WESTERN POWER DISTRIBUTION

Serving the Midlands, South West and Wales

Company Directive

STANDARD TECHNIQUE : OS6C/3

Co-ordination of Electrical Safety of Work on Street Furniture in the Vicinity of the WPD Distribution System

Policy Summary

This Standard Technique sets out safety procedures and clearances for the electrical safety of persons working for public lighting authorities on public lighting fittings in the vicinity of the WPD distribution system.

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Implementation Date: **June 2020**

Approved:

Paul Woodward
Safety and Environment Manager

Date **30th June 2020**

Target Staff Group	**All staff involved with street lighting authorities who require to operate or work in the vicinity of WPD Apparatus**
Impact of Change	**Green no impact on current working practices, this ST has combined the existing practices set out in ST:OS6C/2 and ST:OS6C(M)**
Planned Assurance checks	**To be done as part of the day to day SSV and Field check process**

NOTE: The current version of this document is stored in the WPD Corporate Information Database. Any other copy in electronic or printed format may be out of date.

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IMPLEMENTATION PLAN

Introduction

This document sets out safety procedures and clearances for the electrical safety of persons working for public lighting authorities on public lighting fittings in the vicinity of the WPD distribution system.

Main Changes

This document has been reviewed – references are updated and existing practices that are specified in ST: OS6C/2 and ST: OS6C(M) are combined into this single document.

Impact of Changes

None.

Implementation Actions

Line managers shall ensure their relevant staff are aware that ST: OS6C(M) and ST:OS6C/2 have been combined.

Implementation Timetable

This policy set out in this document shall continue to be implemented per existing arrangements.

REVISION HISTORY

Document Revision & Review Table		
Date	**Comments**	**Author**
June 2020	• Document reviewed – references and format updated. • ST: OS6C(M) combined into this document. • Sect 1.8 clarifies allowed operations. • Sect 1.9 clarifies the need for contact details. • Sect 3.1 confirms additional detail about the positioning of equipment. • Sect 7 recognises ability to carry out audit. • These changes do not affect the application of existing practices.	Jason Powell
Nov 2019	• Document reviewed – no changes required, document not re-issued.	Paul Woodward
Nov 2016	• Document reviewed – no changes required.	Paul Woodward
July 2013	• New version of ST: OS6C created.	Steve Loveridge

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1.0 INTRODUCTION & RESPONSIBILITIES

1.1 G39 entitled "Model Code of Practice covering electrical safety in the planning installation commissioning and maintenance of public lighting and other street furniture" is published by the Energy Networks Association and is recognised by WPD. A copy of the current version of G39 is provided as Appendix A of this document. G39 is also generally accepted by lighting authorities and their contractors as the national standard for the operation of cutouts in, or supplying, public lighting fittings, and work on public lighting fittings in the vicinity of the distribution system. WPD have not agreed any alternative to G39.

1.2 In order to allow lighting authority personnel to operate WPD owned cutouts, WPD require that the lighting authority ensures their personnel are competent and equipped to do so safely. It is therefore expected that lighting authorities shall train, certificate, audit and maintain a register of their personnel, who are required to operate WPD owned cutouts, in accordance with G39.

1.3 There are several organisations which train and accredit public lighting personnel to the standards described in G39.

1.4 It is the sole prerogative of the lighting authority to choose a suitable training and assessment regime which covers the requirements of G39.

1.5 The lighting authority is responsible for safe conduct of public lighting work and for ensuring that appropriate clearances from existing overhead lines are provided. WPD staff are responsible for ensuring that appropriate clearances are observed when erecting overhead lines adjacent to existing Street Furniture.

1.6 Lighting authorities' should note that some older, metal clad cut-outs may contain asbestos materials. It shall be the lighting authorities' responsibility to ensure that their personnel are adequately trained and equipped to recognise and control the risk presented to them by any asbestos that may be present.

1.7 In the event of lighting authority personnel discovering a problem or fault with any item of WPD equipment, or, for whatever reason being unsure of how to continue with their work safely in the vicinity of the WPD system, they shall stop work and shall not carry any further operation until WPD personnel have provided advice or rectified any problem associated with the WPD equipment.

1.8 Access to WPD owned cut-outs to allow the removal or insertion of the controlling LV fuse, attachment to and climbing of WPD poles, and work on, or within 1m of WPD's low voltage system is permitted only for the purpose of carrying out street furniture related operations and shall be subject to the lighting authority providing WPD with a written indemnity as described in Section 6 of this document.

1.9 The lighting authority and WPD Shall provide each other with contact details including name, address and telephone number where a responsible person can be contacted at all reasonable times for the notification of accidents/incidents.

2.0 PERSONAL PROTECTIVE EQUIPMENT

2.1 For work activities conducted within the scope of G39, WPD ADVISE that the following Personal Protective Equipment (PPE) should be worn by all persons who enter the vicinity around WPD Low Voltage Overhead lines or carry out work or testing which has the *potential* to cause damage to the line, the pole or any other apparatus such as cables clipped to the pole etc.

- LV insulating gloves
- A safety helmet
- A full face visor
- An arc and flame retardant coverall which covers the arms, legs and torso at all times.

These PPE requirements are however MANDATORY for lighting authority personnel working under a WPD AP-PL Category 4, LVPOLE or PLPTR authorisation.

2.2 It shall be the lighting authorities' sole responsibility to specify the PPE to be used in the circumstance described in 2.1 above and to ensure that their personnel comply with the requirements of 2.1.

3.0 STREET FURNITURE POSITIONING

3.1 Street furniture shall only be attached to WPD owned structures where the highest operating voltage on the overhead line does not exceed 1000 volts. New and replacement street furniture and any supporting brackets / structures etc., Shall be erected at least 1 metre from, and at least 1 metre vertically below any LV conductor (including Aerial Bunched Conductor, ABC). Any equipment mounted on an LV structure shall also be positioned at least 3m from any HV apparatus and in a freely accessible position that does not require entry to any WPD substation site.

3.2 The lighting authority must obtain a written consent from WPD for each item of street furniture which is proposed to be attached to a WPD owned LV structure. The attachment of such items shall be at the sole discretion of WPD.

3.3 The positioning of equipment must be such that it will not unreasonably interfere with any reasonably foreseeable work envisaged by WPD at that location.

4.0 LIGHTING AUTHORITY ACCESS TO WPD POLES AND CLOSE TO WPD OVERHEAD LINES

4.1 Metal ladders or ladders with exposed metal reinforced stiles shall not be used on or near poles carrying conductors.

4.2 When work is taking place on street furniture which is mounted on WPD poles all work shall, as far as is reasonably practical be carried out from a suitable independent platform (MEWP) which is operated by a person /persons who are competent to do so.

4.3 The buckets of all working platforms used in the vicinity of live overhead conductors shall be constructed of suitable non-conducting material to ensure that the operator is working within an insulated zone.

5.0 ACTIVITIES OUTSIDE OF THE SCOPE OF G39 (South West & South Wales only)

5.1 It is foreseeable that the activities identified in this section, and which exceed the scope of G39 will be required to be undertaken by lighting authority personnel.

- The initial erection and final removal of street furniture on WPD poles.
- The erection of shrouding on WPD overhead lines.
- Access where the 1 metre clearance from live LV conductors cannot be observed or where the installation is mounted on a WPD pole level with, or above, the conductors.
- Access to fittings attached to WPD poles by use of a ladder.

If this work is required to be undertaken by the lighting authority, they may;

- Adopt a suitable national standard which specifically covers the above activities and is recognised by WPD

Or

- Request that WPD issue an Operational Authorisation to suitably experienced and competent personnel nominated by the lighting authority.

If such persons are not available, this work shall only be carried out by WPD staff or contractors on a rechargeable basis.

5.2 Where MEWP access to lanterns or brackets on WPD poles is not reasonably practical, then the work may be carried out from a ladder by an AUTHORISED PERSON certified with LVPL Category 4 and the supplementary authorisation LVPOLE. This person shall be accompanied by a second person who is trained in pole top rescue techniques and holds the supplementary authorisation PLPTR.

5.3 Where a bracket is to be dismantled from any position above the overhead line, all work necessary shall be carried out by WPD staffs who are AUTHORISED PERSONS and who hold a current LVOH authorisation. This work shall be conducted on a rechargeable basis.

5.4 AUTHORISED PERSONS holding LVPL Category 4 may PERSONALLY SUPERVISE another person working under a G39 authorisation during the inspection of street furniture equipment located within 1 metre from any conductor. Access in these circumstances shall only be gained by the use of a MEWP which shall be operated by the suitably trained AUTHORISED person. All work within 1 metre of any conductor must be undertaken by the AUTHORISED PERSON.

5.5 The lighting authority or their contractor shall request in writing to the Company's Head of Safety, Training and Engineering Policy for persons to be certified.

5.6 Authorisations issued to lighting authority staff or their contractors for work on street lighting installations shall be detailed in writing on a formal WPD public lighting authorisation certificate in the current format.

5.7 In order to distinguish lighting authority personnel who are authorised on behalf of lighting authorities from those working for WPD contractors and Independent Connection Providers (ICPs), persons who are required to hold a WPD public lighting authorisation shall do so in addition to any other WPD operational authorisations that they may hold.

5.8 Public lighting authorisation certificates issued by WPD shall be clearly marked with the words “Not Permitted to enter Substations in the course of Normal Duties”.

5.9 Authorisation Procedure

5.9.1 Following attendance at a Company course each candidate for authorisation shall be interviewed by a WPD Examining Officer. The Examining Officer will assess each candidate individually. Provided the Examining Officer is satisfied that the candidate has adequate technical knowledge and experience and that the candidate's attitude to the concept of discipline and accident prevention are suitable he will submit the authorisation to an Issuing Officer for approval to be issued.

5.9.2 Each authorisation shall be valid for a maximum period of 3 years from the date of issue. The public lighting authorisation shall be AUTHORISED PERSON (AP – PL) ***without entry into substations***.

5.10 Public Lighting Authorisation Descriptions

The following shall be recorded on a WPD AP-PL certificate and are subject to an annual or bi-annual field check / audit.

5.10.1 **LVPL Category 4**

(a) To carry out work on public lighting equipment erected on Company poles within 1 metre of the Company's LV conductors or fittings.

(b) To carry out the initial erection of new public lighting on Company poles where the highest operating voltage does not exceed 1000 volts and where the equipment is at least 1 metre from, and at least 1metre below, any conductor. To carry out final removal of public lighting equipment from Company poles where the highest operating voltage does not exceed 1000 volts and where the equipment is no higher than any conductor.

(c) To PERSONALLY SUPERVISE another person certified to G39 while inspecting equipment located within 1 metre from any conductor. Access in these circumstances shall only be gained by the use of a MEWP which shall be operated by the suitably trained AUTHORISED person. No work within 1 metre of any conductor may be undertaken by the non-AUTHORISED PERSON.

5.10.2 **LVPOLE**

(a) To use a ladder for access and egress from a fitting attached to a WPD pole only in circumstances were MEWP access is not reasonably practical.

5.10.3 **PLPTR**

(a) To carry out pole top rescue techniques on live WPD LV poles.

5.10.4 A typical WPD Public Lighting Authorisation Certificate is shown in Appendix D.

5.11 Re -Authorisation

5.11.1 Re-authorisation shall take place before the maximum 3 year period has expired and will include a refresher course and an interview with an Examining Officer.

5.11.2 Persons holding LVPL Category 4 authorisations shall receive an annual live working field check by a WPD Examining Officer. This requirement may be satisfied for persons who hold an LVOH authorisation, by completion of an annual LVOH field check.

LVPL Training and Audit Course Codes

Authorisation	Initial & Refresher Training Course	Audit
LVPL Cat 4	B754	B752 (annually)
LVPole and PLPTR	B755	B755 (bi-annually)

5.11.3 WPD shall provide the lighting authority with notice of when refresher courses and audits are required, but it shall be the sole responsibility of the lighting authority to arrange for the attendance of their personnel.

5.11.4 Failure to attend an audit will result in the authorisation being removed 30 days after the authorisation was due for refreshment or audit. This will be confirmed in writing by WPD.

5.11.5 It shall be the lighting authorities' sole responsibility to ensure that persons who do hold a current and appropriate WPD AP-PL certificate do not carry out any of the works detailed in 5.10 above.

5.12 Records

5.12.1 Records of all authorisations issued by WPD shall be maintained on WPD's current authorisations database.

5.12.2 WPD will provide copies of course and assessment attendance records to the employer of each AUTHORISED PERSON. It shall be the sole responsibility of the employer to retain these records in a manner they deem appropriate.

6.0 INDEMNITY

6.1 Operation of WPD owned cut-outs, attachment to and climbing of WPD poles, and work on, or within 1m of WPD's low voltage system is permitted only subject to the lighting authority providing WPD with a written indemnity as described below.

6.2 In working on, or in the vicinity of WPD plant and apparatus, both within and outside of the scope of G39 as described in this document, the lighting authority shall ensure that all personnel conducting such work on their behalf are competent persons within the meaning of the Electricity at Work Regulations 1989 and accept that they will undertake only the work for which they are certified by the lighting authority or appointed contractor in accordance only with G39 or as stated in this document. The lighting authority also undertakes that no persons other than those who have been properly trained and certified will be permitted to carry out work as specified in G39 and as detailed in this document.

Further the lighting authority and the contractor shall be responsible for and agree to indemnify Western Power Distribution plc (WPD) against all claims and demands made, all proceedings brought, all losses, damages, costs expenses and liabilities arising directly or indirectly from:

Any act, default, omission or negligence of employees of the lighting authority and their contractors working on any column, pole, lantern, sign or underground fifth core / wire.

Except to the extent to which the act, default, omission or negligence of WPD or WPD's employees or agents is the cause.

6.3 Existing indemnities provided by lighting authorities prior to the issue of this document will continue to be taken to be current unless the lighting authority issue a replacement indemnity to WPD.

7.0 AUDIT

7.1 WPD reserve the right to conduct unannounced site audits either while the lighting Authority's employees or their accredited contractors are carrying out work, or audit the installation on completion of work.

7.2 The purpose of the Audit would be to ensure that:

- Safe working practices are being used
- Technically competent persons are carrying out or supervising the work
- All equipment is sealed (where required) in accordance with requirements
- The site is left in a safe condition.

7.3 If a safety or quality issue is discovered on an asset belonging to the lighting authority, at the interface where the lighting authorities assets are connected to the WPD network or during any activity being carried out by the lighting authority staff, WPD will take appropriate action to render the issue safe and then report the findings and actions taken, without undue delay, to the responsible Authority.

APPENDIX A

ENGINEERING RECOMMENDATION G39

APPENDIX B

AUTHORISATION REQUEST WITH SCHEDULE OF TERMS AND CONDITIONS

Course Application Form

Name:
Address:
Postcode: Telephone Number:

1. Apprenticeship: Have served recognised Electrical Apprenticeship? Yes / No
2. Other Formal Electrical Training: Site Details
3. Qualifications: Electrical Installation "City and Guilds"
   Certificate "B" Yes / No Certificate "C" Yes / No
4. Other Electrical Qualifications: State Details
5. Employer's Details
   Name:
   Address
   Postcode:
   Telephone Number: Fax Number:

To comply with current legislation please enclose a copy of your:

- Health and Safety Policy Statement
- Methods of work and Codes and Practice, for tasks appropriate to the category of authorisation
- Risk Assessment for the tasks appropriate to the category of authorisation
  (Items ticked have already been received)

AUTHORISED PERSON Category of authorisation LVPL applied for
(see reverse side of Application Form)

- LVPL Category 4
- LVPOLE
- PLPTR

DECLARATION:

I enclose my application (order/fee) for £* plus VAT (to include lunch) and copies of documentation in respect of 1, 2, 3, 4 and 5 above if applicable.

I understand that completing the course does not guarantee authorisation in the category applied for or any other category, and that the authorisation will be subject to a separate oral examination by a Company Examining Officer and that his decision be final.

Signature of Course Applicant Date

Signature of Employer Date:

LVPL Category 4

(a) To carry out maintenance of public lighting equipment erected on Company poles within 1 metre of the Company's LV conductors or fittings.

(b) To carry out the initial erection of new public lighting on Company poles where the highest operating voltage does not exceed 1000 volts and where the equipment is at least 1 metre from, and at least 1m below, any conductor. To carry out final removal of public lighting equipment from Company poles where the highest operating voltage does not exceed 1000 volts and where the equipment is no higher than any conductor.

LVPOLE

(a) To use a ladder for access and egress from a fitting attached to a WPD pole only in circumstances were MEWP access is not reasonably practical.

PLPTR

(a) To carry out pole top rescue techniques on live LV poles

Indemnity

..... (the Authority or appointed Contractor) confirms that the person nominated overleaf is a competent person within the meaning of the Electricity at Work Regulations 1989 and accept that he/she will undertake the work for which he/she is certified by the Authority or appointed Contractor in accordance only with the terms and conditions stated in the schedule attached to this document. The signatories also understand that no persons other than those who have been properly trained and certified will be permitted to carry out work in Category 4, LVPOLE and PLPTR as detailed above.

Further the signatories shall be responsible for and agree to indemnify Western Power Distribution plc (t/a WPD) against all claims and demands made, all proceedings brought, all losses, damages, costs expenses and liabilities arising directly or indirectly from:

any act, default, omission or negligence of employees of the signatories working on any column, pole, lantern, sign or underground fifth core / wire

except to the extent to which the act, default, omission or negligence of WPD or WPD's employees or agents is the cause.

Signed for ..... (name of Authority or appointed Contractor)

by: ..... (signature)

..... (printed name)

..... (position)

APPENDIX C

Example WPD Public Lighting Authorisation Certificate

WESTERN POWER DISTRIBUTION
Serving the Midlands, South West and Wales

Valid Until 31 Feb 2021

LV Field Check 31 September 2013

AUTHORISED PERSON - Public Lighting

This is to certify that Joe Bloggs is appointed to carry out the duties listed in the schedule in accordance with the Distribution Safety Rules and Company Instructions.

Not Permitted to enter Substations in the course of Normal Duty

(Examining Officer) I Newton Date

(Issuing Officer) B Cox Date

SCHEDULE

Supplementary

LVPL4	Operation of public lighting cut-outs and work on public lighting poles carrying live LV conductors in accord with ST:OS6C... Restricted to Category 4 public lighting work.
LVPOLE	To use a ladder for access and egress from a fitting attached to a WPD pole only in circumstances where MEWP access is not reasonably practical.

APPENDIX D

SUPERSEDED DOCUMENTATION

This document supersedes ST: OS6C/2 dated July 2013 and ST: OS6C(M) dated March 2012 which have now been withdrawn.

APPENDIX E

ASSOCIATED DOCUMENTATION

POL: OH1 – Clearance to Overhead Lines
POL: OS7 and associated Standard Techniques – Operational Authorisations

APPENDIX F

RECORD OF COMMENTS DURING CONSULTATION

ST: OS6C/3 - Comments

APPENDIX G

KEY WORDS

G39, Public Lighting, Authorisation, Lighting Authority, Street Lighting, Road Furniture.