20 October 2015

Mr Doug Watt
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By email: Doug.Watt@ea.govt.nz

Dear Doug

Electricity Authority – Draft report on the inquiry in Penrose substation fire

Thank you for your email of 6 October 2015 attaching a copy of the draft report on the inquiry into the Penrose substation fire on 5 October 2014, and providing the New Zealand Fire Service (the Fire Service) with the opportunity to comment.

We have carefully read the draft report, and take the opportunity to provide comment on 3 aspects of it. These are discussed below. Before doing so however, the Fire Service would like to restate that it had and continues to have mutually cooperative engagement with both Transpower and Vector.

1. Recommendation 9 – An independently peer reviewed, post event safety review must be undertaken to identify improvement opportunities. [Paragraphs 10.36 - 10.39]

The Fire Service supports the recommendation that Transpower, Vector and the Fire Service engage to review safety and inter-agency aspects associated with the Penrose fire, with a view to looking at any opportunities to improve safety and fire control management involving high voltage electrical facilities.

The Fire Service, Vector and Transpower are in the process of arranging a workshop involving key personnel from the three organisations to review the emergency response to the Penrose substation fire. That workshop proposes to look at the roles and responsibilities of each party, the actions of each party and the interactions between the three parties. Draft terms of reference have been drawn up which take account of relevant findings from the Authority’s draft report. The intended purpose of this workshop is to assess the effectiveness of the response, and to identify learnings to improve the response at future incidents.

2. Fire Service record of events – responsibility for power isolation [Paragraph 7.45(d)]

The Fire Service acknowledges that Transpower and Vector dispute the Fire Service’s record of events that identified its personnel experienced difficulties knowing who to ask for advice.
We also note the report states there was confusion in the letter about whether onsite personnel were Transpower or Vector staff.

The Fire Service's letter of 15 September was intended to reflect the understanding and perception of firefighters and officers who attended the Penrose substation fire at the time, and shortly afterwards at the debrief; namely that its personnel were unsure as to who was responsible for the site, and making decisions about the isolation of power at different parts of the site. Importantly, those staff in attendance felt this caused confusion for them in identifying whether extinguishing options could be performed safely. As the draft report acknowledges [para 7.45(c)], this concern is reflected in the notes from the Fire Service debrief, which say:

The difficulty in knowing who to ask for advice when there is more than one external organisation in attendance was highlighted.

SO Wilkinson (821) was designated safety officer and described his actions. He was advised by a workmen [sic] from either Transpower or Vector, who stated that he couldn't be 100% sure that power was off to the affected area.

While Transpower and Vector may be clear about the organisation to which the staff or contractor's on site were aligned, that was not the experience of the Fire Service during the event.

3. Fire Service record of events – withdrawal of personnel [Paragraph 7.45(c)]

The Fire Service also acknowledges that Transpower and Vector dispute the Fire Service's statements that its personnel were withdrawn due to uncertainty that power was actually off and isolated.

The Fire Service is clear that its staff were withdrawn from firefighting for a period because it was not certain that power in the affected areas was off and isolated.

Our understanding is that:

- 3.23am the Fire Service was advised power was off to the switchgear building. Foam was applied to this area.
- 3.35am The Fire Service became aware that power was still on in other areas of the site.
- 3.55am Power was confirmed as isolated at the switchgear building, and 2 foam deliveries were in use at that site.
- 4.47am The Fire Service was advised by Transpower that the 220Kv switchyard was completely de-energised. The Fire Service commenced firefighting in that area.

That staff were withdrawn is verified by the debrief notes and SMS Incident Report provided to the Inquiry by the Fire Service.

The debrief notes state:

SO Wilkinson (821) was designated safety officer and described his actions. He was advised by a workmen [sic] from either Transpower or Vector, who stated that he couldn't be 100% sure that power was off to the affected area. Wilkinson then ordered the firefighters to withdraw from the area and advised the OIC of this.

The SMS Incident Reports records a situation report at 04.47am stating:

There has been two fires – first fire has been extinguished – 2nd fire is in an area that we need to confirm has been isolated before we extinguishing – fire in cabling underground – oil filled under pressure – pumps to oil have been isolated we have sufficient foam stocks on site.

The Fire Service is satisfied that the wording in the draft report acknowledges the concerns raised by the Fire Service; that Transpower and Vector hold divergent views to the Fire Service; and any disagreement as to fact should not distract from the overarching concern that the issues raised by
the Fire Service are safety concerns held by frontline personnel and should be subject to further discussion amongst the parties.

As set out in its letter to you, the Fire Service takes the view that its experiences should be shared with the relevant electricity agencies, with a view to improving the responses at future events, in particular where multiple agencies are involved. This is reflected in recommendation 9 of the draft report.

Yours sincerely

Rob Pope
Director, Office of the Chief Executive

cc: [Redacted]