-5060.01
Asset Inspection Audits Procedure	SRCE-447194848-39784
Asset Inspection Manual	CPPAL-MA-0450
Asset Inspection Procedure	18–20–P0002
Audit and Inspection Programme Requirements Policy	JEQA4UJ443MT-175-29
Bushfire Mitigation Policy	PO-0003
Crisis Management Plan	JEQA4UJ443MT-154-386
Developing, Updating or Retiring an Asset Management Plan	PR-0009
Distribution Surge Arresters Policy	D–540
Electric Line Clearance (Vegetation) Management Plan	
Electricity Safety Management Scheme	
Energy Safe /AER and Cintellate Incident Reporting Procedure	PR-0018
High Voltage Fuses Policy	D–320
Identification, Recording and Rectification of Defective PELs (LV)	JEQA4UJ443MT-158-503

Title	Document No.
Inaccessible Asset Procedure	SRCE-447194848-40030
Incident Management Procedure	JEQA4UJ443MT-185-28490
Maintenance Defect Priority Standard [ID]	CPPAL-ST-5060.01
Maintenance Procedure – Conductors Aerial Line Clearances	PR-5064.02
Maintenance Procedure – Conductors and Connectors	PR-5064.01
Maintenance Procedure – Distribution Thermographic Inspection	CPPAL-PR-5060.01
Maintenance Procedure - Distribution Transformers	CPPAL-PR-5071.01
Maintenance Procedure - Private Electric Lines	PR-5062.02
Maintenance Procedure - Poles and Towers [ID]	PR-5062.01
Maintenance Procedure - Pole Top Assembly	PR-5063.01
Maintenance Procedure – ZSS Thermographic Inspection	CPPAL-PR-5060.03
Maintenance Risk Assessment Procedure	SRCE 44719848-38420
Manage Fault Follow-Up and Repair Guideline	JEQA4UJ443MT-149-115
Manage Network Faults Procedure	JEQA4UJ443MT-149-83
Minimising Fire Start Risk on Total Fire Ban Days	PR-0016
Network Fault Dispatch Guideline	JEQA4UJ443MT-149-543
Planting Trees Near Power Lines	
PELs - Understanding Your Responsibilities	
Serviceability Assessment of Poles	CPPAL-ST-5062.01
Technical Training Compliance Policy	JEQA4UJ443MT-173-25
Technical Training Guideline	JEQA4UJ443MT-173-28
Total Fire Ban Day Action Plan [ID]	CP-PL-0009.1

Table 12: External References

Title	Document No.
Country Fire Authority Act 1958	
Country Fire Authority Regulations	
Electricity Safety Act	1998
Electricity Safety (Bushfire Mitigation) Regulations	2023
Electricity Safety (Electric Line Clearance) Regulations	2020
Energy Safe Incident and Safety Performance Reporting Guidelines - Major electricity companies	July 2022
Incident reporting and site preservation guidelines	2024
Knapsack Spray Pumps	AS 1687 - 1991
National Qualification Certificate II in Asset Inspection and Testing	UET20621
Overhead Line Design	AS/NZS 7000 - 2016
VESI Apprentice Supervision Guidelines	
VESI Skills and Training Matrix	

13. Definitions

Table 13: Terms and Definitions

Term	Definition
CitiPower	CitiPower Pty Ltd
Defective PEL	The inspection of PELs in accordance with the *Electricity Safety (Bushfire Mitigation) Regulations* may identify defects on the customers PEL requiring maintenance
F Factor Scheme (IRU)	The scheme initiated by the Victorian government and administered by the AER is designed to incentivise Victorian electricity distribution businesses to reduce the risk of bushfires originating from electricity distribution assets. The IRU calculates the risk associated with these asset fires based on the geographic location of the fire and the time of the fire relative to the fire danger rating day, irrespective of the size or damage caused by the fire.
Failed in an unusual manner	Characterises an asset failure that deviates significantly from established reliability profiles, historical performance data, or manufacturer expectations. This includes failures occurring outside of the predicted "bathtub curve" (e.g., premature infant mortality of a long-life asset), failures involving multiple simultaneous mechanisms, or those resulting in unexpected physical manifestations.
Fire Danger Period	A period declared under *section 4 of the Country Fire Authority Act 1958* to be a fire danger period
Functional Failure	The inability of a system to perform its mission because of deviations from its expected behaviour
Has not performed as intended with an unknown mode of failure	A condition where an asset is unable to meet its required performance standards or has ceased to operate entirely (Functional Failure), yet the specific physical or mechanical process, such as fatigue, corrosion, or electrical tracking, that led to the transition from a functional to a failed state has not yet been diagnosed.
Hazardous PEL	Is a defect or combination of defects which is, or is likely to be an immediate cause of fire or electric shock; and requires same or next working day detailed inspection and/or repair to ensure fire and/or electrical safety, or disconnection
Identified a potential systemic issue	Refers to the discovery of a common underlying vulnerability, such as a design flaw, manufacturing defect, or environmental sensitivity, that is likely to affect an entire population or sub-class of assets. It indicates that the observed failure or degradation is not a stochastic (random) event, but rather a predictable outcome of shared characteristics across the fleet.
Preventative maintenance	Preventative maintenance is planned maintenance carried out on network assets at scheduled intervals, or based on asset condition, to reduce the likelihood of failure, deterioration, or unsafe operation.
Private Electric Line	Any low voltage line used to take electricity from the point of supply, whether or not that line is vested in the electricity supplier
Proactive asset replacement	Proactive asset replacement programs are planned strategies that replace assets prior to failure based on risks.
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*

Table 14: Acronyms, and abbreviations

Acronyms, abbreviations	Definition
ACR	Automatic Circuit Recloser
AC Serviceable	Added Controls Serviceable
ACT	Annual Capacity Test
AER	Australian Energy Regulator
AFAP	As Far As Practicable
AIM	Asset Inspection Manual
AMCM	Asset Maintenance Compliance Measure
AMP	Asset Management Plan
AS	Australian Standard
BFM	Bushfire Mitigation
BMP	Bushfire Mitigation Plan
BOM	Bureau of Meteorology
CBRM	Condition Based Risk Model
CFA	Country Fire Authority
CP	CitiPower
CPPAL	CitiPower and Powercor
DAPR	Distribution Annual Planning Report
DB	Distribution Business
DEECA	Department of Energy, Environment and Climate Action
DSDBI	Department of State Development, Business & Innovation
EDO	Expulsion Drop Out
EMLO	Emergency Management Liaison Officer
EMV	Emergency Management Victoria
Energy Safe	Energy Safe Victoria
ESC	Essential Services Commission
ESI	Electricity Supply Industry
ESMS	Electricity Safety Management Scheme
Energy Safe	Energy Safe Victoria
FFU	Fault Follow up
FMC	Field Mobile Computing
FOLCB	Fused Overhead Line Connection Box
FRV	Fire Rescue Victoria
FSD	Fused Switch Disconnect
GIS	Geographic Information System
HBRA	Hazardous Bushfire Risk Area
HV	High Voltage
HVC	High Voltage Customers

Acronyms, abbreviations	Definition
HVCC	High Voltage Covered Conductor
ID[ID]	Incorporated Document
ICT	Initial Capacity Test
INMS	Integrated Network Management System
IRU	Ignition Risk Unit
IS	In-service
L	Deepdene 66 kV line
LiDAR	Light Detection and Ranging
LBRA	Low Bushfire Risk Area
MAPPC	Mutual Aid Plan Planning Committee
MEC	Major Electricity Company
NAO	Network Availability Officer
NS	No-service
NZS	New Zealand Standard
OMS	Outage Management System
P1	Priority 1
P2	Priority 2
P3	Priority 3
P42	Priority 42
PAL	Powercor
PEL	Private Electric Line (previously POEL – Private Overhead Electric Line)
PINS	Pole Inspection Orders
PL	Plan
PN	Priority Notification for Information
PO	Policy
POPP	Priority Opportunistic
PR	Procedure
REC	Registered Electrical Contractor
RESI	Resistograph
RCM	Reliability Centred Maintenance
RTO	Registered Training Organisation
SCC	State Control Centre
SDD	Sound, Dig, Drill
SES	State Emergency Service
SRCE	Source
ST	Standard
TFB	Total Fire Ban
TSTS	Templestowe Terminal Stations

Acronyms, abbreviations	Definition
VESI	Victorian Electricity Supply Industry
VMS	Vegetation Management System
VP1	Vegetation Priority 1
VP2	Vegetation Priority 2
ZSS	Zone Substation

Appendix A: Total Fire Ban Day Action Plan

Refer separate document Total Fire Ban Day Action Plan (CP-PL-0009.1) [ID].

Appendix B: BFM Program Milestones

Table 15: BFM Program Milestones

Item No.	BFM Milestone Description	Activity	Responsible Officer/Business Stream	Completion Date
1	Submit Electric Line Clearance (Vegetation) Management Plans to Energy Safe.	Management Plan submission is a regulatory requirement.	Vegetation Manager	As required
2	Conduct the annual Post Summer Season Debrief.	Review previous fire season.	Head of Network Risk and Performance	31 May
3	Conduct annual internal audit of the BFM Plan.	Identify areas for auditing and undertake audit	Head of Audit Services	30 September
4	Submit BFM Plan to Energy Safe.	BFM Strategy plan submission is a regulatory requirement.	Network Risk and Assurance Manager	As required
5	Complete mail out to CitiPower PEL customers.	Letters will raise awareness / importance of PEL maintenance works with PEL owners.	Network Risk and Assurance Manager	30 November
6	Conduct the annual Pre Summer Season Briefing.	Review the upcoming fire season preparedness	Head of Network Risk and Performance	30 November

Appendix C: Vehicle Fire Equipment & Vehicle Movement

C.1 Vehicle Fire Equipment & Vehicle Movement

Declared Fire Danger Period & Total Fire Ban (TFB) Days

This applies for all CitiPower personnel including contractors and sub-contractors when travelling off-road. All drivers are to be advised that vehicles with hot exhausts entering grassed areas can initiate fires.

Definition of Off-road

"Vehicle travelling off a formed roadway or a paved or gravel surface".

During "Declared Fire Danger Periods" - for all travel on non-formed roadways or surfaces other than paved or gravel surfaces, a risk assessment must be undertaken.

The following checks should be included:

- Vehicle Clearance – Check that grass and other combustible material will not come in prolonged contact with the vehicle exhaust system whilst accessing/leaving the work site.
- Vehicles should be checked to ensure they are fitted with an efficient exhaust silencing device.
- Vehicles should be checked to ensure no grass or other combustible material is trapped on or near the exhaust system, both before going off-road and before leaving the work site.
- Vehicles must carry the prescribed fire suppression equipment prescribed in the *Country Fire Authority Regulations* i.e. At least one knapsack spray pump or stored pressure fire extinguisher of at least 9 litres capacity. (See below for more details).
- Check the worksite before leaving, looking for any signs of possible ignition.

Other Items for Consideration:

- During "Declared Fire Danger Periods", off–road activities should be limited as much as possible.
- Vehicles with greater ground clearance i.e. 4-wheel drive vehicles, are preferred to be used when travelling off-road.
- Drivers are to use already formed roads/tracks where possible, to access the work site, to limit contact with combustible material (If risk assessed as safe to do so).
- At the work site, park vehicles in areas where there is the least amount of combustible fuel.

C.2 Total Fire Ban Days (TFB)

On Total Fire Ban (TFB) days - off-road activity should be restricted to emergency/fault situations and other works necessary to maintain the network, which is risk assessed as safe to undertake.

Requirements applicable to the following items are described in procedure Minimising Fire Start Risk on Total Fire Ban Days (PR-0016):

- Fire Fighting Equipment; and
- Non-Vehicular Heat Engines (Examples: Generators, Hoggers, Chainsaws etc.)

Appendix D: Inspecting Powerlines on your Property Brochure

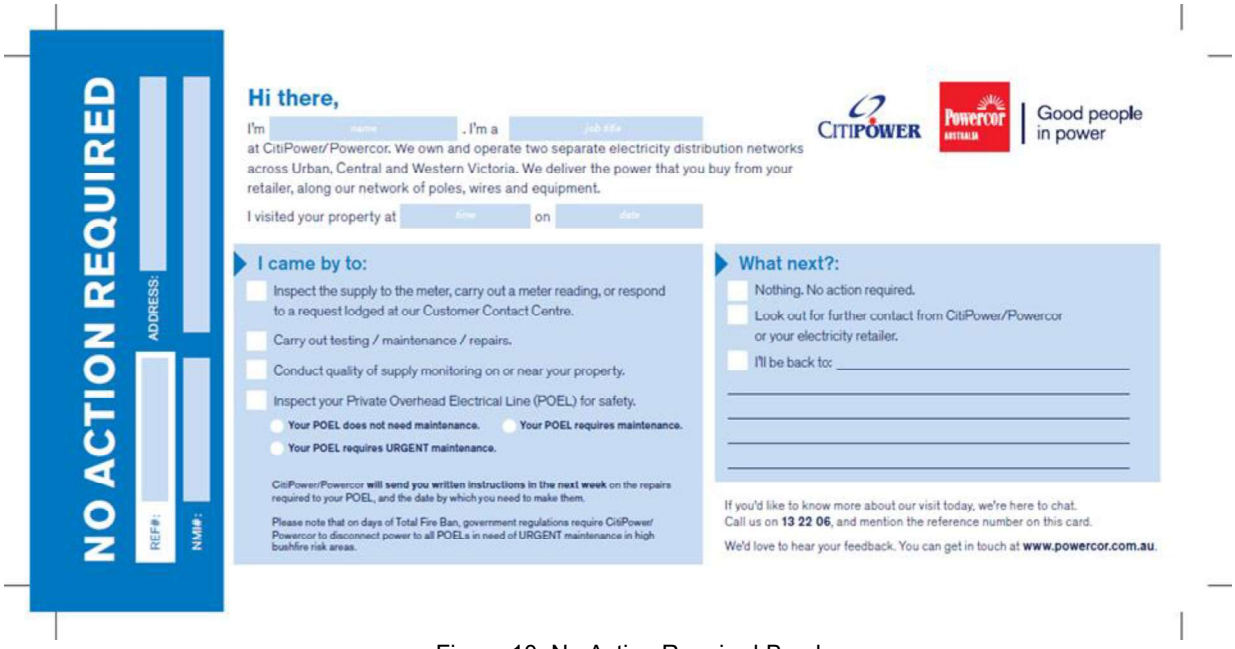


Figure 10: No Action Required Brochure

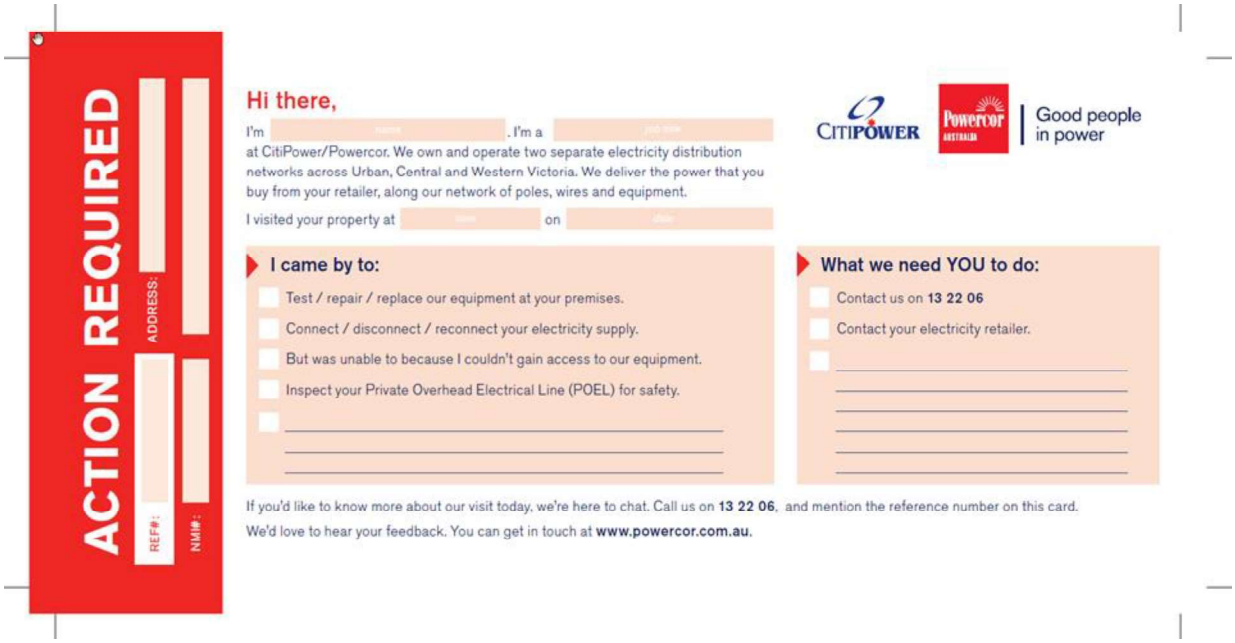


Figure 11: Action Required Brochure

Appendix E: PEL Inspection Notification Letter

(Insert date)

(Insert Customer Name)
(Insert Customer Address)
(" " " ")

Supply Address:- (Insert Supply Address)

Account Number:- (Insert Account Number)

NOTICE OF INSPECTION

Dear Sir/Madam,

CitiPower and Powercor Australia LTD is inspecting assets in your area as part of our routine 5-year inspection cycle.

In accordance with Section 113F (2) of the Electricity Safety Act 1998, please be advised that on or about *(Insert date)* our asset inspector will inspect all private electric lines above the surface of land on the property you occupy, except for those parts of the lines that are installed after the point at which they are connected to a building or other structure (not including a pole).

Our asset inspector requires safe, unhindered access to these lines for the purpose of this inspection. If the asset inspector is unable to gain safe, unhindered access to your private electric line, we will provide you with written advice that a time and date for inspection must be arranged.

The inspection may reveal that defects exist, and maintenance is required on a private electric line on the property that you occupy. If this is the case, we will provide you with written notice of the
maintenance work required to be carried out.

Please contact CitiPower and Powercor's Customer Contact Centre on telephone 132206 to speak with Kimberley Sabien-Stratton if you have any queries.

Carla Grech
Team Leader - Asset Inspection Planning and Scheduling
CitiPower Pty Ltd and Powercor Australia Ltd

40 Market Street, Melbourne VIC Australia Telephone: (03) 9683 4444 Facsimile: (03) 9683 4499 Postal Address: Locked Bag 14090, Melbourne VIC 8001 Australia
CitiPower General Enquiries: 1300 301 101 www.citipower.com.au ABN 76 064 651 056
Powercor General Enquiries: 13 22 06 www.powercor.com.au ABN 89 064 651

Figure 12: PEL Inspection Notification Letter

Appendix F: CitiPower Asset Maintenance Compliance Measure

Asset Maintenance Compliance Measure

An example of how the Asset Maintenance Compliance Measure (HBRA) is calculated in Table 16.

Table 16: Asset Maintenance Compliance Measure - HBRA

Asset Index Category	Description of Measure	HBRA		
		Items NOT completed by procedure date	Items completed by procedure date plus items not completed by procedure date	AMCM by Category (for reporting period)
Asset Inspection	Total no of assets inspected	0	11	100.00%
Asset Defects (P42)	Number of P42 Defects	0	0	100.00%
Asset Defects (P2)	Number of P2 Defects	0	0	100.00%
Total AMCM				100.00%

An example of how the Asset Maintenance Compliance Measure (LBRA) is calculated in Table 17.

Table 17: Asset Maintenance Compliance Measure - LBRA

Asset Index Category	Description of Measure	LBRA		
		Items NOT completed by procedure date	Items completed by procedure date plus items not completed by procedure date	AMCM by Category (for reporting period)
Asset Inspection	Total no of assets inspected	0	1211	100.00%
Asset Defects (P42)	Number of P42 Defects	0	12	100.00%
Asset Defects (P2)	Number of P2 Defects	0	224	100.00%
Total AMCM				100.00%

Appendix G: Bushfire Mitigation Plan Documents

Table 18 lists the documents that CitiPower will not change without first seeking Energy Safe approval and are the only documents that form part of the BMP. Documents referenced within these documents do not form part of the Bushfire Mitigation Plan.

Documents which are Incorporated Documents have been marked with a superscript [ID].

Table 18: Bushfire Mitigation Plan Documents

Count	Document Title	Document No.	Revision Number	Date
1.	Maintenance Defect Priority Standard [ID]	CPPAL-ST-5060.01	4	29 July 2026
2.	Maintenance Procedure - Poles and Towers [ID]	PR-5062.01	2	28 May 2026
3.	Total Fire Ban Day Action Plan [ID]	CP-PL-0009.1	2	2 June 2026

Appendix H: Bushfire Mitigation Policy

Bushfire Mitigation Policy

CitiPower, Powercor and United Energy are committed to providing our customers with **safe, reliable and affordable** supplies of electricity and network services through the application of our Integrated Network Management System. We are committed to bushfire mitigation activities and making our communities safer. Therefore, we design, construct, commission, operate, maintain and decommission the network to minimise as far as practicable the **bushfire danger** arising from the electricity network.

We will achieve our commitment by adopting the following principles:

- **Minimise fire ignition** risks as far as practicable.
- Apply a **risk-based approach** to optimise the management and development of our network and systems.
- **Comply** with all relevant legislative and regulatory requirements as well as Australian and industry standards and any other requirements to which we subscribe.
- Continuously improve our management systems and activities by **embracing innovation and technology** to enhance our reputation, leading the industry in adopting and promoting network management practices where it makes sense to do so.

We meet these important commitments by conducting the following activities:

- **Monitor and evaluate** appropriate metrics to effectively manage network performance.
- Focus on **reducing** the number of network fire risk **incidents** and their **consequence**.
- Ensure that **developments** having a relevance to fire risk reduction are adequately **supported.**
- Work with our communities and other agencies to ensure a **coordinated approach** to fire risk management.
- Maintain an accepted **bushfire mitigation plan.**

We strive for excellence in everything we do and are always **accountable** for our own performance including the management and operation of our network to achieve the commitments outlined in this Policy.

This Policy is to be read in conjunction with the **Network Management Policy** and the **Network Safety Policy.**

Glen Thomson
General Manager Electricity Networks

October 2025
PO-0003

Figure 13: Bushfire Mitigation Policy

Appendix I: Revision History

Table 19: Revision History

Rev No.	Revision Summary	Date
1	Initial Version	Dec 3, 2024
1.1	Revisions responding to ESV's evaluations of v1 dated 25 June 2025 and any PAL BMP ESV evaluation response dated 13 May, 18 June, 18 July, 22 July and 31 July 2025 that may also be applied across the CP BMP. • **Section 1.1 –** update BMP Emergency contact number • **Section 1.2 –** Included regulation 15 Exemptions in table • **Section 4.1 –** Updated figure 2 to align with latest framework activities • **Section 4.2 –** Updated figure 3 CitiPower Network with 6.6kV line assets and shared 66kV assets • **Section 4.3 –** Amended to include reference to HBRA assets • **Section 5 –** Included description of BMC governance and oversight activities. • **Section 6 –** Included statement regarding communication of changes to maintenance documents. • **Section 6.1 –** Included paragraph to clarify scope of inspection and assessment for network assets. • **Section 6.1.1**: o Updated 3-year full inspection and 1-year ACS inspection commencement date and full compliance date o Updated table to include HBRA inspection frequencies o Under full inspection included inspection of above-ground assets and inspection on site. o Updated aerial view for crossarm condition to include other defects were identified in photo. • **Section 6.1.2 –** Included references for clearance assessments and included reference to HBRA inspection frequencies • **Section 6.1.3 –** Included clarification of unserviceable pole serviceability condition assessment using 4-point method. • **Section 6.1.6 –** Provided detail to clarify the approach for the delivery of the line condition observation program. • **Section 6.2:** o Amended to describe the distribution network assets to align with regulation o Added reference to recording defects in SAP. • **Section 6.3 –** Amended to clarify the priority trouble order assignment and timeframes • **Section 6.5 –** Amended PEL steel poles inspection requirements • **Section 6.7 –** General update for developing new technology • **Section 6.8 –** minor amendments • **Section 6.10** - General update and included additional detail relating to Asset Inspector VESI training, National qualifications and competency • **Section 6.12 –** included reference to CitiPower website for REC information. • **Section 6.14 –** includes reference to Total Fire Ban Day Action Plan • **Section 6.15 –** General additions	26 August 2025

Rev No.	Revision Summary	Date

	• **Section 8 –** included references to ESV reporting guidelines
	• **Section 9**:
	  ○ General update and inclusion of measures where available
	  ○ 9.1 Updated to include key measures for AMCM and how monitor, review and report.
	  ○ 9.2 Update for ground and asset fires, including F-Factor and IRU monitoring and review.
	• **Section 9.3 –** Updated to provide further detail for Asset Investigation approach for fire ignition including analysis and reporting.
	• **Section 10.1 –** Included detail to outline the role of the Bushfire Mitigation Committee and defining the BFM Status and AMCM reporting.
	• **Section 10.2 –** Amended to include Audit program details such as volumes, coverage, frequency, scope and auditor competence for Asset Inspection, Maintenance programs and Vegetation.
	• **Section 11 –** General update to strengthen commitment to BMP reviews
	• **Section 12 –** Updated reference documents
	• **Appendix A –** New section for Total Fire Ban Day Action Plan
	• **Appendix E –** Updated to reflect current PEL notification letters example.
	• **Appendix F –** New section showing AMCM calculation and report
	• **Appendix G –** updated Incorporated Documents revisions
	• **Appendix H –** New section included updated Bushfire Mitigation Policy (PO-0003)	

1.2	Revision includes any additional feedback from ESV's Powercor Safety Case Evaluation Panel evaluation for v11.1 dated 10 September 2025, that may also be applied across the CP BMP. **Section 6 –** Updated to include reference to ESA 1998 for BMP revisions **Section 6.1.1 –** minor update to transition plan description for 3-year full inspection and 1-year ACS inspection **Section 8 and 9.2 –** Updated ESV/AER and cintellate Incident Reporting document reference to new document PR0018 (Tri branded) **Section 9.3 –** Updated to reformat sentence structure **Appendix G –** included Total Fire Ban Day Action Plan (CP-PL-0009.1) [ID] document approval date	Dated: Sept 29, 2025
1.3	Revisions responding to Energy Safe CP BMP evaluation assessment received dated 4 April 2026. General format, reference and information updates **Section 4.3 –** updated to include LBRA fire ignition lower risk leading to bushfire **Section 5 –** minor updates to include monitoring LBRA performance **Section 6.1 –** updated to provide commitment to inspection and maintenance requirements for poles and towers **Section 6.1.1 –** minor update to transition plan description for 3-year full inspection and 1-year ACS inspection **Section 6.1.3 –** included LBRA Serviceability Index application **Section 6.1.5 –** updated to clarify distribution line 3-yearly inspection and included ZSS thermographic inspections **Section 6.6 –** removed reference to PEL inspection variations	Dated: Jun 4, 2026

Rev No.	Revision Summary	Date
	Section 6.7 – updated to include commitment t submitting a revised BMP for inclusion of new technology **Section 6.8 –** new section Asset Replacement Programs, confirming no proactive asset replacement preventative strategies and programs identified **Section 6.9 –** minor updates to: • reinforce commitment to inspect and maintain identified conductor clearance defects. • clarify recorded defects and use of priority ratings in LBRA and for leaning poles relating to conductor clearance inspections. **Section 6.11 –** minor updates clarify what is meant by "as required" and "if deemed appropriate" **Section 8 –** updated to include reference to Energy Safe Incident reporting and site preservation guidelines and commitment to investigate asset failure fire starts **Section 9.1 –** inclusion of AMCM (LBRA) performance reporting **Section 9.2 –** updated to include fire events, trends and fire asset categorisation information and graphs, AFAP assessment and reference to controls / programs **Section 9.3 –** updated to: • reference new Asset Failure Investigation and Reporting Procedure (PR-5060.01) • outline the methodology that will be used for the investigations • provide commitments for implementing investigation recommendations, close out and post implementation reviews • definitions updated for failure type in section 13, table 12 **Section 10.1 –** updated to clarify LBRA reporting and monitoring commitments, AMCM (LBRA) reporting, commitment to maintenance defect rectification and Energy Safe reporting **Section 11 –** include statement confirming a revised BMP will be submitted to Energy Safe for acceptance of the changes and amendments to the BMP **Appendix F –** updated to include the AMCM (LBRA) measure **Appendix G –** updated incorporated document revision numbers and dates	
1.4	Revisions responding to Energy Safe CP BMP evaluation assessment received dated 29 July 2026. General format, reference and information updates **Section 1.2 –** updated to include overarching clause relating to BMP revisions and resubmissions **Section 6.1 –** new section to outline fire start performance analysis, identify key events and determine preventative strategies and programs. Information moved from section 9.2, and included external contact fire start performance. **Section 6.2.1 –** updated to remove full inspection transition program as now compliant and clarify previous AC Serviceable inspection programs **Section 6.2.4 –** updated to clarify the LBRA serviceability condition assessment approach for unserviceable poles **Section 6.2.5 –** updated removing reference describing thermographic multi-year inspection periods **Section 6.3 –** removed reference to 'distribution network assets' replacing with 'supply network'	Aug 21, 2026

Rev No.	Revision Summary	Date
	Section 6.8 – updated to remove reference to Materiality (material and immaterial); BMP revision and resubmission requirements; and Smart meter detection program. **Section 6.12 –** amended to include thermographic training and competencies **Section 9.2 –** relocated reference to fire start performance to new section 6.1. **Section 9.3 –** removed reference to class 3 & 4 incidents, and reformatted asset failure descriptions **Section 11 –** updated to remove reference to Materiality (material and immaterial); and include statement for BMP revision and resubmission requirements. **Section 13 –** updated table to include further terms and definitions	