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2021-2026 Electric Line Clearance (Vegetation) Management Plan

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Head of Vegetation Management
Document No: CPPAL & UE 2021-2026 ELCMP V2.2

June 2021

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1. Plan Introduction

1.1. Plan Approvals

Prepared By March 2021
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Reviewed By March 2021
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Approved By March 2021
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Document Revision History			
Version No.	Revision Summary	Author	Date
1	Draft 2020-2021 ELCMP, based on the 2019-2020 ELCMP	Mike Tshaikiwsky / Kelly Imber	March 2020
1.4	2020-2021 ELCMP v 1.3 revised following ESV evaluation	Mike Tshaikiwsky / Kelly Imber	June 2020
2.0	2021-2026 ELCMP v 2.0 to comply with Electricity Safety (Electric Line Clearance) Regulations, 2020	Mike Tshaikiwsky / Hugh Vickers-Willis	March 2021
2.1	2021-2026 ELCMP v 2.0 revised following ESV evaluation	Mike Tshaikiwsky / Hugh Vickers-Willis	June 2021
2.2	2021-2026 ELCMP v 2.1 revised following ESV evaluation	Mike Tshaikiwsky / Hugh Vickers-Willis	June 2021

1.2. Electric Safety (Electric Line Clearance) Regulations 2020 compliance information

The table below cross references the specific [Electric Safety \(Electric Line Clearance\) Regulations 2020](#) requirement, Part 2 Prescribed Provision 9 Preparation and submission of management plans, and Schedule 1 of the Code of Practice to the appropriate section of the ELCMP.

Item Ref	Regulation Requirement	ELCMP Reference
Part 2; Prescribed Code of Practice and related provisions; 9 - Preparation and submission of management plans		
4(a)	The name, address and telephone number of the responsible person	Section 1.4 - Responsible persons
4(b)	The name, position, address and telephone number of the individual who was responsible for the preparation of the management plan	Section 1.4 - Responsible persons
4(c)	The name, position, address and telephone number of the persons who are responsible for carrying out the management plan	Section 1.4 - Responsible persons
4(d)	The telephone number of a person who can be contacted in an emergency that requires clearance of a tree from an electric line that the responsible person is required to keep clear of trees	Section 1.4 - Responsible persons
4(e)	The objectives of the management plan	Section 2 - ELCMP objectives
4(f)	The land to which the management plan applies (as indicated on a map)	Section 3.1 Powercor network geographic coverage Section 3.2 CitiPower network geographic coverage Section 3.3 United Energy network geographic coverage
4(g)	Any hazardous bushfire risk areas and low bushfire risk areas in the land referred to in paragraph (f) (as indicated on the map)	Section 3.1 Powercor network geographic coverage Section 3.2 CitiPower network geographic coverage Section 3.3 United Energy network geographic coverage
4(h)	Each area that the responsible person knows contains a tree that the responsible person may need to cut or remove to ensure compliance with the Code and that is – (i) indigenous to Victoria; or (ii) listed in a planning scheme to be of ecological, historical or esthetic significance; or (iii) a tree of cultural or environmental significance	Section 3.4 Indigenous Vegetation Coverage Section 3.4.1 Important vegetation coverage Reference B: Tree Management Plans
4(i)	The means which the responsible person will use to identify a tree of a kind specified in paragraph (h)(i), (ii) or (iii)	Section 3.4.2 Identification of Important Vegetation
4(j)	The management procedures that the responsible person will adopt to ensure compliance with the Code, which – (i) must include details of the methods to be adopted for managing trees and maintaining a minimum clearance space as required by the Code; and (ii) for the purposes of determining a minimum clearance space in accordance with Division 1 of Part 3 of the Code – (A) must specify the method for determining an additional distance that allows for conductor sag and sway; and (B) may provide for different additional distances to be determined for different parts of an electric line span	(i) Section 4.1 Inspection prescribed (ii) AS 7000 Overhead Line Design
4(k)	The procedures to be adopted if it is not practicable to comply with the requirements of AS 4373 Pruning of amenity trees while cutting a tree in accordance with the Code	Section 4.2.3 Selection of method for maintaining clearance space

Item Ref	Regulation Requirement	ELCMP Reference
4(l)	A description of each alternative compliance mechanism in respect of which the responsible person has applied, or proposes to apply, for approval under clause 31 of the Code	Section 4.2.4 Alternative Compliance Mechanisms
4(m)	The details of each approval for an alternative compliance mechanism that- (i) the responsible person holds; and (ii) is in effect	Noted
4(n)	A description of the measures that must be used to assess the performance of the responsible person under the management plan	Section 6 ELCMP Performance Monitoring and Auditing
4(o)	Details of the audit process that must be used to determine the responsible person's compliance with the Code	Section 6 ELCMP Performance Monitoring and Auditing
4(p)	The qualifications and experience that the responsible person must require of the persons who are to carry out the inspection, cutting or removal of trees in accordance with the Code and the Electricity Safety (General) Regulations 2019	Section 5 Training
4(q)	Notification and consultation procedures, including the form of the notice to be given in accordance with Division 3 of Part 2 of the Code	Reference E: Notification and Consultation
4(r)	A procedure for the independent resolution of disputes relating to electric line clearance	Section 4.4.2 Dispute Resolution
4(s)	If Energy Safe Victoria has granted an exemption under regulation 11 relating to a requirement of the Code, details of the exemption or a copy of the exemption	Reference F: ESV Exemptions

Part 2; Prescribed Code of Practice and related provisions: 10 - Obligations relating to management plans

(6)	The responsible person must ensure that a copy of the current management plan is published on the responsible person's Internet site.	Section 4.4.1 - Available Information and Publications
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Code of Practice Compliance information

1	Definitions	Noted
2	Meaning of minimum clearance space	Noted
3	Responsible person must keep minimum clearance space clear of trees	Reference G: Vegetation Management Policy
4	Exception to minimum clearance space for structural branches around insulated low voltage electric lines.	Section 3.4.4 Managing exception trees
5	Exception to minimum clearance space for small branches around insulated low voltage electric lines	Section 3.4.4 Managing exception trees
6	Exception to minimum clearance space for small branches growing under uninsulated low voltage electric lines in low bushfire risk areas	Section 3.4.4 Managing exception trees
7	Exception to minimum clearance space for structural branches around uninsulated low voltage electric lines in low bushfire risk areas	Section 3.4.4 Managing exception trees
8	Owner or operator of transmission line must manage trees around minimum clearance space	NIL transmission lines

1	Definitions	Noted
9	Responsible person may cut or remove hazard tree	Section 4.1.3 Hazard tree program
10	Cutting of tree to comply with Standard	ELCMP references compliance with AS 4373 Pruning of amenity trees throughout
11	Cutting or removal of indigenous or significant trees must be minimised	Section 3.4.2: Identification of Important Vegetation
12	Cutting or removing habitat for threatened fauna	Section 3.4.2: Identification of Important Vegetation
13	Restriction on timing of cutting or removal if notification is required	Section 4.4. Notification and Consultation Reference E: Notification and Consultation
14	Restriction on urgent cutting of trees	Section 4.2.2. Urgent Cutting/Removal
15	Restriction on urgent removal of trees	Section 4.2.2. Urgent Cutting/Removal
16	Responsible person must provide notification before cutting or removing certain trees	Section 4.4. Notification and Consultation
17	Responsible person must publish notice before cutting or removing certain trees	Reference E: Notification and Consultation
18	Responsible person must consult with occupier or owner of private property before cutting or removing certain trees	Section 4.4. Notification and Consultation
19	Notification and record keeping requirements for urgent cutting or removal	Reference E: Notification and Consultation
20	Duty relating to the safety of cutting or removal of trees close to an electric line	Vegetation Management Procedure
21	Duty relating to assisting to determine the allowance for cable sag and sway	Section 4.3 Assistance to responsible persons
22	Duties relating to management procedures to minimise danger	Vegetation Management Procedure
23	Additional distance that allows for cable sag and sway	Section 4.1.2 Inspection to maintain vegetation clear of powerlines Section 4.2.1 Cutting to maintain vegetation clear of powerlines
24	Insulated electric lines in all areas	LiDAR, XUGO software
25	Uninsulated low voltage electric line in a low bushfire risk area	LiDAR, XUGO software

1	Definitions	Noted
26	Uninsulated high voltage electric line (other than a 66,000 volt electrical line) in a low bushfire risk area	LiDAR, XUGO software
27	Uninsulated 66,000 volt electrical line in a low bushfire risk area	LiDAR, XUGO software
28	Uninsulated low voltage and high voltage electric lines (other than a 66,000 volt electrical line) in a hazardous bushfire risk area	LiDAR, XUGO software
29	Uninsulated 66,000 volt electric lines in a hazardous bushfire risk area	LiDAR, XUGO software
30	Transmission lines	NIL transmission lines
31	Application for approval of alternative compliance mechanism	Noted
32	Formal safety assessment of alternative compliance mechanism	Noted
33	Approval of alternative compliance mechanism	Noted
34	Amendment of approval	Noted
35	Suspension or revocation of approval	Noted

1.3. ELCMP definitions

Act: Electricity Safety Act 1998.

Affected Person: an owner or occupier (including a person who is responsible for the management of public land).

Consult: Means to provide an adequate opportunity to members of the public, local government and landowners to understand the vegetation works proposed and to seek additional information regarding the proposed works.

ELCMP: Electric Line Clearance Management Plan

Fall tree:

Transmission fall tree: Means a tree, adjacent to the transmission line, that may enter the minimum clearance space around the transmission line.

Distribution fall tree: Means a tree, adjacent to the distribution line, if it were to fall, is likely to fall on to, or come into contact with the electric line.

Indigenous Vegetation: Indigenous vegetation means plants, trees, shrubs, herbs and grasses that would have been endemic to its current location before European arrival. Indigenous vegetation excludes plantings, regrowth, vegetation on road reserves, fire breaks and established powerline corridors.

Regulations: Electricity Safety (Electric Line Clearance) Regulations 2020 including any exemptions granted by Energy Safe Victoria.

Service Provider: a Contractor or Sub-contractor engaged through contractual arrangements with either CitiPower, Powercor or United Energy.

Specified person: means the owner or occupier of land in the area of an electric line or the relevant distribution company or relevant transmission company that owns or operates the electric line

Suitably qualified arborist: means an arborist that meets the requirements of the Electricity Safety (Electric Line Clearance) Regulations, 2020

Vegetation Assessor: a person whose qualifications, experience and ongoing training and assessment demonstrate competency in assessing and scoping vegetation near live electrical apparatus. This person determines cutting requirements to confirm compliance for vegetation near live electrical apparatus.

Vegetation Management: the CitiPower, Powercor and United Energy document hierarchy of Vegetation Management Documents, end-to-end business processes, activities and instructional material for implementation of the ELCMP.

Vegetation Management System (VMS): the CitiPower, Powercor and United Energy structured set of data to manage vegetation for compliance to the Electricity Safety (Electric Line Clearance) Regulations and corporate strategy.

1.4. Responsible Persons

Responsibility	Name	Title	Address	Contact Details
ELCMP Responsible Person	Powercor Australia Ltd ABN 89 064 651 109	Electricity Distribution Business	40 Market Street Melbourne, 3000 Post to: Locked Bag 4090 MCMC Vic 8001	Phone: 13 22 06 Email: info@powercor.com.au
	CitiPower PTY LTD ABN 76 064 651 056	Electricity Distribution Business	40 Market Street Melbourne, 3000 Post to: Locked Bag 4090 MCMC Vic 8001	Phone: 13 22 06 Email: info@CitiPower.com.au
	United Energy Distribution PTY LTD ABN 70 064 651 029	Electricity Distribution Business	43-45 Centreway, Mt Waverley Vic 3149	Phone: (03)8846 9807 Email: Mike.Tshaikiwisky@ue.com.au

Responsibility	Name	Title	Address	Contact Details
ELCMP Preparation	Hugh Vickers-Willis	Head of Vegetation Management	40 Market Street Melbourne 3000	Phone: 13 22 06 Email: HVickerswill@powercor.com.au

Responsibility	Name	Title	Address	Contact Details
ELCMP Implementation	Hugh Vickers-Willis	Head of Vegetation Management	40 Market Street Melbourne 3000	Phone: 13 22 06 Email: HVickerswill@powercor.com.au

Responsibility	Name	Title	Address	Contact Details
ELCMP Emergency Contact	Powercor 24 hour			Phone: 13 24 12 www.powercor.com.au
	CitiPower 24 hour			Phone: 13 12 80 www.citipower.com.au
	United Energy 24 hour			Phone 132 099 www.unitedenergy.com.au

2. ELCMP objectives

The objectives of the ELCMP are to inform stakeholders of the;

- standards and practices adopted for tree cutting or removal to keep the whole or any part of a tree clear of electric lines
- management procedures employed to minimise, As Far As Practicable (AFAP), the danger of electric lines causing a fire or electrocution, in a manner that complies with the legislation and achieves the company objectives.

2.1. Preface

This ELCMP has been prepared to meet the requirements of the Electricity Safety (Electric Line Clearance) Regulations.

CitiPower, Powercor and United Energy are committed to continually improving electrical safety and reliability:

- Ensure that the network complies with the Code of Practice for Electric Line Clearance
- Clearly articulate the results of vegetation inspection and clearance to ESV
- Clearly define the vegetation management practices
- Nominate the executive that is responsible for governance of the vegetation management practice
- Demonstrate executive oversight of the vegetation management practice.

CitiPower, Powercor and United Energy remain committed to implementing the Vegetation Management Improvement Program that was established, following the Boston Consulting Group (BCG) review, to deliver step-change improvements in vegetation management. Key improvement included:

- Implement leading practices in vegetation management
- Improve vegetation management processes (controls)
- Improve data management, and governance
- Ensure that all staff have the functional skills and competency required
- Improve the contract management, and field validation processes
- Improve the LiDAR controls, and the ground-based data collection and processing processes
- Improve vegetation program planning, structure, processes, systems, responsibilities, and reporting
- Establish a governance committee to oversee the delivery of improvements in electric line clearance

2.2. Vision

The CitiPower, Powercor and United Energy vision is to minimise the risk to the community and the environment arising from the interaction of trees and powerlines.

2.3. Values

The vision is supported by strict attention to our values:

- Live safely
- Improve our business
- Be customer and community minded
- Succeed together
- Be the best we can be

2.4. Mission

Our mission is to maintain the vegetation minimum clearance space for the period of the cutting cycle, and carry out the vegetation management activities with due attention to:

- Minimising the risk of fire starts
- Ensuring public safety
- Ensuring the security of private property
- Ensuring continuity of supply
- Delivering a quality service
- Ensuring electrical safety
- A commitment to work place safety
- Responsible environmental management

- Minimising the cost to the community
- Consultation, and notification

2.5. Vegetation Management Team Structure

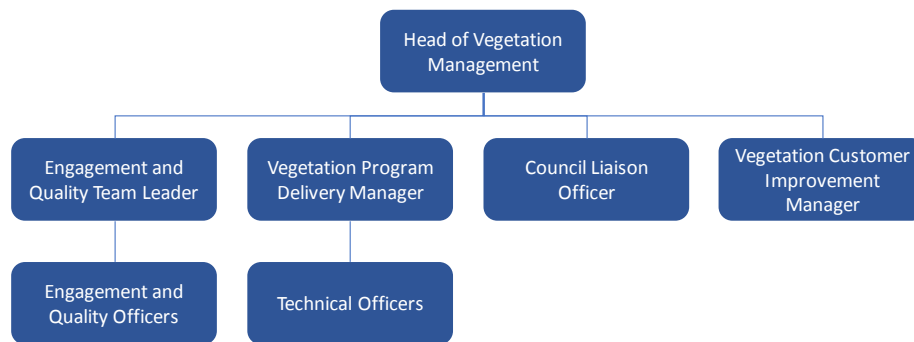


Figure 1: Vegetation Management Team Structure

2.6. ELCMP References

- 2021-2026 Electric Line Clearance (Vegetation) Management Procedure
- CitiPower, Powercor, United Energy Vegetation Reference Guide 2021
- Electricity Safety Act 1998
- Electricity Safety (Electric Line Clearance) Regulations, 2020
- Electricity Safety (General) Regulations 2019
- CitiPower, Powercor and United Energy Customer Action and Response System (CARE)
- Environment Protection and Biodiversity Conservation Act 1999
- Flora and Fauna Guarantee Act 1988 (Vic)
- Victorian Planning Provisions and Planning Schemes
- Pruning of Amenity Trees AS4373
- Powercor Bushfire Mitigation Strategy Plan
- United Energy Fire Prevention Plan

3. Network overview

3.1. Powercor Network Geographic Coverage

The Powercor network area refer [Figure 2: Powercor Geographic Coverage](#) covers the western part of Victoria from the South Australian border (with some connected assets located in South Australia), to the New South Wales border in the North (with some connected assets located in New South Wales), west of the Hume Highway, the western suburbs of Melbourne, to Bass Strait in the South.

The Powercor geographic area includes both Low Bushfire Risk Areas (LBRA) and Hazardous Bushfire Risk Areas (HBRA). The Powercor/ CitiPower Bushfire Mitigation Group consults with CFA annually to ensure that the boundary information is accurate refer [Table 1: Powercor Terrain Factors](#).

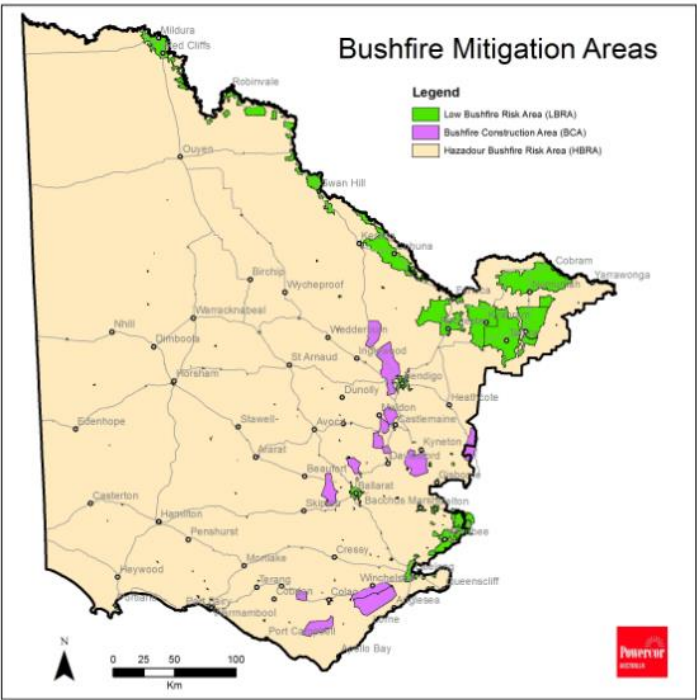


Figure 2: Powercor Geographic Coverage

	Units	(0's) 2020
Rural proportion	%	92
Urban and CBD vegetation maintenance spans	Number of spans	4,948
Rural vegetation maintenance spans	Number of spans	68,656
Total vegetation maintenance spans	Number of spans	73,604
Total number of spans	Number of spans	513,039
Average urban and CBD vegetation maintenance span cycle	Years	2.3
Average rural vegetation maintenance span cycle	Years	2.8
Average number of trees per urban and CBD vegetation maintenance span	Trees	1.7
Average number of trees per rural vegetation maintenance span	Trees	4.8
Average number of defects per urban and CBD vegetation maintenance span	Defects	1.0
Average number of defects per rural vegetation maintenance span	Defects	1.0
Tropical proportion	Spans	-
Standard vehicle access	km	4,224
Bushfire risk	Spans	281,575

Table 1: Powercor Terrain Factors

3.2. CitiPower Network Geographic Coverage

The CitiPower network area refer [Figure 3: CitiPower Geographic Coverage](#) is bound by Port Phillip Bay, Balaclava Road and Toorak Road to the South; Warrigal Road to the East; the Yarra River, Dundas Street and Moreland Road to the North; and the Yarra River, Maribyrnong River and Moonee Ponds Creek to the West.

The CitiPower distribution network includes the Melbourne CBD, and the inner urban suburbs of Melbourne, and as such there are no HBRA areas in the CitiPower geographic area. The CitiPower/Powercor Bushfire Mitigation Group consults annually with the CFA to ensure that the boundary information is accurate refer [Table 2: CitiPower Terrain Factors](#).

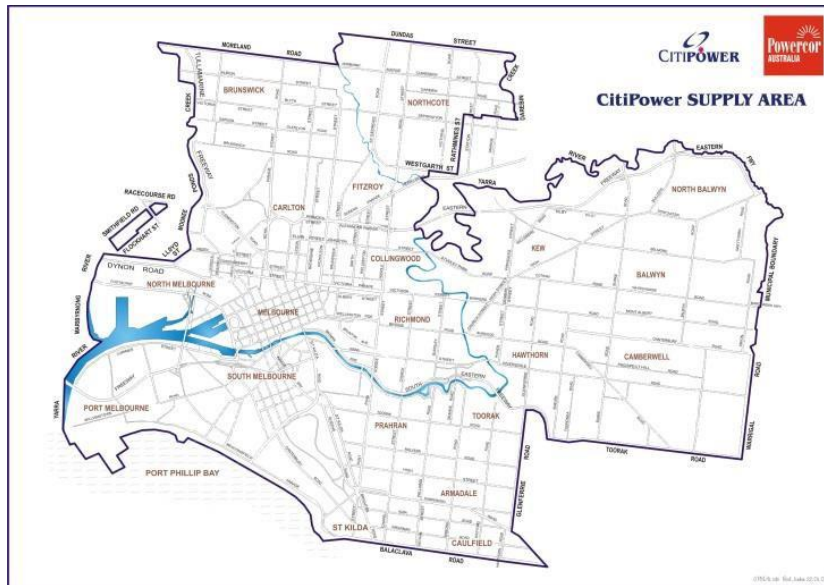


Figure 3: CitiPower Geographic Coverage

	Units	(0's) 2020
Rural proportion	%	-
Urban and CBD vegetation maintenance spans	Number of spans	5,949
Rural vegetation maintenance spans	Number of spans	-
Total vegetation maintenance spans	Number of spans	5,949
Total number of spans	Number of spans	60,883
Average urban and CBD vegetation maintenance span cycle	Years	3.4
Average rural vegetation maintenance span cycle	Years	-
Average number of trees per urban and CBD vegetation maintenance span	Trees	2.3
Average number of trees per rural vegetation maintenance span	Trees	-
Average number of defects per urban and CBD vegetation maintenance span	Defects	1.0
Average number of defects per rural vegetation maintenance span	Defects	-
Tropical proportion	Spans	-
Standard vehicle access	km	-
Bushfire risk	Spans	-

Table 2: CitiPower Terrain Factors

3.3. United Energy Network Geographic Coverage

The northern part of the United Energy network area refer [Figure 4: United Energy Geographic Coverage](#) is located entirely within the Melbourne metropolitan area, bordered by Port Philip Bay and urban areas of Melbourne. The southern part of the network area is a mixture of urban, and rural land. It includes the city of Dandenong, the city of Frankston and the Mornington Peninsula which separates Port Phillip Bay and Western Port Bay, and bounded by Bass Strait.

In conjunction with the CitiPower/Powercor Bushfire Mitigation Group the United Energy Bushfire

prevention team consults annually with the CFA regarding changes to the HBRA boundaries within its network refer [Table 3: United Energy Terrain Factors](#) shown below.

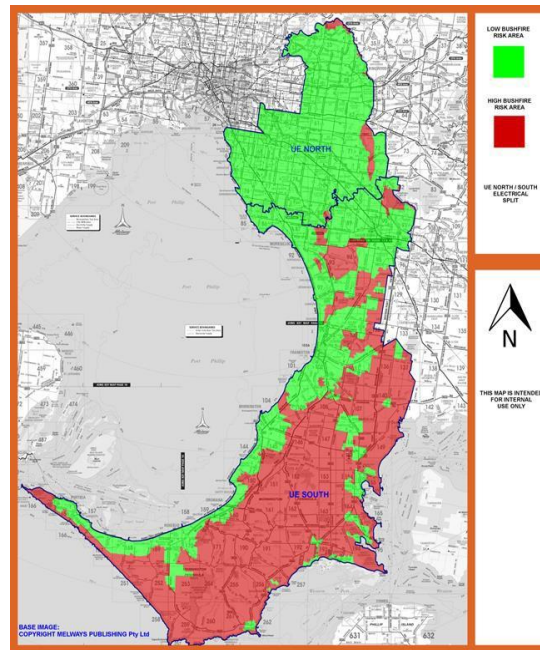


Figure 4: United Energy Geographic Coverage

	Units	(0's) 2020
Rural proportion	%	0
Urban and CBD vegetation maintenance spans	Number of spans	25,593
Rural vegetation maintenance spans	Number of spans	9,108
Total vegetation maintenance spans	Number of spans	34,701
Total number of spans	Number of spans	185,309
Average urban and CBD vegetation maintenance span cycle	Years	4.3
Average rural vegetation maintenance span cycle	Years	3.1
Average number of trees per urban and CBD vegetation maintenance span	Trees	3.3
Average number of trees per rural vegetation maintenance span	Trees	9.7
Average number of defects per urban and CBD vegetation maintenance span	Defects	1.0
Average number of defects per rural vegetation maintenance span	Defects	1.0
Tropical proportion	Spans	-
Standard vehicle access	km	68
Bushfire risk	Spans	18,380

Table 3: United Energy Terrain Factors

3.4. Indigenous Vegetation Coverage

The majority of vegetation within the CitiPower, Powercor and United Energy network areas can be classified as indigenous to Victoria. In addition to the locations and categories, shown in [Figure 5: Powercor Victorian Vegetation Coverage Categories](#), [Figure 6: CitiPower Victorian Vegetation Coverage Categories](#) and [Figure 7: United Energy Victorian Vegetation Coverage Categories](#) below, there are significant areas of remnant indigenous vegetation on road corridors throughout the uncategorized areas (refer Biodiversity Interactive Map DELWP internet version).

More detailed information relating to local vegetation coverage can be found on the Victorian Government Department of Environment, Land, Water and Planning (DELWP) website at the following link: <http://maps.biodiversity.vic.gov.au/viewer/?viewer=NatureKit> which has been overlayed on to the CitiPower Powercor Google Earth Enterprise application.

Local coverage of nationally significant vegetation can be found using the Protected Matters Search tool at

the Australian Government Department of the Environment and Energy website at the following link:
<https://www.environment.gov.au/epbc/protected-matters-search-tool>

CitiPower, Powercor and United Energy will, as far as practicable, restrict cutting or removal of indigenous vegetation to the extent necessary for compliance with the Code and the clearance cycle.

3.4.1. Important Vegetation Coverage

Important Vegetation is considered to include trees and vegetation that is:

- listed in a planning scheme to be of ecological, historical or aesthetic significance
- of cultural or environmental significance as defined in the Regulations (including flora and habitat protected by Victorian law)
- environmentally significant and listed under the Environment Protection Biodiversity and Conservation Act 1999.

The location of important vegetation identified is registered in [Reference B: Tree Management Plans](#) which are individually linked at span level in the vegetation management records. Areas of significant grassland and low lying vegetation, which may be impacted or damaged in the course of accessing or working on road reserves, private and public land, will also be included in vegetation management records. Important information is identified at the vegetation inspection stage prior to any cutting or removal works and made available directly to the vegetation assessors.



Figure 5: Powercor Victorian Vegetation Coverage Categories



Figure 6: CitiPower Victorian Vegetation Coverage Categories



Figure 7: United Energy Victorian Vegetation Coverage Categories

3.4.2. Identification of Important Vegetation

This section outlines the process employed to ensure that important vegetation located in the vicinity of powerlines is identified, given special consideration and appropriate consultation when pruning or clearing of the vegetation is proposed. *2021-2026 Electric Line Clearance (Vegetation) Management Procedure: Section 2 Conduct vegetation inspection and allocate scope notify tasks* is used to identify important vegetation.

CitiPower, Powercor and United Energy will determine the location of important vegetation for special consideration by consulting government records, including;

- The Victorian Heritage Register <http://vhd.heritagecouncil.vic.gov.au/>
- The Victorian Aboriginal Heritage Register <https://w.www.vic.gov.au/aboriginalvictoria/heritage/heritage-tools-and-publications/victorian-aboriginal-heritage-register.html>
- Department of the Environment, Land, Water and Planning, Flora and Fauna Guarantee Act 1988, Threatened List <https://www.environment.vic.gov.au/conserving-threatened-species/victorias-framework-for-conserving-threatened-species>
- The DEPI Biodiversity Interactive Mapping Website <http://maps.biodiversity.vic.gov.au/viewer/?viewer=NatureKit>
- Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), List of threatened flora, List of threatened ecological communities, List of threatened fauna and the Protected Matters Search Tool website <http://www.environment.gov.au/epbc/about/epbc-act-lists#species>, and
- Council records, including the relevant zoning and overlay controls in the planning scheme. <https://mapshare.vic.gov.au/vicplan/>

CitiPower, Powercor and United Energy have offered to establish tree management plans (TMPs) for each council, listed in *Reference B Tree management plans*. Trees of significance can be individually linked to each council at span level in the vegetation management records. Each plan will include an agreed list of the important vegetation, supplied by the council, and an agreed communication plan for regular engagement with councils. Regular engagement ensures that the councils remain informed of CitiPower, Powercor and United Energy vegetation management programs (including the possible impact on important vegetation). TMPs are amended as required (eg. when important vegetation sites are identified) with the expectation that the councils will support the process.

Vegetation information for CitiPower, Powercor and United Energy electric line clearance staff is recorded in the TMPs and the VMS. The TMPs are not intended to act as a substitute, nor present an alternate for the regular CP-PAL UE / council engagement process *2021 – 2026 Electric line clearance (vegetation) management procedure Section 3 Scoping, notifications and consultation*. The ELCMP remains the basis of the standards, practices and procedures adopted by CP-PAL UE to comply with legislation and achieve

company objectives. Council that elect not to establish a TMP are advised and accept that the CP-PAL UE ELCMP becomes the overriding document for management of council designated important vegetation.

Councils are informed monthly of the proposed tree clearing works scheduled in the CitiPower, Powercor and United Energy works program. The council notification and consultation process is detailed in [Section 4.4: Notification and Consultation](#). The process has been employed so that councils and public land managers will provide the specific location of important vegetation that may require pruning or clearing under the regulations. Vegetation that is:

- specified in a relevant planning scheme to be of ecological, historical, aesthetic significance
- of cultural or environmental significance as defined in the regulations
- nationally environmentally significant and listed under the Environment Protection Biodiversity and Conservation Act 1999
- the habitat of rare or endangered species.

Pruning/clearing of these trees will only be completed after consultation with the important tree owner regarding vegetation regrowth to minimise the impact on the vegetation.

Pruning/clearing of vegetation will be undertaken outside of the breeding season for fauna habitat listed as either:

- threatened in accordance with section 10 of the Flora and Fauna Guarantee Act 1988
- listed in the Threatened Invertebrate Fauna List with a conservation status in Victoria of "vulnerable", "endangered" or "critically endangered"
- listed in the Threatened Vertebrate Fauna List with a conservation status in Victoria of "vulnerable", "endangered" or "critically endangered";

Where it is not practicable to undertake cutting or removal of the tree outside the breeding season, translocation of the fauna will be undertaken as far as practicable.

Important vegetation located on private property will be managed using the same process as that for vegetation located on public land. Trees that do not meet the criteria for significant trees but have specific management requirements agreed with the tree owner, will have the requirements recorded in the sensitive customer database.

All planned actions will be documented in the council/land manager/CitiPower, Powercor and United Energy [Reference B: Tree Management Plans](#). All trees listed in the planning scheme as being of ecological, historical, aesthetic, cultural or environmental significance will be inspected by a suitably qualified arborist with the vegetation data and advice recorded in the VMS. Tree removal shall only proceed following the advice of a suitably qualified arborist that cutting the tree to make it compliant would render the tree unhealthy or unviable.

It is not practical to include a map showing the locations of important vegetation in CitiPower, Powercor and United Energy regions in the ELCMP. The tree management plans and the Vegetation Management System with its concerned customer database records this information which is made available to vegetation assessors to ensure that important vegetation is identified prior to any clearing works. All Significant Tree information, when provided by councils, is included in the [Reference B: Tree Management Plans](#).

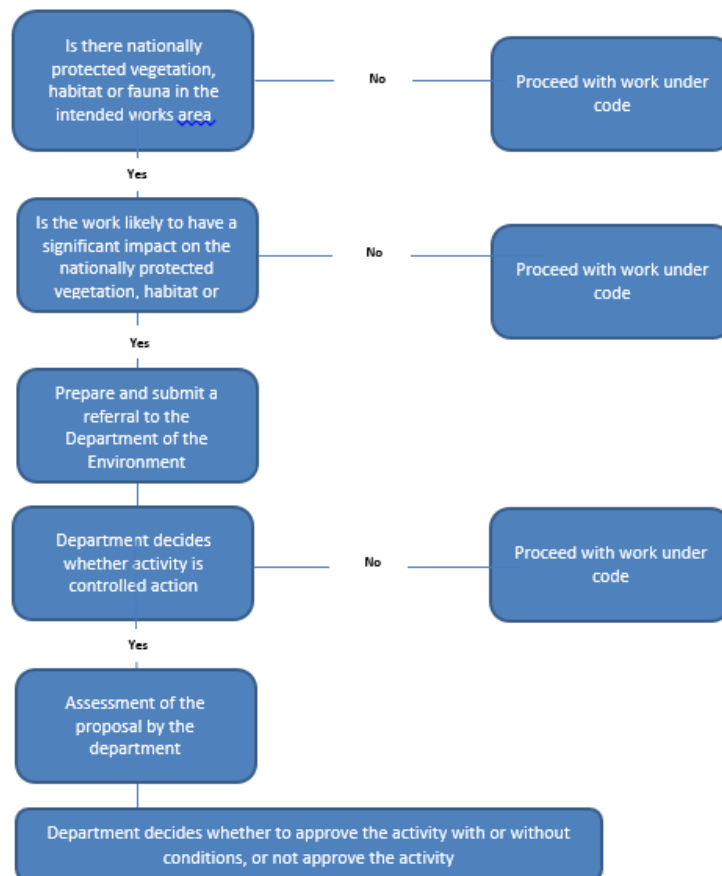


Figure 8: Summary of EPBC Act

Reference D: Assessment and Approval Process for Controlled Actions provides further information regarding assessment and approval of controlled actions.

3.4.3. Impact on important vegetation

In considering the nature and magnitude of the impact, due regard is given to:

- the sensitivity of the environment which will be impacted
- the timing, duration and frequency of the action and its impact
- the on-site and off-site impacts, and the direct and indirect impacts
- the impact on the geographic area
- existing impact from other sources
- the degree of confidence in the impact of the action is known and understood.

Further guidance on assessing the impact is available in the Significant Impact Guidelines 1.1. at: www.environment.gov.au/epbc/publications/nes-guidelines.html

Guidance provided by the Department of the Environment, Land, Water and Planning suggests that most fire prevention activities such as routine utility maintenance, and clearing of a defendable space around a rural asset in accordance with state/territory requirements are unlikely to require approval by the federal government (see Bushfire Management and National Environmental Law <http://www.environment.gov.au/resource/bushfire-management-and-national-environment-law>).

CitiPower, Powercor and United Energy will consider the impact of vegetation clearance on a case by case basis as detailed in *Reference D: Assessment and Approval Process for Controlled Actions*

Where line clearance works are likely to have an impact on important vegetation, a referral will be submitted

to the Department of the Environment, Land, Water and Planning for consideration [Figure 8: Summary of EPBC ACT](#), or refer the proposed activity to the department at compliance@environment.gov.au or 1800 110 395, for consideration. [Reference C: EPBC Act Referral Process](#)

3.4.4. Managing Exception Trees

[2021-2026 Electric Line Clearance \(Vegetation\) Management Procedure: Section 3.2 Manage exceptions and referrals](#) and [Section 3.3 Notify and consult with affected persons](#) outline the processes employed to manage exceptions to the minimum clearance space in accordance with the requirements of the [Electricity Safety \(Electric Line Clearance\) Regulation 2020 Code of Practice Schedule 1 Part 2 clauses 4, 5, 6 and 7](#).

Clause 4: Exception to minimum clearance space for structural branches around insulated low voltage electric lines

CitiPower, Powercor or United Energy may choose to leave a structural branch within the minimum clearance space of an insulated low voltage electric line where the span length is less than 40 metres, and the branch is more than 150mm from the line, or in the case of a span length greater than 40 metres the branch is 300mm from the line, and the branch is wider than 130mm at the point of entry into the minimum clearance space, provided that:

- a suitably qualified arborist has inspected the tree within the last 14 months
- the arborist has advised that the branch does not have any visible structural defect that could cause the branch to fail and make contact with the electric line
- an assessment of the risks posed by the branch has been completed
- measures have been implemented to mitigate any risk
- records are kept for 5 years of; the tree inspection, the arborist's advice, the risk assessment, and the risk mitigation measures employed.

Clause 5: Exception to minimum clearance space for small branches around insulated low voltage electric lines

CitiPower, Powercor or United Energy may choose to leave a branch within the minimum clearance space of an insulated low voltage electric line where the branch is less than 10mm wide where it enters the minimum clearance space, and the branch has been removed from the minimum clearance space within the last 12 months.

Clause 6: Exception to minimum clearance space for small branches growing under uninsulated low voltage electric lines in low bushfire risk areas

CitiPower, Powercor or United Energy may choose to leave a branch within the minimum clearance space of an uninsulated low voltage electric line located in a LBRA where the branch is less than 10mm wide where it enters the minimum clearance space, and the branch is no more than 500mm inside the minimum clearance space, and the point at which the branch originates is below the height of the electric line.

If the branch enters the minimum clearance space around the middle 2 thirds of the span, the span shall be fitted with one conductor spreader if the length of the span is less than 45 metres, or 2 conductor spreaders if the length of the span exceeds 45 metres, provided that:

- a suitably qualified arborist has inspected the tree within the last 14 months
- the arborist has advised that the branch does not have any visible structural defect that could cause the branch to fail and make contact with the electric line
- an assessment of the risks posed by the branch has been completed
- measures have been implemented to mitigate any risk
- records are kept for 5 years of; the tree inspection, the arborist's advice, the risk assessment, and the risk mitigation measures employed.

Clause 7: Exception to minimum clearance space for structural branches around uninsulated low voltage electric lines in low bushfire risk areas

CitiPower, Powercor or United Energy may choose to leave a branch within the minimum clearance space of an uninsulated low voltage electric line located in a LBRA where the branch enters the minimum clearance space around the middle 2 thirds of the span, the span shall be fitted with one conductor spreader if the length of the span is less than 45 metres, or 2 conductor spreaders if the length of the span exceeds 45 metres.

The structural branch no more than 500mm inside the minimum clearance space, and wider than 130mm at the point of entry into the minimum clearance space, provided that:

- a suitably qualified arborist has inspected the tree within the last 14 months
- the arborist has advised that the branch does not have any visible structural defect that could cause the branch to fail and make contact with the electric line
- an assessment of the risks posed by the branch has been completed
- measures have been implemented to mitigate any risk
- records are kept for 5 years of; the tree inspection, the arborist's advice, the risk assessment, and the risk mitigation measures employed.

4. Strategy outline

CitiPower, Powercor and United Energy have implemented a common vegetation management strategy for their networks to maintain the appropriate vegetation clearance distance between the vegetation and overhead powerline assets. The strategy is supported by the [2021-2026 Electric Line Clearance \(Vegetation\) Management Procedure](#). The annual inspection and forecast cutting plan is outlined in [Figure 9: Annual Inspection and Cutting Plan](#).

LBRA	Total number of spans to be inspected (estimated) (100%)	Forecast number of spans with vegetation to be cut (annual)
CP	~61,000	16,000
PAL	~220,000	40,700
UE	~171,000	39,400

HBRA	Total number of spans to be inspected (estimated) (100%)	Forecast number of spans with vegetation to be cut (annual)
CP	-	-
PAL	~288,000	46,700
UE	~19,000	8,850

Figure 9: Annual Inspection and Cutting Plan

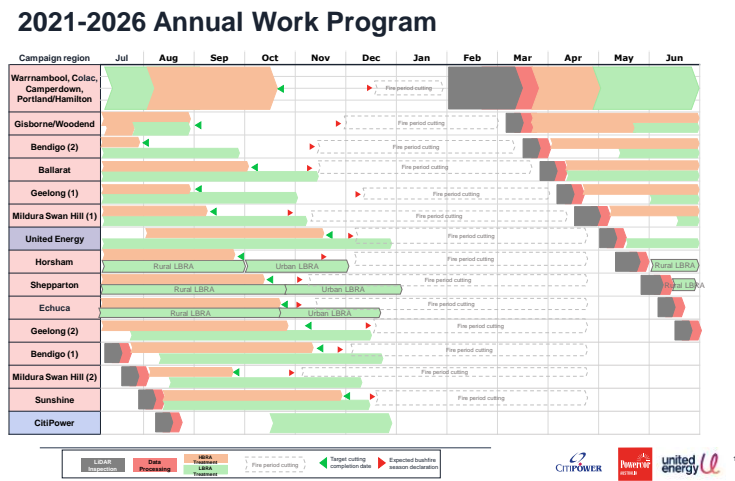


Figure 10: 2021-2026 Annual Work Program

The annual works program is developed each year and outlines the target inspection and cutting timeframes for each campaign region. This plan is subject to change based on find-rates, weather, resource availability and environmental variations from year to year.

A combination of GIS, and VMS data is used to facilitate the vegetation management program. The GIS maintains the key network spatial information, including HBRA and LBRA area boundaries, and the declared area and non-declared area boundaries. The VMS captures the delivery aspects of the inspection and cutting program and is used for reporting of inspection and cutting programs. Spans issued for cutting to field crews include the span details: HBRA/LBRA area, declared/non-declared area, voltage, pole ID and location. A screen shot of the VMS data is shown



Figure 11: Screenshot of VMS

4.1. Inspection Prescribed

4.1.1. Inspection Cycle

[2021-2026 Electric Line Clearance \(Vegetation\) Management Procedure: Chapter 2 Conduct vegetation inspection and allocate scope notify tasks](#) details the vegetation inspection process that facilitates the inspection of the entire CitiPower, Powercor and United Energy networks, both HBRA and LBRA, each calendar year. HBRA inspections are to be completed before the fire season declaration date and LBRA inspections prior to 31 December. The scheduled vegetation inspection program is supplemented by additional inspections including audits by employees, contractors, consultants, and ESV as well as reports from the public, landowners, and government agencies.

LiDAR, a remote sensing device that uses pulsed laser light to measure the distances between conductors and trees, is the primary method used for vegetation inspection. Ground based inspection is used strategically from year to year to collect additional information not available via LiDAR.

4.1.2. Inspection to Maintain Vegetation Clear of Powerlines

This section outlines the process used to inspect and maintain vegetation clear of powerlines, [Refer Figure 12: Vegetation Inspection Cycle](#).

Distribution Network	HBRA - LBRA	Inspection Cycle
Powercor	HBRA	Annual, each calendar year
	LBRA	Annual, each calendar year
United Energy	HBRA	Annual, each calendar year
	LBRA	Annual, each calendar year
CitiPower	LBRA	Annual, each calendar year

Figure 12: Vegetation Inspection Cycle

The following codes shall be assigned to electricity network assets, or spans to indicate that NIL vegetation clearance is required:

- **NCR;** (No Code Required) – A pole and asset which has no exposed overhead powerline connections and therefore no requirement for vegetation clearance. For example a street light pole.
- **NVS;** (Non Vegetated Span) – A span that contains no vegetation or that is unlikely to require cutting within the foreseeable future

2021-2026 Electric Line Clearance (Vegetation) Management Procedure: Sections 2.1 LiDAR vegetation inspection, and 2.2 Ground based vegetation inspection detail the LiDAR and ground-based vegetation inspection processes used to select the method for maintaining the Minimum Clearance Space (MCS). As part of the vegetation management program, an inspection of each span shall be conducted each calendar year to gather the information required. LiDAR vegetation data processing, which includes updating the data in the VMS can take up to 42 days. Upon completion of the data processing, which includes establishing the vegetation cutting priority, vegetation cutting works shall be scheduled in the works program with VP1 work having the highest priority.

Powerlines are subject to sag and sway which are functions of the wind load, the conductor stranding, material, temperature, and tension.

The additional distance that needs to be added to the applicable distance to allow for powerline sag and sway, refer [Section 4.2.1 Cutting to maintain vegetation clear of powerlines](#), is calculated for each span in accordance with the requirements of AS 7000 Overhead line design.

Vegetation regrowth is a function of tree species, the environment, the climate and the vegetation cutting cycle. An allowance for vegetation growth shall be added to the minimum clearance space to determine the vegetation cutting distance refer [Figure 13: Vegetation buffer zone Clearance Spaces](#).

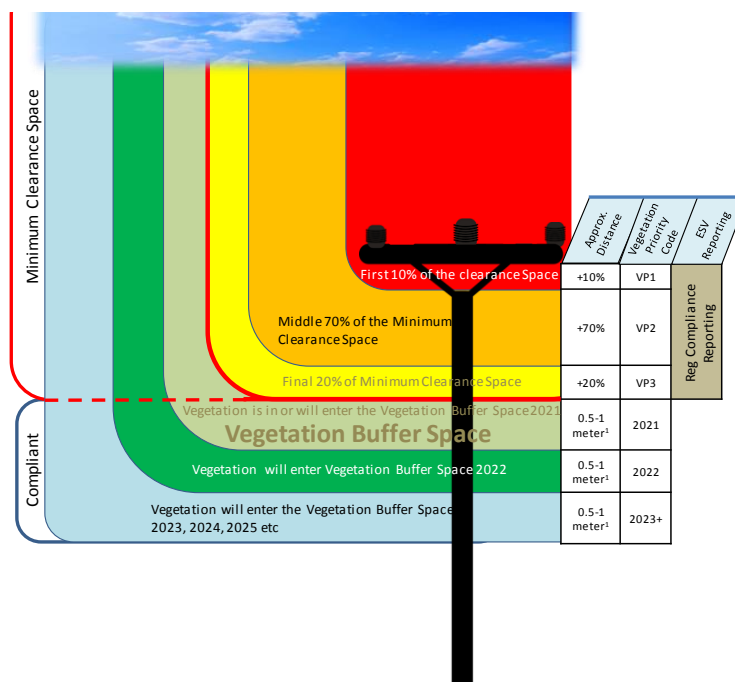


Figure 13: Vegetation buffer zone Clearance Spaces

For the purpose of LiDAR inspections a regrowth of 0.5-1m per year, directly towards the powerline is assumed. This varies for HBRA and LBRA. During ground based inspection, audit and cutting activities greater consideration is given to determining the annual growth rate by including the vegetation species, environmental factors (e.g. Rainfall/water availability), the region, time of year, location relative to the powerlines (e.g. underneath) etc.

Sample field audits by staff and/or sub-contractors provide assurance that the vegetation inspection, and cutting programs facilitate compliance. The information gathered during these inspections, forms the basis for:

- determining the actual vegetation clearing method
- appropriate work force planning and scheduling
- identification and quantification of the equipment and accredited personnel required

- delivering notifications as required by the Code
- consideration of the site specifics: identification of important vegetation, engineering solutions, alternative compliance mechanisms, the public amenity of the site, tree removal, tree replacement with more suitable species, the environmental impact of the proposed works, the extent to which pruning in accordance with [AS4373 Pruning of amenity trees](#) is practicable, past pruning practice, hedging options, pruning for habitat, deferral - negotiate with Affected Persons where vegetation action is to be postponed outside breeding season or involves the engagement of specialists for relocation of fauna species

Following inspection, the vegetation code is updated in the VMS for each span. Reports from the Vegetation database are used to confirm that redundant codes do not persist in the vegetation management database. System reports also confirm that all spans have been allocated a current year code in the VMS. For tracking and analysis purposes the database retains a record of the “year codes” for spans that have not been cut.

Vegetation which is assigned for consideration of an alternative compliance mechanism is treated as disputed work and managed as required by the Code.

In the event a landowner or member of the public requesting works exceeding those determined as being most appropriate, the additional cost may be borne by the individual making the request with an allowance for any avoided maintenance costs.

Vegetation inspection includes the identification of unsuitable species. Information is provided free of charge to the public on the planting and the maintenance of vegetation near powerlines *“Planting Trees near Powerlines – A Guide for Home Gardens and Rural Properties”*. Planting of inappropriate species near powerlines adds to the cost of compliance and increases the risk of future contact between the vegetation and powerlines. Responsible planting strategies are actively promoted with land owners, land managers and councils to ensure that only appropriate species are planted near powerlines.

Where inappropriate species have been identified near or under powerlines, negotiations will be initiated with the Affected Person / Councils to remove the vegetation that may “... otherwise come in contact with an electric line”. Where agreement cannot be reached on the management of the unsuitable species [4.4.2 Dispute Resolution](#) process shall be used.

The vegetation inspection process also monitors compliance with the legislative requirement that an occupier of land is responsible for the keeping the whole or any part of a tree situated on the land clear of a low voltage electric line which solely services that land to ensure land owners and occupiers are aware of their responsibilities.

4.1.3. Hazard Tree Program (including fall trees)

Hazard tree risk assessment is a systematic process used to identify, analyse, and evaluate the risks to the electricity network associated with tree falls or failures.

While not all tree falls or failures can be predicted, many network faults could be avoided by identifying trees that may fail or otherwise impact the electricity network, by implementing mitigation measures to minimise the risks as far as practicable.

A Hazard Tree Program Management Plan and Hazard Tree Assessment Procedure have been developed to assess and manage the threat to the electricity networks posed by hazard and fall trees. The management plan incorporates the following elements:

- **Planning:** development of a three-year tree inspection cycle to identify tree hazards, including fall trees, across the networks
- **Assessment:** assessment of the trees by a suitably qualified arborist using tree health as a key indicator to identify and evaluate potential hazards
- **Action:** develop, prioritise, plan and implement risk mitigation and re-inspection activities
- **Monitoring:** establish clear accountabilities to monitor and report on the progress and findings of hazard tree inspections, and the mitigation activities

Tree Inspections

The tree inspection program aims to identify and mitigate hazard trees, including fall trees, before they adversely impact the electricity network.

CP, PAL and UE contractors, employees, councils and the general public identify and report potential hazard trees. In accordance with the CP, PAL and UE Vegetation Reference Guide, cutting crews are responsible for identifying obvious tree hazards and reporting these to the Vegetation Management Team. The trees identified shall be inspected by a suitably qualified arborist in accordance with the Hazard Tree Assessment Procedure and managed in accordance with the Hazard Tree Program Management Plan.

To manage the higher risk posed by hazard trees in HBRA and BCA areas, additional controls may need to be considered to minimize the risk as far as practicable. In the PAL region, LiDAR inspection data is used to identify potential fall trees which are then scheduled for inspection by a suitably qualified arborist, and prioritised using the criteria below:

- Bushfire Construction Areas (BCA)
- 66kV feeders
- High consequence HBRA feeders (e.g. REFCL program zone substation feeders)
- Feeders with a history of vegetation related faults or incidents

The Vegetation Management Team manages and maintains the register of all hazard tree and fall tree spans as well as the hazards identified.

Spans that have been cut in the past 12 months or have had hazards removed in the previous year are scheduled for inspection in line with the next cyclical inspection for that area.

In accordance with the CP, PAL and UE Hazard Tree Assessment Procedure, a suitably qualified arborist will conduct a ground based visual tree inspection (level 1 assessment) from a location, or locations, within the span where any obvious hazards in the span can best be identified.

Where a potential tree hazard has been identified, the suitably qualified arborist will undertake a Level 2 visual tree assessment in line with the CP, PAL and UE Hazard Tree Assessment Procedure.

Upon completion of the tree inspection the suitably qualified arborist shall assign a risk rating to the tree (see the CitiPower, Powercor and United Energy Hazard Tree Program Management Plan) or assign no risk rating to indicate that no hazards have been identified.

Trees that have been identified as a hazard tree or a fall tree shall be managed in accordance with the CP, PAL and UE Hazard Tree Program Management Plan.

4.1.4. Rectification Timeframes

Rectification timeframes in HBRA during the Fire Danger Period

Where spans in HBRA have been identified as having vegetation inside the MCS, during the declared Fire Danger Period, reasonable steps will be taken to clear the vegetation within the timeframes set out below:

Vegetation Priority Code	Action required
VP1	Vegetation cleared within 24 hours of the date that the VP code was assigned. If not cleared an observer will be posted on a Total Fire Ban day while the FDI is above 30.

VP2	Vegetation cleared within 7 days of the date that the VP code was assigned. No inspection required on a Total Fire Ban day.
VP3	Vegetation cleared within 14 days of the date that the VP code was assigned or re-inspected and risk assessed every 14 days following the date that the VP code was first assigned. No inspection required on a Total Fire Ban day.

Rectification timeframes in HBRA outside the Fire Danger Period

Where spans in HBRA have been identified as having vegetation inside the MCS at times outside the declared Fire Danger Period, reasonable steps will be taken to clear the vegetation within the timeframes set out below:

Vegetation Priority Code	Action required
VP1	Transmission line vegetation cleared within 24 hours of the date that the VP code was assigned. Vegetation cleared within 21 days of the date that the VP code was assigned.
VP2	Vegetation cleared prior to fire season declaration date, or within six months of the date that the VP code was assigned
VP3	Vegetation cleared prior to fire season declaration date, or within six months of the date that the VP code was assigned, or any subsequent re-inspection confirming vegetation remains code VP3

Rectification timeframes in LBRA at all times

Where spans in LBRA have been identified as having vegetation inside the MCS, reasonable steps will be taken to clear the vegetation within timeframes set out below:

Vegetation Priority Code	Action required
VP1	Vegetation cleared within 21 days of the date that the VP code was assigned.
VP2	Vegetation cleared within 6 months of the date that the VP code was assigned.
VP3	Vegetation cleared within 6 months of the date that the VP code was assigned or any subsequent re- inspection confirming vegetation remains code VP3.

Note:

1. Spans shall be coded to the highest Vegetation Priority Code observed within the span.
2. Staff, contractor, public and network safety is UE CPAL highest priority. Where a span with a VP code is inaccessible and/or subject to customer dispute, the risk shall be minimised as far as practicable, and customer objections managed in accordance with [section 4.4.2 Dispute resolution](#). Re-inspection shall occur every 14 days following the date that the VP code was first assigned.
3. Where a span has been identified as being difficult or overhanging in HBRA, and the overhang is not able to be removed within the required timeframe a specific management plan shall be developed for each overhanging span, with a copy of the plan provided to ESV for review

4.2. Code of Practice Cutting Prescribed

This purpose of this section is to define the process to be employed to cut the vegetation clear of powerlines.

Programmed cutting will be actioned following the annual inspection cycle. The cutting will be

prioritised in accordance with the assessed code for the span and the corresponding rectification timeframe detailed in [Section 4.1.4 Rectification timeframes](#).

4.2.1. Cutting To Maintain Vegetation Clear of Powerlines

The aim of the vegetation cutting activity is to maintain a cyclic vegetation cutting program, based on the results of the annual vegetation inspection program.

The aim of vegetation management is to cut the vegetation prior to the vegetation entering the vegetation buffer space, using a two-year cutting cycle. Out of cycle cutting shall be carried out to maintain the minimum clearance space at locations where sufficient cutting cannot be achieved using the two-year cutting cycle.

An additional distance shall be cut to cater for vegetation regrowth, determined by considering the species type and the prevailing conditions to ensure that the vegetation remains outside the minimum clearance space at least until the next planned annual inspection.

The application of appropriate pruning standards may over-ride simplistic calculated re-growth assumptions.

LiDAR software shall be employed to determine, and record in the VMS database, the allowance for sag and sway (SAS) for each individual span, based on conductor type, stringing, span length, temperature and wind speed in accordance with the requirements of [AS 7000 Overhead line design](#).

The Minimum Clearance Space (MCS) shall be determined for each span, and recorded in the VMS database, by adding an allowance for sag and sway (SAS) to the applicable distance (AD), if not already included in the applicable distance: $MCS = AD + SAS$.

LiDAR software shall be employed to determine, and record in the VMS database, the allowance for vegetation regrowth for each individual span, and the total amount of vegetation to be cut for each individual span; (MCS + allowance for re-growth) electronically communicated in the work packages allocated to each field cutting crew.

Quality assessment sample audits shall be carried out to provide assurance that the process has achieved the desired cutting quality (distance).

4.2.2. Urgent Cutting/Removal

Urgent cutting or removal may be undertaken;

- as a result of encroachment or growth that was not anticipated
- as a result of a tree falling or otherwise entering the MCS
- if an assessment confirms the likelihood of imminent contact with electrical assets
- where vegetation exists within the MCS during the fire danger declaration period

Generally urgent cutting/removal will be carried out in accordance with clause 14, and 15 of the Code or as agreed with the tree owner following consultation as detailed in [Section 4.4: Notification and Consultation](#).

Affected person/s shall be notified as soon as practical after urgent pruning has been undertaken using the [Reference A: Vegetation Work Calling Card](#). Records of pruning shall be maintained in the vegetation management database, in accordance with section 19 of Schedule 1 of the Code.

4.2.3. Selection of method for maintaining clearance space

This section outlines the strategy employed in choosing the most appropriate method for maintaining the vegetation clear of powerlines.

Vegetation cutting shall be carried out in accordance with [AS4373 Pruning of Amenity Trees](#), as far as practicable, by the use of:

- Suitably qualified or experienced personnel
- Training and induction
- Appropriate plant and equipment
- Established, audited cutting standards
- Actions to resolve pruning not in accordance with [AS4373 Pruning of Amenity Trees](#)

Suitably qualified or experienced personnel shall identify and assess locations where adherence to [AS4373 Pruning of Amenity Trees](#) is deemed to be impractical. This includes the use of the appropriate plant and equipment such for managing the vegetation. Where it is not practicable to comply with the principles of [AS4373 Pruning of Amenity Trees](#), the tree cutting procedures will be subject to approval, and audit by the Head of Vegetation Management.

Personnel are made aware of the definition of “as far as practicable” and how this is applied via the [CitiPower, Powercor, and United Energy Vegetation Reference Guide 2021](#).

The Head of Vegetation Management is responsible for overseeing the development and implementation of the vegetation management program. A comprehensive, routine monitoring, auditing, reporting and review process has been established to confirm the effectiveness of the vegetation management program in achieving CitiPower, Powercor, and United Energy objectives.

The identification, evaluation and merit of alternate compliance methods shall be referred to the Head of Asset Management for assessment and implementation.

Where trees that are not the responsibility of CitiPower, Powercor, or United Energy have been identified as requiring cutting or removal, the ORP’s shall be notified, requesting that the tree(s) be cut or removed.

Where trees that are the responsibility of CitiPower, Powercor, or United Energy have been identified as requiring cutting or removal, the Head of Vegetation Management shall determine the most appropriate cutting method. Due consideration shall be given to the specific aspects of each site, including:

- The significance of the site as a natural habitat for rare or endangered species, both flora and fauna
- Areas determined by the relevant municipal council to contain culturally or environmentally significant trees, or trees specified in planning schemes to be of ecological, historical or aesthetic significance
- Impact on the tree’s amenity and utility value if subjected to cutting rather than removal
- Assessing the benefit of implementing, available, practicable, alternative line construction methods
- The reduction in risk to public safety and supply reliability
- Significance and public value of the site’s aesthetics
- Opportunity to replace the tree with a more suitable species
- Environmental impact of proposed works

4.2.4. Alternative Compliance Mechanisms

Applications for alternative compliance mechanisms will be submitted to ESV by the Head of Vegetation Management detailing the technical standards and procedures to be adopted for commissioning, installing, operating, maintaining and decommissioning the alternative compliance mechanism. The application will be accompanied by a documented risk assessment in accordance with the [Electricity Safety \(Electric Line Clearance\) Regulations 2020](#).

4.3. Assistance to Responsible Persons

CitiPower, Powercor and United Energy are available to assist any Other Responsible Person with any enquiry

regarding the management of vegetation clearance in proximity to overhead powerlines, and other long-term strategies employed to minimise the risk to the safe operation of powerlines by:

- de-energising lines by planned outages (shutdowns) the issue of Permit To Work
- determining the additional distance required to allow for sag and sway
- suppressing the auto reclose feature on HV circuits
- explaining methods to identify where cutting and removal of trees is required
- offering to undertake work on a commercial basis
- implementing an agreement for an ORP to work under the control of CitiPower, Powercor and United Energy (working to VESI SAD).

2021-2026 Electric Line Clearance (Vegetation) Management Procedure: Chapter 3 Scoping, notification, and consultation outlines the processes employed to assist Other Responsible Persons in carrying out their duties regarding vegetation near powerlines, to facilitate compliance with the *Electricity Safety Act*, and the *Electricity Safety (Electric Line Clearance) Regulations 2020*, including notification of non-compliant vegetation to land owners.

The vegetation clearance space around ALL overhead powerlines, including POELs, will be inspected, and the results recorded. Non-compliant vegetation within the minimum clearance space, identified by the CitiPower, Powercor and United Energy inspection program will be reported to individual councils, Other Responsible Persons, and Energy Safe Victoria as required.

In accordance with the regulations, the vegetation work programs will be communicated to councils, to ensure that tree clearing activities are coordinated and rationalised as detailed in the *Reference B: Tree Management Plans*

4.3.1. ORP Declared Area Non- Compliances

As part of the normal inspection and audit program, all vegetation that is not compliant with the Code, and is the responsibility of Other Responsible Persons shall be identified especially vegetation that is considered to be a priority or in need of urgent clearing. Other Responsible Persons shall be notified and requested to action these locations within the timeframes that consider the immediate risk to public safety, fire ignition, damage to CitiPower, Powercor or United Energy's assets and the reliability of the electrical network.

In the interest of supply integrity, random follow up audits will be conducted to ensure that the appropriate action has been taken. If the identified vegetation has not been cleared within the required timeframes, CitiPower, Powercor or United Energy may seek direction from Energy Safe Victoria and recover the costs from the Other Responsible Persons.

Reports will be prepared to indicate;

- total number of outages attributed to council responsibility vegetation
- determine outages caused by vegetation inside the clearance space and outside the clearance space
- total number of spans inspected for the reporting period
- total number of non-vegetated spans identified for the reporting period
- total number of compliant spans identified for the reporting period
- total number of non-compliant spans identified for the reporting period (ORP, DB, LV, private)
- number of trees of interest, hazard trees, unsuitable species

4.4. Notification and Consultation

Notification and consultation shall be carried out for the cutting or removal of all trees, in accordance with clause 16 of the Code of practice. *2021-2026 Electric Line Clearance (Vegetation) Management Procedure: Section 3 Scoping, notification, and consultation* details the process used to advise and assist Other Responsible Persons.

Private Property

Affected persons and the general public shall be consulted, advised, and assisted with their duties under the Code, the dangers of cutting or removal of trees near powerlines, the safety precautions, and the assistance that CitiPower, Powercor and United Energy can provide.

CitiPower, Powercor and United Energy shall recommend how to maintain the clearance distance between the powerlines and vegetation. However, this does not preclude affected persons from negotiating conditions under which other solutions may be used.

The owner/occupier shall be notified of the extent of tree cutting required to achieve code compliance, with an offer of further consultation on the planned tree cutting. Notification and consultation with the owner/occupier, will seek to preserve the amenity value of trees. In some situations, it may not be practicable to undertake electric line clearance cutting in accordance with [AS4373 Pruning of Amenity Trees](#):

- where the customer insists that work not be completed to [AS4373 Pruning of Amenity Trees](#) (limbs not cleared to growth points)
- where the amenity value of the tree is insignificant to the owner/occupier
- adherence with past practices on large windrows of Pine or Cypress hedges where the use of mechanical devices is deemed a safer and more efficient method of cutting with little or no negative health impact on the tree.

A minimum of 14 days and not more than 60 days written notice, shall be provided to all affected persons prior to works commencing, in accordance with [Electricity Safety \(Electric Line Clearance\) Regulations 2020](#). Should cutting not proceed within the requested notification period, re-notification shall occur. [Reference E: Notification and Consultation](#) provides additional detail.

Where the tree intended for pruning/clearing is a tree of cultural significance or national, state or local environmental significance, affected person/s shall be provided with details of the impact of the works on the tree and the actions proposed to minimise the impact.

Each situation will be subject to specific written notification and negotiation, be tailored to suit the individual situation, and meet the regulatory requirements.

If emergency clearing is undertaken, the responsible person or landowner shall be notified as soon as practicable after the event in accordance with clause 19 of the Code. Copy of a typical notification notice is shown in [Reference A: Vegetation Work Calling Card](#).

Managers of Public Land

Managers of Public Land situated in urban areas will be informed of any proposed tree clearing works where CitiPower, Powercor or United Energy are responsible for maintenance of the powerline Minimum Clearance Space (MCS). Public Land Managers shall be engaged to identify trees which warrant joint long-term management plans.

The Public Land Manager shall be consulted to decide how best to maintain the clearance between powerlines and vegetation so that the MCS remains free of vegetation. The consultation will include;

- when the work is to be carried out
- the extent to which clearing is proposed
- identification of vegetation or habitat of cultural or national, state or local environmental significance
- other available vegetation clearing options
- methods of community engagement
- the name of the responsible person for approval of the plan.

The proposed outcome of this consultation is for a plan to be developed for use by both the Public Land Manager, CitiPower, Powercor and United Energy when conducting line clearance works on the vegetation covered in the agreed plan.

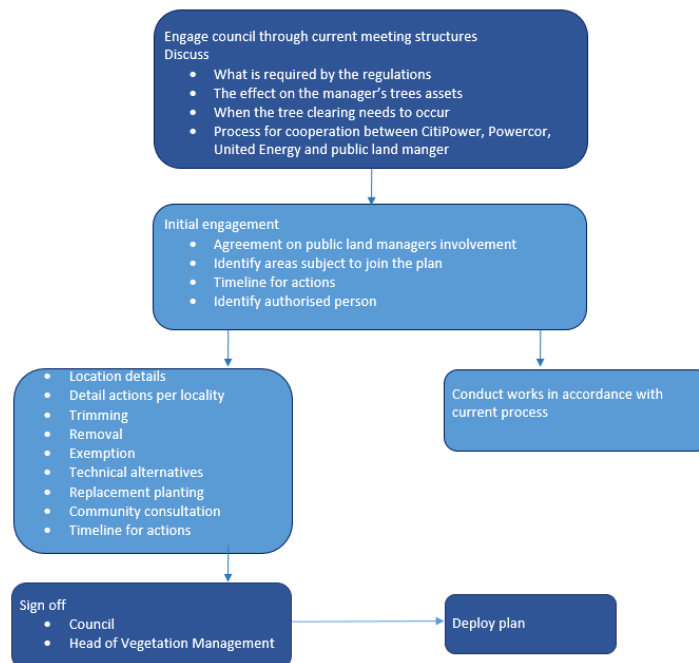


Figure 14: Notification and Consultation Public Land Managers

4.4.1. Available Information and Publications

CitiPower, Powercor and United Energy provide information and advice regarding vegetation management. Customers can call CitiPower, Powercor or United Energy on the free call numbers [Section 1.4 Responsible Persons](#).

A copy of the ELCMPs, and general advice is available on the CitiPower, Powercor and United Energy websites:

<https://www.powercor.com.au/keeping-you-safe/bushfire-mitigation/vegetation-management/>

<https://www.citipower.com.au/keeping-you-safe/bushfire-mitigation/vegetation-management/>

<https://www.unitedenergy.com.au/safety/vegetation-and-powerline-clearance/>

The information includes;

- Planting Trees near Power Lines - a guide for Home gardens and Rural Properties,
- Private Overhead Electric Lines (Understanding your responsibilities)
- Powerlines and Your Property and "No Go Zone" brochures

The tree management plans, listed in [Reference B: Tree Management Plans](#) shall be reviewed jointly by Council, CitiPower, Powercor and United Energy every three years.

4.4.2. Dispute Resolution

Vegetation management concerns and issues can be escalated by the landowner or occupier using the method outlined in [Figure 13: Dispute Resolution \(Method for Independent Resolution\)](#).

CitiPower, Powercor and United Energy shall provide contact details including; name, position and telephone number on notices provided to affected persons as a point of reference if the affected person feels the need to follow up on an issue or a concern. Alternatively, the affected person may contact CitiPower, Powercor or United Energy on the numbers listed in [Section 1.4 Responsible Persons](#).

Where the issues cannot be settled by the Vegetation Assessor (VA), the matter shall be referred to the Head of Vegetation Management.

All Vegetation Assessors have been trained in tree identification, pruning techniques and tree physiology, however, special situations may require greater expertise, and advice may be sought from an arborist where the dispute requires an expert third party opinion. CitiPower, Powercor or United Energy engage many arborists, widely respected in academia and industry, that are available for consultation.

If intervention by the Head of Vegetation Management cannot resolve the dispute, the land owner or occupier may choose to refer the matter to Energy Safe Victoria or The Energy and Water Ombudsman. Where the disputed vegetation clearing work presents an immediate safety or fire risk, CitiPower, Powercor or United Energy may be obliged under Clause 14, and 15 of the Code, to enter the property and complete the work.

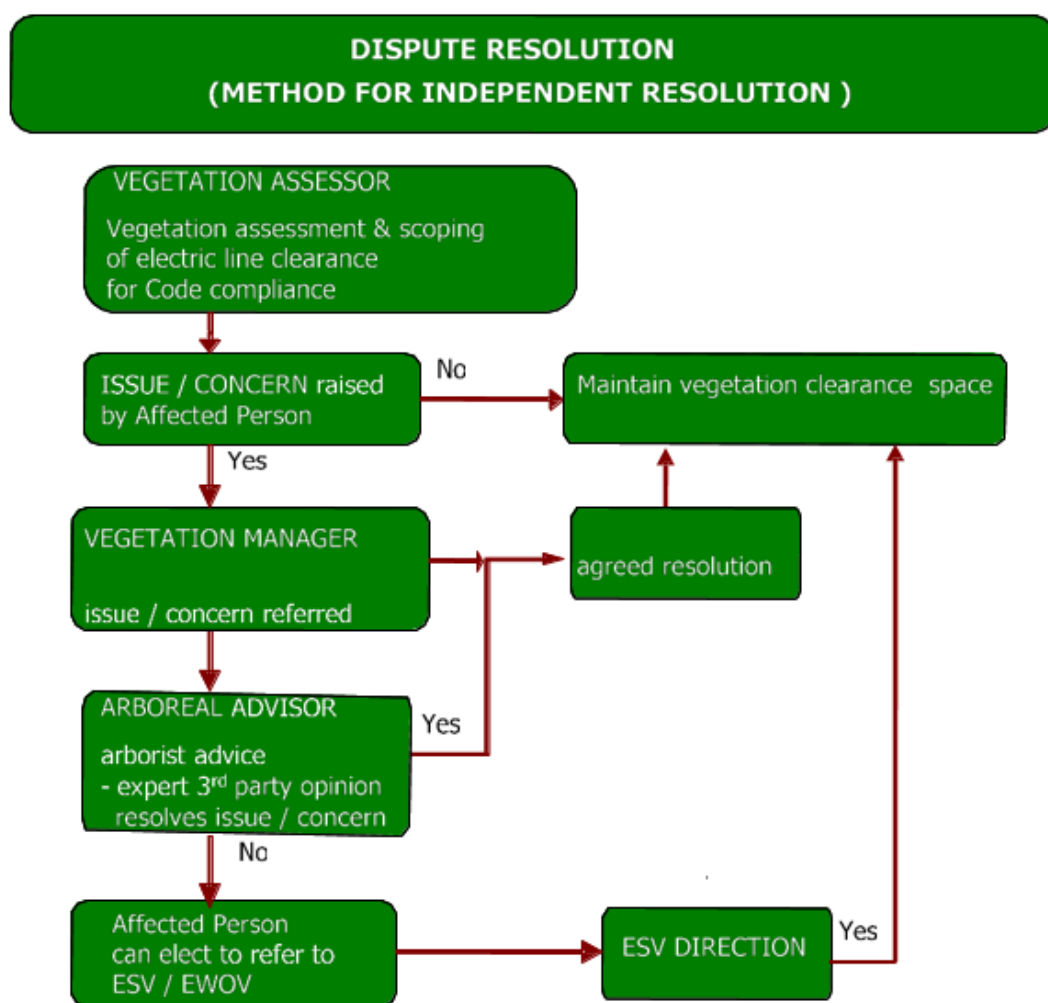


Figure 15: Dispute Resolution (Method for Independent Resolution)

5. Training

The qualifications, training and experience of employees or contractors undertaking vegetation management activities; inspection, cutting or removal of trees shall be appropriate for the task being performed, in accordance with the Code and the Electricity Safety (General) Regulations 2019.

The training requirements have been documented in the [VESI Vegetation Management Guideline](http://www.vesi.com.au) published at www.vesi.com.au.

The qualifications and experience for persons carrying hazard tree and exception tree inspections shall be consistent with the qualifications and experience required for a suitably qualified arborist as defined by the [Electricity Safety \(Electric Line Clearance\) Regulations 2020](#):

- as a minimum, the qualification of National Certificate III in Arboriculture including the "Perform a ground-based tree defect evaluation" unit of competency, or an equivalent qualification; and
- at least 3 years of field experience in assessing trees.

In addition to the VESI requirements, vegetation workers classified as Ground Crew, require a Certificate II in ESI – Powerline Vegetation Control. [Table 4: Units of Competency required for Vegetation Ground Crews](#) outlines the units of competency required for vegetation ground crews. All Mandatory (M) units of competency must be completed to undertake the role. Other units of Competence may be required to complete the task being undertaken.

Legend

M - Mandatory

A - Additional - If worker requires this training for the works being performed

	Qualification / Competency Standard Unit (CSU) number	Ground Crew
Qualification		
Certificate II in ESI - Powerline Vegetation Control	UET20312	M
Certificate II Powerline Vegetation Control – Core Competency Standard Units		
Apply Occupational Health Safety regulations, codes and practices in the workplace	UEENEEE101A	M
Comply with sustainability, environmental and incidental response policies and procedures	UETTDREL13A	M
Working safely near live electrical apparatus as a non-electrical worker	UETTDREL14A	M
Operate and maintain chainsaws	AHCARB205A	M
Plan the removal of vegetation up to vegetation exclusion zone near live electrical apparatus	UETTDRCV23A	M
Monitor safety compliance of vegetation control work in an ESI environment	UETTDRCV27A	M
Certificate II Powerline Vegetation Control – Elective Competency Standard Units		
Operate specialist equipment at ground level near live electrical apparatus	UETTDRCV31A	M
Fell small trees	AHCARB202A	M
Apply chemicals under supervision	AHCCHM201A	M
Operate machinery and equipment	AHCMOM304A	M
Operate a mobile chipper/mulcher	FPIHAR2206B	A

Table 4: Dispute Resolution (Method for Independent Resolution)

Note: Ground Crew to be trained annually in Safe Approach Distances – Vegetation Work.
Vegetation workers to be trained in Maintain safety at an incident scene (PUAOHS0002B).

Prior to a vegetation worker commencing work on the network, the required training shall be confirmed as meeting the required standard. System Audits shall be undertaken to verify that vegetation worker training records are current and appropriately maintained. Persons without the appropriate training shall be removed from site.

Individuals may be engaged as “under supervision” to assess their competency to perform a given task or while training is being completed. Individuals shall attend all training applicable for the role and be deemed competent by a Training Provider. Evidence to demonstrate competence, including Statement of Attainment, and Certificate of Completion shall be provided. When all evidence has been provided the “under supervision” will be removed.

Annual training includes Vegetation Reference Guide refresher training for compliance with the Regulations and this ELCMP as far as practical.

6. ELCMP performance monitoring and auditing

ELCMP effectiveness shall be assessed using leading indicators that provide advance visibility of the vegetation management exposure level and lagging indicators to provide visibility of vegetation caused impacts. The [2021-2026 Electric Line Clearance \(Vegetation\) Management Procedure; Chapter 5 Vegetation program monitoring and risk management](#) provides additional detail.

Lead indicators (reported weekly / monthly), monitor the number of:

- Code VP1, VP2 and VP3 vegetation spans recorded in the HBRAs and LBRAs to assess the effectiveness of the vegetation inspection and cutting regime in preventing vegetation from growing into the minimum clearance space.
- Spans identified for trimming with current year code to assess the effectiveness of estimating the vegetation re-growth rate.
- Other Responsible Party (ORP) Code VP1, VP2 and VP3 vegetation spans outstanding after 90 days to assess the effectiveness of the ORP engagement process.
- Hazard tree removals to assess risk reduction
- Rework spans arising from Quality and LiDAR Audits to assess contractor performance effectiveness and risk reduction.

Lag indicators (reported weekly / monthly), monitor the number of:

- Safety – Bushfire: fires due to vegetation inside the minimum clearance space to assess the effectiveness of the vegetation inspection and cutting regime in preventing fire starts.
- Safety – Bushfire: from due to hazard trees to assess the effectiveness of the hazard tree inspection and removal regime in preventing fire starts.
- Safety – Electrical: Electric shocks caused by vegetation inside the minimum clearance space for which CP-PAL-UE is responsible to assess the effectiveness of the vegetation inspection and cutting regime in preventing electric shock, and assess the effectiveness of work practices around power lines
- Reliability: Outages due to vegetation, and hazard trees to assess the effectiveness of the vegetation inspection and removal regime, and the hazard tree removal program in preventing power outages
- Compliance: Non-compliances recorded in VMS attributable to vegetation to assess the effectiveness of the vegetation inspection and cutting regime in keeping vegetation outside the clearance space

Vegetation management controls

Procedures (controls) have been implemented at all levels to ensure that vegetation management activities are directed at minimising the risks associated with vegetation near powerlines. The controls are specific, measurable, achievable, relevant, timely, and address the cause / source of the risk:

- WHO: The Head of Vegetation Management is responsible for the vegetation management program
- WHAT: Develop the annual vegetation inspection and cutting program
- WHY: Ensure that vegetation is kept out of the clearance space. [NOTE: Other Responsible Persons, Municipal Undertakings and private land owners, are responsible for some of the vegetation management]
- HOW: The vegetation management program is detailed in the Electric Line Clearance Management Plan with a vegetation cutting program based on the findings of the vegetation inspection program.

Audit and Inspection Program

The effectiveness of the CitiPower, Powercor, and United Energy ELCMP vegetation management controls shall be assessed through a comprehensive annual audit program to assure compliance with the elements of the approved ELCMP, [Reference I: Extract from 2021 – 2026 Consolidated audit program \(ELECTRIC LINE CLEARANCE\)](#).

Audit results, including improvement opportunities, shall be reported to the: Continuous Improvement Forums, INMS Governance Committee, the Fire Prevention Committee, the Vegetation Management Improvement Program Board, Senior Management and the CEO for review.

These audits shall include regular field verification and compliance monitoring audits including pruning as far as practicable in accordance with [AS4373 Pruning of amenity trees](#).

The control effectiveness assessment metrics include the number of spans inspected, the number of non-compliant vegetated spans identified / cut, number of spans in backlog, number of non-compliant includes spans that have become non-compliant since the last inspection. Control effectiveness gradings have been quantified:

- Fully effective: Vegetation inspection/cutting program 100% on track
- Mostly effective: Vegetation inspection/cutting program >90% on track
- Partially effective: Vegetation inspection/cutting program >80% on track
- Ineffective: Vegetation inspection/cutting program <80% on track

Performance indicators are employed to monitor service provider performance and fieldwork compliance. Service provider contracts include the Key Performance Indicators (KPIs) and performance measures as described in [Table 5: Performance Indicators](#) below.

Safety	Audit Compliance
Customer Services	Customer Satisfaction Levels
Program	On time delivery
Data	Delivery and accuracy
Cutting Audit	Vegetation Works - Minimum 10% sample audit ¹ - BCA areas 100% MCS cutting

Table 5: Performance Indicators

The audit sample for non-BCA areas may be revised following approval from the General Manager Strategy and Customer, where there is a greater priority to focus audits on a smaller yet higher risk area.

Service Provider performance is reviewed monthly at operational meetings with key personnel including representatives from CitiPower, Powercor and United Energy Vegetation, Bushfire Mitigation, Asset Management and Network Compliance as required.

6.1. Vegetation management program governance

Vegetation management program governance has been established to assure compliance with legislation:


- CEO and governance committee vegetation management briefings are held at least every fortnight
- Weekly field audits, and reports are prepared to confirm quality of inspection, cutting and degree of compliance
- Weekly monitoring and reporting to the General Manager Service Delivery, the General Manager Electricity Network, and ESV during the fire danger period on the progress of the inspection and cutting programs
- Monthly Fire Prevention Committee meetings and quarterly Integrated Network Management System Governance Committee meetings to monitor and assess the efficacy of the approved Electric Line Clearance Management Plan
- Monthly reports are prepared for senior management, and the board on the progress of the inspection and cutting programs and the implementation of the approved Electric Line Clearance Management Plan

- Exception reports (alerts) through VMS for HBRA and LBRA of spans coming due for inspection or cutting
- Pre-summer vegetation inspections
- Annual ESV, and third-party audits to ensure that ELCMP controls are achieving the desired result
- Contractor safety and work practice audits as part of the accepted Electricity Safety Management Schemes

To ensure systemic compliance is maintained during the declaration period:

- Pre-summer audits of the HBRA networks shall be carried out before the declaration date using staff, sub-contractors or as part of the line condition observation program to confirm vegetation, and asset, readiness
- Inspection of at least 1% of the HBRA spans by internal Engagement and Quality Team or contractors
- Reporting and investigation of vegetation incidents and faults, especially significant fires, to determine the root cause of the incident

Reference A: Vegetation Work Calling Card



Trees and Powerline Pending Work Notification

Work location

My name is

Phone

I am a CitiPower and Powercor representative contracted to carry out vegetation inspection and maintenance.

My inspection of the trees on and/or adjacent to your property on/...../..... at has shown that:

☐ No tree clearing works need to be undertaken from this inspection.

☐ Trees on/or adjacent to your property have grown so that they now require pruning to maintain compliance with the Victorian Government's Electricity Safety (Electric Line Clearance) Regulations 2020. These works may commence between 14 and 60 days from the date on this notice.

☐ *Urgent Cutting- Urgent tree clearing/pruning is required. Trees on your property have grown too close to or within the Clearance Space required around powerlines, as noted in the Electricity Safety (Electric Line Clearance) Regulations 2020, schedule 1, section 19, and as such the required 14 day notification period does not apply*.

Previous inspection date:/...../.....

There will be no charge to you for tree clearing works required around CitiPower and Powercor powerlines.

Please contact me as soon as possible so we can discuss the required work. If you have queries about the proposed works.


The works required at your property include:

.....

.....



.....

If you are not the owner of the property we request your assistance in forwarding this notice to the landowner, or contact me.



This is a representation of how your trees will be cleared when viewed along the line from pole

CitiPower and Powercor aims to remove all cables on the day of pruning, however in rural areas clean up can take up to five days. If you experience extended delays in clean up please contact me.

Trees and Powerline Pending Work Notification

Works may be carried out using the following specialist equipment:



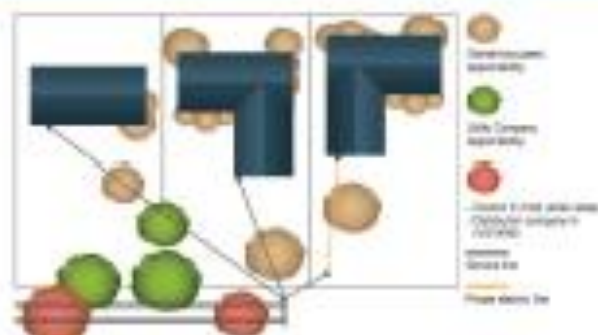
Who is responsible for maintaining vegetation?

Trees on your Property

CEIPower and Powercor or your local council are responsible for maintaining trees affecting the main distribution powerline. Any privately owned electric lines on your property – and the service line to your property are your responsibility.

It is important for your safety that you hire a professional to carry out any tree clearing work near your powerlines.

If you are unsure of your responsibility please contact CEIPower and Powercor for clarification.



As your electricity distributor, CEIPower and Powercor owns and operates the largest electricity distribution network in Victoria. We deliver to you the power you buy from your electricity retailer. Our role is to install and maintain the poles, wires and equipment on our electricity network to reduce the likelihood of fires or supply interruptions caused by trees and vegetation.

Each year, CEIPower and Powercor invests millions of dollars in bushfire mitigation and vegetation management programs to keep the power on and the community safe. CEIPower and Powercor employs expert vegetation management resources, to keep trees and vegetation a safe distance from our network assets.

For all enquiries regarding vegetation and powerlines, contact:

CEIPower

Call 1300 001 101 or visit www.ceipower.com.au

Powercor

Call 13 22 06 or visit www.powercor.com.au

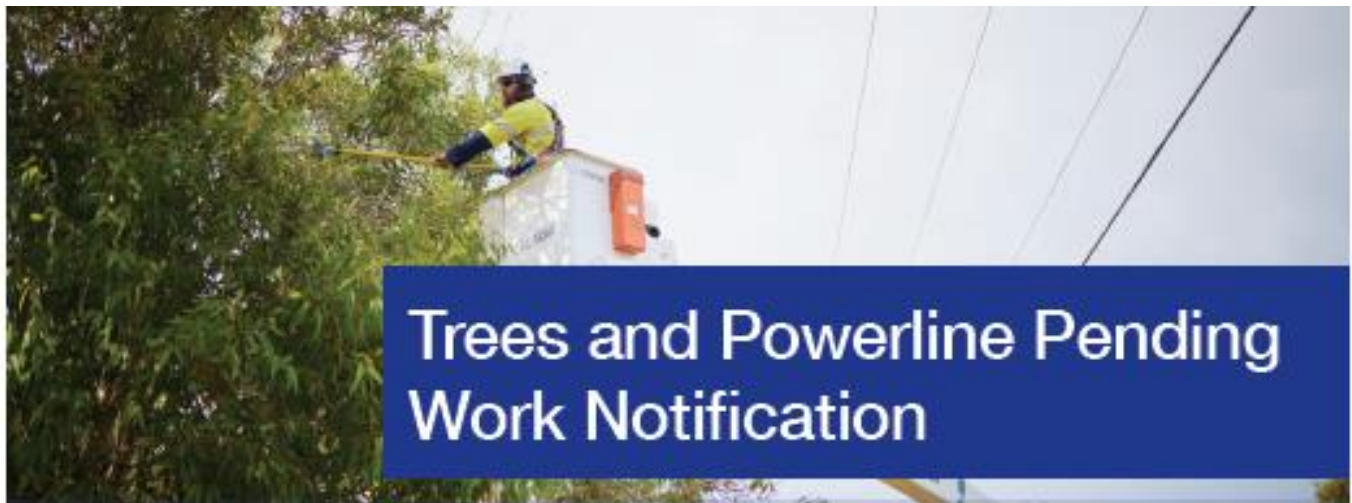
To monitor the level of your satisfaction with our vegetation service, CEIPower and Powercor or our agents may contact you after these works are completed. If you object to this, please contact me to advise.

* Note: This notice applies to Transmission Operations Australia and Transmission Operations Australia 2 assets. For Enquiries 13 22 06

If you have any concerns with our vegetation management, issues can be escalated via the dispute resolution process found in our Vegetation Management Plan. A copy of the plan can be obtained by calling CEIPower on 1300 001 101; or Powercor on 13 22 06.

CEIPower 07/2019





Trees and Powerline Pending Work Notification

Work location

My name is

Phone

I am a United Energy representative contracted to carry out vegetation inspection and maintenance.

My inspection of the trees on and/or adjacent to your property on

..... / / at has shown that:

- ☐ No tree clearing works need to be undertaken from this inspection
- ☐ Trees on/or adjacent to your property have grown so that they now require pruning to maintain compliance with the Victorian Government's Electricity Safety (Electric Line Clearance) Regulations 2020.
These works may commence between 14 and 60 days from the date on this notice.
- ☐ "Urgent Cutting- Urgent tree clearing/pruning is required. Trees on your property have grown too close to or within the Clearance Space required around powerlines, as noted in the Electricity Safety (Electric Line Clearance) Regulations 2020, schedule 1, section 19, and as such the required 14 day notification period does not apply".

Previous inspection date: / /

There will be no charge to you for tree clearing works required around United Energy's powerlines.

Please contact me as soon as possible so we can discuss the required works/if you have queries about the proposed works.

The works required at your property include:

If you are not the owner of the property we request your assistance in forwarding this notice to the landowner, or contact me.



This is a representation of how your tree/s will be cleared when viewed along the line from pole

United Energy aims to remove all debris on the day of pruning, however in rural areas clean up can take up to five days. If you experience extended delays in clean up please contact me.



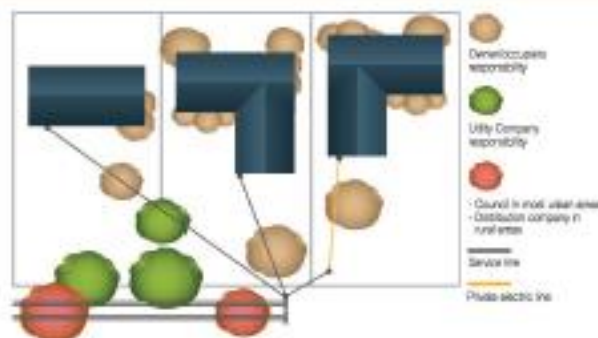
Works may be carried out using the following specialist equipment:



Who is responsible for maintaining vegetation?

Trees on your Property

United Energy or your local council are responsible for maintaining trees affecting the main distribution powerline. Any privately owned electric lines on your property - and the service line to your property are your responsibility. It is important for your safety that you hire a professional to carry out any tree clearing work near your powerlines. If you are unsure of your responsibility please contact United Energy for clarification.



United Energy is your electricity distributor. We deliver to you the power you buy from your electricity retailer. Our role is to install and maintain the poles, wires and equipment on our electricity network to reduce the likelihood of fires or supply interruptions caused by trees and vegetation.

Each year, United Energy invests millions of dollars in bushfire mitigation and vegetation management programs to keep the power on and the community safe. United Energy employs expert vegetation management resources, to keep trees and vegetation a safe distance from our network assets.

For all enquiries regarding vegetation and powerlines, contact:

United Energy

Call 1300 131 689 or visit www.unitedenergy.com.au

To monitor the level of your satisfaction with our vegetation service, United Energy or our agents may contact you after these works are completed. If you object to this, please contact me to advise.

If you have any concerns with our vegetation management, issues can be escalated via the dispute resolution process found in our Vegetation Management Plan. A copy of the plan is available on the United Energy website www.unitedenergy.com.au.

Reference B: Tree Management Plans

Brimbank	Golden Plains Shire
Boroondara	Surf Coast Shire
City of Glen Eira	Corangamite Shire
City of Melbourne	Glenelg Shire
City of Port Phillip	Moyne Shire
City of Stonnington	Warrnambool Shire
City of Yarra	Southern Grampians Shire
Darebin City Council	Buloke Shire
Moreland City Council	Campaspe Shire Central
Whitehorse City Council	Goldfields Shire
Mornington Peninsula Shire	Delatite Shire
Knox City Council	Gannawarra Shire
City of Monash	Greater Bendigo City
Frankston City Council	Greater Shepparton City
Bayside City Council	Loddon Shire
City of Greater Dandenong	Mildura Rural City
Manningham city Council	Moira Shire
Whitehorse City Council	Swan Hill Rural City
Kingston city Council	Ararat Rural City
City of Casey	Ballarat City
Brimbank City Council	Hepburn Shire
Hobsons Bay City Council	Hindmarsh Shire
Macedon Ranges Shire Council	Horsham Rural City
Maribyrnong	Moorabool Shire
Melton	Northern Grampians Shire
Mitchell shire	Pyrenees Shire
Mount Alexander Shire	West Wimmera Shire
Wyndham City Council	Yarriambiack Shire
Borough of Queenscliffe	
City of Greater Geelong	
Colac Otway Shire	

Reference C: Environment Protection and Biodiversity Conservation (EPBC) ACT Referral Process

Referral forms are available from the department's website at www.environment.gov.au/epbc/assessments/referral-form.html

The referral should include all available information about the proposed action, as well as any measures that will be put in place to reduce adverse impacts on those matters.

Examples of mitigating actions might include:

- minimising vehicle access points to avoid impacts of vehicle tracks on nationally protected grassland and low lying vegetation, particularly in wet conditions;
- pruning of trees outside of the breeding season for nationally protected species (for example listed migratory birds)

As part of the referral process there is a 10 business day public comment period. This means that the referral will be made available to the public on-line for their comment.

Referral process

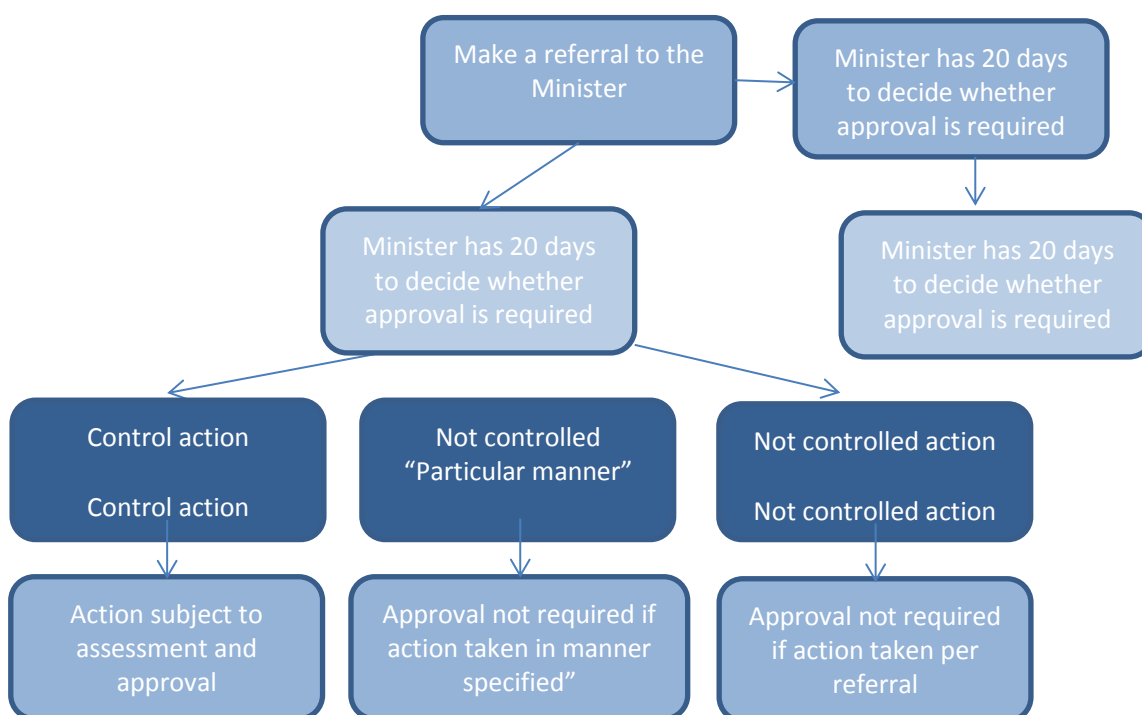


Figure 16: Referral Process

Is the activity a controlled action?

The Minister will consider the referral and decide whether the action is likely to have a significant impact on a matter of national environmental significance, and consequently whether it is or is not a controlled action.

If the Minister decides that the activity is a controlled action, then the action will be subject to the assessment and approval process under the EPBC Act.

If the Minister decides that the activity is not a controlled action, then the Minister can state that approval is not required if the action is taken in accordance with:

- the "particular manner" specified; or
- the referral

There is a statutory time frame of 20 business days in which the Minister must make a decision, so unless there are requests for further information the CitiPower, Powercor and United Energy should usually be notified within 20 business days whether or not federal assessment and approval is required.

In most cases, it is likely that line clearance works would not be controlled actions, particularly where the works are undertaken in accordance with a referral which sets out an adequate analysis of the environment, proposed impacts and mitigating measures, or in accordance with a "particular manner" approval that is developed with the Department of the Environment.

However, if the line clearance works contemplate a wide scale or permanent impact on nationally protected vegetation or key habitats for threatened species, it is possible that the Department may decide that these activities constitute a controlled action which requires assessment and approval. For further information refer to [*Reference D: Assessment and Approval Process for Controlled Actions*](#).

Reference D: Assessment and Approval Process for Controlled Actions

The information on assessment and approval of controlled actions in this reference, has been included in order to provide guidance to the 3 Networks, in the event that any line clearance works are determined to be controlled actions and assessment and approval is required.

The Department of the Environment, Land, Water and Planning has a range of options and methods for assessing controlled actions. The Department has the discretion to determine the most appropriate method of assessment.

Assessment methods include:

- accredited assessment (another government process is accredited as being adequate assessment such as state/territory environmental assessment processes);
- assessment on referral information (assessment done solely on the information provided in the referral form);
- assessment on preliminary documentation (referral form and any other relevant material identified by the minister as being necessary to adequately assess a proposed action)
- assessment by environmental impact statement (EIS) or public environment report (PER): and
- assessment by public inquiry.

The EPBC Act sets out the process and time limits for each of these types of assessment.

There is a Bilateral Agreement between Victoria and the Commonwealth under Section 45 of the EPBC Act. It provides for the accrediting of assessment under certain Victorian laws as being sufficient for EPBC Act purposes, in each case the Victorian assessment must also address the EPBC Act requirements. If the activity has been and/or will go through a Victorian assessment process, the CitiPower, Powercor and United Energy should consider whether the process addressed or will address EPBC Act requirements, and confirm that it is an accredited assessment with the Department of the Environment, Land, Water and Planning.

If an assessment is required, the Department will determine the assessment method. However the most likely assessment methods given the likely scale and impact of most line clearance works, are the processes for assessment on referral information or on preliminary documentation. A general outline of these assessment processes is provided below.

The general process for assessment on referral information is that:

- the Department of the Environment must prepare a draft recommendation report;
- the draft recommendation report is published for a 10 business day public comment period;
- the recommendation report is finalized and provided to the minister;
- the Minister must make a decision to approve, approve with conditions or not approve a proposed action within 30 business days of deciding on the assessment approach,

The general process for assessment on preliminary documentation is that:

- the Minister directs the proponent to publish the referral information for public comment;
- the public comment on the proponent's information;
- the proponent then has the opportunity to revise its information to take account of public comments, and gives a notice to the Minister with the revised information or a notice stating that no comments were received.
- within ten days the proponent must publish the revised information and comments, or if no comments were received, republish the relevant information;
- the Department of the Environment prepares a recommendation report and provides it to the Minister;
- the Minister makes a decision to approve, approve with conditions or not approve the proposed action within 40 business days of receiving finalized documentation from the proponent.

In deciding whether or not to approve a controlled action the Minister must consider:

- the principles of ecologically sustainable development;
- the results of the assessment of the impacts of the proposed action, including the relevant recommendation report from the secretary of the federal environment department;
- referral documentation;
- community and stakeholder comments;

- any other relevant information available on the impacts of the proposed action; and
- relevant comments from other Australian Government and state and territory government ministers (such as social and economic factors).

In deciding whether or not to approve a controlled action the Minister may also at his or her discretion consider the environmental history of the company taking the action, including the environmental history of the executive officers of companies and parent companies and their executive officers.

Assessment Process

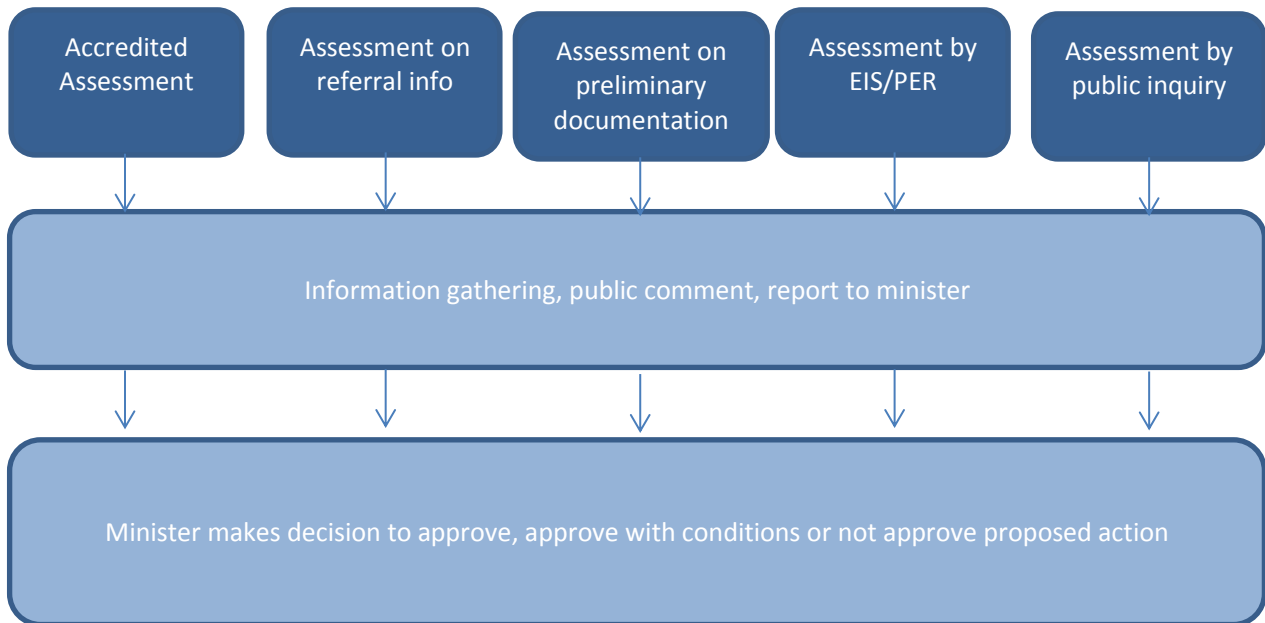


Figure 17: Assessment Process

Reference E: Notification and Consultation

The Following document sets out the Notification/Consultation requirements for all routine CitiPower, Powercor and United Energy Vegetation Clearing activities (Urgent clearing, is not routine). Notification methods range from individual letter drop to media advertising.

For clearance in urban areas:

1. Tree management plans

A CitiPower, Powercor and United Energy / Council Tree Management Plan shall be offered to every Municipality, remain current and contain the below:

- a. Background
- b. Scope
- c. Method of Maintaining Clearances
- d. Communication Strategy
- e. Extent of Pruning
- f. Standard of Pruning
- g. List of important trees
- h. List/Strategy for any tree removals
- i. Council replanting strategy

Notes:

1. The establishment of a Tree Management Plan requires the interest and cooperation of the relevant Council. Where a Council is not willing to participate, a default Tree Management Plan will be adopted which reverts to the ELCMP for all requirements
2. Powercor plans may not include items c, e, f, h and i as some councils are responsible for the maintenance of street trees.

2. Notice by publication

A newspaper advertisement shall be published and remain current when working in a geographic area.

NOTICE TO AFFECTED PERSONS OF TREE CUTTING /REMOVAL (SAMPLE) Under the Code of Practice for Electric Line Clearance

[insert as applicable: CitiPower Pty Ltd (CitiPower) or Powercor Australia Limited (Powercor Australia) or United Energy] must maintain vegetation clearance around powerlines to comply with the Electricity Safety (Electric Line Clearance) Regulations 2020, and the Code of Practice for Electric Line Clearance set out in the Schedule to the Regulations (Code).

Notice is hereby given by [insert as applicable: CitiPower or Powercor Australia or United Energy] pursuant to clause 16 of the Code of cutting and removal works on trees that are [insert as applicable: on public land and/or within the boundaries of private properties and/or of cultural or environmental significance]. These works are scheduled to occur [insert details of the streets and/or locality here with as much precision as is practicable, eg in St Kilda and Port Melbourne] commencing 14 days from the date of this notice and over the next 60 days. Individual properties with vegetation requiring clearing shall receive a leaflet, 14 days prior to commencement of the tree clearing. For [insert as applicable: Port Melbourne], these works will occur no earlier than 14 days and no later than 60 days from the date of this notice. In relation to [insert as applicable: St Kilda], a public notice was previously provided but is likely to continue past the 60 days originally notified, until no later than 60 days from the date of this notice.

3. Notification/Consultation for Pruning and Removal of trees.

- a. Where trees on private land are to be pruned, notification shall be provided to the occupant of the property which contains the tree, or the occupier of contiguous land that may be affected by the works, using the relevant CitiPower, Powercor and United Energy calling card, [Reference A: Vegetation work calling card](#)
- b. Where trees on public land are to be pruned by CitiPower, Powercor and United Energy, a notice shall be placed in a newspaper circulating in the area of the works and;
 - In urban areas written notice shall be provided to the property directly adjacent to the tree to be pruned.
 - For non-urban areas written notification shall also be provided to the occupier of contiguous land that may be affected by the works, where reasonably practicable.
- c. Where trees on private land are to be removed consultation shall occur with the tree owner in both urban and rural areas and any occupier of contiguous land that may be affected by the works. CitiPower, Powercor and United Energy shall maintain a record of the consultation.
- d. Strategies for general notification of other affected persons in urban areas shall be documented in CitiPower, Powercor and United Energy / Council tree management plan, these may consist of;
 - In writing
 - Public information session
 - Electronic communication or other media separate from the regulatory requirement listed above.

Reference F: ESV Exemptions

Powercor


Exemption	Location	Expiry
Cork Oak HBRA Clearance Space Low Voltage	16-18 Armstrong St Creswick Victoria	ongoing – refer PAL correspondence 24 th July 2015 (ie no expiry)
Synagogue Pine LBRA Clearance Space High Voltage	2 Barkley St Ballarat Victoria	ongoing – refer PAL correspondence 24 th July 2015 (ie no expiry)

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Melbourne Victoria 3001

DX 433 Melbourne
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24th July 2015

Noel Murray
Manager Vegetation and Safety System Audits
Level 5 Building 2
4 Riverside Quay
Southbank VIC 3006

Dear Noel

Re: Exemptions Cork Oak Creswick and Synagogue Pine Ballarat

Energy Safe Victoria have previously granted Powercor exemptions to clearance space requirements set out in the Electricity Safety (Electric Line clearance) Regulations 2010 for 2 trees as follows:

- Cork Oak situated at Armstrong St Creswick, and
- Synagogue Pine located at corner Barkley St & Princess St Ballarat.

The exemptions previously granted have expired.


The Cork Oak situated at Armstrong St Creswick remains in breach of Low Voltage clearance per Table 3 of Regulation. Powercor has investigated extending the fire boundary and redesigning our line away from the tree however Powercor is unable to identify a practicable alternative to pruning.

The Synagogue Pine located at corner Barkley St and Princess St Ballarat is in breach of High Voltage clearance per Table 2 of Regulation. Powercor has approached Heritage Victoria to fund line relocation away from the tree however Heritage Victoria is not prepared to fund any works. Powercor is unable to identify a practicable alternate to pruning.

Both trees have been reassessed for condition, associated risk and find clearance remains unchanged and non-compliant to the regulations. Please find attached risk assessments for both locations demonstrating consistency with previous exemption requests.

Powercor believes all alternatives to pruning have been explored hence Powercor request **ESV grant ongoing exemptions to clearance space** requirements set out in the Electricity Safety (Electric Line clearance) Regulations 2015 for both trees.

Exemption	Location	Expiry
Date Palm LBRA Clearance Space High Voltage	95 Canterbury Rd Albert Park	Ongoing – refer CitiPower, Powercor and United Energy correspondence 24 October 2014 Upgraded to insulated cable (ie no expiry)




CITIPOWER

CitiPower Pty
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General Enquiries 132 206
Service Difficulties 132 412

Bendigo Business Centre
601-611 Napier Street, Epsom
Private Bag 8004
Bendigo, Victoria 3550



Friday, 24 October 2014

Noel Murray
Manager Vegetation and Safety Systems Audits
Energy Safe Victoria
PO Box 262
Collins Street West VIC 3007

Dear Mr Murray

Re: Clearance Space exemption 95 Canterbury Rd, Albert Park

CitiPower have identified an important community tree asset, at 95 Canterbury Rd, Albert Park. The tree is a Canary Island Date Palm which does not comply with the clearance requirements of the Electricity Safety (Electric Line Clearance) Regulations 2010 - Table 2 of the code.

The Palm has been assessed as no risk to:

- Safety:
 - Tree unable to be climbed unassisted.
- Reliability

The tree is unlikely to contact the conductors by growth or environmental conditions. Due to the significance of the tree the owner has requested that the tree not be cut.

Per your previous request a silicone cover has been placed over the conductor to further mitigate the risk of the tree contacting open wire conductors.

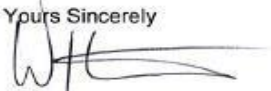
Tree risk assessment and photos below.

As per the CitiPower VMP section 3.5 **Managing trees – The Selection of the Method of Maintaining the Clearance Space**, CitiPower request ESV under clause 10 of the regulation exempt this location from the clearance requirements of Table 2.

In accord with our VMP CitiPower will treat the tree "in dispute" pending resolution of this request by ESV, and so proposes to only carry out urgent clearing if required under clause 6.2(c) of the code.

If you require any addition information regarding this request please contact myself on 9683 4440.

Yours Sincerely



Wayne Evans
Vegetation Manager
CitiPower



Vegetation Management Policy

Policy Statement

This Policy applies to the following entities:

- Powercor PAL)
- CitiPower (CP)
- United Energy (UE)
- Transmission Operations Australia Elaine (TOA)
- Transmission Operations Australia 2 Ararat TOA2)

To minimise the risk to the community and the environment caused through the interaction of trees and powerlines, CP, PAL, UE, TOA and TOA2 are obligated and committed to comply with the requirements of the current Electricity Safety (Electric Line Clearance) Regulations 2020.

The Electric Line Clearance (Vegetation) Management Plan, Vegetation Management Procedure and Vegetation Annual Execution Plan define the detailed programs to achieve our commitment to compliance, whilst allowing flexibility within the business to encourage innovation, continuous improvement and the efficient use of resources.

The Electric Line Clearance Management Plan and strategies are focussed on maintaining a network where **no tree is inside the Minimum Clearance Space** within the CP, PAL, UE, TOA and TOA2 networks. It is acknowledged however that from time to time trees may be discovered inside the MCS and therefore CP, PAL, UE, TOA and TOA2 has processes in place to action these trees. CP PAL & UE has set out VP codes and timeframes to manage vegetation that may unexpectedly grow inside the MCS*.

* The Minimum Clearance Space (MCS) shall be determined by adding an allowance for sag and sway (SAS) to the applicable distance (AD), if not included in the AD: $MCS = AD + SAS$

The allowance for sag and sway is based on conductor type, stringing, span length, temperature and wind speed.

Reference H: 2021-2026 Electric Line Clearance (Vegetation) Management Procedure Overview

Purpose

This procedure document aims to provide clear and concise guidance on how CitiPower, Powercor and United Energy are mitigating the risks to the community and the environment for the interaction of trees and powerlines. As the service provider for TOA and TOA2 this procedure also seeks to manage the risks associated with the TOA and TOA2.

To manage the specific risks associated with vegetation interacting with CP-PAL & UE's overhead supply and overhead transmission network, CP-PAL & UE have developed these Vegetation Management Procedures to address the following key objectives:

1. **Bushfire Risk** – mitigate the risk of bushfires caused by vegetation interacting with live electricity assets;
2. **Electrical Safety** – mitigate the risk of public and worker safety incidents caused by vegetation interacting with live electricity assets;
3. **Compliance** – achieve compliance to all relevant legislative and statutory requirements Electricity Safety (Electric Line Clearance) Regulations 2020, and to work collaboratively with councils to assist them to achieve compliance;
4. **Network performance** – mitigate the risk of supply interruptions as a result of vegetation coming into contact with live electricity assets;
5. **Network damage** – minimise the risk of damage to CP-PAL & UE electricity assets caused by vegetation.

CP, PAL & UE aim to work towards and meet these objectives in a safe, timely, environmentally responsible and cost-effective manner.

CP-PAL & UE seeks to continually improve its practices through driving innovation and investing in new capability and technologies and to become a leader in the area of vegetation management.

Vegetation Management includes all the activities undertaken by the businesses to manage vegetation around electrical assets. This includes; inspection by ground staff and aerial assessment by *Light Imaging, Detection, And Ranging* (LIDAR), tree trimming, fall/hazard tree identification and removal; the implementation of strategies to minimise the establishment of incompatible species under and near power lines and all associated engagements with Councils, Customers and key stakeholders to support the timely the delivery of work.

Key activities included in the procedure are:

- Vegetation Inspection Program
- Vegetation Action Program
- Customer Management Program
- Quality Review Program
- Delivery of the Vegetation Annual Execution Plan
- Weekly internal operations meetings
- Weekly contractor operations progress meetings
- Process for determining herbicide and tree removal prioritisation

Reference I: Extract from 2021 – 2026 Consolidated audit program (ELECTRIC LINE CLEARANCE)

RISK CONTROLS	AUDIT ORGANISER	SCOPE / SUPPORTING INFORMATION
1. PLANNING		
1.5 PLANNING: Electric Line Clearance Management Plans, procedures, processes		-
Electric Line Clearance Management Plan Audit	ESV - Gary Wright	TBA
Electric line clearance management plan	Trevor Fisher, Mike Tshaikiwsky	ELCMP compliance with Electricity Safety (Electric Line Clearance) Regulations
2. TESTING AND INSPECTION		
2.1 TESTING AND INSPECTION: Inspect vegetation		
Vegetation Inspection	Hugh Vickers-Willis Mike Tshaikiwsky	Weekly verification of the effectiveness of the vegetation inspection program.
GROUND BASED INSPECTION AUDITS	Hugh Vickers-Willis Mike Tshaikiwsky	Verify accuracy and completeness of the ground based inspection program and that works are being completed in accordance with the Contract scope of works Focus on spans inspected that have been assessed by the inspector as not needing cut in the current program and spans assessed as NWR. Look at spans coded as 2021 to assess whether they really need to be cut. Focus on the performance of individual inspectors
LIDAR INSPECTION AUDITS	Hugh Vickers-Willis Mike Tshaikiwsky	Verify accuracy of the LiDAR inspection results Focus on a range of spans including LBRA, HBRA, Non declared and declared areas. Volumes to be targeted per campaign pending the initial results.
HAZARD TREE INSPECTION AUDITS	Hugh Vickers-Willis Mike Tshaikiwsky	Assess the accuracy of hazard tree identification and assessments Focus on all spans inspected that have been assessed by the inspector. Each inspector should be audited at least once every 3 months
Vegetation summer inspection (HBRA)	Trevor Fisher Mike Tshaikiwsky	Verify effectiveness of the vegetation inspection program.
Electric Line Clearance Inspection and Audit (HBRA)	ESV - Gary Wright	TBA
Electric Line Clearance Field Audit (LBRA)	ESV - Gary Wright	TBA
Hazard tree audit and inspection	ESV - Gary Wright	TBA
3.1 CONSTRUCTION AND MAINTENANCE: Cut vegetation		
Vegetation Inspection: verify effectiveness of the vegetation cutting program.	Hugh Vickers-Willis Mike Tshaikiwsky	Weekly verification of the effectiveness of the vegetation cutting program.
Treatment quality audits	Hugh Vickers-Willis Mike Tshaikiwsky	Verify effectiveness of the cutting program and audit contractors work to determine if span has been actioned in strict accordance with the Contract scope of works Focus to include 100% auditing of Non Transitioned spans, Short Cycle Spans, NWR spans, non-span rate works and any overdue spans for quarter.

RISK CONTROLS	AUDIT ORGANISER	SCOPE / SUPPORTING INFORMATION
Vegetation summer cutting (HBRA)	Trevor Fisher Mike Tshaikiwsky	Verify effectiveness of the vegetation cutting program.
Electric Line Clearance Inspection and Audit (HBRA)	ESV - Gary Wright	TBA
Electric Line Clearance Field Audit (LBRA)	ESV - Gary Wright	TBA
Hazard tree audit and cutting	ESV - Gary Wright	TBA
4.2 OPERATIONS: Operate the electricity network in a manner that complies with the legislation		
Electricity Safety (Electric Line Clearance) Regulations compliance	Raj Chaal Mike Tshaikiwsky	Annual program of activities
4.5 OPERATIONS; Carry out work on the network and the network assets		
OHS - Vegetation contractor Health and Safety audits	Hugh Vickers-Willis	Work practices and equipment (3 audits per month planned).
5. LEGISLATION		
5.1 LEGISLATION: Maintain a watching brief on the regulatory environment		
Electricity Safety (Electric Line Clearance) Regulations re-make	Raj Chaal	Submission for any proposed legislative amendments, contribute to regulation activities.