

28 April 2017

Mr Hugo Harmstorf
Chief Executive Officer
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop NSW 1240

Submitted electronically via online submission

Dear Hugo

Electricity Network Safety Management System Audit Guidelines

Thank you for the opportunity for Endeavour Energy to provide written comment to the review of the Electricity Network Safety Management System audit guidelines.

We note the change in structure in what is proposed to be Appendix B in the amended document. We believe the simplified content better reflects the spirit of AS 5577 Electricity network safety management systems, as well as the Electricity Supply (Safety and Network Management) Regulation 2014, by allowing network operators to align their individual Electricity Network Safety Management System to their individual risk profile and operating environment.

The draft provides additional clarification to the risk management process, supporting guidance available in ISO 31000, as well as Appendices A and B of AS 5577. We intend to reflect these additions in future development and review of our Formal Safety Assessments and Electricity Network Safety Management System. In considering this new material, we believe it important that the risk assessment effort and methodology continue to be commensurate with the risk level being addressed. This principle should be acknowledged and reflected in the conduct of Electricity Network Safety Management System audits.

We note that Section 2.2 of the Draft Guidelines refers to customer installation safety being included in the scope of an SMS audit. Recent changes to the Regulation under the Electricity Supply Amendment (Advanced Meters) Bill 2016 omit the requirement for a SMS to deal with customer installation safety. To maintain consistency with the requirements of the Regulation, references to customer installation safety should be removed from the final version of the Audit Guidelines.

Should you have any further questions please do not hesitate to contact [REDACTED]
[REDACTED] Alternatively, you can discuss this matter further with
[REDACTED]

Yours sincerely

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[REDACTED]
[REDACTED]