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To Energy Safe Victoria

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback to the Energy Safe Victoria (ESV) [Consultation Paper: Introducing a new class of LEI for renewables](#).

The CEC is the peak body for the clean energy industry in Australia. We represent and work with Australia's leading renewable energy and energy storage businesses, as well as a range of stakeholders in the National Electricity Market (NEM), to further the development of clean energy in Australia. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

Victoria is undertaking a once in a century energy transition and the Victorian government is to be commended for its bold commitments to electrification and decarbonising electricity generation and storage, with [renewable energy targets](#) of 40 per cent by 2025 and 50 per cent by 2030. The renewable energy industry continues to grow in Victoria and is experiencing skills shortages across many fields including renewable energy installation and Licenced Electrical inspectors (LEIs).

We welcome the proposal of more specific training for inspectors operating in the renewable energy sector and a new class of LEI that represents this competency. Improved consistency of safe renewable energy (RE) systems increases consumer satisfaction and trust in the industry which is imperative to a smooth transition.

However, the CEC also recognises that skill shortages have been an issue in the industry and is concerned that eligibility to obtain a new specialised class may be too onerous on LEIs that it exacerbates lack of LEI availability and holds up the industry, ultimately frustrating consumers and resulting in poorer safety outcomes.

## **Workforce**

There has been an acute shortage of LEIs in Victoria for at least 5 years. Increasing the LEI shortage will likely create a situation where Registered Electrical Contractors and Licenced Electrical Workers are unable to meet their legislative obligations under the Victorian *Electricity Safety (General) Regulations 2019* (the Regulations). Regulation 263 of the Regulations gives the Licenced Electrical Worker (LEW) 2 business days after the completion of the work to supply the certificate of compliance

to ESV. Regulation 250 part (1) states that prescribed electrical work must be inspected by an LEI within 8 business days of the completion of that work. When LEIs have several weeks of backlog, the CEC have received reports of LEIs accepting jobs, but not inspecting them, resulting in the LEW indirectly and unintentionally breaking the law.

The CEC does not support further sub-classing of RE systems at this time. LEIs are required to demonstrate their understanding of RE systems and therefore know what to test for in their ongoing safe operation, regardless of the nuance some systems have. In circumstances with new or irregular RE systems, the CEC is informed that LEIs study and consult on a particular system when required to understand any nuance and then assess accordingly. Sub-classing would cause a further dearth of competent inspectors in sectors of the RE industry.

### **Assessment requirements**

The CEC acknowledges that the majority of LEIs surveyed agree that both practical and theoretical assessments are the best way to prove competence. However, the CEC have concerns that raising the bar too high to obtain the RE classification could result in existing G-class LEIs, particularly in the regions, choosing not to upskill ultimately leading to a further shortage of LEIs in the sector, a situation Victoria cannot afford during the transition.

### **Safety**

The CEC have received reports of rushed electrical inspections and some LEIs performing inspections of solar systems without accessing the roof, creating a safety issue when systems have not been fully inspected for compliance. The CEC has also received reports that the issue is worsened by the backlog of installations waiting to be inspected causing LEIs to feel they need to rush or cut corners on inspections to catch up. This creates a safety issue for the LEI themselves by not having tested and assessed a job properly but also through not properly assessing a site before accessing a switch room, for example, or not setting up fall restraint systems before accessing a roof. Increased numbers of competent LEIs will reduce the real or perceived impulse to rush, which will improve safety.

### **Recommendations**

Where historical performance does not deem an existing G-class LEI eligible for the RE class without completing written (theoretical) assessments, a mentor system whereby an experienced RE LEI accompanies a newly classed RE LEI on the first 2-3 jobs may be the best way to encourage participation in the sector. However, there has been resistance to this approach as it is difficult to motivate experienced LEIs to take time out of their schedules to train others, particularly as they may view it as training their competitors. A solution to this may be using the trainers that teach the LEI courses to mentor, as they're already committed to developing the next generation and will not take more LEIs out of the available pool.

The current G-class practical exams are challenging due to time constraints and obscure defects that do not properly test an applicant's competency. Instead, practical exams should be realistic and afford the applicant the opportunity to test and record defects without time pressure, as would be the case out in the field. Applicants should be able to sit their exam without financial fear of failing and having to pay to re-sit.

Where written theoretical assessments are required, the CEC recommends free online content accompanied by multiple choice exams or similar. Supporting LEIs to upskill and participate in the RE industry benefits all. The CEC also acknowledges that the CPD program will help to keep RE LEIs

skills and knowledge sharp, along with a continued audit program that will identify LEIs that are no longer at the required competency or not acting in accordance with their obligations.

Once LEI numbers have returned to sufficient numbers to serve the electrical industry, the issue of sub-classing should be revisited to address the problems arising from the ever-growing complexity of an all-electric, renewable powered economy.

### **Beyond minimum requirements**

The CEC has recognised a demand in the industry for support beyond minimum requirements. MyCEC is the new technical support offering being delivered by the CEC to all workers in the solar industry, which was previously only available to accredited workers. Subscribers can access technical support and educational content which is updated regularly to achieve best practice safety outcomes. We expect a high percentage of subscribers will be LEIs wishing to learn more about rooftop solar and have access to technical support.

If you would like to discuss these solutions further or require more clarity, please contact me at [mshaughnessy@cleanenergycouncil.org.au](mailto:mshaughnessy@cleanenergycouncil.org.au)

Kind regards



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