

19 January 2024

UDS Review Coordinator
Western Power
363 Wellington Street, Perth WA 6000

Via email: customer.connection.standards@westernpower.com.au

Underground Distribution Schemes (UDS) Manual Review

Thank you for the opportunity to provide feedback on the draft changes to the Underground Distribution Schemes (UDS) Manual.

The Urban Development Institute of Australia (UDIA) WA is the peak body representing the property development industry in WA. As a membership organisation, we have private and public sector members from the residential, commercial and industrial property development sectors.

UDIA WA welcomes this review of the Manual and the engagement with industry in finalisation of the document. Ensuring the roles, responsibilities and requirements of both developers and their contractors, as well as Western Power, is correctly and clearly defined is important when designing infrastructure that will be added to the network and we trust that our comments will be of assistance in finalising the 12th edition of the UDS Manual. Improving clarity and consistency in interpretation of the Manual is a critical component to addressing current and potential future bottlenecks in the approvals process.

Whilst we have prepared a more detailed list of comments and suggestions in your requested format (see attached), we have highlighted several items below that we view as being of key importance.

1. Clause 4.4.4 (Table 7) – Submission requirements for design conformance review
 - At present, many DCRs are being delayed awaiting provision of other authority approvals (Local Government Authority, Main Roads WA, service providers), which generally run concurrently with Western Power’s approvals process.
 - This could be addressed under Clause 4.3.3 as the Developer is ultimately responsible for obtaining the necessary approvals.
 - Regarding street lighting ‘authorisation letters’ from local government, the requirement to obtain new authorisation letters for each stage adds unnecessary and unwanted workload on both local governments and consultants.
 - An approval from the local government authority for decorative and/or private street lighting with a minimum of two years validity, before requiring updated authorisation, would reduce unnecessary administrative burden.
2. Clause 5.1.1(e) – Developer responsibilities (UDS design requirements)
 - As referred to above at Clause 4.4.4, the approval processes for other authorities (local government, service providers) generally runs concurrently to the Western Power approvals process, waiting to get approvals from these providers prior to

Western Power undertaking their own approvals process is creating delays in the system.

- As it is ultimately the responsibility of the developer to obtain all necessary approvals for the project prior to completion, these should not need to be supplied to Western Power prior to Western Power commencing their own approvals process.
 - It is suggested that an amendment be made to Clause 5.1.1(e) to state that the Developer is responsible for obtaining all necessary authority approvals for the works.

- 3. Clause 5.3.10 – Cable alignment
 - Paragraph 4 would indicate that a Designer needs to obtain Western Power approval for cable alignments where lot retaining walls adjoin road reserves.
 - This evaluation can take place as part of the DCR review process, noting that underground power is typically ducted in these locations, with deepened wall footings.
 - As Clause 5.3.14 appropriately provides for the above, re-wording Paragraph 4 is suggested through removing “...existing/proposed walls and/or structures built within close proximity to the property boundary...” from Clause 5.3.10.

- 4. Clause 5.3.14 – Cable near to retaining walls / structures
 - Walls are having to be deepened 2m below surface level around substation sites where future structures may be built adjacent to the site.
 - This is intended to allow for Western Power to excavate in future without undermining the adjacent structure.
 - As an alternative, Western Power can utilise shoring boxes or other suitable forms of excavation techniques when/if excavation is required in the future.

We ask that a response is provided to each of our suggested changes and believe that it would be appropriate to discuss these at one of the next quarterly designer forums or, if Western Power deems it appropriate, a specific designer forum to discuss the UDS amendments.

Should you require further information or wish to discuss this please contact Sarah Macaulay, Executive Director – Strategy and Policy at smacaulay@udiawa.com.au or 9215 3404. Thank you again for the opportunity to provide feedback.

Yours sincerely,



Tanya Steinbeck
Chief Executive Officer