Protocol for vegetation management near powerlines - DRAFT

An agreement for consultation between SA Power Networks and Local Government, landholders and the community

January 2015
Draft for consultation and review
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**Foreword**

Vegetation and trees form a fundamental part of our urban and rural landscape and provide a wide range of aesthetic and environmental value and benefits on both private and public land.

However, there are risks associated with trees in relation to their proximity to powerlines. SA Power Networks is required to undertake vegetation clearance to ensure community safety and ensure the delivery of a reliable electricity supply to customers.

Managing vegetation under powerlines is a complex issue particularly as community expectations have changed over time, from a risk-based focus particularly on minimising fire starts and maintaining reliability, to one that wishes to balance managing those risks with ensuring the health and appearance of trees so we can enjoy the benefits of trees in our urban and regional communities.

Following considerable community discussion and consultation, SA Power Networks is proposing a move from the current vegetation trimming approach, towards a longer term vegetation management approach that is more sustainable and customised to different regions and environments. SA Power Networks is keen to work with key stakeholders to develop partnerships and improve how vegetation near powerlines is managed.

In November 2013 a Working Group with the Local Government Association (LGA) and a number of representative councils was established to develop a long-term strategy to improve vegetation management and an Independent Reference Group was established in January 2014 to provide ongoing advice and input into key strategic initiatives. The development of a protocol outlining our approach for vegetation management and opportunities for partnerships with Councils and other stakeholders was identified as a priority initiative by both groups.

This protocol outlines the current approach for vegetation management that applies to the bushfire and non-bushfire risk areas. It outlines the baseline programs for vegetation management for which funding is provided or funding has been sought. If an individual Council require specific approaches that are above the baseline SA Power Networks programs, Councils will need to contribute funding for their specific programs/approaches. Furthermore under current legislation, Councils have the option to take over trimming in their Council area (with the associated liability).

This protocol outlines the initiatives and strategies that SA Power Networks propose to undertake to manage trees and vegetation near powerlines which recognise the value and amenity of trees, whilst managing risk.

The final shape of the outcomes and directions for vegetation management are dependent on endorsement from the Australian Energy Regulator to our specific plans outlined in our Regulatory Proposal for the 2015-2020 period.
## Glossary

<table>
<thead>
<tr>
<th><strong>Aerial Bundled Cables (ABC)</strong></th>
<th>The bundling together of a number of individual conductors for use in an overhead scenario. ABC can be used to reduce vegetation clearance requirements.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Buffer Zone</strong></td>
<td>The additional area around a clearance zone in bushfire risk areas. It defines the maximum extent to which the vegetation may be trimmed.</td>
</tr>
<tr>
<td><strong>Bushfire risk areas</strong></td>
<td>An area where a fire could start and readily escape to an unrestricted area of flammable material causing Moderate Consequences. The relevant parts of the state are shown in the maps in Schedule 4 of the <em>Electricity (Principles of Vegetation Clearance) Regulations 2011</em>.</td>
</tr>
<tr>
<td><strong>Clearance Zone</strong></td>
<td>The minimum safe distance between vegetation and powerlines. The space is shown in Schedule 1 of the Regulations to the Act.</td>
</tr>
<tr>
<td><strong>Conductor</strong></td>
<td>Cable or wire used to conduct electricity – it may be bare, partially insulated or fully insulated. In SA Power Networks, the term ‘conductor’ usually applies to an overhead wire only. Underground conductors are termed ‘Cables’.</td>
</tr>
<tr>
<td><strong>Cyclic program</strong></td>
<td>The programmed cutting repeated at no longer than 3 year intervals, whereby all vegetation identified for clearance is to be cut back far enough from the clearance zone to ensure that no vegetation grows or is likely to bend into that zone before the next programmed cycle cutting.</td>
</tr>
<tr>
<td><strong>Emergency cutting</strong></td>
<td>Vegetation clearance work undertaken without notice or programming caused by unforeseen circumstances such as damage to trees or powerlines by storms, or falling limbs resulting from heat stress.</td>
</tr>
<tr>
<td><strong>Fire Danger Season (FDS)</strong></td>
<td>CFS declared start and end dates of the Fire Danger Season for each of the CFS Fire Ban districts.</td>
</tr>
<tr>
<td><strong>High voltage (HV)</strong></td>
<td>Voltage of 1,000 volts (1 kV) or more</td>
</tr>
<tr>
<td><strong>Landholder</strong></td>
<td>The property owner or occupier of land subject to clearance requirements</td>
</tr>
<tr>
<td><strong>Low voltage (LV)</strong></td>
<td>Voltage less than 1,000 volts</td>
</tr>
<tr>
<td><strong>Native vegetation</strong></td>
<td>Any naturally occurring plant species which are indigenous to South Australia, including trees, shrubs and grasses.</td>
</tr>
<tr>
<td><strong>Naturally occurring vegetation</strong></td>
<td>Any vegetation that has not been planted or nurtured by any person at any time. Although this definition is intended to cover native vegetation of a locality it also includes anything self grown, such as pine and ash, as well as suckers from plants such as poplars and elm.</td>
</tr>
<tr>
<td><strong>Non-bushfire risk areas</strong></td>
<td>Areas defined as non-bushfire risk areas in the Electricity (Principles of Vegetation Clearance) Regulations 1996, Schedule 3.</td>
</tr>
<tr>
<td>---------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>OTR</strong></td>
<td>The Government of South Australia Office of the Technical Regulator – government agency responsible for administering the <em>Electricity Act 1996</em> and its Regulations, the <em>Electricity (Principles of Vegetation Clearance) Regulations 2010</em></td>
</tr>
<tr>
<td><strong>Prescribed area</strong></td>
<td>Each non bushfire risk area of the greater metropolitan area as shown in the maps in Schedule 3 of the Regulations.</td>
</tr>
<tr>
<td><strong>Pruning</strong></td>
<td>The practice of removing parts of a tree, such as branches or buds. In relation to powerlines pruning refers to the removal of parts of a tree to maintain legislated clearances.</td>
</tr>
<tr>
<td><strong>Pruning cycle</strong></td>
<td>The frequency of the pruning cycle – currently annual on bushfire risk areas and three year cyclic in non-bushfire risk areas.</td>
</tr>
<tr>
<td><strong>Regrowth Zone</strong></td>
<td>The area around a clearance zone in a non-bushfire risk area. It defines the indicative extent to which vegetation is likely to be trimmed.</td>
</tr>
<tr>
<td><strong>Scoping</strong></td>
<td>The inspection of feeders for the purpose of scoping annual, cyclic and pre-summer cutting programs</td>
</tr>
<tr>
<td><strong>Span</strong></td>
<td>The distance between stobie poles measured in metres (m)</td>
</tr>
<tr>
<td><strong>Vegetation clearance</strong></td>
<td>The clearance of vegetation under powerlines to meet legislative requirements</td>
</tr>
</tbody>
</table>
Overview

Why do we prune vegetation?

The key drivers for managing vegetation near powerlines are:
- Mitigate bushfire risk
- Ensure public safety
- Maintain reliability of electricity supply
- Ensure legislative compliance

We prune trees to meet the clearance zones defined under the legislation. This is determined by whether the vegetation is in a bushfire risk area or a non-bushfire risk area, the voltage of the conductor, span length, whether the line is insulated or bare, and if the lines are on public or private land. Clearance zones also consider the movement of the trees and the growth and regrowth rates of the trees during the pruning interval.

When do we prune vegetation?

- In bushfire risk areas, we undertake an annual vegetation clearance program and a pre-summer patrol.
- In non-bushfire risk areas, we undertake a three-year cyclic program of vegetation clearance.

Who prunes the vegetation?

Our vegetation management program is undertaken by our vegetation contractors who operate to specific legislated and contracted requirements. Currently, our contractors for vegetation clearance are Active Tree Services and Eastern Tree Services.

How do we prune?

A detailed operation plan is developed to outline the annual clearance program in bushfire risk areas and the three-year cycle in metropolitan Adelaide (prescribed area) and non-bushfire risk areas.

The contractors inspect the feeders for the purpose of scoping annual, cyclic and pre-summer cutting programs. The amount of vegetation that needs to be trimmed is determined by legislation.
1. Introduction

Vegetation and trees form a key part of our urban and rural landscape and provide a wide range of aesthetic and environmental benefits and values.

SA Power Networks delivers electricity to approximately 840,000 residential and business customers across South Australia and our network includes more than 71,000km of overhead powerlines. Managing trees and vegetation near powerlines is critical to mitigating bushfire risks and providing a reliable and safe supply of electricity to our customers. SA Power Networks spends about $40m per annum on vegetation management.

The current vegetation management practices have resulted in considerable angst from Councils and the community in relation to the visual impact of pruning activities when the clearance distances are applied as defined under the legislation.

This protocol outlines the practices SA Networks will employ to manage vegetation near powerlines to help us meet its legislated obligation to minimise risk while addressing community expectations for improved outcomes.

The final outcomes will be dependent on endorsement for the Australian Energy Regulator (AER) to our specific plans outlined in our Regulatory Proposal for the 2015-2020 regulatory control period.

1.1 Purpose

The purpose of the protocol is to:

- Outline SA Power Networks’ approach and the practices to be employed to manage vegetation near powerlines
- Provide a shared vision for vegetation management near powerlines
- Provide guidance on how vegetation around powerlines should be managed
- Outline responsibilities of other stakeholders in relation to managing vegetation near powerlines

The protocol is intended to act as a high level document outlining our commitment and approach to vegetation management. The protocol will be supported by more detailed Fact Sheets and Technical Reports as required. SA Power Networks has also developed a Discussion Paper that outlines our long-term plan for vegetation management.

SA Power Networks is keen to work with Councils to develop programs more tailored to suit regional differences and needs, including location and species specific pruning programs and detailed work plans for individual Council areas.

The key objectives of the protocol are to:

- Outline our current responsibilities in relation to vegetation management near powerlines
- Work with Councils and key stakeholders to improve our approach to vegetation management
- Improve community understanding of our vegetation clearance obligations
- Outline the alternatives to pruning vegetation near powerlines
- Balance our legislative requirements with community expectations.
1.2 Vision and long-term objective

Vision
Vegetation and trees form a fundamental part of our urban and rural landscape and provide a wide range of aesthetic and environmental benefits and values on both private and public land. SA Power Networks' long-term vision in relation to vegetation management is to reduce the level of vegetation clearance over time and implement strategies that recognise regional differences. As an organisation, we are keen to work with key stakeholders to develop partnerships and improve how we manage vegetation near powerlines to achieve this goal.

Managing vegetation under powerlines is complex and it will take time to balance the legislative requirements with community expectations. Community education and awareness, undertaking trials with Council and ongoing research and development will be fundamental to achieving this balance.

While vegetation and trees have a wide range of values in the landscape, there are risks associated with trees in relation to their proximity to powerlines. SA Power Networks is required to undertake vegetation clearance to ensure community safety and ensure the delivery of a reliable electricity supply to customers.

Directions for Vegetation Management - SA Power Networks long-term plan for managing trees near powerlines
SA Power Networks’ has developed a long-term plan for vegetation management that aims to create a more sustainable environment and reduce the need for tree trimming over the next 10-15 years.

The plan identifies a range of initiatives that it wishes to develop in partnership with Local Government, the community, private landholders and other organisations. A copy of the discussion paper can be found at www.talkingpower.com.au

1.3 Key Stakeholders

There are a number of organisations that undertake tree pruning and there are many influences on street trees, with powerlines being just one asset that requires vegetation management. For example:

- Local Government – street tree pruning and maintenance
- Department of Planning, Transport and Infrastructure (DPTI) – roadside clearance
- SA Water – clearance around water assets and infrastructure
- Natural Resources Management Boards/ Department of Environment, Water and Natural Resources (DEWNR) – roadside vegetation and woody weed management

A range of key stakeholders have an interest or role in managing vegetation near powerlines. SA Power Networks will work closely with our key stakeholders and develop partnerships to improve how vegetation near powerlines is managed.

Local Government
Local Government is a key stakeholder in relation to vegetation management and SA Power Networks will work collaboratively to improve vegetation management outcomes.
**Landholders**

Private landholders/occupiers are responsible for the clearance of all vegetation they have planted or nurtured on their property around their private supply lines. This includes vegetation overhanging from a neighbouring property.

SA Power Networks is responsible for establishing and maintaining clearances around public supply lines and for clearing naturally-occurring, non-nurtured vegetation on private land.

**Community and residents**

The wider community and residents have an interest in vegetation management near powerlines for a number of reasons – including visual amenity, health and value of trees, conservation and community safety. Residents and landholders can get involved either through their relevant Council or direct liaison through SA Power Networks.

**Customers**

A customer is any person who has a supply of electricity available from the distribution network for consumption by that person, including the occupier of a place to which electricity is supplied or a person seeking an electricity supply. SA Power Networks currently supplies electricity to 743,918 residential, 99,180 business and 23 major business customers (at 30 June 2014).

**Government agencies**

There are a number of agencies that have specific legislative responsibilities in relation to vegetation management. These include the Department of Environment, Water and Natural Resources and Natural Resources Management Boards and their key interests include native vegetation, national parks and environmental requirements.

The South Australian Country Fire Service (CFS) is the state government agency responsible for fire prevention and bushfire management and planning.

In addition, there are a number of regulators that regulate the energy industry. The Essential Services Commission of South Australia (ESCOSA) regulates the energy industry in SA, including the licensing of electricity operations and determination of tariffs. The Office of the Technical Regulator (OTR) administers the *Electricity Act 1996* and its Regulations, the *Electricity (Principles of Vegetation Clearance) Regulations 2010*. The OTR is responsible for initiating any changes to the Act and Regulations. At the national level, the Australian Energy Regulator (AER) regulates electricity distributors and determines funding levels based on regulatory periods.

**1.4 Engagement with stakeholders**

The International Association for Public Participation (IAP2) has developed a Public Participation Spectrum to outline the possible types of engagement can be undertaken with stakeholders and customers as part of the public participation process. As the public progress through the spectrum there is an increase in the expectation of participation and types of engagement tools that can be implemented along the spectrum from inform to empower.

Based on the IAP2 Spectrum for Public Participation, the proposed levels of engagement and participation for vegetation management near powerlines are outlined in the table below. The intent is to outline the way we propose to engage rather than the engagement program and over time the level of engagement can shift, for example consult to involve to reflect the change in the intent.
For each section of the protocol, the level of proposed engagement with stakeholders is identified. This will provide stakeholders with guidance on where there are opportunities to work in partnership with SA Power Networks to improve vegetation management and areas where we are just informing stakeholders of our vegetation clearance requirements.

Table 1 below shows the proposed levels of engagement and participation for vegetation management near powerlines.
### Table 1: Levels of engagement and participation for vegetation management near powerlines

<table>
<thead>
<tr>
<th>Stakeholder/customer participation goal:</th>
<th>INFORM</th>
<th>CONSULT</th>
<th>INVOLVE</th>
<th>COLLABORATE</th>
<th>EMPOWER</th>
</tr>
</thead>
<tbody>
<tr>
<td>To provide stakeholders/customers with information on our legislative requirements for vegetation clearance and our obligations</td>
<td>To obtain feedback from stakeholders/customers on strategies and initiatives for vegetation management and on our clearance program</td>
<td>To work directly with key stakeholders to ensure issues and expectations are understood and considered in developing strategic vegetation management initiatives</td>
<td>To partner with key stakeholders during all stages of the process, including the development of alternatives and solutions for vegetation management</td>
<td>To place the final decision making in the hands of key stakeholders</td>
<td></td>
</tr>
</tbody>
</table>

| Commitment to stakeholders/customers: | We will aim to keep you informed | We will aim to keep you informed, listen and acknowledge concerns and provide feedback on how influenced decision or process | We will aim to work with you to ensure that your concerns and expectations are reflected in initiatives and provide feedback on how influenced decision or process | We will aim to seek direct advice in developing solutions and incorporate your input into decision or the process as far as practicable | We will implement what you decide |

| Example of opportunities or initiatives implemented: | • Fact Sheets and OTR Brochure  • ‘Vegetation management’ DVD  • ‘In the Garden’ TV series  • Talking Power website  • Media Releases | • Information and feedback sessions  • Regional and Council presentations | • Annual Local Government Forums  • Directions for Vegetation Management Discussion Paper  • Scoping and provision of scoping data | • Joint partnerships in initiatives with local government and communities eg tree removal trials  • LGA Working Group  • Reference Group for vegetation management near powerlines  • Developing different pruning regimes and strategies | • Decision-making  • SA Power Networks does not propose this level of participation for vegetation management due to level of risk and liability |
2 Background

Commitment to stakeholders:

We will aim to keep you informed of our vegetation clearance obligations

SA Power Networks is required to undertake vegetation clearance to ensure community safety and deliver a reliable electricity supply to customers.

2.1 Legislative requirements

Section 55(1) of the *Electricity Act 1996* imposes a duty on SA Power Networks to take reasonable steps to:
- Keep vegetation of all kinds clear of public powerlines under its control; and
- Keep naturally occurring vegetation clear of all private powerlines under its control in accordance with the principles of vegetation clearance.

These principles are set out in the *Electricity (Principles of Vegetation Clearance) Regulations* which provide a mandatory and prescriptive program and regime for the clearance of vegetation in both bushfire risk and non-bushfire risk areas. These include:
- A cyclic cutting program of not more than three years; and
- Defined ‘clearance zones’, with specific references to clearance distances for use in making judgements on the extent and nature of cutting required.

SA Power Networks has a duty of care to take ‘reasonable steps’ to clear vegetation from its powerlines in accordance with the legislation. This includes considering factors such as the characteristics of the powerlines, surrounding vegetation and industry best practice.

To achieve this, SA Power Networks has a set of criteria underpinning its legislative obligations under the *Electricity Act 1996*, including:
- Establishing clear compliance standards
- Development of a clear plan and schedule for powerline inspections
- Establishing and incorporating data capture mechanisms into reporting processes
- Establishing ‘good electrical industry practice’
- Ensuring all training requirements are met (internally and externally)
- Establishing appropriate KPIs and contractual arrangements
- Developing appropriate measurement techniques for communication of program performance; and
- Developing and recording continuous improvement initiatives.

The extent of the clearance zones varies according to whether the vegetation is in a bushfire risk area or a non-bushfire risk area, the voltage of the conductor, swing and sag of the conductor, and whether the line is insulated or bare. Clearance zones take into account movement of the trees and the growth and regrowth rates of the trees during the cyclic cutting interval.

The provisions of the *Electricity Act* and the *Electricity (Principles of Vegetation Clearance) Regulations* place a significant and demanding obligation on SA Power Networks to ensure that

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1 Industry best practice refers to relevant interstate standards and operational experience, as well as recent findings or learning’s in relation to powerline clearance, such as outcomes from a Royal Commission.
vegetation is kept clear of our State’s electricity infrastructure in order to protect life, property and the electricity network. The specific clearance requirements were legislated following Ash Wednesday to address risks in both bushfire and non-bushfire risk areas. Failure to adhere to the requirements not only puts the community and our infrastructure at risk, it also has implications in terms of associated liabilities.

SA Power Networks understands its risk and key liability risks in regards to vegetation management include bushfire and failure to supply (reliability). To manage these risks, a vegetation clearance program is undertaken in accordance with legislated clearance requirements as part of the bushfire risk mitigation measures and procedures are in place to minimise interruptions to supply.

2.2 Australian Standard AS4373 – Pruning of Amenity Trees

There is some Council interest in the inclusion of Australian Standard AS 4373 (Pruning of Amenity Trees) in the Regulations. The Standard however is not easy to apply, is vulnerable to diverse interpretations. Application of this Standard to trimming around powerlines would raise serious doubts in terms of determining the limits of SA Power Networks’ legal liability in respect of a fatality, injury or property damage resulting from a fire caused by the interaction of vegetation with electricity infrastructure.

The current cutting approach under the Act and Regulations with respect to liability is based on compliance with the Principles of Vegetation Clearance. Compliance is based on meeting specifically defined clearance distances and these are well understood by all involved in vegetation scoping and cutting and compliance with them is clearly demonstrable. This provides a large element of certainty in an environment where a bushfire, for example, could be started by any number of factors, and places reasonable and defined limits on SA Power Networks’ liability.

2.3 Typical clearance requirements

The clearance distances between vegetation and powerlines are a legal requirement defined in the Electricity (Principles of Vegetation Clearance) Regulations 2010.

A clearance zone is the minimum safe distance between vegetation and powerlines. It allows the powerlines to safely swing in windy conditions without being damaged or starting fires. It is a legal requirement for the clearance zone to be kept free of vegetation.

A buffer zone is an additional area around a clearance zone in bushfire risk areas. It defines the maximum extent to which the vegetation may be trimmed. Trimming beyond the buffer zone is not permitted. Trimming vegetation within the buffer zone is intended to ensure the clearance zone remains clear until the next trimming is due.

A regrowth zone is the area around a clearance zone in a non-bushfire risk area. It defines the indicative extent to which vegetation is likely to be trimmed. Trimming beyond the regrowth zone is not permitted, without consent from the owner of the tree. The extent of trimming within the regrowth zone will usually be dependant on factors such as the species of tree, the local climate, and the regrowth rate of the tree, to ensure any vegetation remains outside the clearance zone until the next trimming is due (currently cannot exceed three years).
**Bushfire risk areas**

In bushfire risk areas, a clearance zone of 0.1 m is required for fully insulated powerlines and for uninsulated powerlines, the clearance zone depends on the voltage and length of span of the powerlines. It is important to note there is no ceiling for the clearance zone above uninsulated powerlines in bushfire risk areas.

The middle sections of a conductor between two poles can swing or sag more than the sections closer to the poles and require greater vertical and horizontal clearances.

**Figure 1:** A typical clearance zone and buffer zones for an 11,000 Volt (11kV) overhead powerline between 100-150m in length in a bushfire risk area
Non bushfire risk areas (including prescribed areas)

In non-bushfire risk or prescribed areas, a clearance zone of 0.1m is required for fully insulated powerlines (all voltages) and uninsulated low voltage powerlines. For uninsulated high voltage powerlines, the clearance zone depends on the voltage and span of the powerlines.

A typical clearance zone and regrowth zone for an 11kV overhead powerline in the prescribed area (metropolitan Adelaide) is shown in Figures 2, 3 and 4 below.

**Figure 2:** Cross section of a powerline showing the clearance and regrowth zone

**Figure 3:** Image depicting typical clearance and regrowth zone
Figure 4: Image showing typical uninsulated powerlines in non-bushfire risk areas
3. Consultation, notification, communication and decision making

Commitment to stakeholders:

We will aim to keep you informed, listen and acknowledge concerns and provide feedback on how influenced decision or process.

This section outlines the process undertaken by SA Power Networks and its contractors in respect to notifying or consulting with affected parties in relation to vegetation management near powerlines. It also outlines opportunities to improve how we inform stakeholders of our vegetation clearance program and how we will continue to engage with our key stakeholders.

3.1 Notification

How we engage with landholders and Councils and the notification/consultation process is critical as a significant proportion of customer and community complaints are in relation to the current notification process.

Our legislative requirements

Table 2 outlines our legislative requirements in relation to notification requirements under the Act.

Table 2: Notification requirements

<table>
<thead>
<tr>
<th>Notice</th>
<th>Requirement under legislation</th>
<th>Process or potential improvements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scoping/Inspection</td>
<td>SA Power Networks shall provide notice of intent to scope/inspect for the purposes of vegetation clearance</td>
<td>SA Power Networks will liaise with the relevant Council prior to any scoping work commencing.</td>
</tr>
<tr>
<td>Notice of Intent to Cut – “Notice of Vegetation Clearance Required”</td>
<td>SA Power Networks shall provide at least 30 days written notice to private landholders/occupier of the land prior to vegetation clearance works commencing. This does not apply to works undertaken prior to or after an emergency.</td>
<td>Notices are sent to the private landholders/occupier of the land where vegetation cutting is required to inform them of the obligations to cut or remove interfering vegetation. The owner/occupier has 21 days to object in writing to the OTR.</td>
</tr>
<tr>
<td>Notice of Intention to Enter Council Land to Clear</td>
<td>SA Power Networks must provide at least 30 days written notice to Council prior to vegetation clearance works commencing, including details of when and where clearance will occur under the program. This does not apply to works undertaken prior to or after an emergency.</td>
<td>SA Power Networks provides notice to Council and dataset of trees identified for pruning to Council contact. The 30 day notice can be waivered if a Vegetation Clearance Agreement (VCA) is in place. No agreements are currently in place with Councils.</td>
</tr>
<tr>
<td>Emergency cutting or special purpose</td>
<td>In an emergency, SA Power Networks may exercise a power of entry at any time and without prior notice. This includes in the event of outages, a threat to life or property or cutting</td>
<td>Cutting is undertaken and SA Power Networks informs occupier of work undertaken.</td>
</tr>
</tbody>
</table>
### Notice

<table>
<thead>
<tr>
<th>Requirement under legislation</th>
<th>Process or potential improvements</th>
</tr>
</thead>
<tbody>
<tr>
<td>vegetation to re-establish clearances. Contact must be made with the occupier prior to or after the emergency to inform the occupier of what was done and why (verbal or written).</td>
<td>The occupier is given the option of either removing the vegetation, liaising with SA Power Networks regarding tree removal or applying for an exemption under the Act. Notification of the occupier’s responsibility to remove the vegetation shall nominate a realistic date by which this is to be done. The OTR must be notified of any instances where the occupier wishes to retain inappropriate species and an exemption may be provided. A copy of the exemption is provided to SA Power Networks.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Inappropriate species</th>
<th>Where species contrary to the Regulations to the Electricity Act have been planted, SA Power Networks may advise the occupier of this in writing by letter 'Vegetation Planted or Cultivated Near Powerlines’.</th>
</tr>
</thead>
</table>

### Our commitment to effective notification and communication

Whilst under the legislation a number of requirements are placed on SA Power Networks, there are opportunities to improve our notification process to maximise coverage and community awareness of our vegetation clearance program in both bushfire and non-bushfire risk areas.

#### Timing of notification

SA Power Networks will provide Councils with 30 days between notification and cutting to enable Councils to provide information to residents and review the scope of pruning and where required, identify alternative approaches to clearance, such as tree removal or insulating powerlines.

#### Maximising the notification process

To maximise coverage and community input, SA Power Networks will undertake a mixture of the following methods to notify landholders and residents when we will be undertaking clearance. Whilst this will depend on the area and specific Council requirements may include:

- Advert(s) in local paper(s) outlining when pruning being undertaken in your Council area
- The use of social media via Facebook
- Power@MyPlace™ and via SMS (if registered at Power@MyPlace)
- Online via our website
- Provide information on vegetation clearance program to publish on Council websites, Council newsletters, Council forums or community meetings

It should also be noted that not all of these options will be available to rural landholders and written notification may be the only avenue of notification.
3.2 Community Information and Education

One of the key drivers for vegetation clearance is to ensure community safety and deliver a reliable electricity supply to customers. Educational material and information on why SA Power Networks undertakes its vegetation management program assists the public with understanding the clearance parameters and our legislative requirements.

SA Power Networks currently has a number of Fact Sheets, including:

- **Approved Tree List** – provides a list of species considered appropriate for bushfire and non-bushfire risk areas for planting under powerlines
- **Tree Trimming near Powerlines** – provides an overview of tree trimming around powerlines (eg responsibilities, considerations and legal requirements)
- **Bushfire Safety** – outlines our approach to bushfire safety and measures to mitigate risk
- **Entering your land** – outlines the main reason SA Power Networks may enter your land and your rights and responsibilities
- **Trees and Powerlines** - booklet produced by the Office of the Technical Regulator to outline the legislative requirements for vegetation near powerlines.

Information and copies of the Fact Sheets are available on the SA Power Networks website, [www.sapowernetworks.com.au](http://www.sapowernetworks.com.au), or by calling 13 12 61 (general enquiries). Copies of the current Fact Sheets are also provided in Appendix A.

To improve the approach to community information and education, the following initiatives will be pursued:

- Develop a brochure to improve community understanding of our vegetation clearance requirements
- Use of TV/ media to improve community education/ awareness on fire mitigation, especially pre-bushfire season

**Appropriate Species List**

SA Power Networks can assist and provide general advice to customers and the public on management, planting and maintenance of vegetation close to powerlines.

SA Power Networks has an appropriate species list (available on the website and via the OTR) that provides guidance on the types of trees appropriate for planting under powerlines based on bushfire risk areas or areas where lines are uninsulated (mature height <3m) and non-bushfire risk areas or areas where lines are insulated (mature height more than 3m but less than 6m).

The Botanic Gardens has developed an Interactive Plant Selector Tool which is a comprehensive online resource to help achieve more sustainable urban landscapes through improved plant selections. Detailed information is provided about each plant including suitability for different landscape types, soil and light preferences, physical appearance, growth habits, attraction for native fauna, common landscaping uses and other qualities and cautions. Additional information about trees includes suitability for a variety of urban placements and purposes. The tool is a valuable resource for landholders, Councils and the general public regarding appropriate species selection.

SA Power Networks has funded development of additional capability for this online tool. Trees and plants suitable for growing under or near powerlines have been incorporated into the Plant Selector Tool to improve species selection around powerlines. The database has about 800 trees or plants that are considered appropriate for planting under powerlines, based on their bushfire boundary designation. There are also a number of species of trees that whilst they may require cyclic pruning...
are considered appropriate by some Councils and will perform successfully under powerlines in non-bushfire risk areas such as pear trees or crepe myrtles as an example.

The online tool will need to be used by Councils in conjunction with their Tree Management Plans in relation to species selection that suits and meets Council and community requirements.

3.3 Community and stakeholder engagement

SA Power Networks will continue to work with the community and develop partnerships to improve vegetation management. Community and stakeholder engagement is crucial to developing a long-term plan for vegetation management and improving consumers understanding of our vegetation clearance requirements.

To improve how we work with our stakeholders we have established the following:

- LGA Working Group – a working group with the LGA and several member Councils has been established to improve how we manage vegetation near powerlines and develop a long-term plan for implementation.
- Reference Group for Vegetation Management near powerlines – an independent group has been established to provide horticultural and arboricultural expertise on strategic vegetation management initiatives.

In addition, SA Power Networks will undertake the following activities to engage with our stakeholders:

- Ongoing liaison and partnerships with Councils and stakeholders
- Improved education and engagement
- Developing partnerships with key organisations eg educational and research institutions and government agencies, such as NRM Boards
- Investigate working with schools and educational opportunities
- Investigate establishing Regional Advisory Groups to improve vegetation management and implement strategic initiatives such as tree removal and replacement programs
- Develop mechanisms for collating and managing feedback
- Explore further opportunities for engaging with landholders and customers.
- Work with the CFS to improve community education/ awareness on fire mitigation.

3.4 Decision making

Management of customer issues

SA Power Networks has a Customer Charter that outlines our commitment to customers in relation to how we will provide our services, including requirements in relation to vegetation clearance, the obligations of property owners/ occupiers, our pre-summer bushfire mitigation preparations and property access requirements.

SA Power Networks values community feedback, which can be made via the following:

- General enquiries service – 13 12 61 (Mon – Fri 9.00am-5.00pm)
- Email – customerrelations@sapowernetworks.com.au
- Website – www.sapowernetworks.com.au
- Mail – Customer Response
  SA Power Networks
  GPO Box 77
  Adelaide SA 5001
- Facebook
Dispute resolution
Disputes may arise from decisions made by SA Power Networks in carrying out its responsibilities to maintain safe clearances around powerlines.
Resolving customer grievances is important to SA Power Networks and we will endeavour to resolve any dispute with those affected in accordance with our Complaint Management Process.

SA Power Networks aims to respond to or acknowledge all complaints or enquiries within five business days via the most practical and time efficient medium, whether this be via written correspondence, email, telephone, or social media.

If you are not satisfied that SA Power Networks has satisfactorily resolved an issue, the matter can be referred to the Energy and Water Ombudsman of South Australia:

- Energy and Water Ombudsman SA
  Level 12, 50 Pirie Street
  Adelaide SA 5000
  GPO Box 2947
  Adelaide SA 5001

  Tel: 1800 665 565
  Email: contact@ewosa.com.au
  Website: www.ewosa.com.au

The Energy and Water Industry Ombudsman is a totally independent industry body and will act as a mediator between the customer and SA Power Networks. This service is free of charge.

3.5 Opportunities to improve how we engage with our customers

There are a number of opportunities to improve how we engage and work with our key stakeholders in regards to vegetation management.

These include, but are not limited to, the development of:
- ‘One Stop Shop’ for Councils to communicate with SA Power Networks.
- Online complaints email or customer service number for addressing vegetation management issues or concerns.
- Consultation process for notifying Council staff eg Councils provide list of contact people in Council to notify for any vegetation clearance work.
- Notification process to include written notification, incorporating a contact person, and followed up with a face to face meeting.
- Investigate establishing Regional Advisory Groups to improve vegetation management and implement strategic initiatives such as tree removal and replacement programs
- Partnerships with community and interest groups with a particular interest in vegetation management and wildlife management, including Trees for Life, Landcare, and wildlife groups.
- Opportunities to work with local schools on education programs or replanting programs.
- Opportunities to work with Councils and customers to ensure vegetation originating on their properties, encroaching into the street or over neighbour’s fences, is managed and controlled by the customer.
In addition, SA Power Networks will continue to work with the LGA Working Group and Independent Reference Group for Vegetation Management near Powerlines to enhance the overall quality and sustainability of vegetation management and implement key strategic initiatives.
4 Agreements with Councils, community, landholders and other land managers

**Commitment to stakeholders:**

We will seek direct advice in developing partnerships and opportunities for vegetation management improvements and seek your input into location or zone specific pruning programs.

Working with Councils, landholders and other land managers to understand who is responsible for vegetation management, including pruning, tree removal and replacement, and species selection and the different roles they play, is fundamental to improving vegetation management near powerlines.

4.1 Interface between Council and SA Power Networks tree pruning and programs

There are a number of opportunities for improved coordination between Councils and SA Power Networks in relation to pruning activities and tree replacement/ renewal programs.

**Councillors’ Street Tree Management Plans**

The majority of Councils have a Tree Management Framework, Policy or Plan in place to provide vision and direction for the management of trees within their Council area, including street trees.

Species selection and tree removals and replacement will need to align with Councils endorsed management plans.

**Pruning work**

There are opportunities for Councils and SA Power Networks to work more collaboratively to improve vegetation clearance outcomes. These could include:

- Joint scoping to identify opportunities or alternatives to clearance
- Additional pruning being undertaken by Councils following line clearance by SA Power Networks to achieve a better visual outcome
- Formative pruning being undertaken by Council

**Street tree reviews**

There are a number of Councils with ageing tree stocks and plans to replace these trees in the future, depending on life expectancy and other factors.

SA Power Networks and Councils should work together to identify aged trees, review and where possible align replacements with Councils’ Tree Management Plans and determine suitable replacement options over a one to 10-year timeframe.

**Street renewal and replacement programs**

A number of Councils undertake streetscape renewals, which involves replacing entire streets of trees, generally considered aged or inappropriate, with new species. There are opportunities for SA Power Networks to work with Councils as part of these renewals on replacement options and timeframes.

**Management of culturally significant trees**

SA Power Networks will consult with the relevant stakeholder prior to undertaking any pruning work on culturally significant trees. This includes:
• Native Vegetation Council – roadside vegetation of environmental significance or protected native vegetation
• Local Council – heritage and national trust trees, culturally significant trees, avenues of honour
• Local Council – significant trees (defined under the Development Act – metropolitan Adelaide)
• Local Council/ DEWNR – trees that are particularly large, native to the area and/or significant
• National Trust of SA – maintain a Register of Significant Trees to help identify and conserve trees of importance, including trees with historic or cultural value, environmental or botanical significance and avenues of honour.

4.2 Responsibilities/ allocation of costs

In South Australia, SA Power Networks accepts the costs and liabilities associated with vegetation clearance in bushfire and non-bushfire risk areas and on private or public lands, in accordance with the Electricity Act 1996 and the Electricity (Principles of Vegetation Clearance) Regulations.

SA Power Networks currently undertakes a program of vegetation clearance in bushfire and non-bushfire risk areas. This program is funded through the Australian Energy Regulator (AER) and ensures compliance with the legislation. This approach is based on funding approved for 2010-2015.

The protocol outlines the baseline programs for vegetation management for which funding is approved ie. What we do now, as well as for programs where funding is being sought through the Regulatory Reset Proposal for 2015-2020. Additional funding is being sought for a number of vegetation management initiatives and implementation will require funding approval. This includes for example, a shift to a 2 year cycle in selected non-bushfire risk areas and implementation of a tree removal and replacement program in bushfire and non-bushfire risk areas.

SA Power Networks would support proposals from Councils to introduce a different pruning regime or tree treatment as long as it meets our legislative and risk obligations or for which funding is provided. Furthermore, under current legislation Councils have the option to contribute to additional programs or take over trimming in their Council area (with the associated liability).

If an individual Council require specific approaches that are above the baseline SA Power Networks programs, Councils will need to contribute funding for their specific programs/approaches. The additional programs could be based on either a trade-off within a Council area or funded by Councils. For example, to reduce clearance costs within a Council area, Council might opt for removals in one location for more advanced pruning or additional pruning in another area.

4.3 Opportunities for partnerships with Councils

There are a number of opportunities for partnerships with Local Government. Councils are responsible for managing street trees under their control to improve streetscape value and appeal and enhance biodiversity and habitat value. A large number of Council’s have Tree Management Policies and Plans in place to protect their street trees and provide a framework for their management.

If individual Council require specific approaches for vegetation clearance that are above the baseline SA Power Networks clearance programs, Councils will need to contribute funding for their specific programs and needs. There are also opportunities for Councils and SA Power Networks to develop cost-effective solutions to reduce clearance costs.
SA Power Networks is also keen to work with Councils to develop location and species specific pruning programs. For example, Council might nominate different zones within its Council area where different pruning regimes and strategies could apply. SA Power Networks and the LGA would need to liaise with Councils on their concept of zones for different pruning regimes and strategies.

Table 3 provides some examples of different zones where different regimes and strategies could apply.

**Table 3: Different zones for different pruning regimes**

<table>
<thead>
<tr>
<th>Zone</th>
<th>Possible strategies</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Zone A - Low rainfall and limited trees</strong></td>
<td>• Shifting from a 3-year cycle to a 5-year cycle&lt;br&gt;• Tree removal and replacement — arid appropriate species</td>
</tr>
<tr>
<td>eg Ceduna, Roxby Downs</td>
<td></td>
</tr>
<tr>
<td><strong>Zone B – High rainfall</strong></td>
<td>• More frequent tree trimming&lt;br&gt;• Tree removal/ replacement&lt;br&gt;• Span by span strategies eg multiple cutting on targeted spans&lt;br&gt;• Growth retardants&lt;br&gt;• Species specific removal programs eg fast growing species&lt;br&gt;• Woody weed removal programs&lt;br&gt;• Species specific pruning techniques&lt;br&gt;• Sapling removal</td>
</tr>
<tr>
<td>eg Mount Lofty Ranges (Stirling, Gumeracha)</td>
<td></td>
</tr>
<tr>
<td><strong>Zone C – Rural townships</strong></td>
<td>• More frequent tree trimming&lt;br&gt;• Tree removal/ replacement&lt;br&gt;• Species specific pruning techniques&lt;br&gt;• Sapling removal&lt;br&gt;• Individual tree removal and replacement&lt;br&gt;• Street tree renewals&lt;br&gt;• Asset modification eg insulating the powerlines, undergrounding</td>
</tr>
<tr>
<td>eg Cummins, Melrose</td>
<td></td>
</tr>
<tr>
<td><strong>Zone D - Agricultural areas</strong></td>
<td>• Tree removal/ replacement&lt;br&gt;• Woody weed removal programs&lt;br&gt;• Sapling removal</td>
</tr>
<tr>
<td>eg Yorke Peninsula, Mid North, South East</td>
<td></td>
</tr>
<tr>
<td><strong>Zone E - High amenity areas (tourist/historical precincts, high traffic areas, main streets and shopping centres, near schools or community centres)</strong></td>
<td>• Staged removal/ replacements&lt;br&gt;• More frequent tree trimming&lt;br&gt;• More advanced horticultural techniques&lt;br&gt;• Species specific pruning techniques&lt;br&gt;• Individual tree removal and replacement&lt;br&gt;• Street tree renewals&lt;br&gt;• Asset modification eg insulating the powerlines, undergrounding</td>
</tr>
<tr>
<td>eg Hahndorf, Glenelg, Port Elliot, Clare, McLaren Vale</td>
<td></td>
</tr>
<tr>
<td><strong>Zone F - Metropolitan area (prescribed area)</strong></td>
<td>• More frequent tree trimming&lt;br&gt;• Staged removal/ replacements&lt;br&gt;• More advanced horticultural techniques&lt;br&gt;• Other pruning techniques eg formative pruning</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Zone Possible strategies

- Woody weed removal programs eg olives, Pines
- Species specific pruning techniques
- Sapling removal
- Individual tree removal and replacement
- Street tree renewals
- Asset modification eg insulating the powerlines, undergrounding

### Zone G – Natural/ environmentally sensitive areas

- Sapling removal – non-naturally occurring
- Woody weed removal
- More advanced horticultural techniques

#### eg protected areas, environmentally sensitive areas, RMS sites

### Zone H - Low visibility areas

- Tree removal/ replacement
- Sapling removal
- 3 year cycle (compliance vs amenity)

#### eg areas where tree removals relatively easy to implement or woody weeds, industrial areas, rural areas, low traffic areas

### Zone I - No Tree Zone, areas where there is significant service utility infrastructure (water pipeline, gas pipeline, sub transmission (66kV) and transmission (132kV and 275kV) powerlines exist)

- Tree removal
- Shifting from a 3-year cycle to a 5-year cycle

#### eg areas where trees should not be replanted if trees are removed

Some specific opportunities for partnerships with Council include:

- Developing partnerships to investigate alternatives to pruning such as tree removal and replacement, asset modification or implementing spacers
- Data sharing opportunities between Councils and SA Power Networks, including scoping data, GIS information on street trees or native vegetation
- Undertaking joint scoping with Councils to improve vegetation management outcomes
- Developing location and species specific pruning programs in partnership with individual Councils
- Opportunities for trade-offs within a Council area and developing detailed work plans for individual Council areas in consultation with Council
- Engaging qualified arborists to provide expert advice and input into trimming practices, including a trial of more advanced trimming practices. Council arborists would be involved in the selection of trees for the trial and the specific trimming requirements.
5  **Pruning and vegetation clearance**

<table>
<thead>
<tr>
<th>Commitment to stakeholders:</th>
</tr>
</thead>
<tbody>
<tr>
<td>We will aim to keep you informed, listen and acknowledge concerns and provide feedback on how your issues and concerns have influenced the decision or process</td>
</tr>
</tbody>
</table>

5.1  **SA Power Networks vegetation clearance program**

SA Power Networks vegetation clearance program consists of the following programs to manage vegetation near powerlines:

- Annual cyclic program in bushfire risk areas (approximately 430,000 line spans across the state)
- Pre-fire danger season program in high bushfire risk areas – repatrol all spans that were inspected as part of the annual cyclic program prior to 1 May in that year
- Three-year cyclic program in non-bushfire risk areas
- Metropolitan Council program – three-year cyclic program
- Metropolitan 33kV/66kV Pre Fire Danger Season Program – preventative maintenance program on high voltage feeders

5.2  **Scoping**

The vegetation services contractors are responsible for undertaking the inspection of feeders for the purpose of scoping annual, cyclic and pre-summer cutting programs. Inspection is done using a 4WD vehicle to traverse the line, checking every span for potential and existing vegetation infringements. The required clearance under the Act (Section 6) is then determined for the cutting crew.

SA Power Networks is responsible for liaising with Council pre-inspection to gain their input into the scoping process. This allows Councils to provide information on:

- Trees suitable for removal
- Culturally sensitive trees
- Opportunities for integration with Council or other agency (eg DPTI, developers) pruning work
- Stakeholder/ community issues or concerns
- Council inspect trees for consideration of options
- Trees under stress eg health, old age, decay, disease.

SA Power Networks will:

- Provide Councils with 30 days notice of their intent to scope
- Provide Councils the scoping data 30 days prior to cutting to allow Council review, consultation and identification of alternatives. A template outlining the scoping data to be provided to Councils to enable Councils to review the data within the 30 day period will be developed.
- SA Power Networks will aim to develop an indicative schedule for the metropolitan and non-bushfire risk areas clearance program to provide advanced notice of when tree trimming is likely to occur in Council areas.
- Meet with Council on-site to discuss the proposed program following the provision of cutting data and prior to the commencement of tree trimming.
5.3 Pruning techniques

Pruning is the directed and purposeful cutting of a plant towards a pre-determined end, which in the case of SA Power Networks vegetation clearance program is to prune the branches of trees which do or may interfere with powerlines, in accordance with the legislation.

A number of specific issues have been identified by Local Government in relation to pruning, including:

- Pruning needs to be more species and location specific
- Native vegetation management – requires different pruning approach
- One size fits all approach but different species have different regrowth and other factors need to be considered eg rainfall, weather
- Provide information on the extent of pruning to be undertaken per tree.

It should be noted that improvement in these areas requires additional data being captured. There is a range of data that needs to be collected at the line span level to enable effective strategic planning and improve future optimisation of the program. SA Power Networks is working to improve its data capture to improve our understanding of different species, growth rates and regional differences.

The following table outlines the different pruning techniques and their application for managing vegetation near powerlines.

The definitions for the pruning techniques have largely been sourced from the Australian Standard AS 4373 for the Pruning of Amenity Trees. Line clearance is defined as pruning to maintain clearances around overhead services, such as powerlines, which should involve formative pruning, reduction pruning or remedial pruning.
<table>
<thead>
<tr>
<th>Pruning technique</th>
<th>Description of pruning technique</th>
<th>Application of technique</th>
<th>Illustration of pruning techniques</th>
</tr>
</thead>
<tbody>
<tr>
<td>Formative pruning</td>
<td>Formative pruning consists of the selective removal of specific branches to enhance form and improve structure, or to directionally shape the young tree. One of the aims of formative pruning is to accommodate site constraints and reduce encroachment on powerlines as the tree grows. Future conflicts between vegetation and electricity infrastructure can be reduced by ensuring vegetation planted on Council controlled land is appropriately selected and formatively pruned during development.</td>
<td>SA Power Networks is looking for Councils to undertake formative pruning to shape trees or improve the visual aesthetics of trees over time. Formative pruning techniques should generally be used for Council street trees to reduce conflict with powerlines over time.</td>
<td></td>
</tr>
<tr>
<td>Selective pruning</td>
<td>Selective pruning is the removal of identified branches that are causing a specific problem.</td>
<td>Selective pruning aims to reduce the height of the tree and maintain the required clearance zone.</td>
<td></td>
</tr>
</tbody>
</table>
### Directional Pruning

Directional pruning involves removing limbs growing into the powerlines and encouraging growth away from the powerlines.

Directional pruning leaves trees healthier and ultimately reduces clearance costs over the long-term.

Whilst directional pruning may not always improve the trees appearance it is the preferred method for managing trees near powerlines.

### Reduction Pruning

Reduction pruning reduces the size of the crown of the tree in the height or spread. The ends of the branches are removed to internal lateral branches or stems.
| Pollarding | A pruning technique that establishes branches ending in a pollard head of buds and vigorous shoots. |
| Tree removal | If the degree of pruning required is such that a satisfactory appearance cannot be maintained, then it may be preferable to remove the tree. |

Under the current legislation there are no provisions for tree removal for visual or health reasons. SA Power Networks relies on working with Councils and landholders.
5.4 Pruning cycles

The frequency of tree trimming varies among Council areas, and even within Council areas, depending on the line voltage and area/zone ie bushfire or non-bushfire risk areas.

Bushfire risk areas
SA Power Networks undertakes an annual cycle of inspection and cutting in bushfire risk areas.

Non-bushfire risk areas
SA Power Networks currently undertakes a three-year cycle in non-bushfire risk areas. Community engagement has indicated that a change to the trimming frequency would reduce the negative impact to the trees as a less severe cut would be required. Subject to funding, SA Power Networks proposes to move to a two-year trimming cycle in selected non-bushfire risk areas.

5.5 Species and specimen specific guidelines

Pruning should also consider a number of species and specimen specific constraints, including but not limited to:
- Location (Council)
- Species (tree types)
- Social (stakeholders/community)
- Importance of local knowledge and training

5.6 Timing and Scheduling

Timing
- Timing of pruning needs to consider a range of factors including weather, species, environmental indicators (nesting times of birds), flowering and access to area
- Greater lead in times – 30 days is provided to Councils between notification and pruning. Where considered warranted by SA Power Networks, a 30 day extension can be requested (subject to SA Power Networks approval), to allow more time to review the pruning schedule.

Timing and type of pruning
Different trees have different optimum times for pruning. For example:
- Deciduous trees should be pruned when they are leafless as the branches are more easily seen and the direction of regrowth can be planned.
- Evergreen trees should be pruned after flowering or bearing fruit but can generally be cut at any time.
- Conifers can be pruned at any time but excessively heavy pruning will expose their limbs.

If the degree of pruning required is such that a satisfactory appearance cannot be maintained, then it may be preferable to remove the tree.

Scheduling
Clearance work should be scheduled to minimise impacts to landholders, Councils and the community. Scheduling needs to also consider environmental factors, such as wildlife breeding seasons.
There are a number of factors that need to be considered when scheduling clearance work, with the size and nature of the street being the key determinants. Some of the specific issues that need to be considered are outlined in Table 4.

Table 4: Vegetation management scheduling

<table>
<thead>
<tr>
<th></th>
<th>Proposed approach</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Schools</strong></td>
<td>Where possible cutting will be avoided during the following times:</td>
</tr>
<tr>
<td></td>
<td>• School drop-off and pick-up hours (between 8.15-9.00am and 3.00-3.45pm)</td>
</tr>
<tr>
<td></td>
<td>• Not during the first week of school term</td>
</tr>
<tr>
<td></td>
<td>Cutting will be scheduled during School Holidays where possible to minimise disruptions.</td>
</tr>
<tr>
<td><strong>Community events</strong></td>
<td>Clearance work will be scheduled to avoid or minimise disruption to community events where possible.</td>
</tr>
<tr>
<td></td>
<td>Events organisers should contact SA Power Networks' to inform them of dates</td>
</tr>
<tr>
<td></td>
<td>• General enquiries service – 13 12 61 (Mon – Fri 9am-5pm)</td>
</tr>
<tr>
<td></td>
<td>• Email - <a href="mailto:customerrelations@sapowernetworks.com.au">customerrelations@sapowernetworks.com.au</a></td>
</tr>
<tr>
<td><strong>Special event clearance</strong></td>
<td>Clearance works will be undertaken as required prior to major events to minimise outages eg. Royal Adelaide Show</td>
</tr>
</tbody>
</table>

5.7 Site management

Traffic control and costs
Appropriate traffic management must be put in place by the contractor prior to vegetation clearance work being undertaken.

All traffic management must adhere to the Road Traffic Act, Regulations, Codes of Practice and Australian Standards.

Safe work zones
The contractor is required to provide a safe work zone prior to clearance works being undertaken.

Native vegetation management
SA Power Networks are exempt under the Native Vegetation Act 1993 from tree trimming and maintenance work and for clearance work undertaken in accordance with the Electricity Act 1996.

SA Power Networks will seek to minimise damage to native vegetation. SA Power Networks will work with the Native Vegetation Council to develop guidelines for tree removal and replacement and investigate developing a Standard Operating Procedure to meet our requirements for vegetation clearance.

The contractor needs to consider when vehicle access is or is not inappropriate to a site to protect and minimise damage to native vegetation. Councils have a role to play in identifying and flagging environmentally sensitive areas.
The Roadside Marker System (RMS) has been developed to protect native vegetation occurring on road reserves. Councils are involved on a voluntary basis and a simple uniform standard for marking sites of natural, historic or cultural significance has been developed to help Council, other agencies and contractors to manage roadside vegetation. SA Power Networks will ensure these sites are managed appropriately in accordance with the mitigation measures identified for the site.

Site debris/ clean-up
Contractors leaving site debris is frustrating for residents and prompts complaints to Councils, as well as SA Power Networks.

Vegetation debris may either be left in rural situations (following agreement with the landholder or Council), where it will not pose a bushfire, safety or environmental risk, to decompose naturally or mulched in other situations.

Where requested by the landholder, the mulch generated may be left on site to stabilise the site.

5.8 Opportunities for improvement in pruning and vegetation clearance

There are a number of opportunities to improve the current vegetation clearance program and how we work with Councils and landholders. This could include:

- Opportunities for joint scoping with Councils or involving Councils during scoping stage
- Increased lead in time between scoping and pruning
- Better documentation of scoping data and more detail
- Part of scoping for contractor should require them to consider the health of the tree and contact Council prior to works if health if likely to be affected
- Recognising the importance of local knowledge and reflecting this in contractor training.
6 Alternatives to vegetation pruning

<table>
<thead>
<tr>
<th>Commitment to stakeholders:</th>
</tr>
</thead>
<tbody>
<tr>
<td>We will seek direct advice in developing partnerships and opportunities for vegetation management improvements and seek your input into location or zone specific pruning programs</td>
</tr>
</tbody>
</table>

Whilst pruning is the most common method of maintaining clearance between powerlines and vegetation, there are a range of alternative methods that can be considered by Councils and SA Power Networks to manage vegetation near powerlines.

SA Power Networks has developed a long-term plan for vegetation management that outlines a range of initiatives as alternatives to vegetation clearance to reduce our clearance requirements. The following section provides an overview of the initiatives that SA Power Networks is keen to develop in partnership with Councils to reduce clearance requirements.

One of the principles of our long-term plan is sustainability, including tree removal, planting appropriate trees and creating an overall positive net impact on the environment. Determining the value of the tree(s) and an appropriate approach (removal, pruning or asset modification) will be a key part of our long-term plan.

6.1 Vegetation management initiatives

Tree Removal
Tree removal programs are critical to developing a sustainable vegetation management plan that reduces the need for tree trimming over time. The removal of inappropriate, fast growing or large trees in consultation with Local Government and the community is one alternative to the current cutting practices to achieve clearance near powerlines and, in many instances, is the preferred management approach by SA Power Networks. There is also growing support from Councils and the community that this approach is preferable to excessive and ongoing cutting.

Whilst the focus of the tree removal program will be in bushfire risk areas, tree removals will also be investigated in metropolitan Council areas (non-bushfire risk areas), however this is likely to be on a tree by tree basis, rather than on the span by span basis used in the bushfire risk areas.

SA Power Networks propose to implement a 2.5% tree removal and replacement program in both bushfire and non-bushfire risk areas over the 2015-2020 regulatory control period.

Guidelines will be developed to provide parameters for what is defined as an ‘inappropriate tree’ for removal. This is likely to include consideration of fast growing species, weed trees, areas difficult to access for pruning, self-seeding saplings or unstable trees.

SA Power Networks is liaising with the Native Vegetation Council regarding options to offset the removal of native vegetation as part of our proposed tree removal and replacement program.

Removal and Replacement with appropriate species
While SA Power Networks is keen to remove inappropriate trees, the development of a replacement program where appropriate will provide ongoing environmental benefits. In some instances tree removal will not result in tree replacement, however in many cases trees removed will be replaced with more appropriate species eg. smaller or slower growing trees. The replacement need not be in
the same location and replacement in a negotiated alternative location will be considered in the same Council area, in consultation with the Council.

The replacement of trees will be undertaken with the following priority:

- Trees replaced in the same location but with a more appropriate species for growing under powerlines.
- Trees replaced in the same Local Government Council area or Natural Resource Management Region (NRM), in consultation with Council’s Biodiversity Officer(s).
- A financial contribution is provided to Trees for Life, the Nature Foundation of SA or a grants program for replanting, subject to discussions with the Native Vegetation Council.

The removal of large trees and the replacement with suitable, smaller trees was identified as an area of concern by Councils in terms of the streetscape and amenity value, given the value larger trees play in the urban environment. One option would be to provide exemptions for Council to replant large trees removed with a similar species on the condition that Councils undertake formative pruning to shape trees and alleviate future clearance requirements. SA Power Networks would enter into agreements with Councils for them to undertake formative pruning for an initial one to three year period.

Sapling removal
A sapling removal program is a preventative program aimed at reducing cutting requirements over time. The cost of sapling removal is significantly less than the cost of repeatedly trimming or removing a mature tree, so a program targeting the removal of saplings within the vegetation clearance easement before they mature and become a management issue is proposed.

The target for the sapling removal program is naturally occurring vegetation, pest plants, self-seeded saplings and inappropriate trees. Following removal, the spans cleared would be mowed and sprayed to avoid regrowth (where appropriate).

The removal of saplings requires consultation and approval from Councils or private landholders as this is not currently allowed under the Regulations.

Species specific removal programs eg fast growing species
There are a number of Councils, particularly Councils with high average rainfall and fast growing species, where it is necessary to cut trees multiple times in a year to meet legislative clearance requirements. In these situations tree removal would be the most appropriate (and sustainable) approach from a cost benefit perspective.

Implementing specific programs with Councils, eg Adelaide Hills, Mt Barker Council and Clare and Gilbert Valleys, will be investigated if funding is secured.

Staged renewal program
To minimise visual impacts associated with tree removal, opportunities for staged removal and renewal will be investigated to decrease impact, protect habitat and manage community concerns. For example, a three, five or seven-year replacement/ renewal program could be implemented in partnership with Council along a particular feeder or area.

Individual tree removal and replacement
In some instances, such as established avenues of trees or ceremonial trees, maintaining trees and species is a more appropriate approach to manage community expectations and streetscape values. In such situations, individual trees would be removed and replaced by Councils to maintain these
established avenues. An alternative in these situations is to insulate the lines to reduce the clearance requirements.

Replacement in such situations would be on a case by case basis and SA Power Networks would work with Councils to negotiate an acceptable outcome in terms of replacement and future maintenance.

**Growth retardants**
The use of pesticides and tree growth retardants to inhibit regrowth can be an effective management tool in some circumstances. This includes stump poisoning and chemically treating stumps to prevent and manage regrowth.

Further work to understand appropriate sites for application and to assess the effectiveness of this approach to vegetation management needs to be undertaken in consultation with Council and the community.

**Trial of more advanced tree trimming practices**
The trial would involve selecting a sample of trees across one or multiple metropolitan councils to test alternative trimming practices. The trial would assess the value of applying more advanced tree trimming practices, taking into account good horticultural practices and species requirements, as well as the use of different equipment. The trial would look at the time and cost impact of using these tree trimming practices, consider their ability to maintain compliance with the Regulations and the long-term benefits in terms of tree health, amenity, stability and customer response.

SA Power Networks would support proposals from Councils to introduce a different pruning regime or more advanced pruning techniques as long as it meets our legislative and risk obligations. SA Power Networks would be looking for Councils to fund the additional cost of undertaking additional pruning to shape trees to improve the visual aesthetics of trees.

### 6.2 Relocating electricity assets

There are a number of options available to manage vegetation near powerlines that does not require vegetation clearance.

**Undergrounding**
The undergrounding of overhead powerlines is another strategy to manage vegetation clearance and improve visual amenity. While undergrounding is supported as an option it is an expensive solution to manage vegetation and would only be considered in certain areas, including high amenity and tourist areas or streetscapes, heritage and coastal areas, high bushfire risk areas and road safety hot spots.

The PLEC program will be maintained and SA Power Networks will continue to work with Councils on priority projects suitable for PLEC funding.

SA Power Networks is developing an undergrounding plan for 2015-2020 that includes:

- Maintaining the current $9.5m per annum Powerline Environment Committee (PLEC) program
- Undergrounding up to a maximum of 135km of powerlines in bushfire risk areas in conjunction with vegetation management initiatives
- Undergrounding up to a maximum of 20 traffic blackspots, including intersections and road sections
There are also opportunities for consumers to pay for infrastructure options that protect trees and therefore the need to build in possible community contribution to the consultation process when considering vegetation management options.

**Asset modification**

Where vegetation is identified as having significant public amenity / historical/ streetscape value it may be decided to modify the electrical asset rather than cut or remove the vegetation. In some locations this is the preferred approach to manage vegetation where we are unable to cut or where it is more cost effective to undertake work on the asset than cut. This could include:

- Installation of insulating powerlines, eg Aerial Bundled Cables (ABC)
- Relocation of powerlines.

At some locations, rebuilding a section of the asset with insulated conductors will either eliminate or significantly reduce the vegetation clearance required and therefore the cost of vegetation clearance.

SA Power Networks has a current budget of approximately $150,000 in $2013, based on an average cost of $6,500 per line clearance rectification, for asset rebuilds required as a result of vegetation issues. For the 2015-2020 period, a budget of $2m per annum is being sought for asset modification for vegetation related issues given the number of occurrences where asset rebuilds are required to manage vegetation.

The final outcome is dependent on endorsement by the AER of our specific plans outlined in our Regulatory Proposal for the 2015-2020 period.
## 7 Environmental Management

### Commitment to stakeholders:

- We will keep you informed of our environmental obligations and requirements

SA Power Networks is committed to conducting its electricity distribution operations and business activities in a manner that prevents or minimises pollution and other adverse impacts on the environment.

We also monitor stakeholder and community values to ensure that our environmental management systems and initiatives are consistent with the expectations of the community, policy makers and stakeholders.

SA Power Networks has in place a comprehensive structure to manage its impact on the environment. To ensure our environmental management objectives are met, we maintain a robust Environmental Management System (EMS), inclusive of an annual Environmental Management Plan. The plan is a key part of the system and provides direction for SA Power Networks’ managers and employees in delivering the intent of our Environmental Policy.

The Environmental Management System (EMS) provides guidance and procedures on the implementation and management of environmental Aspects and Impacts.

In relation to vegetation clearance activities, this includes the following:
- Biosecurity - Preventing the spread of plant and animal disease and pest plants
- Management of significant and regulated trees
- Sensitive and Protected Vegetation areas
- Cultural and European Heritage sites
- Protection of Flora and Fauna
- Erosion and Sediment control
- Waste management
- Noise mitigation.

SA Power Networks carries out vegetation management near powerlines in compliance with all applicable environmental legislation.

SA Power Networks will develop a Standard Operating Procedure (SOP) for vegetation clearance to provide guidance to employees and contractors associated with construction, maintenance and operational works on network assets.

The SOP will outline the requirements for vegetation clearance approvals and regulation compliance during construction works, operation and maintenance activities.

Activities associated with SA Power Network’s vegetation management program are required to comply with state legislation. SA Power Networks has an Environmental Branch that monitors our environmental performance, provides advice on environmental issues and ensure we meet our legislative requirements.

A summary of the aspects considered in the planning and implementation of the program is outlined below.
7.1 Biosecurity – Pest Plants and Plant and Animal Disease Management

SA Power Networks has an obligation to prevent the introduction of weeds to new areas of the network and the spread of existing weed infestations.

Declared plants (weeds) and plant diseases generally inhabit areas where disturbance is high, especially along easements and boundary fences.

To minimise impacts of pest plants and plant and animal diseases, SA Power Networks will identify the presence of pest plants and plant and animal diseases, quarantine areas and determine control measures prior to work activities.

Employees and Contractors will selectively and responsibly apply herbicides in compliance with the Agricultural and Veterinary Products (Control of Use) Act and Regulations eg. residual herbicides in substations to prevent off target damage to vegetation.

7.2 Significant and Regulated Trees

The Development Act 1993 provides that any activity that damages a regulated/significant tree is ‘development’, and as such requires a development approval.

A significant tree is any regulated tree in metropolitan Adelaide and/or townships in the Adelaide Hills Council or parts of the Mount Barker Council with a combined total trunk circumference of 3.0m or more measured at a point 1.0m above the natural ground level. Local Councils have a register of all Significant Trees in their area and other trees may be identified as significant trees in the Development Plan of the City of Adelaide, City of Burnside, City of Prospect or City of Unley.

A regulated tree is any tree in metropolitan Adelaide and/or townships in the Adelaide Hills Council or parts of the Mount Barker Council with a combined total trunk circumference of 2.0m or more measured at a point 1.0m above the natural ground level.

SA Power Networks is exempt under the Act for vegetation clearance work around powerlines but shall consult with Councils in the instance that pruning may constitute a ‘Tree Damaging Activity’.

7.3 Sensitive and Protected Areas

Protected areas are sensitive areas that are covered by, and must be protected under legislation and/or Codes of Practice, including:

- Natural Refuges
- Conservation Areas
- Wilderness Areas
- National Parks and Nature Reserves
- Conservation Parks
- Declared Fish Habitat Areas
- State Forest, Timber Reserves or Land Act Reserves
- Key Coastal Sites declared under Regional Coastal Management Plans
- International Agreement Areas such as RAMSAR sites.

SA Power Networks shall identify areas of protected and significant habitat by considering local, state and federal government agencies, as well as local signage eg. significant roadside vegetation.
markers (RMS sites) and Bushcare sites and heritage listed areas prior to undertaking vegetation management activities work.

The Department of Planning, Transport and Infrastructure (DPTI) has roadside significant sites, most of which are protected by State or Commonwealth Legislation. All works in such areas will adhere to the provisions under the Electricity Act and Regulations.

7.4 Cultural and European Heritage Sites

Operational activities have the potential to affect Aboriginal and European Heritage artefacts and significant sites. Aboriginal Heritage features can include rock art, scarred and carved trees, native trees, shell middens and stone artefact scatters to burial or ceremonial grounds.

European heritage may include designated natural heritage eg. vegetation or single trees and historical buildings.

The assessment and management of risk in regards to indigenous cultural heritage are performed in accordance with the requirements of the *Aboriginal Heritage Act 1988*. Notification of traditional owners and native title claimants is required if ground disturbance works are to take place in areas of known cultural heritage. Under this Act it is illegal to harm, excavate, relocate, take away or be in possession of indigenous cultural heritage.

If SA Power Networks or contractors find items that could be cultural or European heritage there are strict stop work and discovery notification protocols that must be adhered to.

7.5 Fauna Management

Vegetation Management activities will be undertaken with consideration given to fauna (native animal) habitat and the maintenance of their biodiversity (fauna type and number). Impacts on domesticated farm animals (livestock) will also be considered. While most animals will move away as a result of the presence of people or equipment in the area, some native animals such as koalas, possums and some nesting birds may remain and are protected.

Vegetation clearance has the potential to impact on fauna by disturbing habitat (the environment it lives in). For large protected and or threatened bird species, such as Wedge Tailed Eagles and Sea Eagles, SA Power Networks will endeavour to avoid undertaking these activities during critical breeding times of the year.

Inspection of areas will be undertaken to ensure fauna is not present or will not be harmed as a result of planned works and where necessary, seek to relocate fauna.

7.6 Soil Erosion and Sediment Control

Vehicular movements along easements and access tracks have the potential to cause soil disturbance, which can result in erosion of soils by wind or water. Removal of vegetation can also lead to soil disturbance. This in turn leads to sediment loss in resultant run-off water that may impinge on the environment. Sediment contaminated run-off water entering a watercourse is illegal under the Environment Protection (Water Quality) Policy 2003.

Exposed soil has the potential to erode and care shall be taken to minimise the impact and where possible low growing species will be retained to stabilise the site.
To minimise the impacts on soils SA Power Networks employees and contractors will ensure that vehicle, plant and equipment movements are confined to the easement or access tracks unless absolutely necessary and after prior consultation with the property owner/manager, local council or state or federal government agencies.

7.7 Waste Management

SA Power Networks has robust waste management systems and recycling processes in place to reduce the proportion of material going to landfill and wherever possible re-use and recycle.

All waste generated from vegetation management works including vegetation debris, herbicide containers etc. shall be recycled wherever possible. Vegetation debris may either be left in rural situations (subject to landholder/ Council agreement), where it will not pose a safety risk, to decompose naturally or mulched in other situations.

Where requested by the landholder, the mulch generated may be left on site to stabilise the site.

7.8 Noise Mitigation

The Environment Protection Authority (EPA) regulates the maximum allowable noise levels for commercial and industrial activities in residential and regional areas across the state. This is undertaken in conjunction with local councils.

Vegetation management works will be carried out in a manner that will minimise any nuisance or annoyance to members of the public while achieving the objectives of the works.
8 Monitoring and Review

<table>
<thead>
<tr>
<th>Commitment to stakeholders:</th>
</tr>
</thead>
<tbody>
<tr>
<td>We will keep you informed, listen and acknowledge concerns and provide feedback on how your issues and concerns have influenced the decision or process</td>
</tr>
</tbody>
</table>

8.1 Independent monitoring and arbitration

The Energy Industry Ombudsman of South Australia is an independent industry body and will act as a mediator between the customer and SA Power Networks, if required.

In addition, SA Power Networks has established a Reference Group for Vegetation Management near Powerlines to provide expert and independent arboriculture and horticultural input into the development of SA Power Networks’ long-term vegetation management strategy. The group is represented by TreeNet, the Botanic Gardens of South Australia, Arboriculture Australia, Trees for Life, the South Australia Tree Advisory Board and Local Government, as well as expert individuals and a community/landholder representative. There is an opportunity for the role of this group to be expanded to provide independent advice or arbitration on vegetation management issues or disputes as required.

8.2 Contractor management

When complaints regarding contractor behaviour are reported to SA Power Networks these are followed up with the contractor eg leaving area untidy, property damage and access.

The contract for vegetation clearance details a number of specifications which the contractor needs to comply with. These include the requirement to prepare and lodge regular reports with SA Power Networks. This includes information on cuts, customer complaints. SA Power Networks also meets on a monthly basis (as a minimum) with the contractor to discuss the program and any particular issues.

Customer liaison
The vegetation contractor currently communicates and liaises with the public as part of the clearance work.

Skill levels for vegetation clearance staff and contractors
Councils and stakeholders have raised concerns regarding the quality of pruning and the minimum skill level required by contractors. There is a desire for vegetation clearance contractors to undertake pruning methods to a higher arboriculture standard.

To undertake vegetation clearance, contractors are required to hold (or be obtaining) a Certificate Level II (as a minimum) in Arboriculture or Horticulture.

Training and mentoring
SA Power Networks is a recognised RTO and is currently providing training for Asset Inspection. There is an opportunity to develop a partnership with the Botanic Gardens and Arboriculture Australia to deliver additional programs for vegetation management for contractors, including native vegetation management, species and location specific pruning and awareness and customer management and engagement.
There are also opportunities to improve arborist skills and contractor management, including:

- Minimum qualifications and skill levels
- Ongoing discussions and training
- Identifying areas for improvement eg weed management, access, communication
- Random audits (internal/external) by qualified arboriculturist on the work undertaken by contractors to ensure work is being done to a high standard
- Improved supervision and project management of clearance program
- Improved training in legislative requirements
- Species specific issues and management
- Local knowledge.

SA Power Networks is proposing to engage a number of qualified arborists to provide expert advice and input into trimming practices. The arborists would assist in training, auditing and contractor management.

### 8.3 Record keeping and practice

All customer complaints will be tracked and monitored utilising SA Power Networks’ CARE system. Through monthly reporting, SA Power Networks monitor complaint trends and identifies areas shown to have the greatest concern by our customers.

A system to capture data is required to improve vegetation management data knowledge, enable effective strategic planning and improve future optimisation of the vegetation clearance program. In addition, a customer database is required to manage specific customer or landholder issues and requirements.

### 8.4 Auditing

**Internal**

SA Power Networks have a number of vegetation inspectors who audit clearance work by contractors year round.

**External**

SA Power Networks engage an external consultant to undertake audits on our compliance with legislative requirements for vegetation clearance. A pre and post summer audit is currently undertaken on behalf of SA Power Networks.

### 8.5 Research/ trials

Benchmarking with other utility providers in Australia is important to understand interstate trends and improvements in vegetation management to ensure best practice vegetation management in South Australia.

There is a need to keep up to date with technological improvements eg powerline covering and insulation to understand options for managing vegetation near powerlines and undertook trials to test their effectiveness.

There is a need for research into cutting practices and how different trees respond to cutting eg species specific programs, cutting techniques and their impacts. There are opportunities to work with Universities and educational institutions and develop partnerships with Waite and the Botanic Gardens on tree knowledge and research and specific vegetation management projects.
8.6 Protocol review and update

It is anticipated that this protocol will be reviewed every 2 years to promote opportunities for continual improvement on how we manage vegetation near powerlines and how we engage with our stakeholders. However, any interested parties may provide relevant comment and feedback on this protocol at any time by writing to:

- Customer Relations
  SA Power Networks
  GPO Box 77
  Adelaide SA 5001
  Email - customerrelations@sapowernetworks.com.au
9  **Key actions and implementation**

SA Power Networks currently undertakes a program of vegetation clearance in bushfire and non-bushfire risk areas. This program is funded through the Australian Energy Regulator (AER) and complies with the legislative requirements. This approach is based on funding approved for 2010-2015.

SA Power Networks is seeking funding for a number of initiatives as part of its Regulatory Proposal for the 2015-2020 regulatory control period. The extent to which SA Power Networks can implement these directions and initiatives will depend on the extent of funding secured through the AER or other sources. The initiatives being sought have been supported through community consultation and there is support for these initiatives to improve vegetation management.

If individual Council require specific approaches for vegetation clearance that are above the baseline SA Power Networks clearance programs, Councils will need to contribute funding for their specific programs and needs. Furthermore, Councils also have the option to contribute to additional programs or take over trimming in their Council area (with the associated liability).

SA Power Networks would also support proposals from Councils to introduce a different pruning regime or tree treatment as long as it meets our legislative and risk obligations or for which funding is provided.

Table 5 below outlines some of the key actions or initiatives and whether they are currently funded, funding is being sought or Council will need to fund.
### Table 5: Proposed actions and initiatives

<table>
<thead>
<tr>
<th>Action/ initiative</th>
<th>Current approach (AER approved funding)</th>
<th>Proposed approach (subject to funding approval by AER for 2015-2020)</th>
<th>Council funding will be required to implement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community and stakeholder engagement</td>
<td>Number of engagement initiatives developed at SA Power Networks discretion:</td>
<td>• Funding being sought for number community/stakeholder engagement initiatives</td>
<td>• Opportunities for partnerships in initiatives eg tree removal trials or engagement activities</td>
</tr>
<tr>
<td></td>
<td>• LGA Working Group</td>
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<tr>
<td></td>
<td>• Arborist Reference Group</td>
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<tr>
<td></td>
<td>• Local Government Forums</td>
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<tr>
<td></td>
<td>• Occasional advertising</td>
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<td></td>
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<tr>
<td>Frequency of pruning cycle</td>
<td>• Annual in bushfire risk areas</td>
<td>• Annual in bushfire risk areas</td>
<td>• Less than 3 year cycle (or 2 years if funding is approved by AER for 2015-2020)</td>
</tr>
<tr>
<td></td>
<td>• 3 year in non-bushfire risk areas</td>
<td>• 2 year in non-bushfire risk areas</td>
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<tr>
<td>More advanced trimming practices</td>
<td>• Not funded</td>
<td>• Funding being sought for trial and engagement of arborists</td>
<td>• More aesthetic and amenity pruning/ sculpting</td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>Location and species specific pruning</td>
<td>• Not funded</td>
<td>• Funding being sought for trial and Council can discuss pruning trade-offs</td>
<td>• Council can contribute extra funding for different pruning regimes</td>
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<td>regimes</td>
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<tr>
<td>Tree removal program</td>
<td>• Removals undertaken as part ongoing program in consultation with Councils</td>
<td>• Funding being sought to implement a 2.5% removal program in bushfire and non-bushfire risk areas</td>
<td>• Councils contribute to trials eg stump removal and replacement</td>
</tr>
<tr>
<td></td>
<td>• Number trials being undertaken</td>
<td></td>
<td>• Councils provide funding to remove trees and replace with more appropriate species</td>
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<tr>
<td>Alternatives to pruning eg staged removal, growth retardants</td>
<td>• Not funded</td>
<td>• Funding being sought through Reset Proposal for 2015-2020</td>
<td>• Council can contribute to implement program in partnership with SA Power Networks</td>
</tr>
<tr>
<td>Action/ initiative</td>
<td>Current approach (AER approved funding)</td>
<td>Proposed approach (subject to funding approval by AER for 2015-2020)</td>
<td>Council funding will be required to implement</td>
</tr>
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<td>---------------------------------------------------------------------------------------------------------------</td>
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<tr>
<td>Asset modification eg insulating wires</td>
<td>• Current budget of $150,000 per annum for vegetation related asset modification issues</td>
<td>• Seeking funding for $2m per annum for vegetation management</td>
<td>• Council can contribute funding towards asset modification in partnership with SA Power Networks</td>
</tr>
<tr>
<td>Undergrounding</td>
<td>• $9.5m PLEC scheme (2/3 SA Power Networks and 1/3 Council)</td>
<td>• Seeking funding to maintain PLEC program plus some targeted undergrounding in high bushfire risk areas and at 30 traffic hotspots</td>
<td>• Council continue to contribute 1/3 of total budget under PLEC program</td>
</tr>
<tr>
<td></td>
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<td>• Council can contribute funding for additional but related works eg traffic hotspots</td>
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</table>
Providing feedback

SA Power Networks values your feedback as a key stakeholder and your input and feedback on this protocol will help ensure we improve how we manage vegetation near powerlines.

The consultation phase will commence on 12 January and the closing date for submissions is Friday 27 March 2015. A series of information and feedback sessions will be held across the state to seek Council input into the protocol.

<table>
<thead>
<tr>
<th>Date</th>
<th>Tentative time</th>
<th>Location</th>
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</thead>
<tbody>
<tr>
<td>Wednesday 11 February 2015</td>
<td>9.30-11.30am</td>
<td>South East Region Room, LGA House, 148 Frome Rd, Adelaide</td>
</tr>
<tr>
<td>Thursday 12 February 2015</td>
<td>10.00am-12.00pm</td>
<td>Clare Town Hall Function Room, Clare</td>
</tr>
<tr>
<td>Wednesday 18 February 2015</td>
<td>10.00am-12.00pm</td>
<td>Council offices, District Council of Karoonda East Murray</td>
</tr>
<tr>
<td>Thursday 19 February 2015</td>
<td>10.00am-12.00pm</td>
<td>Council offices, District Council of Yankalilla</td>
</tr>
<tr>
<td>Wednesday 25 February 2015</td>
<td>10.00am-12.00pm</td>
<td>Lock, District Council of Elliston (venue to be confirmed)</td>
</tr>
<tr>
<td>Thursday 26 February 2015</td>
<td>10.00am-12.00pm</td>
<td>Council Chamber, Port Pirie Council</td>
</tr>
<tr>
<td>Wednesday 4 March 2015</td>
<td>10.00am-12.00pm</td>
<td>Torrens Valley Community Centre, Gumeracha</td>
</tr>
<tr>
<td>Thursday 5 March 2015</td>
<td>10.00am-12.00pm</td>
<td>Naracoorte Town Hall, Naracoorte</td>
</tr>
</tbody>
</table>

Please RSVP to Alexandra Lewis, Vegetation Strategy Lead, alexandra.lewis@sapowernetworks.com.au or Bethany Loates, Policy Officer, LGA on bethany.loates@lga.sa.gov.au to confirm your attendance at one of the sessions.

How to make a submission

Submissions on the protocol can be made either through SA Power Networks or the Local Government Association (LGA).

- Alexandra Lewis, Vegetation Strategy Lead - alexandra.lewis@sapowernetworks.com.au or
- Bethany Loates, Policy Officer, LGA - bethany.loates@lga.sa.gov.au

Hard copy submissions can be faxed to 08 8404 5877 or mailed to:

Alexandra Lewis  
Vegetation Strategy Lead  
SA Power Networks  
GPO Box 77  
Adelaide SA 5001

Submissions should be submitted no later than close of business on Friday 27 March 2015.

If you have any queries please contact Alexandra Lewis on 8404 5433 or Bethany Loates on 8224 2038.
Privacy
SA Power Networks is committed to the protection of your personal information. We are required to comply with the Privacy Act 1988 (Cth) (Privacy Act) including the privacy principles applying to the private sector.

Please visit our website at www.sapowernetworks.com.au for our privacy policy.
Appendices

Appendix A – Fact Sheets

- Approved Tree List
- Tree Trimming near Powerlines
- Bushfire Safety
- Entering your land
- Trees and Powerlines – OTR Brochure
## Appendix B – IAP2 Public Participation Spectrum

<table>
<thead>
<tr>
<th>IAP2 PUBLIC PARTICIPATION SPECTRUM</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>INFORM</strong></td>
</tr>
<tr>
<td><strong>Public Participation Goal:</strong></td>
</tr>
<tr>
<td>To provide the public with balanced and objective information to assist them in understanding the problems, alternatives and/or solutions.</td>
</tr>
<tr>
<td><strong>Promise to the Public:</strong></td>
</tr>
<tr>
<td>We will keep you informed.</td>
</tr>
<tr>
<td><strong>Example Tools:</strong></td>
</tr>
</tbody>
</table>
| • fact sheets  
• web sites  
• open houses. | • public comment  
• focus groups  
• surveys  
• public meetings. | • workshops  
• deliberate polling. | • citizen advisory committees  
• consensus-building  
• participatory decision-making. | • citizen juries  
• ballots  
• delegated decisions. |
Appendix C – Pruning responsibilities

Image 1: Pruning responsibilities