

#	Discussion Paper Summary - Response to the Review of Queensland's Electricity Safety Act 2002	POWINS Comment
	Topic 1: Electrical safety considerations of new and emerging technologies	
1	Recommendation 1: It is recommended that modernising the scope of the Act to ensure new and emerging energy generation and storage technologies are incorporated, whether or not they are connected to the grid or stand-alone in nature, by including in the definition of electrical equipment/electrical installation: (a) solar PV modules, designed to be connected to other solar PV modules and when connected be of a combined voltage of greater than extra low voltage; and	No objection
2	Recommendation 4: To ensure the Act keeps pace with technological change, consider creating a general category of exception to the "extra low voltage" threshold for the definition of "electrical equipment", to reflect risk to life and property by ELV electrical equipment.	No objection
3	Recommendation 13: Clarify that off-grid systems are captured within the meaning "electrical equipment" and are therefore within the definitions of Serious Electrical Incident and Dangerous Electrical Event (Act, ss 11-12), giving rise to duties to notify the Regulator and otherwise respond to such incidents	No objection
	Topic 2: Changing landscape of electricity and the workforce	
4	Recommendation 5: For solar PV panels falling within the definition of electrical equipment (see Recommendation 1), consider ensuring that the resultant "electrical work" definition is amended as needed to require: a) all connections and testing of PV module cabling as well as earthing and bonding work be performed by competent licensed electrical worker/s; and b) installation of cabling to be carried out by a licensed electrical worker or an unlicensed person assisting a licensed electrical worker and working under their direct supervision; and c) the mounting, fixing, and locating of solar PV modules and arrays to be carried out by competent persons under the direct supervision (Recommendation 16) of a licensed electrical worker (Act s 18(2)(f)).	How does this recommendation incorporate the allowances for electrical apprentices to perform such work and be supervised in accordance Electrical Safety Office publication - PN12535 Version 1 - July 2019 - Supervising Electrical Apprentices?
5	Recommendation 6: Consider including within the definition for Electrical Work that the electrical aspects of air conditioning / mechanical services work is electrical work and the tasks of fixing, installation of brackets/mounting of equipment and mechanical cable protection is ancillary to the complete installation.	There is more clarity required as to whether the tasks considered ancillary are also to be classified as electrical work.
6	Recommendation 7: Ensure the installation of mechanical protection for cables, including but not limited to conduit (both plastic and metal), cable racks and trays, skirting, troughs etc., and the installation of cabling into these protection components is the work of licensed electrical workers or to be performed under the direct supervision of a licensed electrical worker. Associated with this work is earthing and bonding work, to be defined as electrical work (recommendation 5) and must only be performed by competent licensed electrical worker/s.	How does this recommendation incorporate the allowances for electrical apprentices to perform such work and be supervised in accordance Electrical Safety Office publication - PN12535 Version 1 - July 2019 - Supervising Electrical Apprentices?
7	Recommendation 17(a)&(c): Consider clarifying miscellaneous requirements related to supervision, by: (a) inserting the word "direct" before "supervision" in section 18(2)(e)(iii); and, (c) requiring direct supervision for a person directly assisting the licensed electrical worker in the laying, cutting or sealing underground cables that are part of the works of an electricity entity before the initial connection of the cables to an electricity source (s 18(2)(j)).	How does this recommendation incorporate the allowances for electrical apprentices to perform such work and be supervised in accordance Electrical Safety Office publication - PN12535 Version 1 - July 2019 - Supervising Electrical Apprentices?
	Topic 3: Electrical safety and electric vehicles	
8	Recommendation 2: Review the electrical safety risks presented in electric vehicles and consider their inclusion in the scope of regulation by the Act. It is further recommended that the Electrical Safety Office engage with other relevant Queensland and Australian regulators as needed to ensure appropriate scope and to avoid both regulatory gaps and duplication.	No objection
9	Recommendation 8: For electric vehicles (or parts thereof) falling within the definition of "electrical equipment" (see Recommendations 2 and 4), consider requiring: (a) appropriately licensed electrical workers to carry out the electrical work on the electrical components when the vehicle is serviced and or repaired, to ensure the safety of owners/operators and community; and (b) appropriately licensed electrical workers carry out the electrical work on the electrical components of the vehicle when an electric vehicle requires on-road	No comment
10	Recommendation 74(c): Consider clarifying and enhancing standards that apply to electrical installations (Regulations, Part 6), including by considering: (c) ensuring there is a legislative basis in the Act for regulations concerning work involving water equipment (s 72), and, if it is to be maintained, work involving electric motors (s 73).	No objection