

Safety Awareness Plan - CPE - (SA)

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Safety Awareness Plan - CPE - (SA)

Document Acceptance and Release Notice

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Prepared by: Adrian Mitchell, GM Legal & Commercial	3 August 2020
Accepted by: Chris Giaouris, GM Operations	3 August 2020

Version History

Version No.	Published Date	Description of Change
1.0	23 July 2020	New document

Amendments in this Version

Section No.	Section Title	Amendment Summary
	Whole Document	This is the first release of this document.

References

Cited in this Document

Title	Document Number
Australian Energy Market Operators' Gas Quality Guidelines	
AS4564-2011 Specification for general purpose natural gas	
AS/NZS ISO 31000 'Risk management – Principles and guidelines'	
Compliance Management System	BMSDOC-18-1915
Gas Act 1997 (South Australia)	
Gas Regulations 2012 (South Australia)	
Hazard and Risk Management Procedure	BMSDOC-18-466
Health and Safety Policy	BMSDOC-18-623

Additional Reading

Title	Document Number
N/A	

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1. PURPOSE

The purpose of this Safety Awareness Plan (SAP) is to outline CleanPeak Tonsley's commitment to and compliance with South Australia's safety legislation and associated regulations.

Although CleanPeak Tonsley is operating under a retail exemption issued by the Australian Energy Regulator, it has voluntarily chosen to comply with Part 5A – Regulation of NERL retailers of the Gas Act 1997 (South Australia) (Gas Act) – to ensure it complies with best practice.

In accordance with Clause 59A of the Gas Act and clause 36A(2)(a) of the *Gas Regulations 2012* (South Australia), CleanPeak Tonsley will prepare, maintain and publish on its website a safety awareness plan consistent with the requirements set out in the regulations.

CleanPeak Tonsley will comply with the conditions of the plan and audit from time to time its compliance with the plan.

1.1 Definitions

Term	Description
CleanPeak Energy	CleanPeak Energy includes, but is not limited to, the following entities: <ul style="list-style-type: none"> • CPE Mascot • CPE Central Park • CPE Funding No.2 Holdings Pty Ltd • CPE Tonsley • CPE Funding Pty Ltd
SAP	Safety Awareness Plan
OTR	Office of Technical Regulator
CMS	Compliance Management System
AER	Australian Energy Regulator
AGN	Australian Gas Networks
LEL	Low Explosive Level

2. FACILITY DESCRIPTION – THE SALE OF GAS BY RETAIL

2.1 Background

CPE Tonsley Pty Ltd (ACN 623 288 175) (CleanPeak Tonsley) owns and operates the embedded natural gas network situated at Tonsley Innovation District, 1284 South Road, Clovelly, South Australia (Tonsley Network).

CleanPeak Tonsley is able to retail natural gas to customers on the Tonsley Network pursuant an individual exemption to the National Energy Retail Law granted by the AER on 23 September 2019. CleanPeak Tonsley is a wholly owned subsidiary of CPE Funding No.2 Holdings Pty Ltd (ACN 641 054 444), and part of the broader CPE Renewable Investment trust group.

2.2 Scope

CleanPeak Tonsley acquires natural gas from an AER authorised retailer operating on the national gas market and registered with AEMO. The gas is delivered by Australian Gas Networks (AGN) via their distribution network to a metered connection point on the Tonsley Network. Gas is delivered directly to customers connected to the Tonsley Network by CleanPeak Tonsley.

3. COMMUNICATIONS WITH CUSTOMERS

3.1 General

CleanPeak Tonsley understands that the effectiveness of its SAP depends on communicating important information to customers and the public in general and has established processes to ensure customers and the public are informed about gas safety matters.

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In accordance with clause 36A(3) of the Gas Regulations CleanPeak Tonsley has a comprehensive section (tab) on the publicly available website www.cleanpeaktonsley.com.au. The tab is called the Help Centre and provides detailed information to customers in relation to safety and warning notices. This information is also available by contacting our customer service centre staff.

The Help Centre provides the detailed information under the headings Gas Safety and Emergency Information. A list of Frequently Asked Questions is also provided.

In addition, CleanPeak Tonsley's customer service staff are fully trained to provide customers with information in relation to gas safety.

3.2 Gas Properties

CleanPeak Tonsley provides information in relation to gas properties relevant to safety on the website. The information includes warnings and advice on how to deal with suspected gas escapes.

The following information is available on the Help Centre tab :

- Natural gas is a colourless, odourless and tasteless fossil fuel consisting mainly of methane. Other gases that can form part of natural gas include small amounts of ethane (C₂H₆), propane (C₃H₈) and butane (C₄H₁₀).
- Formed by the decomposition of organic matter trapped in rock formations beneath the surface of the earth.
- Natural gas is lighter than air, so if it leaks from a pipe or appliance; it won't sink and form dangerous pools of explosive gas but will instead disperse in the air, unlike other fuels diesel, petrol, propane or LPG, which are heavier than air.
- An odorant (Mercaptan) is added for safety as a ready means of leak detection.
- Most people can easily detect the smell of gas at a concentration as low as 1% by volume in air. That concentration is about 5 times lower than the level that will support combustion: (LEL) Lower Explosive level.

3.3 Gas Safety Information

The following information is available on the Help Centre tab in relation to the safety use of gas infrastructure, installations and appliances:

- Use a licensed gas fitter for all of your repair, servicing and or the removal of appliance work.
- Do not place clothing or other flammable items directly in front of heaters or other gas appliances.
- Do not remove safety devices or guards from appliances.
- Ensure your cooktops and ovens are cleaned regularly and remove waste to prevent fires.
- Do not use flueless gas appliances in confined areas. Always ensure the room within which the appliances are being operated is well ventilated.
- Never use appliances design for the outside of your home indoors.

Natural gas is one of the safest fuels you can use. The natural gas industry is highly regulated with many controls and standards in place to ensure your safety. Prior to making gas available, the distributor thoroughly tests all pipelines in your neighbourhood to ensure compliance and safe operation. Natural gas is composed almost entirely of methane, which is lighter than air. If there is a gas leak, natural gas will disperse through natural ventilation.

Modern hot water appliances now use advanced electronic ignition, removing the need for pilot flames. They also use tempered hot water systems, meaning that you will not burn yourself on the hot water and you can control the temperature by using the appliance touchpad. A tempering valve can also be used, meaning that you can set different temperatures at different parts of the house, such as the kitchen and the bathroom.

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Various models of gas cooktop feature a flame failure safety device, which will shut off the gas supply to the burner if the flame is accidentally put out. Some models also contain a recessed base plate to catch any accidental food spills and a safety valve to control the amount of gas coming through the stove.

Gas heaters now have modern automatic safety shut-down features when low oxygen levels are measured and have a tip-off protection and shut off. Flame Effect Fires now contain the feature of a safety guard or glass around the flame, meaning that children will be protected from any hot areas. Portable heaters also have safety features including oxygen depletion sensor, tilt switch, cool to touch cabinet, thermostatic control, child lock button and auto off mode.

CleanPeak Tonsley's preferred gas fitters are all fully trained and qualified in gas fitting and must comply with workplace standards to be classed as a preferred gas fitter. We choose our preferred gas fitters carefully, and will only trust licenced, capable and reliable gas fitters.

3.4 Gas Emergency Information

The following information is available on the Help Centre tab in relation to Gas Emergencies on the Tonsley Network:

Gas incidents are rare but can occur. To report gas leaks or other gas emergencies, call 1800 413 613 for assistance at any time.

In case of fire call 000 immediately.

If it is safe to do so:

- try to extinguish flames using a fire blanket or an appropriate extinguisher
- turn off the gas at the gas meter.
- never ignore your senses.
- if you smell gas take the following precautions
 - turn off the gas at the meter but only if safe to do so
 - extinguish all flames and do not smoke or strike matches
 - do not operate electrical switches or devices
 - if inside a dwelling open doors and windows to ventilate the area
 - keep people away from the affected area.

CleanPeak Tonsley will fix gas leaks associated with the meter and pipework it is responsible for, however, any gas leaks between the meter and your property and inside your property (including appliance issues) are your responsibility to have fixed by a licenced gas fitter.

3.5 Defects or Malfunctions

The following information is available on the Help Centre tab in relation to the correct action to be taken with respect to defects or malfunctions of gas infrastructure, installations and appliances (including gas leaks or suspected gas leaks), and the means by which customers can report those defects or malfunctions:

3.5.1 *If you have a gas outage or your equipment fails to work*

If possible, check if the outage is affecting your neighbours. If it is just affecting your home, it may be a localised fault. If your equipment is not working and there is no sign of a gas leak, check that your gas supply valve is still in the 'on' position and you have mains power as most new gas appliances require power to operate. If you have done this and that is the case, do not attempt the fix the appliance yourself. Contact the gas emergency and outage number on 1800 413 613 if you have no natural gas and all and contact a qualified gas fitter if it is a problem with a specific appliance.

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3.5.2 If You Suspect a Gas Leak In Your Home

Turn off your gas supply at the meter and open the doors and windows. Remove ignition sources and contact your gasfitter.

3.5.3 Gas Leak or Smell Of Gas in the Street or at the Meter

Contact the gas emergency line immediately on 1800 413 613.

3.5.4 Cold Snaps

Sometimes even Adelaide can have some cold mornings. If you find that you have lost your natural gas supply during this time, contact 1800 413 613. This gas emergency hotline is operated 24/7 and will be able to help you in getting your natural gas going again.

3.5.5 Working Around a Buried Gas Network

If you're working in or around the gas infrastructure, always dial before you dig. For more information call 1100.

3.5.6 Disruption to Supply

Either we or the distributor will contact you directly or via the media, depending on the circumstances.

3.5.7 How to turn your gas supply on and off

1. Turn off all your gas appliances including any pilot lights
2. Locate the gas meter



Illustration 1

3. To turn your gas meter OFF, turn the lever to the lower position as in illustration 2 below:



Illustration 2

4. Turning your gas back on – important safety information

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If you are asked to turn your meter off due to an emergency event, please wait for instructions on when and how to turn your meter back on.

During an emergency CleanPeak Tonsley may arrange for a technician to visit properties to ensure they are turned off (if safe to do so). If your property is visited by a technician, they may knock on your door to provide you with information. If you are not home, they will leave a card in your letter box advising that your meter has been turned off and contact information. After an emergency event, for safety reasons, CleanPeak Tonsley may arrange for technicians to restore supply to individual households when safe to do so.

Please ensure that your contact numbers, particularly your mobile phone and email addresses are kept up to date with CleanPeak Tonsley as we may both text and email you during an emergency to provide you with information and updates.

If you have turned off your valve by your gas meter for personal reasons (for example you turned it off prior to embarking on an extended holiday) you should firstly ensure all appliances have been turned off before turning your meter back on.

If upon turning your meter back on your appliances do not work, or if you have a smell of gas, immediately turn off your gas meter and call your gas fitter who will safely relight and test your appliances. For your own and other's safety, please do not attempt to relight appliances yourself.

3.6 Approval Schemes for Gas Appliances

The following information is available on the Help Centre tab in relation to approval schemes for gas appliances and how a customer can determine whether a gas appliance has been approved:

All gas appliances must be certified before they can be sold or installed in South Australia.

Components used in gas installations and in the manufacture of gas appliances must also be certified by an approved certifying body. The components can be certified individually against the requirements of the relevant standard or included in the certification of the overall appliance.

For more details on the certification requirements click on the following link:

<https://www.sa.gov.au/topics/energy-and-environment/electrical-gas-and-plumbing-safety-and-technical-regulation/manufacturers-and-importers/approval-of-gas-products>

Each year, many household accidents are caused by faulty gas appliances, misusing gas appliances and incorrect gas installations.

You can reduce the risk of this happening to you making sure you buy appliances that have been safety tested and certified for use in Australia, and you regularly maintain them. Also, if any damage is caused to your property by a non-certified gas appliance, your insurance company may not cover you.

If you are purchasing a gas appliance and want to know if the product is certified click on the following link:

<https://www.sa.gov.au/topics/energy-and-environment/using-electricity-and-gas-safely/buying-gas-appliances>

3.7 Licensed Trades Persons

The following information is available on the Help Centre tab in relation to ensuring that persons who undertake gas fitting work are required to be licensed or registered under the *Plumbers, Gas Fitters and Electricians Act 1995* and how customers can determine whether a person is appropriately licensed or registered.

Only people with an appropriate licence can carry out work on gas appliances and associated pipework in your home for a list of licensed gas fitters in the Tonsley area please click on the following link:

<https://www.licensedtrades.com.au/licensed/gas-fitter/adelaide>

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If you are uncertain whether the work you are planning falls under gas work then check the *Plumbers, Gas Fitters and Electricians Act 1995* which provides a definition of plumbing, gas and electrical work and the requirements for a person to hold an appropriate licence.

Only such licensed people can legally fill out a gas certificate of compliance and certify the work carried out. CleanPeak Tonsley require a copy of the certificate of compliance before gas can be supplied to a new installation.

Gas fitters must provide customers with a gas certificate of compliance after completing gas installation work in any location, including homes, rental and commercial premises. This work includes installing, replacing, removing/decommissioning or repairing gas pipework, installing new, pre-owned or replacement gas appliances, relocating existing gas appliances, installing new or replacement gas appliance flue pipes, converting gas appliances from natural gas to LPG, or vice-versa.

A gas certificate of compliance is not required for repairing broken-down appliances or for maintenance service work where the appliance is not modified from the manufacturer's specifications. Replacing parts on an appliance with original manufacturer parts preserves any appliance warranties and existing appliance certification.

Gas fitters may use certificates of compliance as a record of work they have performed at a property, to distinguish it from other work that may have been done, and to formally notify the owner/operator of any gas safety issues that need to be fixed.

When you receive your certificate of compliance from your gas fitter please send a copy to: applications@cleanpeaktonsley.com.au.

If you have any queries regarding obtaining a certificate of compliance, please first refer to your gas fitter before contacting Enwave.

4. GAS QUALITY

Clause 36A(2)(b) of the Gas Regulations requires a NERL retailer to use its best endeavours to supply gas in accordance with the standards of quality under regulation 38 and any relevant act or other instrument that relates to the quality of gas supply.

Regulation 38(1) sets out the following requirements in relation to gas quality:

- must be at a safe temperature and pressure and safe in all other respects for the purposes of the system
- contain sufficient odorant that it has a distinctive smell to a person with a normal sense of smell at one-fifth of the lower explosive limit in air
- comply with the relevant specifications set out in Schedule 2 (unless otherwise agreed between the Technical Regulator and the operator).

Schedule 2 of the Gas Regulations requires the specification for natural gas to be within the limits set out in Australian Standard 4645 for general purpose natural gas.

CleanPeak Tonsley buys and on-sells natural gas that complies with:

- gas quality standards set out in AS4564-2018 (which may be updated from time to time)
- the Australian Energy Market Operator's Gas Quality Guidelines

Compliance is achieved by sourcing gas from an authorised natural gas retailer who is regulated by the AER and is registered with and monitored by the Australian Energy Market Operator (AEMO).

All contract arrangements, including gas supply agreements, with the authorised natural gas retailer, natural gas distributor and with producers and large customer agreements require as soon as possible notification of off-specification gas (both supplier and customer). Further, AEMO publishes gas quality data daily via its website.

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For odorant levels, CleanPeak Tonsley relies on notification from CleanPeak Tonsley and AGN who monitor odorant levels on a regular basis.

Purchasing gas from an authorised natural gas retailer which is delivered to the Tonsley Network from the AGN distribution network via a regulator approved meter connection also ensures that CleanPeak Tonsley complies with Clause 36A(2)(d) to use its best endeavours to supply gas in a manner that does not interfere with the safe operation of a distribution system.

5. RELIABILITY OF GAS SUPPLY

Clause 36A(2)(e) of the Gas Regulations requires a NERL retailer to use its best endeavours to provide a reliable supply of gas to a small customer in accordance with any relevant Act or other instrument that relates to the reliability of gas supply.

CleanPeak Tonsley has contractual agreements in place to ensure a reliable supply of gas including a gas supply agreement with an authorised gas retailer.

6. GAS METERS

Clause 36A(2)(f) requires a retailer who carries out the work of installation, maintenance, operation, reading or replacement of a meter to provide relevant information and access to the distributor.

CleanPeak Tonsley as distributor will carry out any work in relation to the gas meters on the Tonsley Network.

7. EMERGENCY PREPAREDNESS

In the event of a major emergency, CleanPeak Tonsley will be guided by the distributor's incident controller in accordance with the distributors' Emergency Response Plan (note the distributor may be AGN or CleanPeak Tonsley dependent upon the nature or location of the emergency). This may include the provision of a list of affected customers.

For smaller emergencies, CleanPeak Tonsley will liaise with the distributor's incident controller regarding communication with stakeholders, customers, and or the wider public. Communication systems that CleanPeak Tonsley utilises include SMS, email and phone. CleanPeak Tonsley has access to social media but will only use this platform for emergency situations at the direction of the distributor's incident controller or other key personnel under the distributor's Emergency Response Plan.

Any emergency actions such as disconnections without notice will be determined in consultation with the OTR and either CleanPeak Tonsley or AGN (or both) dependent on the nature and location of the emergency.

8. AVAILABILITY OF THE SAP AND ASSOCIATED RECORDS

This SAP is available on our public website and our internal document registry where it is available to all staff. Copies are also kept at Level 9, 213 Miller Street, North Sydney NSW 2060 together with all related records. Copies may be provided to customers on request.

CleanPeak Tonsley will keep records relating to the accepted SAP for at least 7 years from the creation date of the record.

9. INTERNAL MONITORING, AUDITING AND REVIEWING

To ensure that CleanPeak Tonsley's compliance obligations with this SAP are monitored, they have been included in an overarching Compliance Management System (CMS) which is prepared in accordance with Australian Standard ISO 19600-2015.