

AGL Hydro

Bushfire Mitigation Plan 2022-2023



AGL Hydro AEL Reference: ML AL FI 01 (Rev5.4)

Table of Contents

1.	Regulation Compliance Summary.....	7
1.1.	Victorian Regulation Compliance	7
1.2.	NSW Regulation Compliance	9
2.	Responsibilities	10
2.1.	Responsible Persons	10
2.2.	Management Structure and Responsibilities.....	11
3.	References.....	11
3.1.	Victorian.....	11
3.2.	New South Wales	12
4.	Policy	12
5.	Plan Objectives	12
6.	Scope.....	13
6.1.	Overview	13
6.2.	Maps.....	13
7.	Prevention Strategies.....	13
7.1.	Preventative Programs.....	13
7.2.	Monitoring of Asset Condition and Vegetation	14
7.3.	Engineered Solutions	14
7.4.	Hardware Maintenance and Replacement.....	14
7.5.	Victorian Powerline Bushfire Safety Program	15
7.6.	Private Overhead Electric Lines.....	15
7.7.	Key Timings	15
8.	Inspection Programs	15
8.1.	Inspection Methodology	16
8.2.	Load Assessments	16
8.3.	Asset Performance and Health Index	16
8.4.	Visual Inspections	16
8.5.	Inspection Schedule.....	17
8.6.	High Voltage Cross Arms	17
9.	Qualifications, Training and Competency.....	18
9.1.	Qualifications, Training and Competencies.....	18
9.2.	Competency and Refresher Requirements.....	19

9.2.1.	Asset Management.....	19
9.2.2.	Vegetation Management.....	20
9.2.2.1.	Qualification and Competencies	20
10.	Operations and Maintenance Plans	21
10.1.	Event of a Fire	21
10.2.	Days of Total Fire Ban and Fire Emergencies	21
10.3.	During the Fire Danger Period	22
11.	Investigations, Analysis and Methodology	22
11.1.	Fire Reporting and Investigations	22
11.1.1.	Definitions	22
11.1.2.	Fire Reporting Procedures.....	23
11.1.3.	Report to Energy Safe Victoria	23
11.1.4.	Investigations	23
11.2.	Response Review and Reporting.....	24
11.3.	Assistance from Fire Agencies for Fires near Electrical Assets	24
12.	Processes and Procedures	24
12.1.	Implementation Monitoring.....	24
12.1.1.	General	24
12.1.2.	Preparedness Reviews	25
12.1.3.	Plan Effectiveness and Monitoring	25
12.1.4.	Performance Indicators.....	25
12.2.	Implementation Verification.....	26
12.3.	Implementation Deficiencies	26
12.4.	Changes to the Plan’s Implementation	26
12.5.	Monitor Effectiveness of Inspections	27
12.6.	Verification of the Effectiveness of Inspections	27
13.	Assistance Provided to Fire Control Authorities	27
13.1.	Investigations of fires.....	27
13.2.	Liaison with Management Agencies	27
14.	Public Awareness Programs	28
15.	Plan available for inspection	28
16.	Victorian Assets	29
16.1.	Kiewa Hydro Scheme Overhead Powerlines	30
16.1.1.	Mount Beauty Depot Pole Location Image	30
16.1.2.	Clover and Bogong Creek Raceline	32
16.1.3.	Bogong.....	33
16.1.4.	Kiewa – McKay Crk PS.....	34

16.2.	Rubicon Hydro Scheme Overhead Powerlines	36
16.2.1.	Rubicon A - Rubicon PS	37
16.2.2.	Rubicon PS	40
16.2.3.	Rubicon Falls PS	41
16.2.4.	Royston PS	42
16.3.	NSW Assets	43
16.3.1.	Pindari Power Station	44
16.3.2.	Copeton Power Station	45
16.3.3.	Burrendong Power Station	45
16.3.4.	Glenbawn Power Station	46
17.	Appendices	48
17.1.	Reporting Organisational Structure	48
17.2.	Incident Reporting	49
17.3.	Engineered Solutions	50
17.4.	AGL Hydro Vegetation Types	51
17.4.1.	Mt Beauty Depot	51
17.4.2.	Kiewa Scheme	52
17.4.3.	Rubicon Scheme	53
17.5.	Works Management and Verification Schedule	54
17.5.1.	Kiewa Scheme (SAP Extract)	55
17.5.2.	Rubicon Scheme (SAP Extract)	56
18.	Referenced Documents / Procedures	57

Plan Revision History

Date	Version	Author	Comment	Sections
1.0	1 July 2016	S. Cariss	Initial 2016/17 Draft	All
1.1	11 Sep 2016	All	BMP Working Group Review	All
2.0	1 Oct 2016	S. Cariss	Release 2016/2017	All
2.1	28 Dec 2016	S. Cariss	Revised to include ESV Comments	All
3.0	01 Aug 2017	S. Cariss	BMP Working Group Review	All
3.1	12 Feb 2018	S. Cariss	Amendments following recommendations from ESV (Greg Sieburn)	Section 2 Section 7.4.1 Section 7.5 Section 13
4.0	01 Aug 2018	S. Cariss	BMP Working Group Review	All
4.1	07 Dec 2018	S. Cariss	Website URL updated	Section 2
4.2	27 June 2019	S. Cariss	Annual review AGL Hydro	All
4.3	09 July 2020	S. Cariss	Annual review AGL Hydro	All
4.4	25 Aug 2020	S. Cariss	ESV review feedback	Regulation Ref 6(h) Section 7.4.1 Section 9.5 Section 10.1
5.0	18 June 2021	S. Cariss	Annual AGL Hydro review	All
5.1	29 June 2021	S. Cariss	Minor changes resulting from the annual review and following the ESV Line Clearance Plan Systems Audit.	All
5.2	6 April 2022	S. Cariss	Changes resulting from the ESV BMP Audit concluding in April 2022.	All
5.3	27 May 2022	S. Cariss, Stu McQ and Col P	Changes resulting from the annual AGL Hydro review.	All
5.4	5 Sept 2022	S. Cariss	Changes to incorporate ESV feedback during the annual acceptance review	Section 1.1 (Exemptions) Section 2 (URL reference) Section 11 (No fire starts)

Distribution

Copy	Position
1	AGL Hydro Reception
Electronic File	Energy Safe Victoria
Electronic File	Head of Hydro
Electronic File	Works Team Supervisor
Electronic File	Operations and Governance Manager
Electronic File	Works Team Supervisor
Electronic File	Works Team Leader - Eildon
Electronic File	Works Team Leader - Outlying Works
Electronic File	Health and Safety Manager
Electronic File	AGL Hydro Web Site

Electronic File	AGL Hydro Enterprise Library
-----------------	------------------------------

1. Regulation Compliance Summary

1.1. Victorian Regulation Compliance

Electricity Safety (Bushfire Mitigation) regulations 2013

Regulation 6: Prescribed particulars for bushfire mitigation plans – Specified Operators

Specified operator legal entity	
<u>Victorian Assets:</u>	AGL Hydro Partnership Pty Limited (ABN 86 076 691 481)
<u>NSW Assets:</u>	AGL Southern Hydro (NSW) Pty Ltd (ABN 73 056 452 601)

Reg	Requirement	Reference in this Plan
6 (1)(a)	the name, address, and telephone number of the specified operator	Responsible Persons (Section 2)
6 (1)(b)	the position, address and telephone number of the person who was responsible for the preparation of the plan	Responsible Persons (Section 2)
6 (1)(c)	the position, address and telephone number of the persons who are responsible for carrying out the plan	Responsible Persons (Section 2)
6 (1)(d)	the telephone number of the specified operator's control room so that persons in the room can be contacted in an emergency that requires action by the specified operator to mitigate the danger of bushfire	Responsible Persons (Section 2)
6 (1)(e)	the bushfire mitigation policy of the specified operator to minimise the risk of fire ignition from its at-risk electric lines	Policy (Section 4)
6 (1)(f)	the objectives of the plan to achieve the mitigation of fire danger arising from the specified operator's at-risk electric lines	Objectives (Section 5)
6 (1)(g)	a description, map or plan of the land to which the bushfire mitigation plan applies, identifying the location of the specified operator's at-risk electric lines	Scope (Section 6)

Reg	Requirement	Reference in this Plan
6 (1)(h)	the preventative strategies and programs to be adopted by the specified operator to minimise the risk of the specified operator's at-risk electric lines starting fires	Preventative Strategies (Section 7)
6 (1)(i)	a plan for inspection that ensures that all of the specified operator's at-risk electric lines are inspected at regular intervals of no longer than 37 months	Inspection Programs (Section 8)
6 (1)(j)	details of the processes and procedures for ensuring that each person who is assigned to carry out the inspections referred to in paragraph (i) has satisfactorily completed a training course approved by Energy Safe Victoria and is competent to carry out such inspections	Qualifications, Training and Competency (Section 9)
6 (1)(k)	details of the processes and procedures for ensuring that persons (other than persons referred to in paragraph (j)) who carry out or will carry out functions under the plan are competent to do so	Operations and Maintenance Plans (Section 10)
6 (1)(l)(i)	the operation and maintenance plans for the specified operator's at-risk electric lines — in the event of a fire	Operations and Maintenance Plans (Section 10)
6 (1)(l)(ii)	the operation and maintenance plans for the specified operator's at-risk electric lines — during a total fire ban day	Operations and Maintenance Plans (Section 10)
6 (1)(l)(iii)	the operation and maintenance plans for the specified operator's at-risk electric lines — during a fire danger period	Investigations, Analysis and Methodology (Section 11)
6 (1)(m)	the investigations, analysis and methodology to be adopted by the specified operator for the mitigation of the risk of fire ignition from its at-risk electric lines	Processes and Procedures (Section 12)
6 (1)(n)(i)	details of the processes and procedures by which the specified operator will— monitor the implementation of the bushfire mitigation plan	Processes and Procedures (Section 12)
6 (1)(n)(ii)	details of the processes and procedures by which the specified operator will— Verification the implementation of the plan	Processes and Procedures (Section 12)

Reg	Requirement	Reference in this Plan
6 (1)(n)(iii)	details of the processes and procedures by which the specified operator will— identify any deficiencies in the plan or the plan's implementation	Processes and Procedures (Section 12)
6 (1)(n)(iv)	details of the processes and procedures by which the specified operator will— change the plan and the plan's implementation to rectify any deficiencies identified under subparagraph (iii)	Qualifications, Training and Competency (Section 9)
6 (1)(n)(v)	details of the processes and procedures by which the specified operator will— monitor the effectiveness of inspections carried out under the plan	Processes and Procedures (Section 12)
6 (1)(n)(vi)	details of the processes and procedures by which the specified operator will— Verification the effectiveness of inspections carried out under the plan	Processes and Procedures (Section 12)
6 (1)(o)	the policy of the specified operator in relation to the assistance to be provided to fire control authorities in the investigation of fires near the specified operator's at-risk electric lines	Assistance Provided to Fire Control Authorities (Section 13)
13 (1)	Energy Safe Victoria may, in writing, exempt a specified operator or major electricity company from any of the requirements of these regulations.	No exemptions have been issued by ESV.
13 (2)	An exemption under sub regulation (1) may specify conditions to which the exemption is subject.	

1.2. NSW Regulation Compliance

This plan is provided to meet the objectives and requirements of the NSW Electricity Supply (Safety and Network) Regulation 2014 in accordance with AS5577. This includes consideration of industry codes, guidelines, and practices as well as published standards. The primary objective of this plan is to ensure AGL Hydro's Hydro electrical infrastructure and associated sub-networks at our NSW small Hydro sites is safe in its design, construction, and operation and to support:

- (a) safety of members of the public
- (b) the safety of persons working on networks
- (c) the protection of property
- (d) the management of safety risks arising from the protection of the environment (for example, preventing bush fires that may be ignited by network assets)

Approved Date: 06/09/2022

Document ID: 9708169

Release Number: 24 Fire Mitigation Plan 2022-2024 Approved By: Simon Kelley (A100998)

Next Review Date: 05/09/2023

Uncontrolled When Printed 9

Owner: Hydro Manager

9 of 57

2. Responsibilities

2.1. Responsible Persons

Regulation 6	Specification – Contact Details
6 (1)(a) Name, address and telephone number of the specified operator	Simon Kelley Head of Hydro AGL Hydro Kiewa Valley Hwy Mt Beauty 3699 Phone: 0429 002 094 Email: skelley@agl.com.au
6 (1)(b) Position, address and telephone number of the person who was responsible for the preparation of the plan	Stuart Cariss Operations Governance Manager, Renewables AGL Hydro Kiewa Valley Hwy Mt Beauty 3699 Phone: (03) 5754 3225 Email: scariss@agl.com.au
6 (1)(c) Position, address and telephone number of the persons who are responsible for carrying out the plan	Stu McQuade Works Team Supervisor (Acting) AGL Hydro (Hydro) Kiewa Valley Hwy Mt Beauty 3699 Phone: 0428 348 595 Email: smcquade@agl.com.au
6 (1)(d) Telephone number of the specified operator's control room so that persons in the room can be contacted in an emergency that requires action by the specified operator to mitigate the danger of bushfire	AGL Hydro Dispatch Center Duty Generation Dispatcher 699 Bourke St Melbourne 3000 Phone: (03) 5754 3142 Email: agldc@agl.com.au
<p>Information, including a copy of the Plan is available to be viewed by the state regulatory agencies or members of the public at AGL Hydro office located at Kiewa Valley Highway Mt Beauty or by appointment during normal business hours.</p> <p>A copy of the Plan is also available on the AGL internet site at: https://www.agl.com.au/about-agl/how-we-source-energy/hydroelectric-powerstations?zcf97o=vlx3ap </p>	

2.2. Management Structure and Responsibilities

The AGL Hydro management structure with respect to this plan is as follows (refer to appendices):

Head of Hydro - responsible for:

- Overall management of AGL Hydro
- Timely completion and actioning of bushfire mitigation strategies; and
- Ensuring the actions of AGL Hydro meet legislative requirements.

Operations Manager – responsible for:

- Compliance and Verification of the bushfire mitigation plan
- Ensure proper liaison with other fire attack and land management agencies; and
- Ensure the administration of the Bushfire Mitigation Plan meets legislative requirements

Works Team Supervisor – responsible for:

- Ensuring all outstanding work is completed in a timely manner and adequate resources are made available for the implementation of the plan
- Ensuring all outstanding compliance issues are addressed and to ensure that matters are communicated to senior management; and
- Ensuring all compliance and Verification outcomes are reported to the Operations Manager in a timely manner

Works Team Leaders (Civil and Electrical) — responsible for:

- Day to day operation of electric line asset maintenance in accordance with this plan
- Asset inspection, vegetation control program and liaison with other land management agencies in accordance with this plan; and
- Allocation of contracts, with the responsibility of ensuring training and competencies are maintained in accordance with this plan. Refer 4.5
- Development of the verification report prior to the declared fire season

Senior Electrical Engineer — responsible for:

- Providing technical advice as required to ensure that the assets are maintained to the required standard; and
- Assist with contractor evaluation and selection to ensure they are technically competent and can provide the required levels of service

3. References

3.1. Victorian

- AGL Hydro Line Clearance Plan 2022-2023
- AGL Hydro Electricity Safety Management Scheme 2022 (Hydro)
- AGL Hydro Electricity Safety Management Scheme 2022 (Yarrawonga)
- AGL Hydro Electricity Safety Management Scheme 2022 (Somerton)
- AGL Hydro Consultation, Communication and Dispute Resolution (HP AI AD 01)
- AGL Hydro Customer Complaints Policy
- Electricity Safety Act 1998
- Electricity Safety (Electric Line Clearance) Regulations 2020
- Electrical Safety (General) Regulations 2019
- Electricity Safety (Management) Regulations 2019
- Electricity Safety (Bushfire Mitigation) Regulations 2013
- Electricity Safety (Bushfire Mitigation Duties) Regulations 2017
- Australian Standard AS4373 Pruning of Amenity Trees

Approved Date: 06/09/2022

Document ID: 9708169

Release of the Bushfire Mitigation Plan 2022-2023 Approved By: Simon Kelley (A100998)

Next Review Date: 05/09/2023

Owner: Hydro Manager

Uncontrolled When Printed 11

11 of 57

3.2. New South Wales

- AGL Hydro Installation Safety Management Plan (ISMP) – NSW Power Stations
- Line Clearance Plan 2022-2023
- Electricity Safety Act 1995
- Electricity (Consumer Safety) Act 2004 (Section 32)
- Electricity Supply (Safety & Network Management) Regulation 2014
- Service and Installation Rules 2019 of NSW
- NSW Code of Practice – Installation Safety Management Plan
- NSW Code of Practice – Managing Electrical Risks in the Workplace
- ISSC 4 – Guideline for Managing Vegetation Near Powerlines

4. Policy

Reg	Requirement
6 (1)(e)	the bushfire mitigation policy of the specified operator to minimise the risk of fire ignition from its at-risk electric lines.

AGL Hydro Hydro's management and employees are committed to avoiding fire ignition caused by electrical assets and achieving compliance with relevant legislative and regulatory requirements while encouraging innovation, system improvement and the effective use of our flexible resources. AGL Hydro Hydro's policy is to mitigate as far as practicable the risk of fire starting from those at-risk assets that AGL Hydro own.

This Bushfire Mitigation Plan outlines the policies, procedures, standards, codes, and guidelines that AGL Hydro applies to construction, operation and management of our electrical infrastructure and sub-networks. The Plan also provides an overview of AGL Hydro Hydro's bushfire risk management strategies in relation to key stakeholders including local government, government agencies and emergency services.

AGL Hydro is committed to maintaining fire safe assets by:

- Periodic inspection of the assets to identify the works necessary to maintain fire safety
- Operation programs to remove or manage the identified risks; and
- Monitoring and reporting regimes to measure the state of preparedness for the declared bushfire season and the effectiveness of programs.

5. Plan Objectives

Reg	Requirement
6 (1)(f)	the objectives of the plan to achieve the mitigation of fire danger arising from the specified operator's at-risk electric lines.

The objectives of AGL Hydro Bushfire Mitigation Plan are as follows:

- Public Safety
- Compliance by AGL Hydro with the Electricity Safety Act 1998 (Vic) and Electricity Safety Act 1995 (NSW) and associated regulations
- To maintain a program of inspection of assets on a regular basis dictated by the risks assessed at each location
- Reduce the risk of fire starting from its assets
- Vegetation management with compliance to minimum clearances and environmental practices
- Asset maintenance to a level consistent with industry standards

- Liaise with fire attack and land management agencies to formulate strategies to minimise damage to the environment in the case of bushfires
- Measurement, monitoring, reporting, and Verification of program achievement and performance including the rectification of non-conformances; and
- Regular assessment of all programs in accordance with the relevant standards, regulations, and codes.

6. Scope

6.1. Overview

AGL Hydro assets forms a key part of the AGL Hydro fleet which has one of the largest portfolios of Renewable generation assets across Australia. AGL Hydro was established from the breakup of the former State Electricity Commission of Victoria and now operates hydroelectric power stations across Victoria and NSW. Our three primary hydroelectric schemes are in the Kiewa, Dartmouth and Eildon catchments.

Overhead electric line assets in Victoria are in the Kiewa and Rubicon catchments, and within the Cairn Curran Power Station switchyard. Overhead electric line assets in New South Wales are in the Pindari, Copeton, Burrendong, and Glenbawn Power Station switchyards located at the base of Water NSW owned and operated dams. Maps identifying the areas where the assets are located are provided in the appendices.

AGL Hydro bushfire mitigation strategy is described by this Bushfire Mitigation Plan along with other documents, including the Electric Line Clearance Management Plan (Vic), and Installation Safety Management Plans (NSW), and all subordinate documents.

6.2. Maps

Reg	Requirement
6 (1)(g)	a description, map or plan of the land to which the bushfire mitigation plan applies, identifying the location of the specified operator's at-risk electric lines.

Refer to Appendices for the following maps of the land and location of at-risk electric lines:

- Kiewa Hydro Scheme Assets
- Dartmouth Hydro Scheme Assets
- Yarrawonga Power Station Asset
- Eildon Hydro Scheme Assets
- Rubicon Hydro Scheme Assets
- NSW Hydro Scheme Assets

7. Prevention Strategies

Reg	Requirement
6 (1)(h)	the preventative strategies and programs to be adopted by the specified operator to minimise the risk of the specified operator's at-risk electric lines starting fires.

7.1. Preventative Programs

The following preventative programs are adhered to, to minimise the risk of bushfire initiation AGL Hydro assets:

- All conductor spans in all areas will be inspected prior to the start of the fire season to identify any trees infringing the clearance space and any other obvious line defects, which may be a cause of the ignition of fire. Inspections may be carried at other times depending on location and prevailing weather conditions
- The inspection will be carried out by the method determined by the Works Team Supervisor as the most appropriate in the circumstances including ground patrol or line inspection; and
- The clearance space prescribed in the line clearance regulations will always be maintained clear of vegetation. In carrying out the work necessary to achieve this, the duties assigned to the responsible person in the electric line clearance plans will be observed

7.2. Monitoring of Asset Condition and Vegetation

The procedures employed by AGL Hydro meet the requirements of electric line clearance regulations and include:

- Recurrent pruning and clearing will be conducted on a maximum 36-month (+/- 1 month) cycle for hazardous fire areas, however, all reasonable efforts will be made to achieve an annual pruning and clearing cycle with the following objectives
- To maintain the clearance space during this period additional pruning and clearing will be required (regrowth space) and diseased and unstable vegetation in the area beyond this which is a hazard to the line (hazard space) must be removed or other remedial action taken
- Establishing the appropriate regrowth space will enable pruning and clearing to be limited to the maintenance cycle, but as this is dependent on climatic conditions during the cycle pre-summer, clearing may be necessary at some locations outside the normal cycle
- The pre-summer inspection program is produced by SAP and coordinated by Civil works team
- The pre-summer Verification program of all AGL Hydro line assets for vegetation clearance is conducted by an independent, competent, external contractor on an annual basis. AGL Hydro monitors this program via regular Verifications of the contractors
- The ongoing inspection program is scheduled using SAP and undertaken by authorised competent employees and/or contractors (refer to the appendices)
- The ongoing Verification program consists of annual desktop Verifications of procedure and maintenance tasks and regular fault reporting arising out of routine line Verifications; and
- To maintain a high standard of compliance through technology and information exchange AGL Hydro undertakes to maintain best industry practice through regular communications and liaison with distribution and transmission network companies

7.3. Engineered Solutions

AGL Hydro will investigate engineering solutions prior to any clearing activities. Alternative methods shall be used where the benefits outweigh those of conventional practices.

AGL Hydro undertake to provide uniform and consistent asset management strategies for undertaking corrective (reactive) and preventive (pro-active) actions committed to avoiding fire ignition caused by electrical assets and achieving compliance with relevant legislative and regulatory requirements.

Asset management strategies comprise major capital upgrades and consideration to underground infrastructure aimed at reducing risk and ongoing operating and maintenance costs with respect to overhead lines and easements (refer to the appendices).

7.4. Hardware Maintenance and Replacement

When conducting routine hardware and vegetation inspections AGL Hydro staff will note the absence of any cross-arm bird covers and arrange to have them replaced during the next scheduled line maintenance opportunity, or arrange an outage for replacement, prior to the commencement of the declare bushfire season.

AGL Hydro undertake to remove brown insulator hardware during the normal cyclic maintenance of overhead line assets.

AGL Hydro has one Expulsion Drop out Fuse (EDO) at Cairn Curran Power Station. The replacement of this EDO is not planned although catchers for molten metal have been attached for compliance with bushfire mitigation standards. AGL Hydro no longer has any pole mounted powder filled fuses (PFFs).

AGL Hydro has instructed its line maintenance service providers that all work carried out and hardware purchased and installed on AGL Hydro behalf must be fully compliant with all bushfire mitigation standards.

7.5. Victorian Powerline Bushfire Safety Program

The Victorian Government recently introduced enhanced powerline fault detection and suppression requirements to reduce the risk of bushfires caused by faults on the state's regional and rural powerline networks including Rapid Earth Fault Current Limiter (REFCL) protection.

These requirements have been added to the Electricity Safety (Bushfire Mitigation) Regulations 2013 (Regulations) and form part of a raft of measures that have been undertaken as part of the Victorian Government Powerline Bushfire Safety Program (PBSP).

AGL Hydro will take reasonable precautions to minimise the risk of loss or damage to our equipment, premises or business that may result from the over-voltages that occur when a REFCL operates.

AGL Hydro has completed the necessary regulatory reviews and network hardening to ensure all legislative obligations associated with the effect of a REFCL operation on our sub-network and equipment are met.

7.6. Private Overhead Electric Lines

All AGL Hydro overhead line assets are either used for the transmission of generated electricity to the network supplier point of connection or used for the consumption of electricity from the network supplier point of connection. AGL Hydro is not a retailer that supplies customers via POEL's.

7.7. Key Timings

Key timings for preventative strategies are as follows:

- The Bushfire Mitigation Plan (BMP) will be completed and submitted to Energy Safe Victoria prior to the 1st of July each year
- The Electric Line Clearance Management Plan (LCP) will be completed prior to the 31st of March each year and submitted to Energy Safe Victoria upon request
- The NSW HV customer Installation Safety Management Plans (ISMP) will be completed and available to the NSW transmission or distribution network companies prior to the 1st of September each year
- Inspection program dates are triggered by SAP (refer to the appendices); and
- Timing for rectification works is determined by the priority status of work found.

8. Inspection Programs

Reg	Requirement
6 (1)(i)	a plan for inspection that ensures that all of the specified operator's at-risk electric lines are inspected at regular intervals of no longer than 37 months.

8.1. Inspection Methodology

The purpose of the inspection programs is to assess the condition of electricity generation and distribution assets, record test results and observations, and log results for further evaluation and action. Inspection programs have been designed for the surveillance of identified causes of fire ignition.

Structures are assessed using an infra-acoustic scanning technique (Woodscan®) to determine the residual strength at, or just above, ground line. Initially, the residual strength is determined as a percentage of the structures original strength given the structures strength group and size attributes.

The serviceability criteria assume that all structures were designed to an industry safety factor of 2.5:1. Our contracted service providers normally recommend that a limited state engineering analysis is undertaken to structures found to be limited life or unserviceable.

8.2. Load Assessments

It is critical that all load and structure information is associated with a directional bearing. These bearings are based on along-line and across-line coordinates from 0 – 360 degrees. To assess the applicable load of a structure we measure the following attributes:

- Exposed pole height
- Conductor sizes (including service cables)
- Span lengths, slope, and bearings
- Cross arm types and sizes
- Attachment heights for all attachments
- Stay attributes; and
- Exposure

8.3. Asset Performance and Health Index

Structures conforming to the requirements of the standard AS/NZS 7000 should have a Health Index (HI) greater than 1.0. (The 'Health Index' is the key performance measurement for serviceability and is calculated as 'factored strength over factored load').

The risk rating is based on the Serviceability category based on 'Residual Strength' as described in the flow chart above and the applicable loadings as measured in the field and defined in AS/NZS 7000. The risk table applicable to our assessments is:

WoodScan® status	Sustained Health Index	Ultimate Health Index	Both Indices
Measure	< 1.0	< 1.0	=> 1.0
Serviceable	Medium	Low	Very Low
Limited Life	High	Medium	Low
Unserviceable	Critical	Very High	Medium

8.4. Visual Inspections

Visual inspections of overhead electric line assets is undertaken by our contracted service providers utilising powered image stabilised binoculars and digital SLR cameras and includes, but is not limited to, the following:

- Cross-arms
- Poles
- Insulators

- Conductors
- Connectors
- Stays
- Transformers
- Switches
- Fusing and HV apparatus
- Earthing
- Vegetation; and
- Design

8.5. Inspection Schedule

The following inspections are undertaken:

- A Vegetation Line Clearance Verification of all AGL Hydro line assets is conducted annually by an appropriately qualified contractor with results recorded in AGL Hydro works management system (SAP)
- Pole top inspection is conducted on a 36-month cyclic rotation (+/- 1 month). Inspection results are recorded in the AGL Hydro works management system (SAP)
- All poles, cross arms, conductors, and hardware belonging to AGL Hydro are inspected and tested on a 36-month cyclic rotation (+/- 1 month)
- Limited life poles belonging to AGL Hydro are inspected and tested annually

All issues or actions arising from any of these inspections are entered as jobs in SAP (refer to the appendices) and prioritised below. These SAP entries are reviewed as part of the annual Verification to ensure items have been completed in the required timeframe.

Priority/Code	Description
P1 (Immediate)	<ul style="list-style-type: none"> • Requires immediate remedial action
P2 (Break Schedule)	<ul style="list-style-type: none"> • Requires high priority remedial action within the current working week
P3 (Next Sched Week)	<ul style="list-style-type: none"> • Requires high priority remedial action within the next working week
P4 (Start 2-4 weeks)	<ul style="list-style-type: none"> • Requires remedial action within 2-4 weeks during fire & non fire season
P5 (Start 4+ weeks)	<ul style="list-style-type: none"> • Requires further assessment or remedial action within a period greater than 4 weeks in normal maintenance timeframes

8.6. High Voltage Cross Arms

Deteriorated HV cross-arms, where detected, will be replaced by galvanised steel cross-arms to prevent further deterioration and failure.

9. Qualifications, Training and Competency

Reg	Requirement
6 (1)(j)	details of the processes and procedures for ensuring that each person who is assigned to carry out the inspections referred to in paragraph (i) has satisfactorily completed a training course approved by Energy Safe Victoria and is competent to carry out such inspections.
6 (1)(k)	details of the processes and procedures for ensuring that persons (other than persons referred to in paragraph (j)) who carry out or will carry out functions under the plan are competent to do so.

This section outlines the process to be employed by all personnel, including contracted staff, carrying out asset inspections and tests carried out in a responsible manner and applies to all persons associated with this management plan.

All personnel, including contracted staff, must have satisfactorily completed the required competency-based training and their performance verified on an annual basis.

Contractor training and competency verifications are completed prior to the work commencing through the AGL Hydro contractor engagement 'Authority to Mobilise' (ATM) and pre-qualification process and at the commencement of the site work. Any non-compliance issues are communicated to the relevant contractor or employee and corrective actions are taken immediately. These are recorded for verification purposes.

9.1. Qualifications, Training and Competencies

Workers shall only undertake work for which they have been trained, assessed, and deemed competent to enable them to safely perform work and all relevant contractors must have sufficient knowledge, training, qualifications, and experience to ensure that tree activities under their control are conducted in a safe and environmentally responsible manner.

AGL Hydro engages contractors to perform annual inspections of at-risk electric assets and all work is carried out by suitably qualified and licensed personnel having experience in the types of work as laid out in the VESI framework.

AGL Hydro contractors who are suitably qualified will be considered as an "authorised person" or under the control of an authorised person under the Victorian High Voltage Code of practise on electrical safety for the work on or near high voltage electrical apparatus.

AGL Hydro records all contractor training and qualifications in the 'RAPID Global' and 'cm3' contractor management application systems including ensuring routine refresher training in relevant modules are current and work can be undertaken in a safe competent manner. Training records will be available prior to commencement of works or made accessible via the individuals Australian ESI Skills Passport.

AGL Hydro will have a representative responsible for carrying out this plan on site at the commencement of the inspections/clearance to observe/conduct appropriate inductions which may include such a request for records.

If any worker associated with the work tasks covered under this plan are found to be performing works outside of their capabilities or the prescribed documentation, they are supposed to be working under then work will be immediately stopped and the associated personnel removed from the site.

9.2. Competency and Refresher Requirements

9.2.1. Asset Management

The following table outlines the Units of Competency required to be undertaken for the applicable Asset Management and Inspection roles AGL Hydro. All Mandatory (M) units of competency shall be completed to undertake the role.

Qualification and Core Competency and Refresher Standard		Competency Standard Unit	Asset Inspector	Asset Inspector Trainee
Qualification				
Certificate II in Asset Inspection		UET20312	M	M
Apply ESI safety rules, codes of practice and procedures for work on or near electrical apparatus (Green Book / Blue book)		UETDRRF01B	M	M
Prepare to work safely in the construction industry		CPCCOHS1001A	M	M
Working safely near live electrical apparatus as a non-electrical worker		UETTDREL14A	M	M
Refresher Requirements				
3 Yearly	Apply ESI safety rules, codes of practice and procedures for work on or near electrical apparatus (Blue book)	UETDRRF01B	M	M
3 Yearly	Apply access procedures to work on or near electrical network infrastructure (Receive Access Permit)	UETDRRF09B	M	M
3 Yearly	Control traffic with stop-slow bat	RIIWHS205D	M	M
3 Yearly	Implement traffic management plan	RIIWHS302D	M	M
3 Yearly	Manual Handling		M	M
3 Yearly	VESI Environmental Framework		M	M
3 Yearly	VESI Safety Framework		M	M
1 Year	Cardiopulmonary Resuscitation (CPR)	HLTAID001	M	M
1 Year	First Aid in an ESI environment	UETDRRF10B	M	M
Other Requirements				
ESI Worker Card			M	M
Network Operator Induction			M	M

M – Mandatory; A – Additional (If worker requires for the works being performed)

9.2.2. Vegetation Management

The following table outlines the Units of Competency required to be undertaken for the applicable Vegetation role at AGL Hydro. All Mandatory (M) units of competency shall be completed to undertake the role.

9.2.2.1. Qualification and Competencies

Qualification and Core Competency Standard	Competency Standard Unit	Assessor	Cutter Working from EWP	Specialist Plant Operator	Tree Climber
Qualification					
Certificate II in ESI - Powerline Vegetation Control	UET20312	M	M	M	M
Apply ESI safety rules, codes of practice and procedures for work on or near electrical apparatus (Green Book / Blue book)	UETTDRRF01B	M	M	M	M
Elective Competency Standard Units					
Use climbing techniques to cut vegetation above ground near live electrical apparatus	UETTDRVC21A				M
Assess vegetation and recommend control measures in an ESI environment	UETTDRVC24A	M			
Use elevated platform to cut vegetation above ground level near live electrical apparatus	UETTDRVC25A		M		
Operate specialist equipment at ground level near live electrical apparatus	UETTDRVC31A			A	
Use specialised plant to cut vegetation above ground level near live electrical apparatus	UETTDRVC32A			M	
Apply pruning techniques to vegetation control near live electrical apparatus	UETTDRVC33A		M	M	M
Undertake release and rescue from a tree near live electrical apparatus	UETTDRVC34A				M
Fell small trees	AHCARB202A		A	A	A
Undertake standard climbing techniques	AHCARB204A				M
Apply chemicals under supervision	AHCCHM201A		A	A	A
Operate machinery and equipment	AHCMOM304A		A	M	A
Recognise plants	AHPCPM201A	M	A	A	A
Operate a mobile chipper/mulcher	FPIHAR2206B		A	A	A
Licence to operate a boom-type elevating work platform (boom length 11 metres or more)	TLILIC2005A		M		

M – Mandatory; A – Additional (If worker requires for the works being performed)

Approved Date: 06/09/2022

Document ID: 9708169

9.2.3. Refresher Requirements

Frequency	Qualification and Core Competency Standard	Competency Standard Unit	Assessor	Cutter Working from EWP	Specialist Plant Operator	Tree Climber
3 Yearly	Apply ESI safety rules, codes of practice and procedures for work on or near electrical apparatus (Blue book)	UETDRRF01B	M	M	M	M
3 Yearly	Apply access procedures to work on or near electrical network infrastructure (Receive Access Permit)	UETDRRF09B	M	M	M	M
1 Year	Cardiopulmonary Resuscitation (CPR)	HLTAID001	M	M	M	M
1 Year	First Aid in an ESI environment	UETDRRF10B	M	M	M	M
1 Year	EWP Controlled Descent Escape	UETDRRF08B		M		
1 Year	EWP Rescue	UETDRRF03B		M		
1 Year	Undertake release and rescue from a tree near live electrical apparatus	UETDRVC34A				M

M – Mandatory; A – Additional (If worker requires for the works being performed)

10. Operations and Maintenance Plans

10.1. Event of a Fire

Reg	Requirement
6 (1)(I)(i)	the operation and maintenance plans for the specified operator's at-risk electric lines — in the event of a fire

In the event of fire which prevents the safe operation of the HV overhead line, the line will be deenergised to minimise further ignition sources. Where the fire is in the area but presents minimal or no risk to the safe operation of the overhead line, the overhead line will continue to operate.

10.2. Days of Total Fire Ban and Fire Emergencies

Reg	Requirement
6 (1)(I)(ii)	the operation and maintenance plans for the specified operator's at-risk electric lines — during a total fire ban day

On days of Total Fire Ban and emergencies, the AGL Generation Dispatcher will inform AGL Hydro team leaders of the declaration days of total fire ban, verbally and in writing before 7:30 am. Team leaders will organise to reschedule any planned works that may be considered by government fire service agencies, or under codes of practice, regulations, or statutory requirements, to pose a risk of fire ignition.

Where such tasks need to be performed to ensure the security and safety of the network all permits required by the government fire service agencies, or under codes of practice, regulations, or statutory requirements, will be obtained.

AGL Hydro does not have any reclose suppression line protection systems. Subject to safe access, AGL Hydro high voltage pole assets in the Victorian Rubicon State Forest high risk area will be visually inspected subject to safe access, prior to 9:00am on Total Fire Ban days. Any potential hazards will be reported to the Works Team Supervisor and a decision made to remove the hazard or isolate the affected asset.

Records of events and instructions for days of Total Fire ban will be kept by AGL Hydro Dispatch Centre electronic logs for inspection by regulatory and government fire service agencies if required. The AGL Works Team Supervisor will remain in close liaison with government fire service in the approach to the fire season to confirm season start date.

10.3. During the Fire Danger Period

Reg	Requirement
6 (1)(l)(iii)	the operation and maintenance plans for the specified operator's at-risk electric lines — during a fire danger period

AGL Hydro assets will be operated in accordance with normal operating practices during the declared fire danger periods.

11. Investigations, Analysis and Methodology

Reg	Requirement
6 (1)(m)	the investigations, analysis, and methodology to be adopted by the specified operator for the mitigation of the risk of fire ignition from its at-risk electric lines.

AGL Hydro has had no fire starts from at risk electric lines. Electrical events/faults, if they influence risk of fire ignition from the AGL Hydro at-risk electric lines or not, are recorded and reported using AGL Hydro 'myHSE Event Report' which if considered to be a 'Serious Electrical Event', are reported separately to ESV and/or WorkSafe Victoria. For faults/incidents/defects requiring further internal investigation the 'Incident Reporting and Investigation Procedure' is followed.

11.1. Fire Reporting and Investigations

AGL Hydro undertakes to report, investigate, and analyse all fire ignitions originating from its electric line assets.

11.1.1. Definitions

Fires are categorised under two definitions as follows:

- Fire: the ignition of combustible materials on the ground including trees and other vegetation possibly caused by AGL Hydro assets; and
- Significant Fire: a fire which causes injury or death, or significant damage to stock or property which includes trees, pasture and fencing possibly caused by AGL Hydro assets.

11.1.2. Fire Reporting Procedures

Should a fire occur, which may have been caused by AGL Hydro assets it is to be reported by:

- A telephone report to the AGL Hydro Dispatch Center, Works Team Supervisor, Operations Manager and Head of Hydro
- An HSE incident raised in the AGL Hydro HSE Management System (myHSE) – Refer to Appendix 17.3 in this plan

When reporting fires causing minimal damage, and where it is unlikely that there will be any media involvement, the Head of Hydro, Operations Manager and Works Team Supervisor must be provided with at least the following information:

1. Current status of the fire (ie. out, under control etc.)
2. Attendance of any other authority (Police, CFA)
3. Date and time of discovery
4. Pole number
5. Locality or line/spur name
6. Injured personnel
7. Material damage
8. Line voltage
9. Possible cause; and
10. Details of preliminary information from the initial site inspection.

In the event of a significant fire, or if media involvement is likely, the Works Team Supervisor, Operations Manager and Head of Hydro are to be provided with the following information, in addition to that above, as soon as possible:

1. Name of the person reporting the fire
2. Whether AGL Hydro Employees are still on site; and
3. If the police attended the incident.

Fire Report information must be submitted within 48 hours of first notification of the incident. Sufficient detail is to be included to allow a full understanding of the incident (including weather, pole/cross arm materials, conductor materials, etc.).

11.1.3. Report to Energy Safe Victoria

If as the result of an incident, serious property damage, or a serious reduction in the level of public safety, has occurred or is likely to occur in Victoria, then all details of the incident must be reported to Energy Safe Victoria in accordance with the Electrical Safety Management Regulations 2009. Refer to the AGL Hydro Electrical Safety Management Scheme Manual for assistance with the reporting process requirements.

11.1.4. Investigations

In the event of any fire involving AGL Hydro assets; the Operations Manager with the assistance of the Works Team Supervisor is to initiate an investigation into the cause and effects of the fire and produce, if necessary, a plan for minimising the likelihood of a further similar occurrence. Every effort is to be made to commence the investigation within two calendar weeks of the incident and have the investigation completed and the recommendations and action plan produced within six calendar weeks of the incident. Investigation findings, recommendations and action plans are then to be forwarded to the regulatory agencies for all notifiable incidents.

11.2. Response Review and Reporting

- AGL Hydro undertakes to respond as soon as practicable to all fires arising from their actions or asset. In the case of potential ignition sources from asset operations on days of total fire ban, AGL Hydro may open-off HV lines running through high-risk areas, dependent on weather conditions such as the Rubicon State Forest. All employees and contractors employed by AGL Hydro are instructed to report all fires immediately
- Bushfire Mitigation Plans, Electric Line Clearance Management Plans, Installation Safety Management Plans, and all subordinate documents will be reviewed on an annual basis or more frequently if required
- All AGL Hydro procedures, documentation and asset readiness relating to bushfire mitigation, shall be reviewed each year in August prior to declaration of the fire season. All corrective actions identified shall be identified prior to the declaration of the fire danger period. A verification report and progress on corrective actions shall form part of the annual review of the plan prior to the declaration of the fire season; and
- AGL Hydro shall forward the bushfire mitigation index (refer to the appendices) relating to the Victorian assets to Energy Safe Victoria monthly during the declared period.

11.3. Assistance from Fire Agencies for Fires near Electrical Assets

The following procedures apply when assistance is required from fire agencies for fires near electrical assets:

- Access to assets - for personal safety reasons no access to any high voltage source (eg: switchyards, HV Lines, Poles) by any fire authority or personnel is permitted without prior approval from an authorised employee of AGL Hydro
- Appointed contact persons — in the event of an incident affecting any AGL Hydro asset, the Duty Officer shall notify the Works Team Supervisor or his delegate for allocation of resources; and
- Information exchange - AGL Hydro shall maintain a free exchange of information to all fire control agencies to enable a rapid, appropriate response to all incidents. The Works Team Supervisor will use this information exchange to best advantage to identify risks to and from AGL Hydro assets and effectively apply lessons learnt from past events to manage future fire risk.

12. Processes and Procedures

12.1. Implementation Monitoring

Reg	Requirement
6 (1)(n)(i)	details of the processes and procedures by which the specified operator will— monitor the implementation of the bushfire mitigation plan

12.1.1. General

Monitoring the implementation of the plan is performed predominantly through the use and management of the AGL Hydro SAP works management system which records any required scheduled or unscheduled works including, but not limited to, the preventative works listed in this plan.

The specific measure is the closure of maintenance work orders related to bushfire mitigation and line vegetation works which have a due date, or are required to be done, prior to the 1st of December or before the declared fire danger period each year, whichever is earlier.

12.1.2. Preparedness Reviews

AGL Hydro will undertake annual reviews of its bushfire preparedness in relation to overhead line assets and generation structures. Plan reviews by Senior Leaders, and other nominated staff, will be held annually to validate; the plan; the efficiency of maintenance programs, program compliance, and program relevance.

Random checks will be undertaken during October/November of each year into all facets of the implementation of the bushfire mitigation plan.

Plan reviews by Senior Leaders, include:

- Operations Governance Manager
- Works Team Supervisor
- Senior Electrical Engineer
- Works Team Leader (Civil)
- Works Team Leader (Electrical); and
- Other nominated personnel as deemed necessary

Note: A delegate may be nominated in the absence of one of the above Leader.

Plan reviews will include checks and assessments of the following:

- Planning
- Monitoring inspections carried out
- Line maintenance database & SAP
- Urgent work
- Poles and Line hardware
- Trees/vegetation
- Communication effectiveness with the fire service agencies
- Response to days of Total Fire Ban and high fire danger; and
- HV switching procedures

All issues or actions arising from any of these reviews are entered as jobs in the SAP works management system (refer to the appendices) and prioritised as follows:

The Works Team Supervisor oversees each plan review and coordinates follow-up action to verify the implementation of the corrective action and that a works management work order is raised and tracked.

12.1.3. Plan Effectiveness and Monitoring

The results of plan reviews that identify deficiencies in the procedures or the plan implementation associated with the management of bushfire mitigation are added to the HSE management system and action register for further action and tracking. This register tracks the issue, responsible person, and progress status. The results of each plan review including the documented actions are advised to the Hydro Leadership Team.

The change to a procedure or this plan will be implemented in a timely manner depending on the significance of the issue identified. All items identified will be incorporated into the next annual revision of the manual.

12.1.4. Performance Indicators

Other performance measures which will be collated and reviewed annually prior to the resubmission of this plan to ESV include:

- Number of electrical events/faults that have occurred on the relevant Electric Lines with the cause identified to be directly related to their condition and/or compliance with the Regulations
- Annual Number of Fire Starts
- Number of Stakeholder complaints/correspondence received in relation to the relevant Electric Lines as measured through AGL Hydro's community and communications department

Approved Date: 06/09/2022

Document ID: 9708169

- Lost Time Injuries (LTI's) or Medical Treatment Injuries (MTI's) with the cause identified to be directly related to the Electric Lines
- Future Electric Line Clearance Plan submitted by 30th June each year
- Financial Penalties (Penalty Units) received

12.2. Implementation Verification

Reg	Requirement
6 (1)(n)(ii)	details of the processes and procedures by which the specified operator will— Verification the implementation of the plan

Verification the implementation of the plan is largely done as part of the annual review process prior to resubmission of this plan to ESV and a review prior to the declared fire danger period which will be undertaken by a representative responsible for carrying out this plan which includes:

- That the qualifications and experience of personnel performing any scheduled inspection and/or clearance works adheres to both ESV's and this plans requirements
- Associated report/s have been submitted to the persons responsible for carrying out this plan
- All inspections, reports, and subsequent recommendations from have been conducted in line with the scope/timing of recommendations and to the quality of this plan and the applicable Acts, Regulations, Codes and Standards; and
- The inspections and recommendations from the report, if any, have appropriate task/s entered in the AGL Hydro SAP works management systems and those task/s have been closed out following completion or the works.

12.3. Implementation Deficiencies

Reg	Requirement
6 (1)(n)(iii)	details of the processes and procedures by which the specified operator will— identify any deficiencies in the plan or the plan's implementation

Identification of any deficiencies in the plan or the plan's implementation is achieved through:

- The annual review process of this plan prior to resubmission to ESV
- Persons carrying out this plan to provide feedback to their Leader and/or the person/s responsible for the preparation of this plan when a deficiency is found
- AGL Hydro critical control checks and workplace safety and environment observation/conversation program which requires employees and leaders to have routine observation/conversation which are entered into the AGL Hydro myHSE systems; and/or
- Review of site/asset risk registers.

12.4. Changes to the Plan's Implementation

Reg	Requirement
6 (1)(n)(iv)	details of the processes and procedures by which the specified operator will— change the plan and the plan's implementation to rectify any deficiencies identified under subparagraph (iii)

Changes to the plan and the plan's implementation if any deficiencies are identified are performed during the annual review of this plan prior to resubmission to ESV.

If there are more critical changes required to important information, including but not limited to, contact details or applicable procedures/policies these will be performed as soon as possible and resubmitted to ESV. The updated plans will then be reloaded into the AGL Hydro enterprise library and on the AGL Hydro webpage listed in the plan.

The annual review of this plan is performed by the persons responsible for preparing the plan in conjunction with the other stakeholders and responsible persons listed in this plan. These include, but is not limited to, updating the plan for any new or revised Legislation, Regulations or Codes, industry practices and Electric Line configurations and/or locations.

12.5. Monitor Effectiveness of Inspections

Reg	Requirement
6 (1)(n)(v)	details of the processes and procedures by which the specified operator will— monitor the effectiveness of inspections carried out under the plan

Monitor the effectiveness of inspections under the plan will be performed through the annual review of the performance measures listed above by the persons responsible for preparing the plan.

12.6. Verification of the Effectiveness of Inspections

Reg	Requirement
6 (1)(n)(vi)	details of the processes and procedures by which the specified operator will— Verification the effectiveness of inspections carried out under the plan

Verification of the effectiveness of any inspections carried out under the plan is performed through conducting a ground based visual assessment following the completion of the 36-month (+/- 1 month) Electric Line Inspection works. This will be performed by personnel who have:

- Knowledge of applicable Acts, Regulations and Codes associated with this plan
- Knowledge of this plan and its review and verification obligations
- Knowledge and are familiar with, the Electric Lines subject to the review and verification; and
- A minimum of 3 years Electric Line management experience; or
- An independent 3rd Party.

13. Assistance Provided to Fire Control Authorities

Reg	Requirement
6 (1)(o)	the policy of the specified operator in relation to the assistance to be provided to fire control authorities in the investigation of fires near the specified operator's at-risk electric lines.

13.1. Investigations of fires

AGL Hydro will allow access to and assist fire control authorities in the investigation of fires at or near the relevant Electric Lines.

13.2. Liaison with Management Agencies

AGL Hydro will maintain a representative on the local Shire or Municipal Emergency Management Committees to ensure that fire mitigation strategies are in place and communicated prior to the declaration of fire season.

AGL Hydro shall maintain links with the local government agencies such as the CFA, Parks Victoria, Water NSW and DELWP to ensure swift and effective, response to fire ignition within its area of responsibility.

14. Public Awareness Programs

AGL Hydro has no private electric supply lines connected to any of its overhead assets. Where AGL Hydro has overhead lines passing over private or public land it shall inform, and make aware, the land holders of their obligations about ensuring limits of approach and clearance distances are maintained, allowing access for periodic inspections, and what actions will need to be undertaken if there is a non-compliance. This will be achieved by informing land holders in writing of AGL Hydro needs for asset access and inspection times, their rights, and the procedure for settlement of any grievances arising.

15. Plan available for inspection

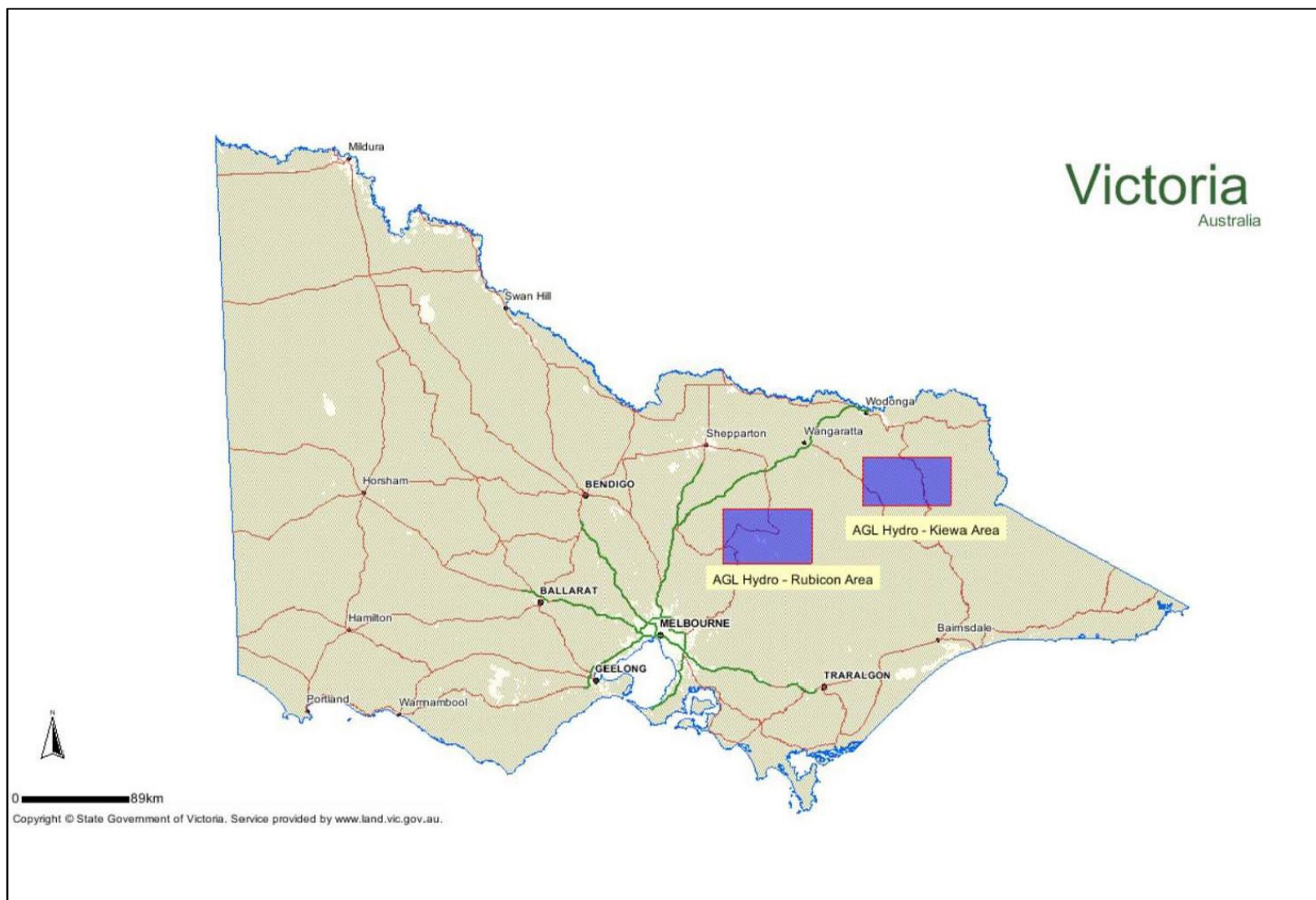
As per Section 83BA (3) (a) of the Act, the latest ESV approved Bushfire Mitigation Plan is available on the AGL Hydro internet site at: <https://www.agl.com.au/about-agl/how-we-source-energy/hydroelectric-assets>

Any superseded versions of the plan located at the above websites will be overwritten by the AGL Hydro person responsible for preparing the plan once an updated version of the document has been approved/accepted by ESV.

A hardcopy of the ESV approved/accepted Bushfire Mitigation Plan mentioned above is available for inspection at AGL Hydro Mt Beauty Administration office, during normal business hours, located at Kiewa Valley Hwy, Mt Beauty 3699. Any hardcopy superseded versions of the plan will be destroyed by the person responsible for preparing the plan.

16. Victorian Assets

All overhead electric lines outline in this section are in a Hazardous Bushfire Risk Areas (HBRA). Images in this section are extracts only and illustrates the approximate location of pole assets. For current and detailed specific asset and scheduled maintenance information, please refer to the SAP works management system.



16.1. Kiewa Hydro Scheme Overhead Powerlines

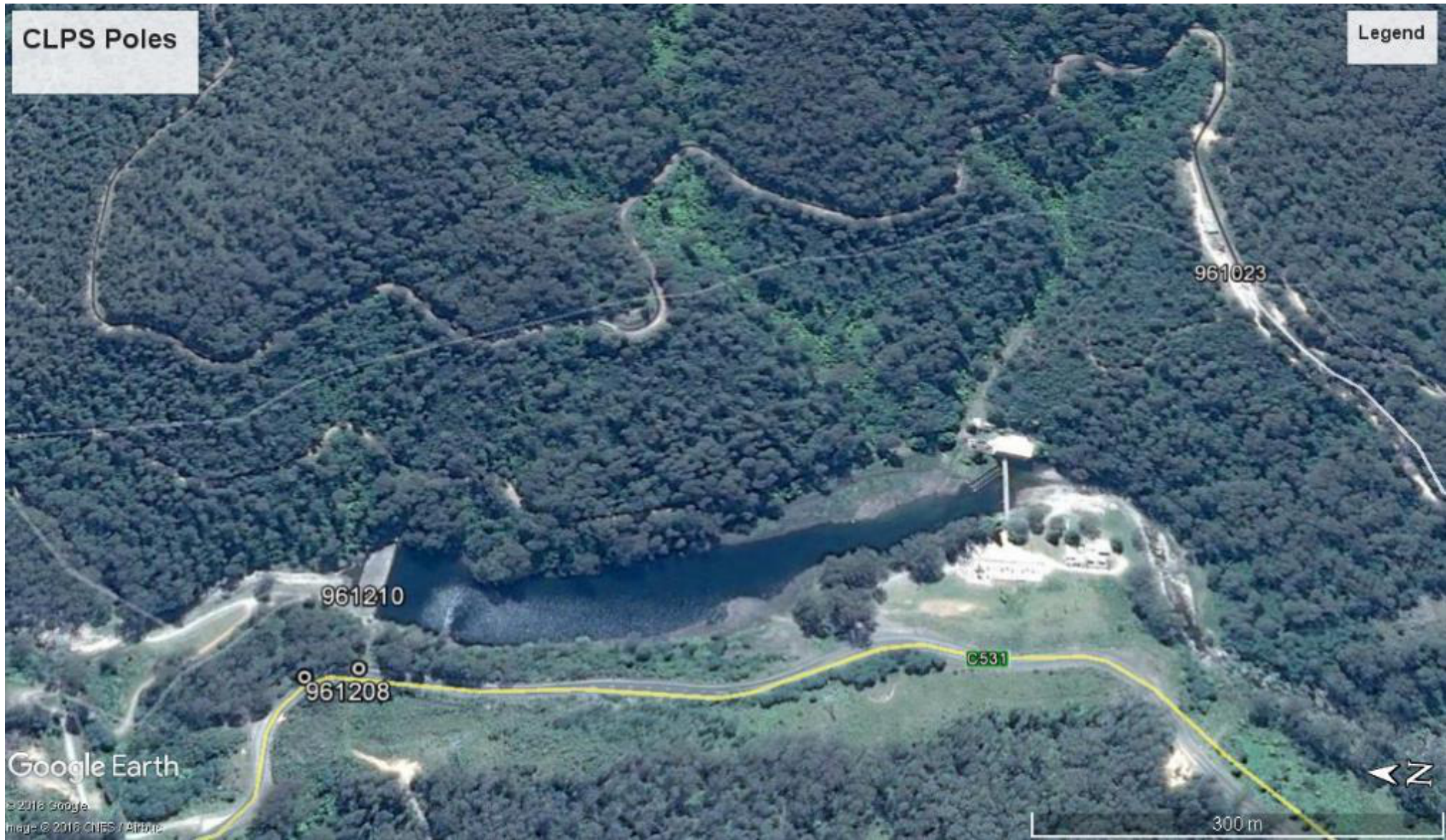
16.1.1. Mount Beauty Depot Pole Location Image



West Kiewa Image



16.1.2. Clover and Bogong Creek Raceline

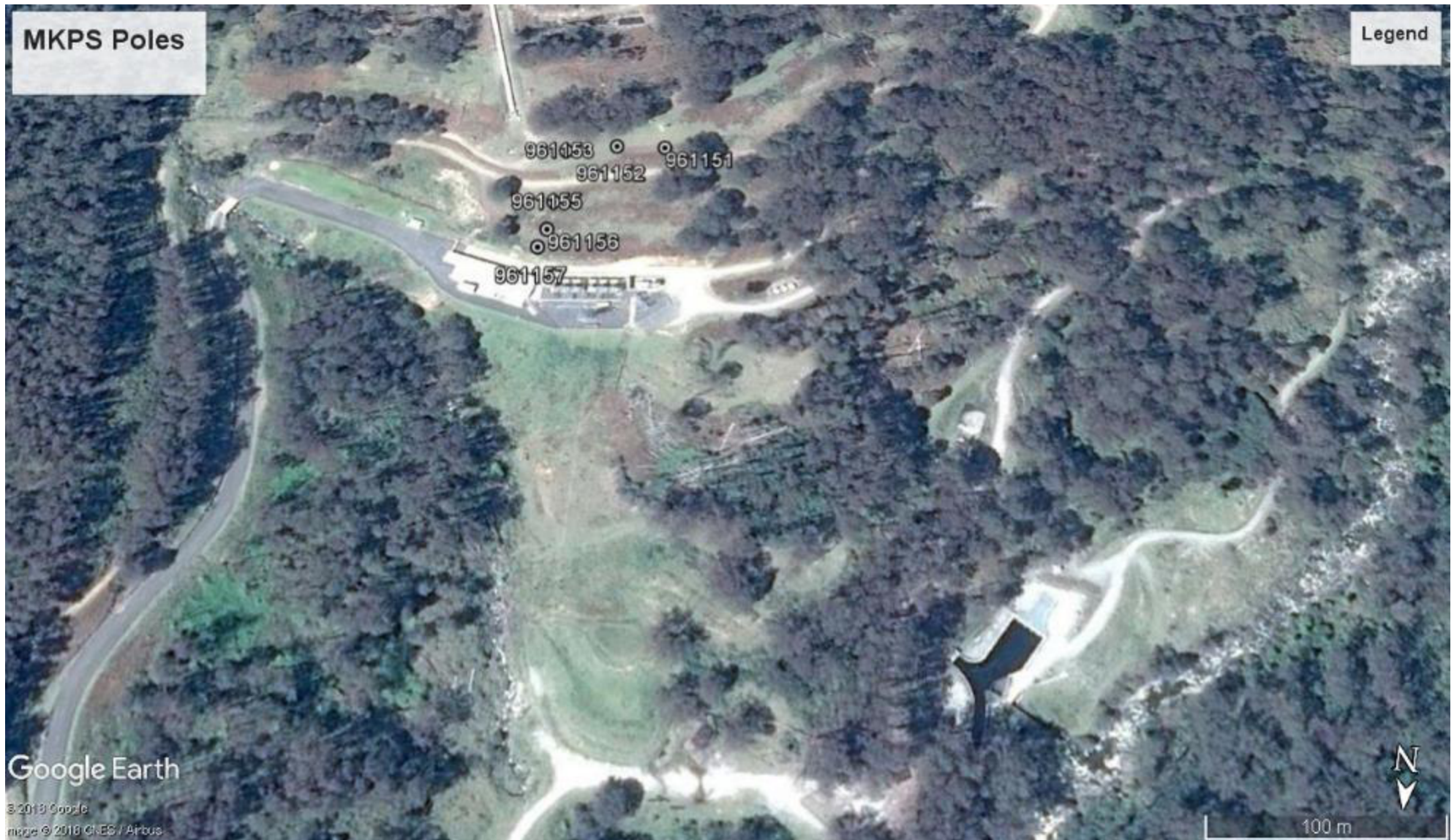


16.1.3. Bogong



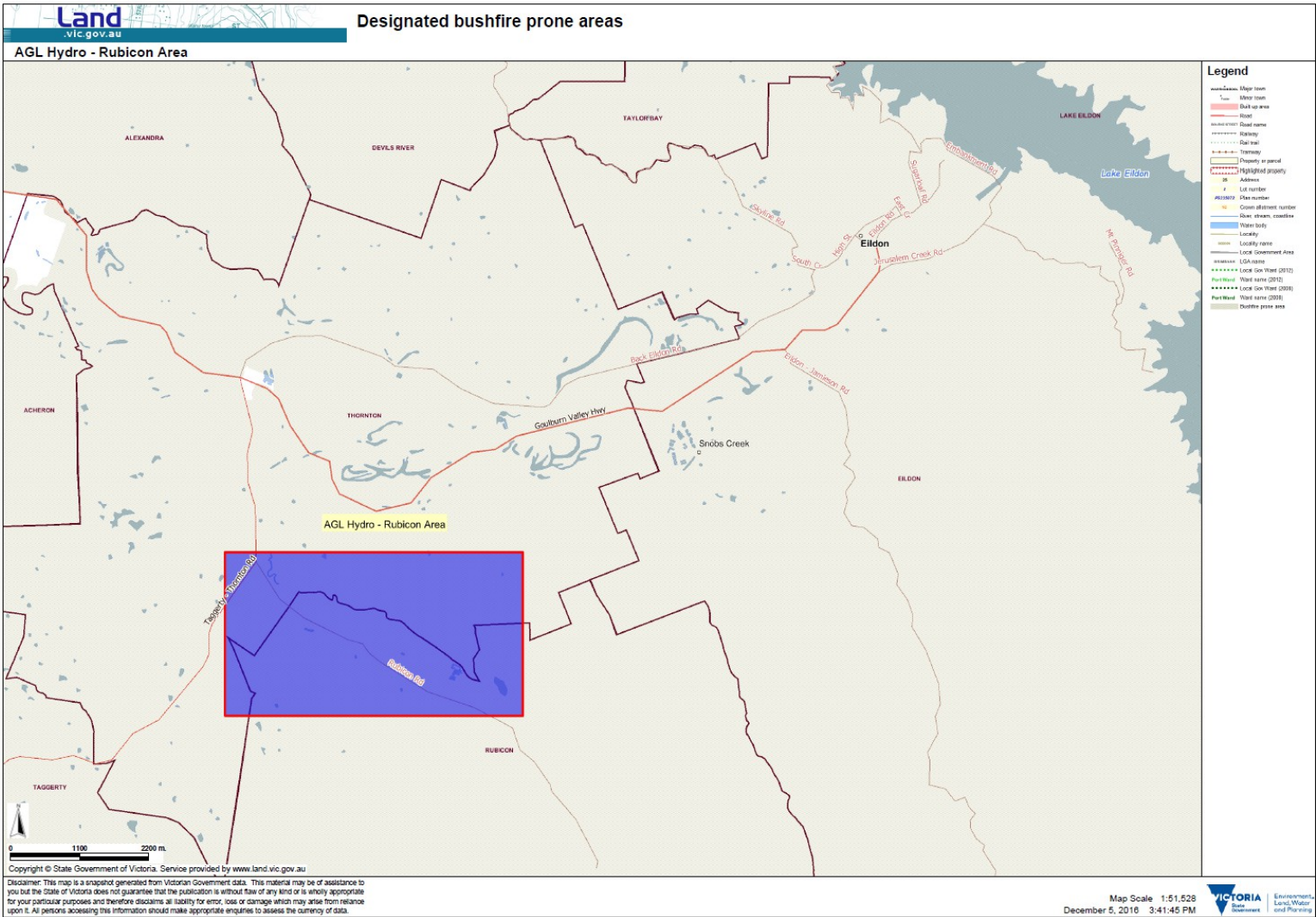
16.1.4. Kiewa – McKay Crk PS





16.2. Rubicon Hydro Scheme Overhead Powerlines

This section relates to all overhead electric lines in the Rubicon Hazardous Bushfire Risk Area (HBRA). Images in this section are extracts only and illustrates the approximate location of pole assets. For current and detailed specific asset and scheduled maintenance information, please refer to the SAP works management system.



Approved Date: 06/09/2022

Approved By: Simon Kelley (A100998)

Uncontrolled When Printed

Document ID: 9708169

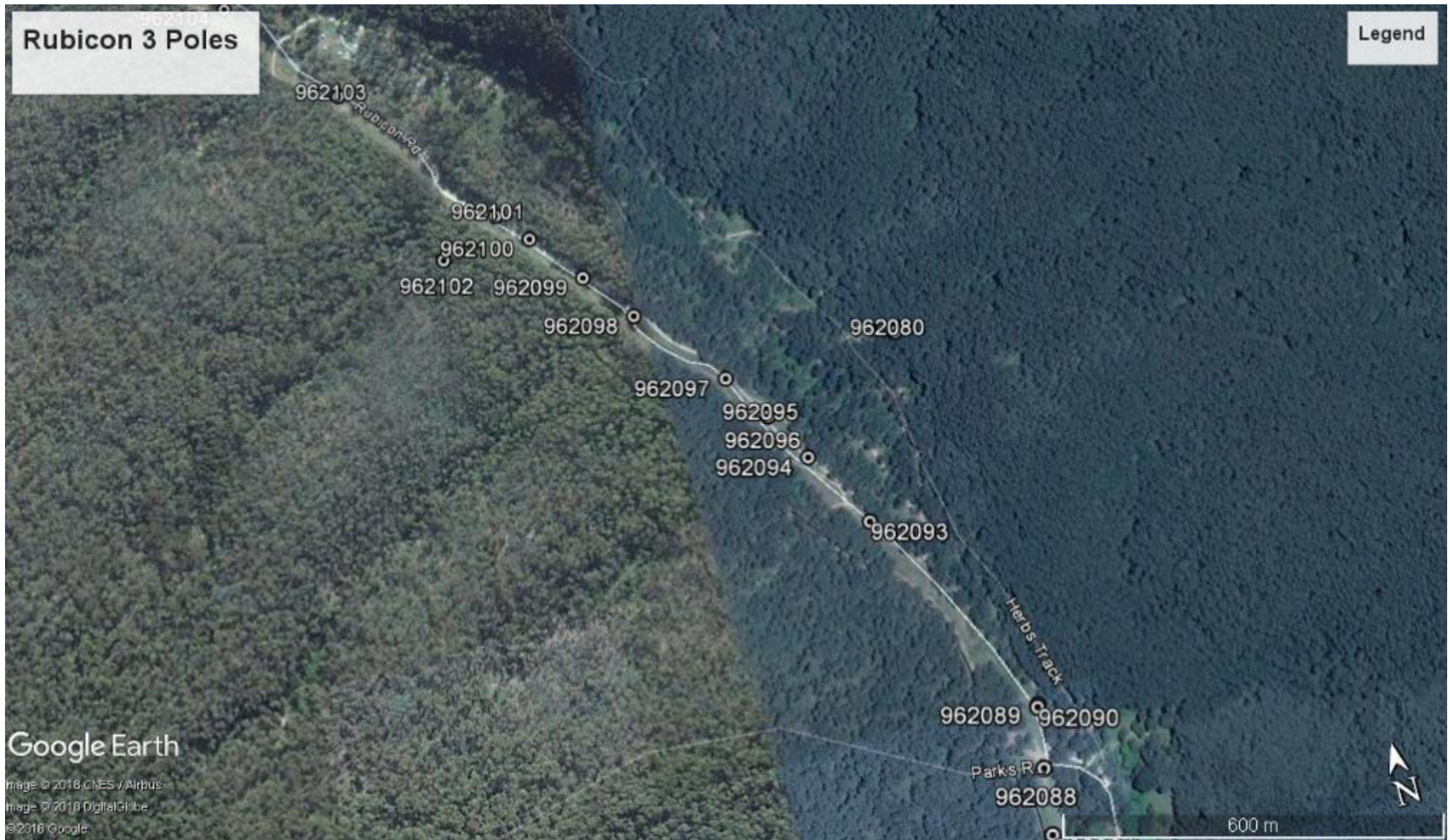
Next Review Date: 05/09/2023

36 of 57

16.2.1. Rubicon A - Rubicon PS







16.2.2. Rubicon PS



16.2.3. Rubicon Falls PS

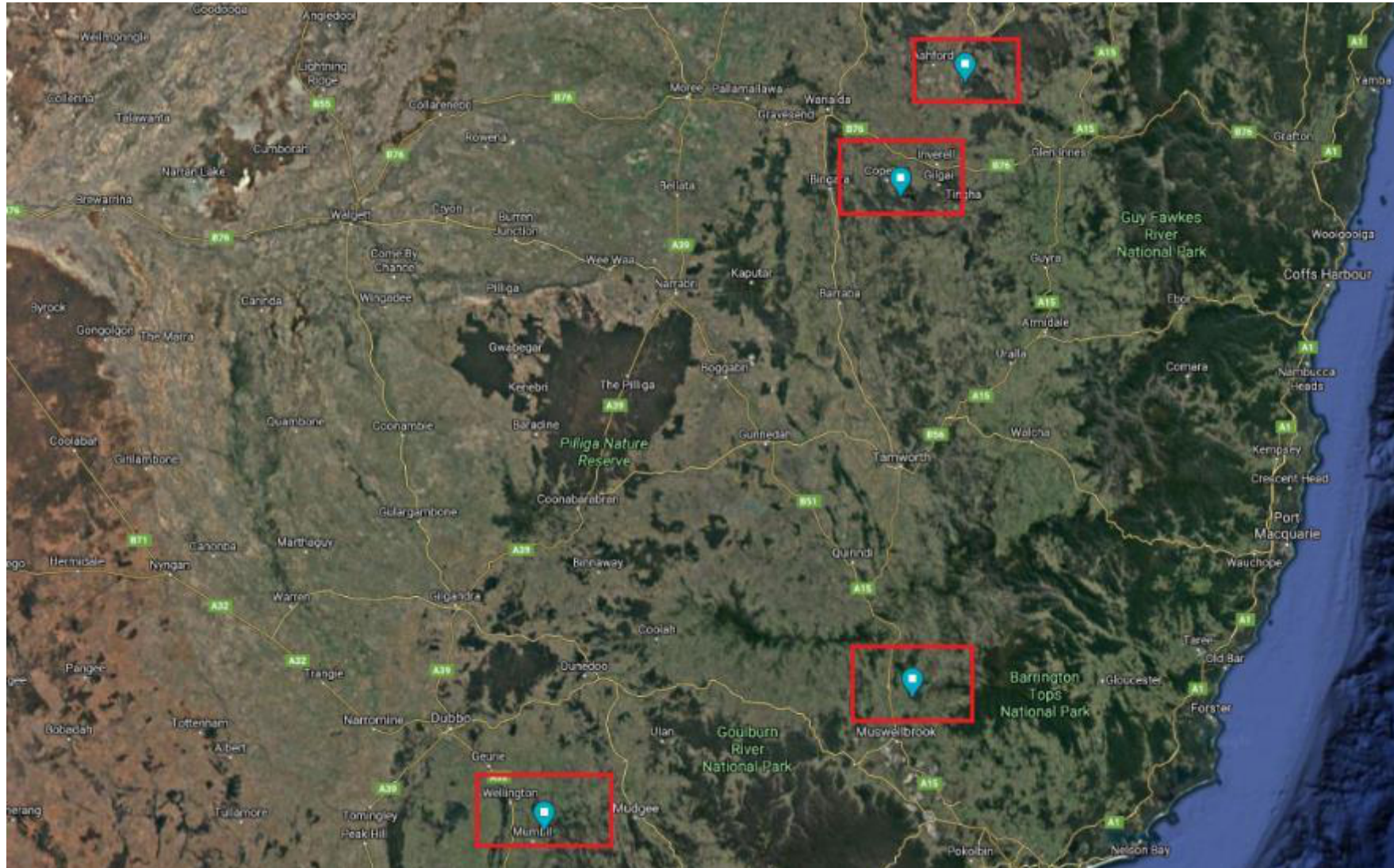


16.2.4. Royston PS





16.3. NSW Assets


All AGL Hydro NSW overhead electric lines are located with the confines of the power station switchyard of each asset located in the following Hazardous Bushfire Risk Areas (HBRA). Images in this section illustrates the approximate location of pole assets, and for detailed and specific asset information, including locations, please refer to the SAP works management system register.





16.3.1. Pindari Power Station

Address	Pindari Dam Road
Connection Point: Connection clamp to the 66kV incoming line to the AGL Pindari substation. AGL Hydro Asset Ownership: AGL Hydro Pindari substation infrastructure including incoming 66kV pole structure and 66kV line connection clamp and dropper cable. TNSP Asset Ownership: 66kV incoming overhead line and insulator connected to the AGL Hydro incoming overhead line pole structure.	
NSW Rural Fire Service bushfire prone area assessment: Bushfire Prone Location	

16.3.2. Copeton Power Station

Address	Copeton Dam Road
Connection Point: 66kV incoming line aerial terminations on the AGL Hydro Copeton substation overhead landing span structure. AGL Hydro Asset Ownership: AGL Hydro Copeton substation infrastructure including incoming 66kV landing span structure and 66kV line connection clamp and dropper cable. TNSP Asset Ownership: 66kV incoming overhead line and insulator connected to the AGL Hydro incoming overhead line landing span structure.	
NSW Rural Fire Service bushfire prone area assessment: Bushfire Prone Location	

16.3.3. Burrendong Power Station

Address	Burrendong Dam Road
<p>Connection Point:</p> <p>132kV incoming line aerial terminations on the AGL Hydro Burrendong substation overhead landing span structure.</p> <p>AGL Hydro Asset Ownership:</p> <p>AGL Hydro Burrendong substation infrastructure including incoming 132kV landing span structure and 132kV line connection clamp and dropper cable.</p> <p>TNSP Asset Ownership:</p> <p>132kV incoming overhead line and insulator connected to the AGL Hydro incoming overhead line landing span structure.</p>	
<p>NSW Rural Fire Service bushfire prone area assessment:</p> <p>Bushfire Prone Location</p>	

16.3.4. Glenbawn Power Station

Address	Glenbawn Dam Road
----------------	-------------------

Approved Date: 06/09/2022

Document ID: 9708169

Release of this document is controlled by the NSW Rural Fire Service (NSW RFS) and is not to be used for any other purpose without the written consent of the NSW RFS.



Next Review Date: 05/09/2023

Owner: Hydro Manager

Approved By: Simon Kelley (A100998)

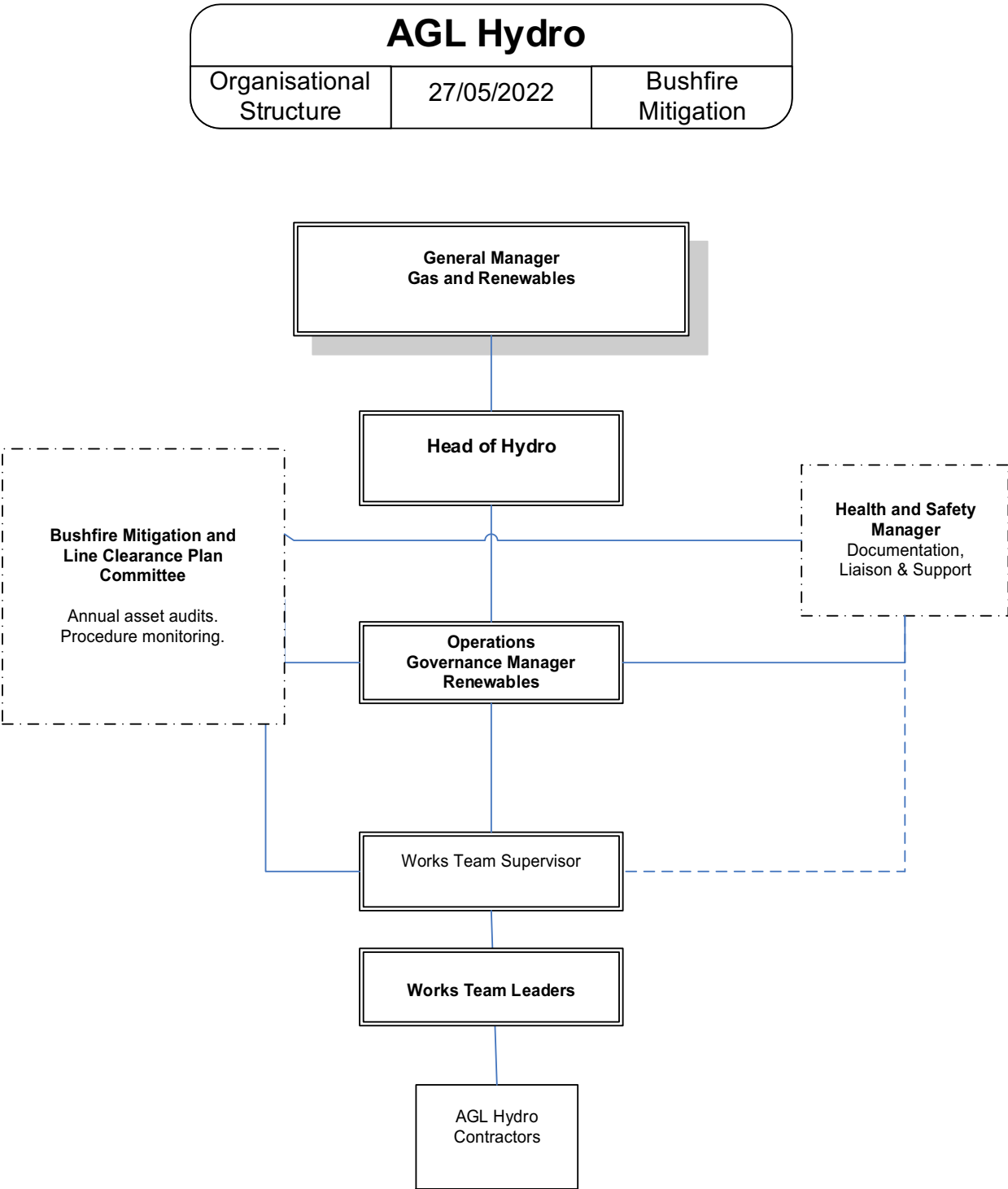
Uncontrolled When Printed 46

46 of 57

<p>Connection Point:</p> <p>33kV incoming line terminations on the AGL Glenbawn rotary air break switch located on the AGL Hydro Glenbawn substation overhead landing span structure.</p> <p>AGL Hydro Asset Ownership:</p> <p>AGL Hydro Glenbawn substation infrastructure including incoming 33kV landing span structure.</p> <p>TNSP Asset Ownership:</p> <p>33kV incoming overhead line and insulator (connected to the AGL Hydro incoming overhead line landing span structure) and dropper cable to the AGL Hydro Glenbawn rotary air break switch.</p>	
<p>NSW Rural Fire Service bushfire prone area assessment:</p> <p>Bushfire Prone Location</p>	

17. Appendices

17.1. Reporting Organisational Structure



17.2. Incident Reporting

For faults/incidents/defects requiring further internal investigation including fire, the AGL Hydro 'Incident Reporting and Investigation Procedure' is followed. Incidents assessed as being a 'Serious Electrical Event' is considered a notifiable incident and reported separately to ESV and/or WorkSafe Victoria.

All electrical events/faults, that are either the direct cause of a fire ignition or influence risk of fire are recorded and reported using AGL Hydro 'myHSE' management system with an example depicted in the images below.

The screenshot shows the 'New Incident' form in the myHSE system. The 'Basic Information' tab is selected. The form includes the following fields:

- Title:** Short description
- Event Owner:** ☒ AGL ☐ Contractor
- What happened?:** Describe what has happened. Please don't use any names or personal details.
- Immediate Actions:** Describe what actions were taken immediately. Please don't use any names or personal details. Max 250 characters.
- Event Date and Time:** Select a date and a time.
- Where did it happen?:** Select a location. If necessary, specify the exact location. (optional)
- Reporting Person:** Stuart Carles
- Outage related?:** ☐
- Emergency Services/External Auth. notified?:** ☒ Yes ☐ No
- Name of Emergency Services or External Authorities:**
- Notification By:** Stuart Carles
- Date/Time of Notification:** Select a date and a time.
- Attachments:** No data

The screenshot shows the 'New Incident' form in the myHSE system. The 'Incident Details' tab is selected. The form includes the following fields:

- Was a person injured or unwell?:** ☐ Yes ☒ No
- Was there an unauthorised environmental impact or community complaint?:** ☐ Yes ☒ No
- Was a regulatory visit conducted?:** ☐ Yes ☒ No
- Was there a violation of an Internal Procedure, Critical Control or Permit?:** ☐ Yes ☒ No
- Is this a Chain of Responsibility Event?:** ☐ Yes ☐ No
- Were any assets damaged?:** ☐ Yes ☒ No
- Was there a fire?:** ☒ Yes ☐ No
- Type of fire:**
- Was this event related to process safety?:** ☐ Yes ☒ No

17.3. Engineered Solutions

Engineered Solutions

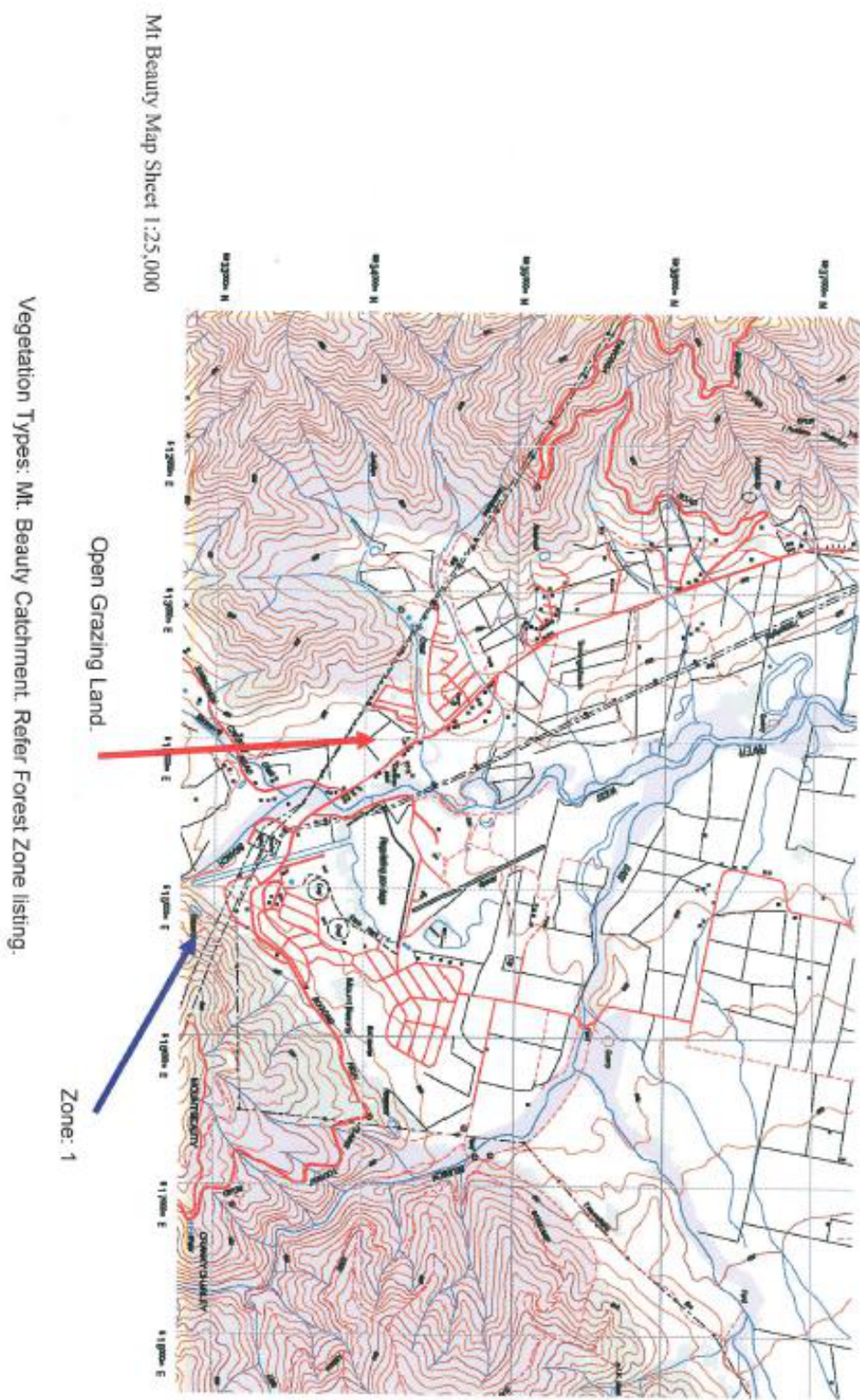
AGL Hydro Bushfire Mitigation Plan 2021-22



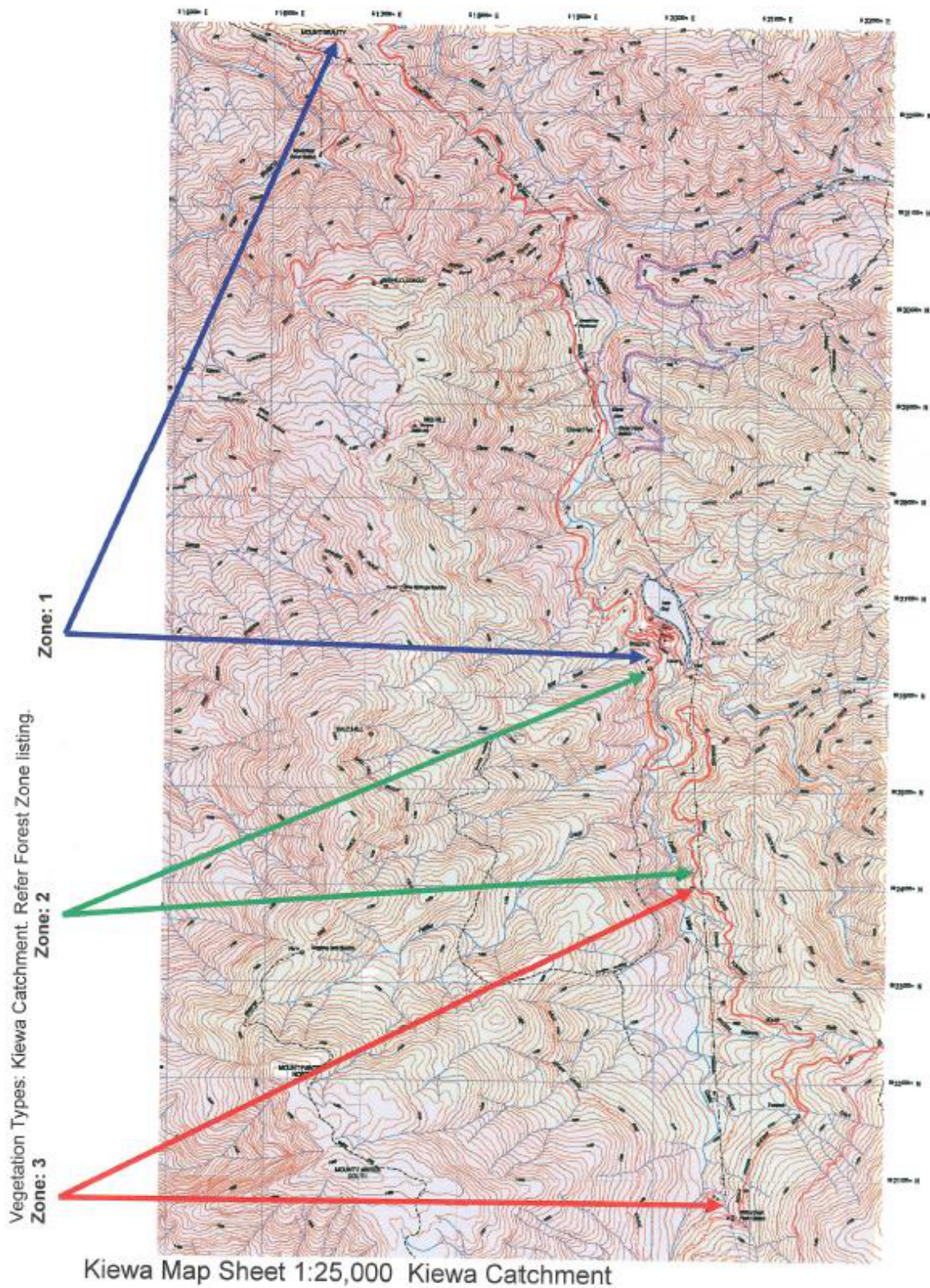
2008	Undergrounding of 5.3 km of overhead 6.6kV line between the Rubicon Haulage and Royston Power station
2014	Undergrounding of the 560m of overhead 240V line between the Royston Power station and the Royston Haulage
2014	Digital modernisation of the 22kV line protection throughout the scheme
2015	Undergrounding of 200m of the upper section of the 6.6kV line to Rubicon falls.
2017	Utilisation of fibre optical connection to site to enable dynamic line protection settings during high fire danger periods & TFB days
2017	Undergrounding of the 1300m 6.6kV line from the Rubicon Haulage to Rubicon Power station
2019	Rubicon A to Rubicon Power Station and Lower Rubicon Station 22kV overhead line REFCL hardening complete and is REFCL compliant
2020	Rubicon Power Station and Lower Rubicon Station 22kV and 6.6kV subnetwork electrical upgrades (REFCL hardening)
2020	Undergrounding the West Kiewa Power Station adit electrical winch LV overhead electrical supply
2021	Undergrounding the Junction Dam telemetry LV overhead electrical supply
2021	Undergrounding the Rubicon Haulage 6.6kV overhead electrical supply

17.4. AGL Hydro Vegetation Types

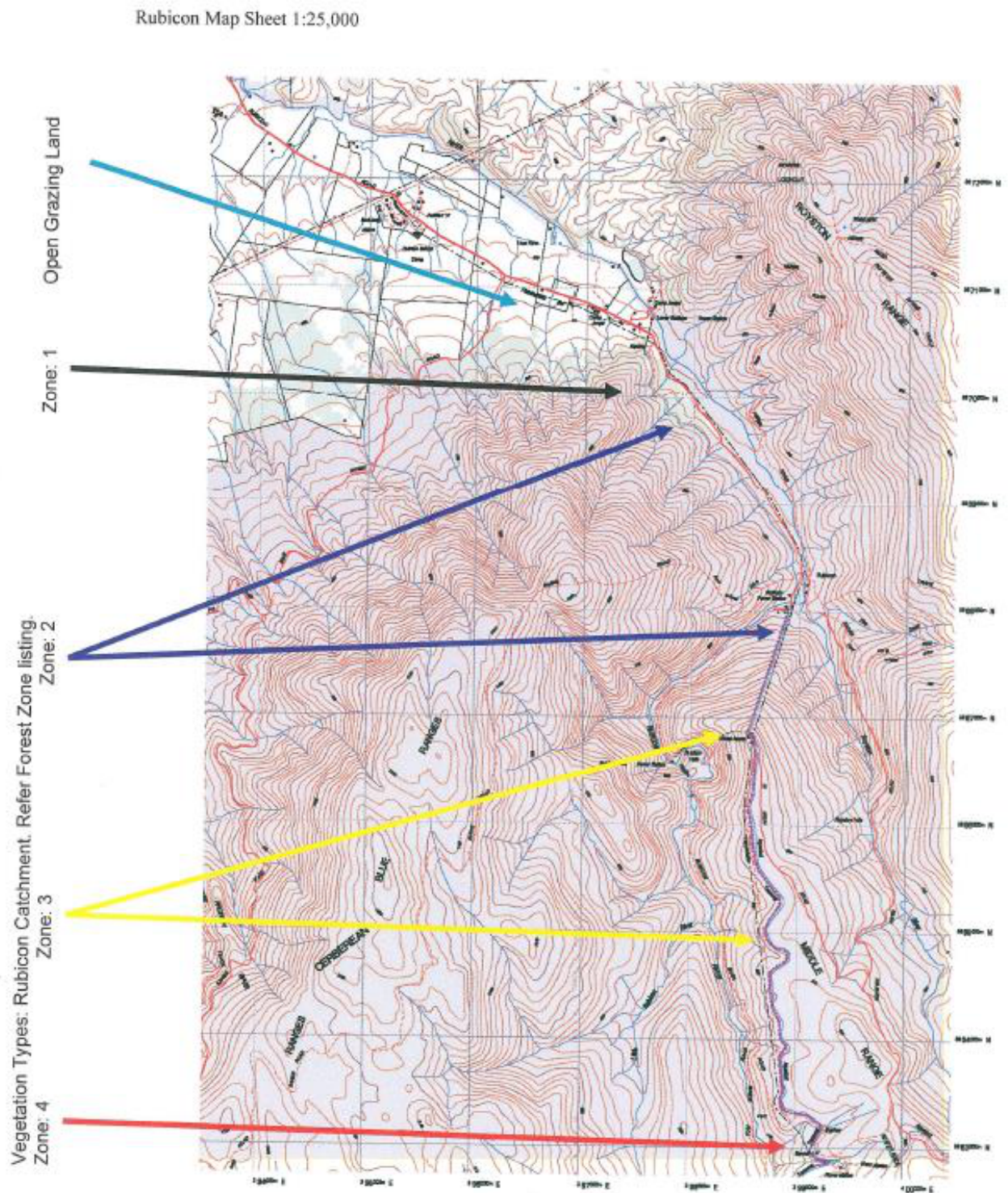
17.4.1. Mt Beauty Depot



17.4.2. Kiewa Scheme



17.4.3. Rubicon Scheme



17.5. Works Management and Verification Schedule

The table below details all AGL Hydro assurance activities managed, scheduled, and tracked in SAP.

Activity	Frequency	Timing
Overhead Powerline Asset Inspections (Rubicon)	Weekly	N/A
Overhead Powerline Asset Inspections (Kiewa)	Monthly	N/A
Switchyard Inspections (Asset and Vegetation)	Monthly	N/A
Access Track Inspections, Clearance and Maintenance	Monthly	N/A
Overhead Powerline Vegetation Inspections	Monthly	N/A
Bushfire Risk Index (During peak season)	Monthly	N/A
Fire Appliance Testing (Chubb)	Bi-Annual	N/A
Fixed Fire Systems Testing (Deluges and Monitoring Systems)	Bi-Annual	N/A
Vegetation Line Clearance Verification Competency Review	Annually	April
Vegetation Line Clearance Verifications	Annually	April
Bushfire Mitigation Plan Review	Annually	June
Line Clearance Plan Review	Annually	June
Annual Switchyard Inspections (Asset)	Annually	N/A
Fire Fighting Equipment Inspections (Portable)	Annually	September
Fire Training (Employees)	3-yearly	October
Pole and Pole Top Verification Competency Review	3-yearly	April
Pole and Pole Top Inspections (Cycled over 36 months)	36 months (+/- 1 month)	April

17.5.1. Kiewa Scheme (SAP Extract)



Maintenance plan:

2002211

HYV B00 3Y POLE AUDIT INSP

Maint. plan header

Item

Object list item

Item location

Schedule call item

Cycle item 04.09.2020

Maintenance Item: 8006188

HYV B00 3YR POLE AUDIT INSP

	Sort	Functional loc.	FunctLocDescrip.	Assembly
<input type="checkbox"/>		CCPM00BBA10	CCP 22KV PWR LINES	
<input type="checkbox"/>		CLPQ01BFA10	CLP 415/240VAC SYS	
<input type="checkbox"/>		MBDQ01BBA10	MBD POWERLINES	
<input type="checkbox"/>		MKPQ01BFA20	MKP PWR STN LV PWR LINE	
<input type="checkbox"/>		MKPZ01ZZA10	MKP ACC TRACKS & ROADS	
<input type="checkbox"/>		RFPM00BBA10	RFP RUP/ROP 6.6 PWR LINE	
<input type="checkbox"/>		ROPM00BBA10	ROP RFP 6.6KV PWR LINE	
<input type="checkbox"/>		RUPM00BBA20	RUP 22KV LWR RUB FDR	
<input type="checkbox"/>		WKPQ01BFA10UC005-UC07	WKP LV PWR LINE FDR	
<input type="checkbox"/>				

17.5.2. Rubicon Scheme (SAP Extract)

Maintenance plan: 2002028 RUP B00 1W PWR LN & ESMT INSP

Maint. plan header

Item Object list item Item location Schedule call item Cycle item 04.09.2020

Maintenance Item: 8001204 RUP B00 1WK PWR LN & ESMNT INSP

Reference object

Functional loc.: RUPM00BBA20 RUP 22KV LWR RUB FDR

Equipment:

Assembly:

Maintenance plan: 2002930 HYV B00 1Y PWR LINE VEG AUDIT INSP

Maint. plan header

Item overview Item Object list item Item location Schedule call item Cycle item 04.09.2020

	Maintenance Item	Maintenance Item Text	O...	S...	T...	Functional Location
<input type="radio"/>	<u>8003388</u>	RUP B00 1YR PWR LINE VEG AUDIT INSP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>RUPZ01</u>
<input type="radio"/>	<u>8006029</u>	CCP B00 1YR PWR LINE VEG AUDIT INSP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>CCPM00BBA10</u>
<input type="radio"/>	<u>8003344</u>	CLP B00 1YR PWR LINE VEG AUDIT INSP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>CLPQ01BFA10UC006</u>
<input type="radio"/>	<u>8003611</u>	LRP B00 1YR PWR LINE VEG AUDIT INSP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>LRPZ01</u>
<input type="radio"/>	<u>8002745</u>	MBD B00 1YR PWR LINE VEG AUDIT INSP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>MBD</u>
<input type="radio"/>	<u>8007033</u>	MKP B00 1YR PWR LINE VEG AUDIT INSP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>MKPQ01BFA20</u>
<input type="radio"/>	<u>8001624</u>	ROP B00 1YR 6.6 PWRLN VEG AUDIT INSP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>ROPZ01</u>
<input type="radio"/>	<u>8006653</u>	ROP B00 1YR LVPWR LINE VEG AUDIT INSP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>ROPZ01</u>
<input type="radio"/>	<u>8004824</u>	WKP B00 1YR PWR LINE VEG AUDIT INSP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>WKPQ01BFA10UC005-UC07</u>
<input type="radio"/>						

18. Referenced Documents / Procedures

Document Number	Document Title
AP AL AD 18	Controlled Document Update Procedure
AP AL AD 00	Controlled Document Numbering System
CF MO AD 01	Maintenance Notification - Corrective Action Request
HI AL SF 02	AGL Hydro Emergency Preparedness, Response and Management Procedure
HP AL AD 01	AGL Hydro Consultation, communication, and dispute resolution
HQ AL SF 02	AGL Hydro Personal Protective Equipment (PPE) Policy
ML AL AD 00	AGL Hydro Asset Management Plan
SP AL SF 01	AGL Hydro Electrical Safety Manual (Hydro)
SP SO SF 01	AGL Hydro Electrical Safety Manual (Somerton)
SP YA SF 01	AGL Hydro Electrical Safety Manual (Yarrawonga)
SP AL PE 02	AGL Hydro HSE Induction and Authorisation
SP AL SA 50	AGL Hydro Safe Access Procedures
AGL-HSE-STD-003	AGL Contractor HSE Management Standard
AGL-HSE-SDM-003	AGL Contractor HSE Management Methodology
AGL-HSE-STD-004.1	AGL HSE Risk Management Standard
AGL-HSE-SDM-004.1	AGL HSE Risk Management Standard Methodologies
AGL-HSE-SDM-004.2	AGL HSE Permit to Work Methodology
AGL-HSE-FMK-004.2	AGL HSE Safe System of Work Framework
AGL-HSE-STD-011.1	AGL HSE Incident Near Miss and Hazard Management Standard
AGL-HSE-PRO-011.1.1	AGL HSE Incident, Near Miss and Hazard Management Procedure
AGL-HSE-PRO-011.1.2	AGL HSE Corporate Reporting Procedure