Our ref: 13086529 / 62842
Contact: Gus Riggs 08 9326 4560

10 July 2015

Director
Construction Policy
Market Structure Branch
Department of Communications
GPO Box 2154
CANBERRA ACT 2615

To whom it may concern:

Submission – 'Amending carrier powers & immunities to support multi-technology rollouts of high-speed broadband'

As the owner and operator of an electricity network in the south west corner of Western Australia, Western Power takes a keen interest in legislative amendments that may impact electricity network infrastructure.

Western Power appreciates the opportunity to comment on the proposed amendments to the _Telecommunications Regulations 2001_ and _Telecommunications (Low Impact Facilities) Determination 1997_) which are set out in the Consultation Paper.

Western Power does not have any comments in relation to proposed amendment numbers 1 to 22 (inclusive) and 24 set out in the Consultation Paper. Western Power's only concern is in respect to proposed amendment 23 and the impact that a thicker cable bundle will have on Western Power's electricity network infrastructure.
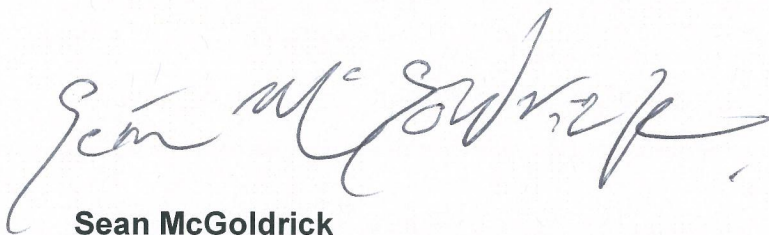
From a general perspective Western Power seeks to minimise the installation of third party equipment on its electricity network for a number of reasons including:

- better safety outcomes for the general public and Western Power employees;

- electricity network asset lifespans are maintained;

- asset integrity is not compromised;

- operational costs and complexities are minimised;

- Western Power's network retrospective undergrounding program is not interfered with; and

- Western Power's is not exposed to unknown liabilities.

With the above-mentioned reasons in mind, a legislative amendment that will allow for NBN Co and other comparable telecommunications carriers to more readily deploy a thicker cable (of up to 48 millimetres in diameter) causes Western Power concern. Western Power's detailed comments in relation to proposed amendment 23 in the Consultation Paper are set out in the appendix to this letter.

Yours sincerely

Sean McGoldrick
Executive Manager Asset Management

363 Wellington Street Perth WA 6000
GPO Box L921 Perth WA 6842
enquiry@westernpower.com.au

T 13 10 87 | F (08) 9225 2660
TTY 1800 13 13 51 | TIS 13 14 50
westernpower.com.au

Electricity Networks Corporation
ABN 18 540 492 861

APPENDIX A

Proposed amendments 1 - 22
- No Comment

Proposed amendment 23:

- Stringing a 48mm cable or equivalent will add to a distribution pole's structural loading and will impact asset integrity.

- An electricity network pole that is subject to the installation of carrier equipment will need to be carefully assessed to determine if it can safely sustain the extra load. If the pole is unable to accommodate the carrier equipment the pole may need to be upgraded, reinforced or replaced to withstand the additional loading at the carrier's cost.

- Adding a 48mm cable to an electricity network pole will result in a measurable loss of useful life for that asset. Reductions in useful life will result in Western Power having to bring forward asset replacement. Remediation of assets earlier than anticipated has flow on cost impacts to electricity network customers.

- To illustrate this, for a typical metro overhead line (60m span), increasing the cable size from 30mm to 48mm would add in the order of 10 percent additional structural load to the pole which means an earlier pole replacement for a proportion of the pole population. For country lines (span 135m) the 30mm to 48mm increase in cable size would result in up to 30 percent additional load.

- Western Power's network assets are designed to provide electricity network services in a way that is safe, reliable and affordable. Western Power's network has not been designed to accommodate carrier equipment.

- While outside the scope of this review there are a range of operational matters which have not been resolved in the Western Australian context relating to:

  o occupation health and safety
  o work practices
  o planned service interruptions for asset maintenance
  o asset data management
  o liability relating to damage and unplanned interruptions
  o fault and emergency response procedures
  o responsibility for maintenance of carrier networks

Proposed amendment 24:
- No Comment

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