

# Energy Safe positions

## Electric Line Clearance Consultative Committee

This document outlines Energy Safe's positions on the Electric Line Clearance Consultative Committee's (ELCCC) proposed amendments to the *Electricity Safety (Electric Line Clearance) Regulations 2020 (Regulations)*, which includes the Code of Practice for Electric Line Clearance (**Code**), as presented by Energy Safe at the ELCCC meeting on 25 June 2024.

ELCCC proposals	Energy Safe comments
<b>Proposals Energy Safe supports/supports 'in-principle'</b>	
4(b) Amendment to clause 4 to remove the requirement for a risk assessment in addition to the inspection by an arborist for applying the exception to minimum clearance space for structural branches around insulated LV electric lines.	Support.
5 Amendment to clause 5 to remove the requirement for a branch to have been removed within the last 12 months for applying the exception to minimum clearance space for small branches around insulated LV electric lines.	Support.
8 Amendment to clause 30, which relates to transmission lines, to update terminology for consistency with other clauses.	Support, subject to confirmation that the proposed amendments do not alter the substantive requirements as indicated by the ELCCC.
9 Amendment to regulation 9 to change the frequency of preparation of management plans from annual to every five years.	Support.
10(a) Amendment to regulation 9 to remove specified prescribed contents for management plans.	Support 'in-principle'.  We support reviewing regulation 9 to ensure the prescribed contents remains fit-for-purpose and to remove any contents found to be unnecessary.
<b>Proposals Energy Safe believes should be subject to a further workshop</b>	
1(a), (b) and (c) Amendment to clause 25 to reduce the minimum clearance space below and beside uninsulated low voltage electric lines in LBRA, from 1000mm to 300mm. There would also be consequential amendments to repeal clauses 6 and 7 (exception clauses) as they would no longer be required.	We believe a further workshop is needed to ensure all relevant factors have been considered before supporting a reduction to 300mm.  We are otherwise likely only to support a reduction in the minimum clearance space from 1000mm to 500mm, which is the clearance space currently allowed by application of the exception clauses.
1(d) Insert a new clause providing an exception to the minimum clearance space prescribed in clause	We believe a further workshop is needed to ensure all relevant factors have been

	25 (as amended) for structural branches around uninsulated low voltage electric lines in LBRA.	considered before supporting a new exception.
2	Amendment to clause 6 (exception to the minimum clearance space for small branches under uninsulated low voltage electric lines in LBRA), if not repealed, to remove barriers to using the exception.	Dependent upon outcome of 1.
3	Amendment to clause 7 (exception to the minimum clearance space for structural branches around uninsulated low voltage electric lines in LBRA), if not repealed, to remove barriers to using exception and reduce the clearance space allowed by exception.	Dependent upon outcome of 1. Particularly with respect to the reduction in the clearance space allowed by exception, we believe a further workshop is needed to ensure all relevant factors have been considered.
4(a)	Amend clause 4 to reduce the clearance space allowed by exception for structural branches around insulated LV electric lines in LBRA and HBRA.	We believe a further workshop is needed to ensure all relevant factors have been considered before supporting a reduction. *
6	Amend clauses 27, 28 and 29 to reduce the 'clear to sky' requirements for uninsulated electric lines in LBRA and HBRA.	We believe a further workshop is needed to ensure all relevant factors have been considered before supporting a reduction. *
7	Amend clause 8(b) to reduce clearance space for trees adjacent to transmission lines.	We believe a further workshop is needed to ensure all relevant factors have been considered before supporting a reduction. *
<b>Proposals Energy Safe does not support</b>		
10(b)	Amendment to regulation 10 to replace requirement to publish management plans on the internet with a requirement to provide a copy when requested to do so in writing.	Do not support. We believe publication of management plans provides transparency and accountability especially as not all management plans are required to be submitted to Energy Safe for approval. However, acknowledging the reasons for the proposal by the ELCCC, we commit to consulting on new guidelines for management plans following the remake of the Regulations and Code to address any residual concerns not addressed by the review of the prescribed contents that we have agreed to support.

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