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Peter Morfee
Energy Safety
Ministry of Business, Innovation and Employment
PO Box 1473
Wellington 6140

Dear Peter

**Submission on Proposed Amendments to the Electricity
Safety Regulations and Gas Safety and
Measurement Regulations**

Introduction

1. Vector Limited ("Vector") welcomes the opportunity to make this submission on Energy Safety's proposed amendments to the Electricity (Safety) Regulations 2010 and the Gas (Safety and Measurement) Regulations 2010, dated 22 March 2013.
2. Vector's contact person for this submission is:

Luz Rose
Senior Regulatory Analyst
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3. Vector broadly supports Energy Safety's proposed amendments, which we understand are minor and technical in nature, and do not represent any policy changes. The proposals provide greater clarity around particular provisions, ensure greater safety for industry practitioners, and align the regulations with new industry standards.
4. In addition, Vector has some comments and suggestions to make in relation to the standards and specific aspects of Energy Safety's proposals, which are set out below.

AS/NZS 3000 Amendment 2

5. Vector notes that AS/NZS 3000:2007 Amendment 2 4.8.13 is deficient because it has missed important limitations that should have been reflected, specifically the fact that “exclusion zone”:
 - only applies to domestic gas measurement systems with a capacity of less than 25m³/hr; and
 - it will vary if the service valve is more than 300mm above ground level.
6. This discrepancy is apparent when comparing AS/NZS 3000:2007 Amendment 2 4.8.13 with AS/NZS 4645.1:2008 O7 (page 103) and AS/NZS 5601.1:2010 Appendix M.

AS/NZS 3000:2007 section 7.7

7. Vector suggests that 7.7.2.4 *Electrical equipment* in the Standards be moved a level higher (currently, it is inappropriately classified under 7.7.2 *Classification of hazardous areas*). It should be re-classified as 7.7.3 and the numbering of clauses under it also amended accordingly.

Exclusion zones

8. Paragraph 41 of the consultation document states that:

. . .The concept of exclusion zones has been introduced in a recent amendment to AS/NZS 3000 for electrical equipment installed outside domestic premises, where there is a risk of ignition of flammable gas. One of the proposed amendments addresses this change within AS/NZS 3000 by creating exclusion zones around gas equipment installed outside domestic premises. This will impact on equipment such as metering equipment, supply equipment, regulators and electric blankets for liquefied petroleum gas (‘LPG’) cylinders. The amendment means that unless the electrical equipment of component is designed for the gas safety regime it cannot be used within the exclusion zones.

9. Vector appreciates the above proposal, which would make the exclusions clearer than they have been in the recent past. Paragraph 41 should make reference to AS/NZS 3000:2007 7.7.2.4 (electrical equipment), in addition to 4.18.3 (reticulated lighter-than-air gas system, metering system and regulators).

Part 6

10. Vector is in general agreement with Energy Safety's proposals in relation to Part 6 of the Regulations (safety of fittings and appliances), as set out on page 10 of the consultation document.

Future review of AS/NZS 3000

11. Vector, and we understand, some industry participants, find the AS/NZS 3000 standard (wiring rules) for non-domestic gas metering too onerous and not reflecting the practicalities of network and metering systems' commercial and industrial requirements.
12. In this regard, Vector **recommends** that Energy Safety canvass the experience of overseas jurisdictions, such as the U.K., United States and Europe, to learn from their experiences and identify aspects that could be usefully applied to the New Zealand environment.
13. Vector would be happy to discuss with and assist Energy Safety in reviewing the AS/NZS 3000 standard, including clarifying why different standards and terminologies are being used for domestic and non-domestic gas metering.
14. Vector also encourages Energy Safety to proactively engage with stakeholders in the further development of this standard, so it would more accurately reflect the needs of industry participants and enable them to ensure consumer safety and better meet consumer requirements.

Yours sincerely



Bruce Girdwood
Manager Regulatory Affairs