

[REDACTED]

**Sent:** Monday, 26 June 2023 8:27 PM  
**To:** ESPolicy  
**Subject:** Electrical Safety Act 2002 review - Feedback on the Discussion Paper

Dear OIR,

I am writing in response to the recommendations made in the Discussion Paper (es-act-review-discussion-paper\_1.pdf). For background I have been working in the Australian Renewable Energy industry on utility scale solar and wind projects for nearly 16 years and whilst I am currently employed in the industry, I am writing this from my personal professional perspective as a practising engineer.

There are two overarching points I wish to raise about the Discussion Paper and the associated recommendations:

- 1) Recommendations 1, 5 and 7 will materially increase the cost of installing and repairing renewable energy projects in Queensland. The Discussion Paper and the review does not appear to have conducted, nor present any quantitative cost analyses, and only presents summary qualitative statements of opinion.

**In order to properly consider the Recommendations 1, 5 and 7, the OIR should undertake a comprehensive cost benefit analysis and the impact on renewable energy projects in Queensland.**

- 2) The evidence provided on potential safety risk appears to be largely uncited, anecdotal, and skewed to supporting the recommendations.

E.g.: "As an example, in 2021, a homeowner was changing and reconfiguring solar panels when fatally electrocuted. While this incident was reported, due to the solar panels operating at ELV it did not meet the definition of a 'Serious Electrical Incident'. This incident highlights the risk posed by the energy stored in ELV equipment and the seriousness of the consequences, including injury and death" (Discussion Paper, page 14), is used to support the Recommendations. However the Discussion Paper does not appear to consider whether in this situation the 'homeowner' was or wasn't authorised under the current Act and/or other existing regulations to undertake this work.

Furthermore, the increase in electrical safety risk is not supported by the presented data. When considering the uptake of residential solar in Queensland (Discussion Paper, Figure 1, page 12) compared against reported Electrical Fatality Data in Queensland (Final Report, Figure 1, Page 15), there is no correlation between the increase in the 'Number of PV systems in Queensland' to 'Electrical Fatalities'.

**In order to properly consider the benefit of Recommendations 1, 5 and 7, the OIR should undertake and present a detailed statistical analysis of historical electrical safety incidents and the forecast benefits (i.e. reduction electrical safety incidents) that will be achieved by accepting the Recommendations.**

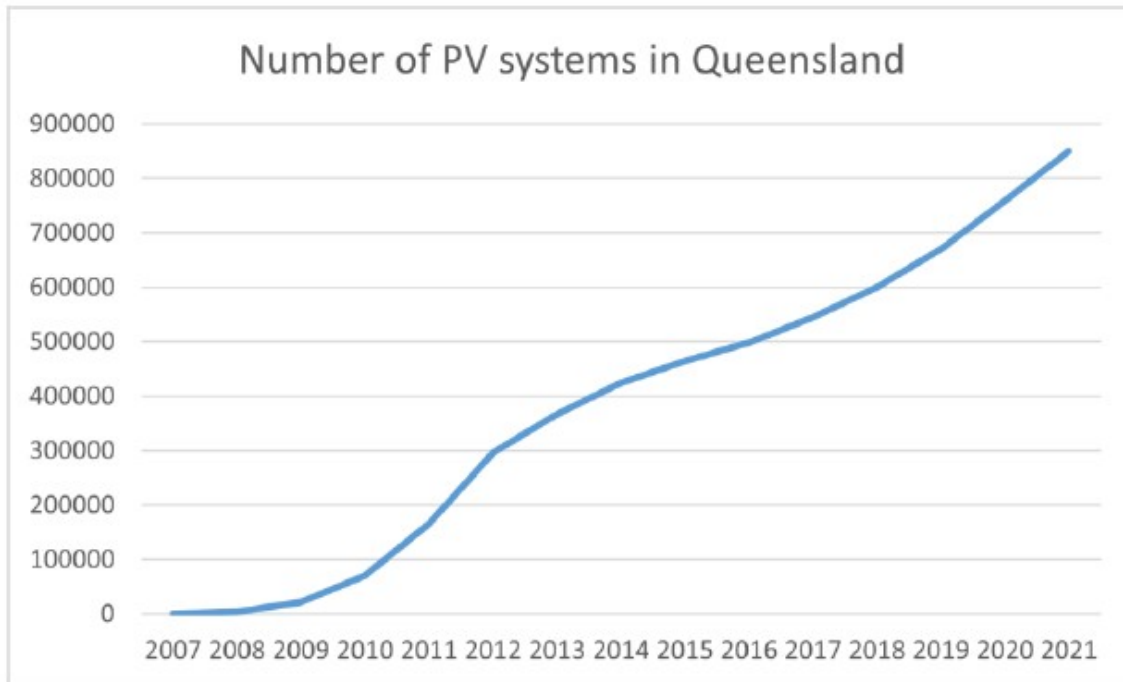
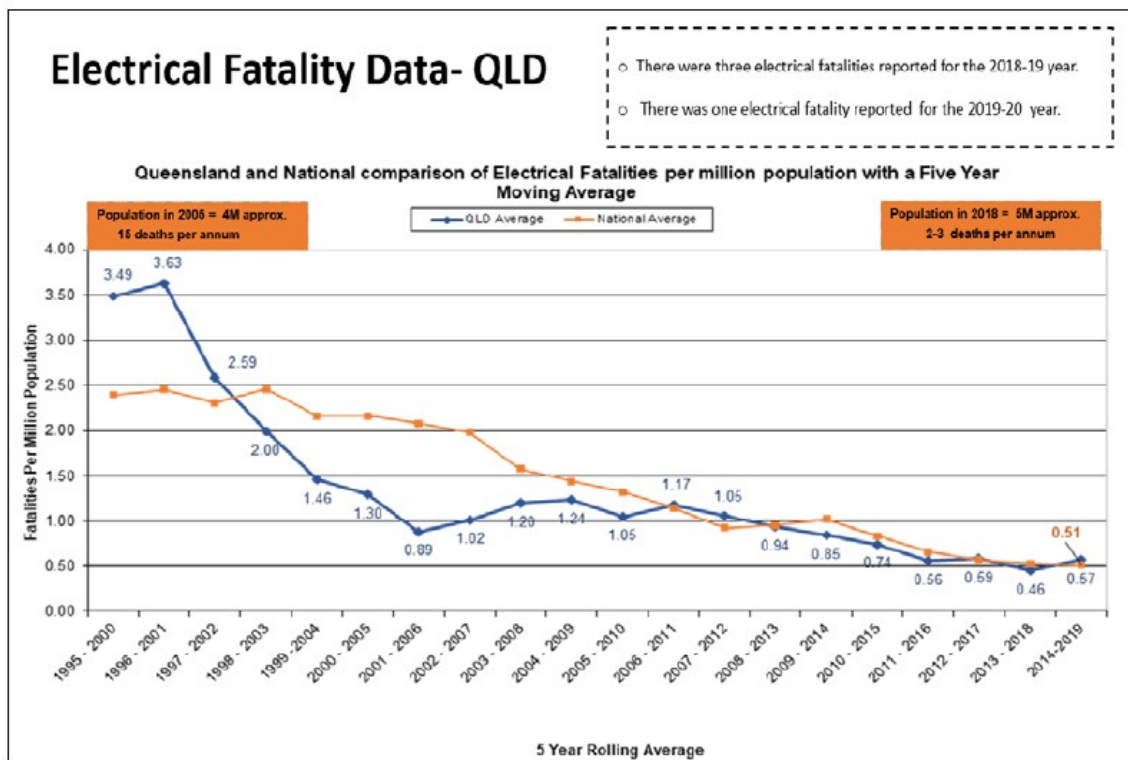


Figure 1: Number of PV systems in Queensland

Figure 1: Queensland Electrical Fatality Data



Kind Regards,

