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**Australian Government**

**Department of Defence**  
Estate and Infrastructure Group

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**Attention: Energy Division**

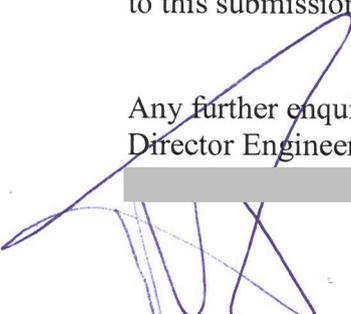
**Essential Services Commission**  
**Level 37, 2 Lonsdale Street**  
**Melbourne VIC 3000**

Dear

*Electricity Distribution Code – Voltage Standard Review 2018*

In reference to the proposed changes to the Electricity Distribution Code as set out in your Draft Decision dated 22 May 2018. The Department of Defence as the owner and operator of high voltage networks across a number of sites within Victoria offers the comments attached to this submission for your consideration.

Any further enquires in relation to this matter may be directed to Mr Gino Jacovelli, Assistant Director Engineering Policy – Electrical High Voltage on telephone [Redacted] or email; [Redacted]

  
Yours sincerely,

Mark Turner  
Director Estate Engineering Policy  
Environment and Engineering Branch

21 June 2018

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**Comments provided by**  
**Department Of Defence**  
**Directorate of Estate Engineering Policy**  
**Environment and Engineering Branch**  
**Infrastructure Division**  
**Estate and Infrastructure Group**

**In relation to**  
**Victorian Essential Services Commission**  
**Electricity Distribution Code**  
**Review of voltage standards for bushfire mitigation**  
**Draft Decision – 22 May 2018**

1. The proposed amendment to Clause 16 (c) is intended to clarify that business customers must take reasonable measures to safeguard their own assets in the event of a REFCL condition.
  - a. Is it the intend and purpose of this change to require that such business customers will be required to fully fund all works to either harden their networks or to suitably isolate their networks to be able to accommodate any RECFL event.
  - b. Under the Code as it currently stands the understanding is that the distributors are obligated to take into account the effect of REFCLs operation on the private assets of high voltage customers and distributors would need to fund protecting these assets. Why is this required to change? Defence's preference would be to retain this obligation unchanged to avoid damaging Defence electrical networks.
2. It is understood that the government is developing a High Voltage Customer Assistance Program (HCAP) that includes assistance measures for affected high voltage customers – will this be available to Defence sites? How will Defence gain access to this program.
3. Publication of REFCL compatible equipment ratings – will guides for surge diverters, voltage transformers, power cables, power transformers and the like be published by the ESC before commencement of the REFCL program to assist high voltage customers in the selection and installation of appropriate equipment?
4. How will notification requirements for issues such as regular REFCL testing or their use for other functions such as reliability be managed and how will high voltage customers be kept informed.
  - a. When will such testing take place?
  - b. Will co-ordination with high voltage customers be required and how?
5. Where isolation transformers are installed between the distributor's and a customer's high voltage network as a means of protection from the higher voltages imposed under REFCL, what if any obligations are there upon the high voltage customer towards ensuring their networks bushfire mitigation measures.

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