
Electricity Safety - Bushfire Mitigation Plan

Classification: Confidential Restricted Unclassified Internal

REVISION/CHECKING HISTORY

REV No.	AUTHOR	DATE	CHECKED BY	APPROVED BY		
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7	P Brimblecombe	Oct 2016	P Brimblecombe	Oct 2016	P Brimblecombe	Oct 2016
8	P Brimblecombe	Mar 2017	S. Dargan	Apr 2017	S Dargan	2017
9	N. Wynn	July 2017	R. Dugan	Aug 2017	N. Wynn	Aug 2017
10	N. Wynn	Aug 2017	C. Barlow	Aug 2017	N. Wynn	Aug 2017
11	N. Wynn	Aug 2017	A. Cooke	Aug 2017	N. Wynn	Aug 2017
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REVISIONS

REV No.	DATE	DESCRIPTION OF CHANGE
0		Development of document from draft for approval
1		Update based on ESV clarifications, organisational change and document review process
2	7 Dec 2012	Update based on ESV clarifications and recommendations
3	19 Jun 2013	Review and update for proposed new regulations

4	12 May 2014	Review and update for current year
5	June 2015	Review to reflect recommendations and affirmations from Board of Inquiry's October 2014 report into the Hazelwood Mine Fire and update for current year
6	June 2016	Review and update for current year
7	Oct 2016	Update based on ESV clarifications and recommendations
8	Jun 2017	Review and update for current year, including business closure
9	July 2017	Final review and update with reference to the closure project
10	Aug 2017	Checked by ENGIE legal C Barlow
11	Aug 2017	Add changes recommended by ESV, document classification, section 6 references update.
12	May 2018	Reviewed following cessation of BWE operations
13	July 2019	Reviewed and updated for the current year (Paradigm Version 1.10)
14	Aug 2020	Reviewed and updated for the current year (Paradigm Version 1.20)
15	Nov 2020	Update based up on ESV's clarifications and recommendations (Paradigm Version 1.30)

Contents

1	Purpose	5
2	Scope	5
3	Responsibilities & Authorities	5
3.1.	Mine Stream Leader:	5
3.2.	Mine Production Manager:	5
3.3.	Head of Compliance:	6
3.4.	Project Director:	6
4	Prescribed Particulars	6
4.1.	The name address and telephone number of the specified operator:	6
4.2.	Person responsible for the preparation of the Plan:	6
4.3.	Person responsible for carrying out the Plan:	6
4.4.	Mine High Voltage Availability Officer:	6
4.5.	Emergency Commander (Falck) 24/7 contacts:	7
4.6.	Stakeholder Engagement contact:	7
4.7.	Fire Policies:	7
4.8.	The objectives of the FRMP:	7
4.8.1.	Plan of the mine showing overhead power lines:	8
4.8.2.	Energy Safe Victoria (ESV) exemptions:	8
4.8.3.	Preventative strategies:	8
4.8.4.	Plan for inspection of electrical assets:	8
4.8.5.	Accreditation and competency of lines inspectors and other workers:	8
4.8.6.	Operation and Maintenance Plans for at-risk electrical lines:	9
4.8.7.	Investigations, analysis and methodology to be adopted for the mitigation of the risk of fire ignition from at-risk electrical lines:	10
4.9.	Specified Operator's Processes and Procedures:	11
4.9.1.	Monitor the implementation of the bushfire mitigation plan:	11
4.9.2.	Audit the implementation of the bushfire mitigation plan:	11
4.9.3.	Identify any deficiencies in the plan or the plans effectiveness:	12
4.9.4.	Change the plan and the plans implementation to rectify any deficiencies identified:	12
4.9.5.	Monitor the effectiveness of inspections carried out under the plan:	12
4.9.6.	Audit the effectiveness of inspections carried out under the plan:	12
4.9.7.	The policy in relation to assistance to be provided to fire control authorities in the investigation of fires near the specified operator's at-risk electrical lines:	12
5	Accessibility of Documents	13
6	References	14
	Appendix A - Mine Electrical At Risk Lines Drawing and Register	15
	Appendix B - Hazelwood Locality Map	17
	Appendix C - Decommissioning Activities and Maintenance Summary:	18

1 Purpose

As a business that has electrical transmission lines above its premises which includes a hazardous bushfire area, ENGIE Hazelwood meets the definition of a “*Specified Operator*”. As such, ENGIE Hazelwood must have systems in place to manage its obligations as a *Specified Operator*.

This **Electricity Safety – Bushfire Mitigation Plan (the Plan)**, amongst other systems of work, helps ENGIE Hazelwood meet its specified obligations and ensures ongoing risk management and compliance with the requirements of relevant Victorian legislation related to the operations and maintenance of overhead electrical assets.

Namely, the relevant Regulations are the:

- **Electricity Safety Act 1998(Vic) (Version No 025)**
- **Electricity Safety (Bushfire Mitigation) Regulations 2013 (Version No 62)**

2 Scope

This plan details the practices and procedures in place at ENGIE Hazelwood for the prevention of fire caused by overhead electrical assets and the mitigation of any fire incident that may occur. As most of the “at risk” electrical equipment is associated with Mine rehabilitation centred activities, the main responsibilities for this plan are with Mine personnel.

3 Responsibilities & Authorities

3.1. Mine Stream Leader:

The Mine Stream Leader shall ensure that:

- a) the processes and procedures required to comply with the applicable Regulations are in place and followed;
- b) the Plan is reviewed and updated at least annually or when operational changes occur during current Mine rehabilitation phases and in line with legislation, regulations and industry “Best Practices”; and
- c) an audit process is in place to ensure that the requirements of the Plan and associated regulatory requirements are being met.

3.2. Mine Production Manager:

The Mine Production Manager shall ensure that:

- a) ensure that all operational personnel and contractors understand their responsibilities and comply with the Plan;

3.3. Head of Compliance:

The Head of Compliance shall ensure that:

- a) the Plan is reviewed and updated annually to comply with the Regulations and ensure that any changes to relevant operational procedures are compliant with the Regulations and reflected in the Plan.

3.4. Project Director:

The Project Director shall ensure that:

- a) a copy of the current Plan is submitted to Energy Safe Victoria (ESV) annually before 1 July each year: and
- b) confirm that each revised Plan gains ESV approval.

4 Prescribed Particulars

4.1. The name address and telephone number of the specified operator:

Name: ENGIE Hazelwood
Address: Hazelwood Drive, Hazelwood, PO Box 195, Morwell VIC 3840
Phone No: (03) 5135 5000

4.2. Person responsible for the preparation of the Plan:

Name: Mine Electrical Asset Engineer,
Address: Hazelwood Drive, Hazelwood, PO Box 195, Morwell VIC 3840
Phone No: (03) 5135 5000 / Mobile 0408 126 223

4.3. Person responsible for carrying out the Plan:

Name: Mine Electrical Asset Engineer,
Address: Hazelwood Drive, Hazelwood, PO Box 195, Morwell VIC 3840
Phone No: (03) 5135 5000 / Mobile 0408 126 223

4.4. Mine High Voltage Availability Officer:

Name: Mine Electrical Asset Engineer,
Address: Hazelwood Drive, Hazelwood, PO Box 195, Morwell VIC 3840
Phone No: (03) 5135 5000 / Mobile 0408 126 223

4.5. Emergency Commander (Falck) 24/7 contacts:

Name: Emergency Commander (Falck),
Address: Hazelwood Drive, Hazelwood, PO Box 195, Morwell VIC 3840
Phone No: (03) 5135 3333 / Mobile 0428 372 090

4.6. Stakeholder Engagement contact:

Name: Stakeholder Engagement Manager,
Address: Hazelwood Drive, Hazelwood, PO Box 195, Morwell VIC 3840
Phone No: (03) 5135 5000 / Mobile 0418 331683

4.7. Fire Policies:

ENGIE Hazelwood manages and maintains its overhead line infrastructure to ensure that the probability of overhead electrical lines causing a fire is minimised, in a known high-risk environment.

The Mine Fire Service Policy (refer to Paradigm original document ID 2589), provides a framework of standards and guidelines which are aimed at:

- Outlining management's commitment to minimising the risks associated with fire at the Hazelwood Mine;
- Protecting the safety of ENGIE Hazelwood employees, contractors and third parties attending the Mine;
- Protecting Mine plant, equipment, infrastructure and exposed coal reserves;
- Minimising fire-related disruptions to the decommissioning, demolition and rehabilitation operations;
- Providing a means of promptly reporting, containing and extinguishing fires at the Mine;
- Preventing the development of a major coal fire giving rise to impacts on third parties and the environment;
- Ensuring that all Mine infrastructure for fire prevention, mitigation, and suppression meets industry best practice, and operational requirements, and
- These requirements are delivered through the Fire Risk Management Plan (FRMP).

4.8. The objectives of the FRMP:

ENGIE Hazelwood is required to ensure that its (FRMP) maintain processes and procedures that control risk of the operations of its overhead lines infrastructure so as to not cause a fire in a known high-risk environment. To ensure this objective is achieved the lines are regularly inspected and vegetation is removed where identified. The Electrical Safety - Electric Line Clearance Plan (Paradigm original document ID 50008) and the Computerised Maintenance Management System (Maximo) are used to manage the maintenance of related assets and the correction of any identified faults.



The electrical overhead line infrastructure is required to be maintained at a high level of security from fire, as it provides secure power supplies to the major mine pumping stations, used for fire risk management in the Mine environment.

4.8.1. Plan of the mine showing overhead power lines:

The whole of the Hazelwood site is in an area assigned by the Country Fire Authority (CFA) as a Fire Hazard Rating of "High".

Note: The "at risk" business power lines are shown in black. The other coloured lines on the map indicate overhead electrical lines, on the Hazelwood site and owned by Major Electrical Company's (MEC's).

A drawing of the Mine showing all electrical overhead power line assets is shown at Appendix 1.

A Site Locality Map is shown at Appendix 2.

4.8.2. Energy Safe Victoria (ESV) exemptions:

ENGIE Hazelwood do not have any existing authorised ESV exemptions to Regulations and/or Sub Regulations with reference to the relevant electrical infrastructure (at risk electric lines) located on the HRP site.

4.8.3. Preventative strategies:

There is limited vegetation on site and all vegetation is reviewed at least annually within the process described in the procedure, Mine Vegetation Assessment for Fire Risk (refer to the Paradigm original document ID 51447). Any vegetation identified as a potential fire risk near electrical assets is removed.

Hazelwood Rehabilitation Project Local Electrical Instructions (refer to the Paradigm original document ID 3136) – section 14.11 detail the maintenance practices relating to vegetation removal near and external inspection of the ENGIE Hazelwood high voltage overhead line system in the mine within the required 3-year time frame. All electrical overhead lines are routinely inspected, see the maintenance summary in Appendix "C" for further details. All faults are recorded and managed through, the Computerised Maintenance Management System (Maximo). This allows Hazelwood personnel to independently review all reported faults as an audit of the inspection work.

Due to the limited extent of the electrical network within the mine, all areas of the network are accessible at all times and clearances to power lines are much greater than the minimum requirements.

4.8.4. Plan for inspection of electrical assets:

A commercial contract is in place with a contractor to provide an inspection of all overhead high voltage power lines (at risk electric lines) on a 3-yearly cycle.

4.8.5. Accreditation and competency of lines inspectors and other workers:

Three yearly inspections are completed by persons with Certificate II accreditation in Asset Inspection (or equivalent as approved by ESV). Inspector qualifications are checked, as part of the Contract



Management Process (refer to SMS documents within Paradigm, original ID 49509, 49510 & 49513), when the external inspector presents themselves for access to the equipment.

The Contract Manager for the inspection activities that include but are not limited to vegetation clearance, auditing, thermographic surveying and line workers, controls their access to the site, checks competencies, monitors progress and checks on site activities.

Other personnel carrying out ad-hoc inspections, as part of normal operational activities on the power distribution system, are trained by Registered Training Organisations to Units of Competency in the Australian Qualifications Framework as Electrical Operators and authorised by ENGIE Hazelwood to operate the mine high voltage power distribution system.

4.8.6. Operation and Maintenance Plans for at-risk electrical lines:

These plans include several additional safeguards and/or redundancies added to the Hazelwood Mine power distribution system in line with the October 2014 Report of the Board of Inquiry into the Hazelwood Mine Fire Recommendations and Affirmations.

For additional information regarding decommission activities relating to HV infrastructure please refer to Appendix C

4.8.6.1. In the event of a fire:

In the event of a fire:

- The Hazelwood Mine power distribution system (“at risk supply network”) is designed to operate without substantial impairment, so as to ensure power supply is maintained to all critical plant systems. This may involve the utilisation of redundancy built into the system.
- Any non-essential planned critical asset maintenance activity will be cancelled. To ensure that all available Hazelwood personnel can be called upon to assist with the fire response.
- The Mine Fire Service Technical Guidelines (Paradigm document original ID 54977) details the requirements for the operation of electrical lines to critical assets and pumping systems which supply the Mine’s reticulated fire service system.
- In the event of a major fire within the business, the Hazelwood Project Emergency Response Plan (Paradigm original document ID 55545) shall be implemented and actions necessary to protect the Mine’s power systems will be directed by the Hazelwood Emergency Commander or CFA Incident Controller with technical support from ENGIE Hazelwood personnel.

4.8.6.2. During a day of Total Fire Ban:

During a day of Total Fire Ban:

- All planned maintenance work on the power distribution system shall be cancelled. This includes all work scheduled by Ausnet Services that would affect the redundant electrical supply requirements for the site. (The Mine power distribution system (“at risk supply network”) is expected to operate without substantial impairment. This may involve the utilisation of redundancy built into the system.)
- All non-essential planned maintenance activity shall be cancelled and any essential maintenance which is proposed to proceed, will be risk assessed to ensure that it did not constitute a fire risk.

On High and Extreme fire risk days, the protection of electricity supply and electrical substations (as critical Mine infrastructure), shall be detailed on a Hazelwood Mine Fire Readiness Plan, (Appendix 2 of Paradigm original document ID 36546) issued under the Fire Readiness Planning Guidelines (Paradigm original document ID 36546). This document is issued on the day prior to each day of Total Fire Ban, as well as internally assessed days of high fire risk for the Mine.

4.8.6.3. During a fire danger period:

During a fire danger period:

- All inspections and high priority maintenance work shall have been completed prior to the start of the fire danger period to minimise fire risk due to the power distribution network. Any required vegetation removal will have been completed. Due to the inherent Mine fire risk, ENGIE Hazelwood shall consider the declaration of a Fire Season for the Mine, independently of the CFA declared season (which typically takes effect some time prior to the CFA fire season). The declaration of a Mine Fire Season under the Fire Readiness Planning Guidelines (Paradigm original document ID 36546) initiates a series of preparatory measures within the Mine to ensure all protective equipment and systems are serviceable and that necessary training and inspections have been conducted to implement a high level of preparedness.
- Maintenance activities for the overhead lines assets are planned around the requirements for pumping systems supplying the Mines reticulated water system. All maintenance activities are prioritised within ENGIE Hazelwood's computerised maintenance management system (Maximo). With the maintenance activities being scheduled through the weekly and daily planning meetings.

4.8.7. Investigations, analysis and methodology to be adopted for the mitigation of the risk of fire ignition from at-risk electrical lines:

All Mine fire incidents shall be reported via Hazelwood's Incident Management System (INX), with both reporting and investigations being undertaken as per the business procedure (Paradigm original document ID 35510)

The electrical transmission lines for the business are designed to limit the risk of fire ignition. This is achieved through several design elements which are not practical for the public distribution system. There are:

- No automatic reclose facilities enabled within the Mine. This limits the possibility of energising a damaged line without suitable inspection and monitoring of the situation.
- All Mine feeders are installed with Sensitive Earth Leakage protection to protect personnel and plant in the event of a fault. This system limits the amount of energy delivered to an earth fault. By limiting the duration and magnitude of fault current, the chance of a fault causing a fire is minimised.
- All the Mine high voltage overhead lines operate at 6,600V. The line hardware specified and used on all new installations is 12,000V and 22,000V hardware. This minimises the risk of an electrical fault that will cause a fire.
- Any operation of electrical protection systems at the substations supplying power to the business's overhead electric lines requires a full inspection of the line prior to the restoration of supply (Hazelwood Rehabilitation Project Local Electrical Instructions, Paradigm original document ID 3136).

- Overhead electric line design is managed to minimise the number of crossovers (especially mid span crossovers) to limit the potential for conductor clash.
- Major changes to the high voltage overhead lines distribution system are modelled by an independent engineering consultant to ensure there is no overloading of individual lines that might contribute to ignition of fires. With the Mine now in its rehabilitation phase, it no longer produces coal and all Large Mining Equipment (LME) activities have ceased. This has resulted in a large reduction of LME related 6,600 V lines and therefore, the risk of overloading power lines has been greatly reduced.

Mine fire is subject to risk assessment under the current Victorian Occupational Health and Safety Regulations. Under these regulations fire has been determined to be a Major Mining Hazard. In accordance with the requirements of these Regulations, a detailed risk assessment has been undertaken and a series of control measures established to reduce risks to the extent that is reasonably practicable. These risk assessments and control measures are subject to periodic review in accordance with the requirements of the Regulations, and oversight from the relevant Regulator (WorkSafe Victoria).

In addition to meeting our WorkSafe commitments ENGIE Hazelwood is required to assess risks that may have the potential to impact upon public health and safety, community facility and the environment. ENGIE assess those risks through its Risk Management Plan (RMP) (formally the Risk Assessment and Management Plan (RAMP)), a requirement of the Mining License under the *Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2013*, Schedule 15 (4.1) and MIN5004, Section 1A). The RMP provides a detailed assessment of mine fire and the prevention and mitigation measures implemented and incorporated into its policies and procedures. It is also a condition of the license that the RMP must be approved by the Department Head of DJPR ERR.

All Mine fires are reported to WorkSafe, CFA and DJPR ERR on an incident by incident basis. Additionally, a summary of all fires on site are sent to both the CFA and DJPR ERR, for further review and oversight, on a monthly basis.

No fires/smoulders ignited on the ENGIE Hazelwood Rehabilitation project site from relevant electrical infrastructure over the period in which the predecessor version of this plan was in place.

4.9. Specified Operator's Processes and Procedures:

Details of the processes and procedures by which the specified operator will:

4.9.1. Monitor the implementation of the bushfire mitigation plan:

When the Annual Fire Season for the Mine is declared, the Mine Production Manager provides weekly reports to the Mine Stream Lead on the status of relevant fire preparedness activities under the Fire Readiness Planning Guidelines (Paradigm original document ID 36546).

4.9.2. Audit the implementation of the bushfire mitigation plan:

All elements of regulatory compliance are audited/inspected by ENGIE Hazelwood internal personnel/auditors, Independent Auditors and various Regulators, including DJPR ERR and Worksafe. The Regulators have adopted a process of audits and site inspections specifically related to fire, both prior to and during the declared fire season.



4.9.3. Identify any deficiencies in the plan or the plans effectiveness:

All fire policies and procedures are reviewed annually prior to the commencement of the Annual Fire Season declared for the Mine as per the Mine Pre-Fire Season Checklist (Paradigm original document ID 36549).

In addition, business processes ensure the update of policies and procedures based on input from any incident investigations, internal audits, external audits, Regulator reviews, etc, by logging and monitoring of action items using Hazelwood's Incident Management System (INX).

The Regulator audits relating to fire preparedness are conducted by WorkSafe and DJPR ERR can also identify deficiencies in the plans or systems in use on site. Recommendations from the Regulators are enforceable and must be complied with.

4.9.4. Change the plan and the plans implementation to rectify any deficiencies identified:

As noted above (in 4.9.3), ENGIE Hazelwood has a process to capture and implement improvements for policies and procedures based on findings, recommendations and / or employee suggestions.

4.9.5. Monitor the effectiveness of inspections carried out under the plan:

All contractors working on site are subject to routine inspections and audit under our procedure SMS Evaluation of Contractors Procedure (Paradigm original document ID 49513).

This procedure requires the Contract Manager to check the contractor on site and confirm that the all health and safety requirements are being met, that the contractors' personnel are qualified and licensed for the work they are performing, and documented work procedures are being followed to the required standard.

4.9.6. Audit the effectiveness of inspections carried out under the plan:

All elements of regulatory compliance are audited by ENGIE Internal Auditors, Independent Auditors and various Regulators, including Worksafe and DJPR ERR Inspectors. This would include both the processes used and documentation created as above (4.9.5.). All faults identified would be planned for rectification by ENGIE Hazelwood employees and physically inspected by ENGIE Hazelwood employees. This allows ENGIE Hazelwood to audit the findings of the contracted inspectors.

4.9.7. The policy in relation to assistance to be provided to fire control authorities in the investigation of fires near the specified operator's at-risk electrical lines:

ENGIE Hazelwood maintains a key stakeholder relationship with the local CFA due to the high risk of fire to the business.

Regular meetings and joint exercises are held with the CFA.

In line with the Board of Inquiry's October 2014 Report into the Hazelwood Mine Fire Recommendations and Affirmations, a number of additional training, resource sharing and communication initiatives have been implemented between ENGIE Hazelwood and the CFA.

ENGIE Hazelwood's, Emergency Response Plan Hazelwood Project (Paradigm original document ID 55545) details the relationship between ENGIE Hazelwood, the CFA and other state emergency service organisations.



The Emergency Response Plan details the requirements for statutory investigations as well as regulatory investigations by other emergency services authorities, and the support to be provided by ENGIE Hazelwood.

In addition, significant fires are also reported to WorkSafe and DJPR ERR. Should a significant fire be caused by the mine electrical assets, a report would also be provided to ESV.

5 Accessibility of Documents

The current ESV approved version of this Plan is kept within the Hazelwood Rehabilitation Project document management system software (Paradigm). A copy of this document may be requested during normal business hours by contacting the Stakeholder Engagement Manager at ENGIE Hazelwood. See section 4.5 of this plan for their contact details.

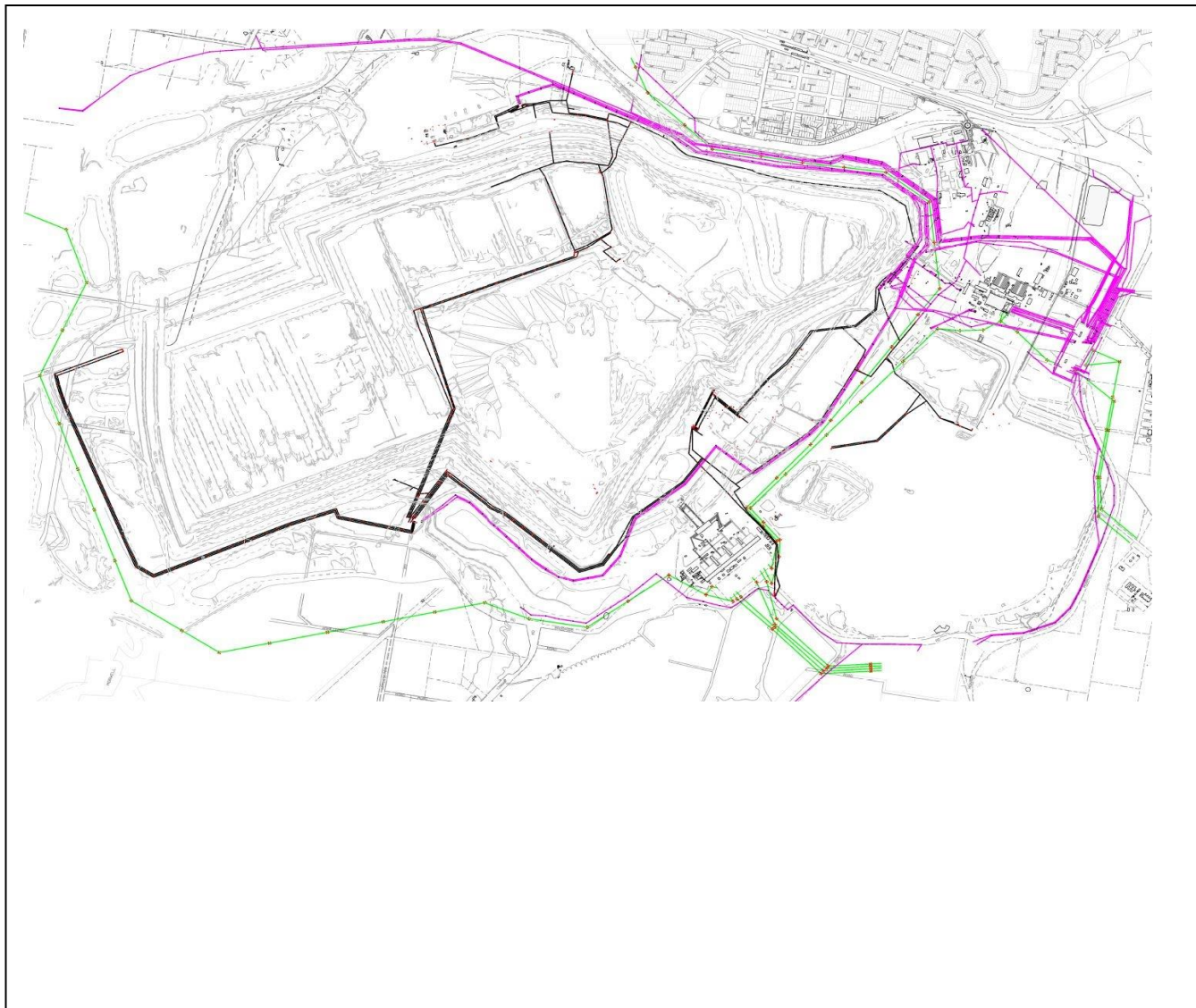
A copy of the approved ESV version is also available on ENGIE Hazelwood public web site. Go to: www.hazelwoodrehabilitation.com.au

6 References

Number	Description
Paradigm OrigID 2589	Mine Fire Service Policy
Paradigm OrigID 3136	Hazelwood Rehabilitation Project Local Electrical Instructions
Paradigm OrigID 55545	Emergency Response Plan Hazelwood Project
Paradigm OrigID 36546	Fire Readiness Planning Guidelines
Paradigm OrigID 49513	SMS Evaluation of Contractors Procedure
Paradigm OrigID 35510	Incident Management Reporting Procedure
Paradigm OrigID 50008	Electrical Safety – Electrical Line Clearance Plan
Paradigm OrigID 51447	Mine Vegetation Assessment for Fire Risk
Paradigm OrigID 36549	Mine Pre-Fire Season Checklist
Paradigm OrigID 54977	Mine Fire Service Technical Guidelines
Paradigm OrigID 49509	SMS 1 Contractors Self Evaluation Form
Paradigm OrigID 49510	SMS 2 ENGIE Health & Safety Evaluation Form
Paradigm OrigID 55886	Safety Inspection Form (formally SMS 3)
HP CM MD 18/335	Hazelwood Mine - Risk Management Plan – RMP 3.2
n/a	Occupational Health and Safety Regulations 2017 (Victorian)
n/a	Board of Inquiry Report into the Hazelwood Mine Fire (October 2014)

Appendix A - Mine Electrical At Risk Lines Drawing and Register

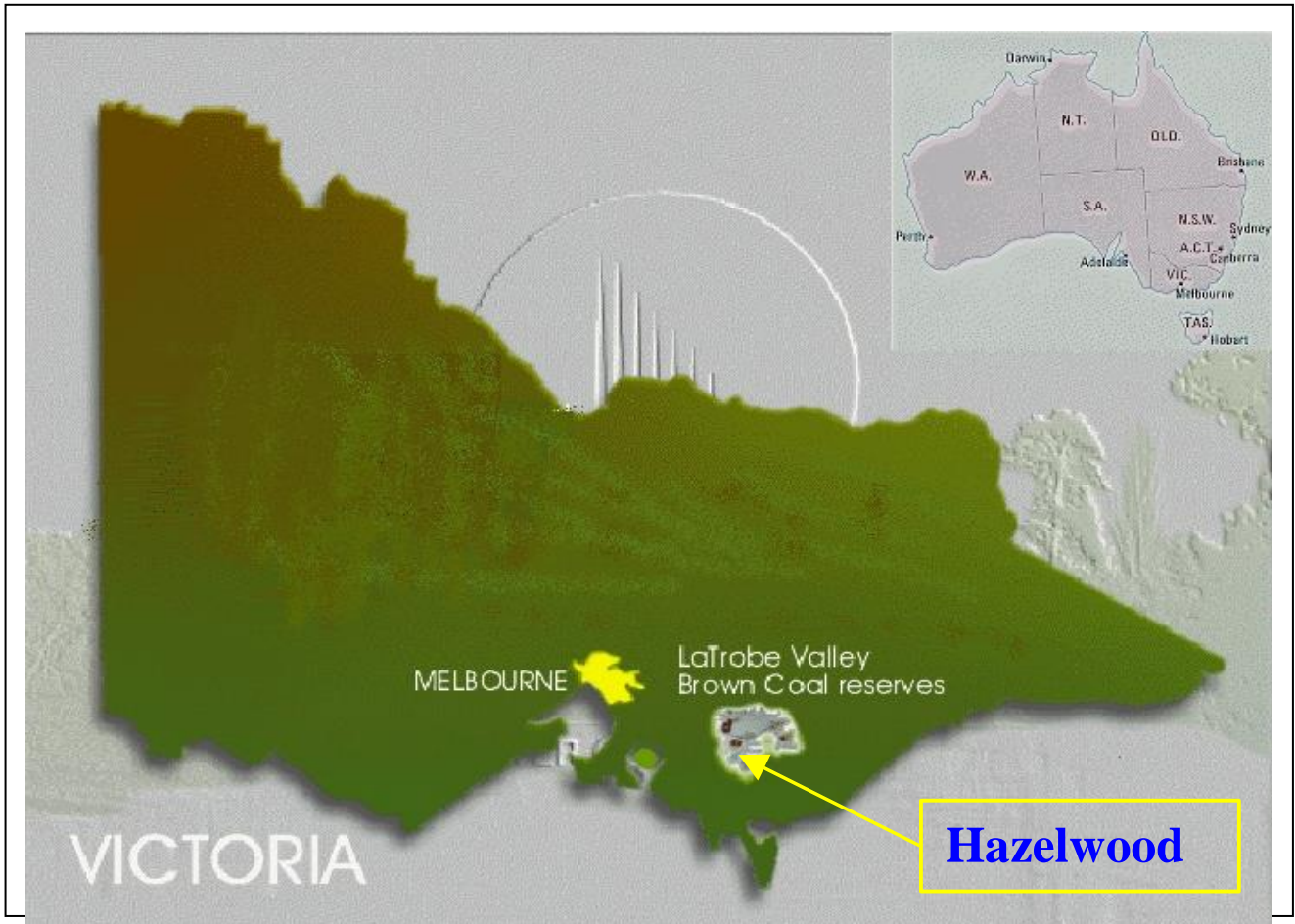
Note: the “at risk” business overhead power lines are shown in black (drawing as at August 2020). The other coloured lines on the map indicate overhead lines, on our site, owned by Major Electrical Company’s (MEC’s). In the additional Table 1 below (see page 16), there is a register of the at-risk business overhead power lines covered by this plan.



Appendix A Continued - Table 1 - Register of “at risk lines” by Line Nomenclature

Line Nomenclature	Line Voltage	Concrete Poles	Wood Poles	Line Length in Metres	Year of original construction
L4A	6.6kV	25	2	1600	1965
L4B	6.6kV	14	15	1070	1965
L4C	6.6kV	12	2	1200	1965
L4E	6.6kV	57	0	3250	2015
L5	6.6kV	59	17	3150	1965
L5A	6.6kV	4	4	802	2006
L21	6.6kV	14	1	822	1980
L22	6.6kV	5	1	174	1980
L23	6.6kV	2	1	58	1980
L24	6.6kV	6	1	61	1980
L24A	6.6kV	16	0	236	1980
L25	6.6kV	18	2	781	1980
L26	6.6kV	28	1	1510	1980
L26A	6.6kV	4	1	224	1980
L30	6.6kV	37	1	2800	2004
L30A	6.6kV	19	11	1560	1965
L30B	6.6kV	19	11	1560	2004
L30C	6.6kV	6	1	342	1965
L31	6.6kV	45	0	3830	2014
L32	6.6kV	46	0	3460	2015
L33	6.6kV	58	0	4160	2015
L34	6.6kV	24	0	1690	2015
L35	6.6kV	9	0	442	2004
L36	6.6kV	53	0	4385	2015
L37	6.6kV	23	1	1379	2004
L38	6.6kV	31	0	4380	2015
L39	6.6kV	36	1	2800	2004

Appendix B - Hazelwood Locality Map



Appendix C - Decommissioning Activities and Maintenance Summary:

Decommissioning Activities:

The ENGIE Hazelwood HV Distribution System will reduce to 50% of its current size by 2021, the planned commencement of the Mine filling. The remaining 50% (50km) of HV distribution is expected to remain in service until the Mine filling process has been completed which is currently estimated to be around 2032 to 2035.

The strategy for power supply to critical assets (Fire Pump Stations, Mine Depressurisation Bores etc) is multiple supplies from multiple zone Sub Stations.

This strategy will remain until these critical assets are no longer required.

Some critical powerlines that restrict Mine rehabilitation works will be relocated, as required.

All ENGIE Hazelwood Electrical Assets and Powerlines will be fully maintained until the asset is no longer required when it will be appropriately decommissioned and removed/demolished.

Ongoing Maintenance Summary:

- Quarterly vegetation inspections and 4 monthly spraying to control vegetation.
 - Skid mounted Electrical Control Cubicles.
 - Skid mounted Transformers.
 - Wooden Poles.
 - HV mining cables.
 - Pumps and Supply cables.
- 12 monthly Line clearance inspection and clearing. October.
- 2 yearly Earth grid testing and repair of in-service assets, unused assets are tagged out.
- 3 yearly Overhead Asset inspection by a qualified electrical contractor.