

29 February 2008

Electricity Regulation Discussion Paper  
Ministry of Economic Development  
PO Box 1473  
Wellington

*By email:* [electricity.safety.regulations@med.govt.nz](mailto:electricity.safety.regulations@med.govt.nz)

**SUBMISSION ON PROPOSED ELECTRICITY SAFETY REGULATIONS DISCUSSION PAPER**

- 1 Orion welcomes the opportunity to submit on the paper released recently by the MED on the proposed electricity safety regulations (the *paper*).
- 2 Overall, we support the proposals in the paper.

**About Orion**

- 3 Orion is an electricity operator for the purpose of the Electricity Act 1992. We are the electricity network provider for Christchurch and central Canterbury. Our network includes more than 14,000 kilometres of overhead lines and underground cables which deliver electricity to more than 185,000 home and businesses. Our network is slightly larger than Transpower's nationwide network of transmission lines. Our shareholders are the Christchurch City and Selwyn District councils.
- 4 As an electricity distributor, we work on both:
  - 4.1 electrical installations; and
  - 4.2 works which are generally in the public domain.
- 5 This dual role brings its own challenges, which we believe the proposals in the paper will address.

### **Objectives of the regulations**

- 6 We agree with and support the objectives of the proposed regulations, as detailed on page four of the paper. In particular, we are pleased to see the objective to:

*...define electrical work and what electrical work must be undertaken by a licensed electrical worker.*

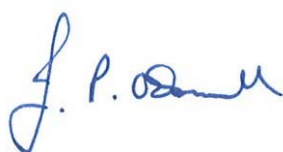
### **Answers to questions asked in the paper**

- 7 We answer the specific questions asked in the paper in the schedule attached to this letter.

### **Further consultation**

- 8 Much of the detail that supports the paper's proposals will only become apparent when the proposed regulations are drafted. We would appreciate the opportunity to comment on the draft regulations at that time.
- 9 Thank you for the opportunity to make this submission. If you have any questions, please contact John O'Donnell at DDI 03 363 9781 or email [john.odonnell@oriongroup.co.nz](mailto:john.odonnell@oriongroup.co.nz).

Yours faithfully

A handwritten signature in blue ink, appearing to read 'J. P. O'Donnell', written in a cursive style.

John O'Donnell  
**General Manager Infrastructure**

## **SCHEDULE ANSWERS TO QUESTIONS**

### **Preliminary provisions**

Q. *Do you agree with the proposed definitions above? If not, why not?*

A. Agree

Q. *Are there any other definitions that you think should be included?*

A. No

### **Applications of the Regulations**

Q. *Do you agree with the proposals relating to exclusions discussed above? If not, why not?*

A. Agree

### **Safety of electricity**

Q. *Do you agree with the proposed general safety requirement?*

A. Agree

### **Earthing and protection measures**

Q. *Do you agree that ECP 35 should be revoked in favour of the industry code of practice?*

A. Agree

### **Residual current devices**

Q. *Is the proposed mandatory use adequate?*

A. Yes

Q. *Should we be considering requiring existing connectable installations to be RCD protected within the next 4 years?*

A. Yes

**Quality of supply**

Q. *Are these the right quality of supply matters to cover in the regulations?*

A. Yes

Q. *Are there any other quality of supply matters that should be covered?*

A. No

**Safety management systems for electricity**

Q. *Have the requirements of hazard identification and assessment been adequately addressed; If not, why not.*

A. Yes

Q. *Have the steps for mitigation been assessment been adequately addressed; If not, why not.*

A. Yes

Q. Are there further aspects for on-going monitoring and maintenance of an SMS that should be considered?

A. No

Q. *Are there any performance indicators that should be mandated in the regulations?*

A. No

**Prescribed electrical work**

Q. *Are you satisfied with the description of prescribed electrical work?*

A. Yes

Q. *Can you suggest other work that should be excluded?*

A. No

Q. *Do you agree with the proposed new structure for appliance regulation?*

A. Yes

### **Periodic Inspection**

Q. *Do you agree with the proposed additional inclusions for periodic inspection?*

A. Yes

Q. *Do you agree with the intervals for periodic inspection?*

A. Yes

### **Electrical safety certificates**

Q. *What do you think of the proposal to have one form that can be used for in place of CoCs, CoVs and WOEF?*

A. Agree

### **Limits and requirements of exemptions for tradespersons**

Q. *Do you agree with restricted licences for tradespeople?*

A. Agree

Q. *Should AS/NZS 3760 continue to be a mandatory requirement for Regulation 49 (8)?*

A. No, the applicable standard should be AS/NZS 3000:2007, section 8. This gives tradespeople the same level of responsibility for testing as other (higher) classes.