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Dear Sir / Madam,

Telstra Corporation Limited wishes to make a submission to the Leaders Group following release of the Discussion Paper on the Harmonisation of Energy Supply Industry Technical and Safety Regulation, in February 2009 – available at http://www.ret.gov.au/Documents/mce/_documents/safety_tech_harmonisation_paper20090210.pdf

As a general comment, being a national company with significant operations across all states involving network asset sharing and works coordination Telstra supports the thrust of the proposals contained within the Discussion Paper, aimed at having similar energy regulations and accreditations across all states. Achieving relatively uniform technical and safety requirements across all states can only facilitate and simplify relationships between Telstra and Energy companies, reduce overheads in matters of technical / safety compliance and ultimately reduce costs for all businesses and their customers.

Regarding specific matters covered by the paper, Telstra considers that Appendix 3 should recognise the industry “Power Coordination” codes and Standards that currently exist. These are aimed at ensuring when power generation, transmission or distribution, or telecommunications companies, plan to extend, alter or build new facilities these changes / additions will not cause hazardous or non-hazardous electrical interference to telecommunications networks through Low Frequency Induction (LFI) or Earth Potential Rise (EPR). For the safety of telecommunications personnel, customers and networks it is very important that power companies recognise these requirements. Code/Standards that need to be recognised are:

Standards Australia Documents

1 Joint Use of Poles CJC 1-1997 (SAA HB87-1997)

2 Unbalanced High Voltage Power Lines CJC 2 – 1997 (SAA HB88-1997)

3 Coordination of Power and Telecommunications - Manual for the establishment of safe work practices and the minimization of operational interference between power systems and paired cable telecommunications systems
CJC 4 (HB100-2000)

4 Coordination of Power and Telecommunications Low Frequency Induction (LFI) – Code of Practice for the mitigation of hazardous voltages induced into telecommunications lines. CJC 5 – 1997 (SAA HB101-1997)

5 Coordination of Power and Telecommunications - Low Frequency Induction (LFI)- Application Guide for the the mitigation of hazardous voltages induced into telecommunications lines. CJC 6 -1997 (SAA HB102-1997)

6 Coordination of power and Telecommunications - Crossings Code: The arrangement of overhead power and telecommunications lines, pole stay wires, and suspension wires. CJC 7-1997 (HB103-1997)

7 AS/NZS 3835.1:2006 Earth Potential Rise – Protection of telecommunications network users, personnel and plant. Part 1: Code of Practice.

8 AS/NZS 3835.2:2006 Earth Potential Rise – Protection of telecommunications network users, personnel and plant. Part 2: Application Guide.

Other Agreements / Arrangements

Futhermore there are Agreements or Arrangements which have been established over the years and which are still applicable. These have been developed to ensure safety of telecommunications personnel as well as, in some cases, also to reduce costs for all parties. The Leaders Group will note the reference documents referred to below were developed under earlier forms of both the ENA and Telstra thus may be considered out of date; Telstra is willing to participate in reviews of these under either Australian Standards, preferably, or as “National Standards” in conjunction with the ENA. The most important of these are:

9 Recommended Practices for Plant Underground - 1883. Agreement between The Electricity Supply Association of Australia and the Australian Telecommunications Commission

10 Sharing of Trenches - 1973. Arrangement between The Electricity Supply Association of Australia and the Australian Post Office.

This has been used as the basis for specific local Arrangements, in some cases including gas company needs, such as:

- Underground Services in a Shared Trench – NSW 1998. An arrangement between AGL, Energy Australia, Optus and Telstra.
- Underground Services in a Shared Trench – Australian Capital Territory 1996. An arrangement between AGL, ACTEW and Telstra.
- Underground Services in a Shared Trench – NSW 1998. An arrangement between AGL, Integral Energy, Optus and Telstra.
- Underground Services in a Shared Trench – NSW Country 2002. An arrangement between Agility, Country Energy, Optus and Telstra.

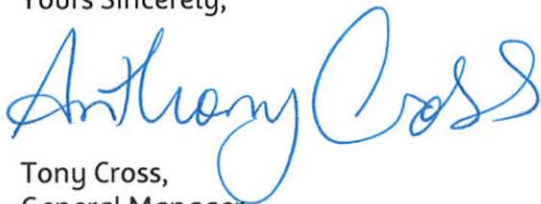
- Shared Trench Agreement between Telstra and Energex for the Sharing of Trenches - Specification for Underground Residential Development URD
 - Shared Trench Agreement - This agreement has been prepared jointly by the State Electricity Commission of Victoria and the Australian Telecommunications Corporation. 1991.
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It is Telstra's view the existence of these eight Standards Australia and two other "Agreements" should be recognised in national regulations (page 27) given their importance to the safety of telecommunications personnel and networks; this would ultimately result in listing in Appendix 3. The matters covered by them should also be recognised in Appendix 4, as a "Safety Issue" - summarised as "Telecommunications worker - prevention of hazardous conditions", or similar; and as a "Technical Issue" - summarised as "Interference to other services - prevention of Noise induction".

As a third comment, noting that Telstra also has requirements to access its plant on power structures/poles, often using travelling elevated work platforms, Telstra supports the establishment of a national skills requirement and "Acceptance/Certification" basis (page 28), based on either Option 2 or 3, rather than the present arrangements which seem to vary across the states.

Should you wish to discuss these matters please contact Kel Payten on 07-38875007 / kel.j.payten@team.telstra.com, or the undersigned, at any time.

Yours Sincerely,



Tony Cross,
General Manager
Access Technology