



Electrical Safety Management Plan Guidelines: What Electricity Licensees Need To Do Now?

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The Guidelines on the Electrical Safety Management Plan (GP/ST/No.63/2026) (ESMP Guidelines), which were issued by the Energy Commission (EC) came into operation on 15 May 2026.

Issued under Section 50C of the Electricity Supply Act 1990 (ESA), the ESMP Guidelines apply to holders of generation, transmission and distribution licences. Retail licensees and licensees for private installations fall outside the scope of the Guidelines.

Most licensees will already have safety procedures, maintenance programmes and some form of operational controls. The ESMP Guidelines do not displace those arrangements. What they do is prescribe how electrical safety must be organised, documented, monitored and reviewed; and critically, how that can be demonstrated to the regulator. The distinction between having adequate systems and being able to show that those systems are working is where many licensees are likely to find the greater part of the compliance challenge.

Why This Matters?

The EC has always had broad powers to address electrical safety. What the ESMP Guidelines add is a common framework, a single set of requirements against which every in-scope licensee can be measured, regardless of size or the nature of their infrastructure.

That has consequences. EC inspectors, technical advisers reviewing asset transactions, counterparties conducting due diligence and lenders assessing infrastructure assets now have a clear benchmark. Licensees who cannot point to a functioning

ESMP documented, reviewed and evidenced, are not simply non-compliant with a set of guidelines. They are exposed in every context where compliance with applicable regulatory requirements is relevant.

The contractual dimension is worth dwelling on. Generation, transmission and distribution licensees operate under a range of agreements, PPAs, connection agreements, O&M contracts, asset management arrangements. Many of which require compliance with applicable laws, regulations and regulatory requirements. The ESMP Guidelines fall squarely within that description. Parties who have not considered whether their contractors, service providers and counterparties are meeting ESMP obligations may find that a compliance gap on the ground translates into a contractual exposure in their agreements.

In the event of an electrical incident, the question a regulator or court is likely to ask is not whether a safety procedure existed in principle. It is whether the licensee can demonstrate that the procedure was in place, being followed, periodically reviewed and working. That is a harder question to answer without an ESMP that has been properly implemented and maintained.

The Six-Element Framework

The ESMP Guidelines are structured around six elements: policy and documentation; organising; planning and implementation; risk control measures; performance evaluation; and action for improvement. A licensee's ESMP must address all six. Each element is mandatory. The depth and sophistication of the measures adopted will necessarily depend on the nature, scale and risk profile of the relevant infrastructure, but the framework itself is not optional.

Policy And Documentation

The starting point is an electrical safety policy signed off by top management. The policy must address safe working conditions, legal compliance, hazard identification and elimination, and a commitment to continual improvement. That much is relatively standard.

The more demanding obligation is the documentation requirement that runs through every element of the Guidelines. Safety activities, training, inspections, maintenance, incident investigations, audits and corrective actions must all be documented, maintained, reviewed and accessible to relevant personnel. The consistency with which this theme recurs throughout the Guidelines is deliberate. The EC is signalling that demonstrability is as important as compliance itself.

For many licensees, this will mean less a wholesale redesign of existing safety practices and more a sustained effort to formalise, record and organise what already exists. That exercise is less glamorous than building something new, but it is often where the real compliance gaps lie.

Organising

The ESMP Guidelines are clear that electrical safety is a management responsibility, not purely a technical one. Top management is required to plan and implement the ESMP, establish safety policies, oversee hazard identification and risk controls, review incident investigations and monitor performance. A safety committee comprising competent persons and employee representatives must be established, with meetings held at least twice a year.

This is not a framework that can be delegated in its entirety to engineers or safety officers, however capable. The EC expects visible management ownership. In organisations where electrical safety has traditionally been treated as an operational matter below senior management level, that expectation will require a structural adjustment.

On contractor management, the Guidelines are equally direct. Licensees remain responsible for ensuring that electrical works are carried out by appropriately registered contractors and competent persons. That responsibility does not pass to the contractor by virtue of the appointment. Licensees who rely on subcontracting arrangements or who have not recently reviewed their contractor qualification and monitoring processes should do so.

Planning And Implementation

The ESMP must be established and maintained as a functioning management system, not a document that is prepared once and shelved. Planning must address objectives, resource allocation, competency and training programmes, hazard identification, maintenance scheduling, emergency preparedness and continual improvement. Each area must have identified responsible personnel, measurable targets and an allocated budget.

The budgeting and resource allocation requirements are worth noting specifically. The Guidelines treat adequate resourcing as a compliance obligation, not a discretionary management decision. A licensee that can demonstrate good safety intent but cannot show that it has allocated the resources necessary to give effect to that intent is unlikely to be in a satisfactory compliance position.

Risk Control Measures

Three distinct and independently mandatory obligations sit within this element.

1. Hazard Identification and Risk Control

Licensees must maintain a systematic, ongoing process for identifying electrical hazards and assessing risks. Control measures must follow the prescribed hierarchy, elimination first, then substitution, engineering controls, administrative controls and, as a last resort, personal protective equipment. PPE issuance records, including expiry

dates, must be maintained. Electrical equipment must be tested and calibrated at specified intervals, with records kept.

The management of change requirement deserves specific attention. Where changes to operations, equipment, work processes or organisational arrangements may affect electrical safety, a formal assessment and approval process must be applied before the change is implemented. This catches a wider range of situations than many organisations might initially assume, asset upgrades, refurbishment programmes, outsourcing arrangements and restructuring exercises may all be in scope. Licensees who do not have a management of change process embedded in their operational governance should address that gap as a priority.

2. Permit to Work (PTW) System

A formal PTW regime is mandatory for high-risk electrical works. Permits may only be issued by a competent person after confirming that required safety measures are in place. Safety briefings must precede every instance of high-risk work. The PTW system must be documented and consistently applied. A system that exists on paper but is not regularly used or monitored is not a compliant PTW system and in a post-incident investigation, the gap between documented procedure and actual practice is precisely where liability tends to concentrate.

3. Emergency Preparedness

Licensees must establish and maintain an Emergency Preparedness and Response Plan covering emergency procedures, responses to electrical shock and fire, incident reporting and a current list of contacts for relevant authorities. An Emergency Response Team must be designated with clearly defined duties. Emergency drills must be conducted periodically and documented. Emergency equipment must be available, accessible and within its validity period.

Performance Evaluation

Electrical incidents must be reported, investigated by a competent person and analysed to identify root causes, shortcomings in the ESMP and corrective actions. Root causes must be addressed through both immediate and longer-term measures.

Beyond incident investigation, licensees must maintain ongoing performance monitoring across a defined set of indicators including lost-time injury targets, incident numbers, training compliance, inspection frequency and corrective action closure rates. Periodic internal audits are required. Management reviews must be conducted at least annually, covering corrective action status, audit findings, regulatory compliance, resource adequacy and the overall effectiveness of the ESMP.

The annual management review is a board-level or senior management obligation, not an operational one. It creates a recurring governance requirement that needs to be embedded in the organisation's annual calendar. Licensees who treat it as a one-time

compliance exercise, or who conduct it below the appropriate level of seniority, are missing both the intent and the practical value of the requirement.

Action For Improvement

Corrective actions arising from incidents, audits, inspections and management reviews must be tracked and implemented. Where recurring incidents show that existing controls are not working, additional measures must be adopted and the hierarchy of controls applies to that assessment. Directives and notices from the EC must be addressed promptly. Recommendations from competent persons during inspections must be acted upon, not merely filed.

The Guidelines also expect benchmarking against comparable organisations. This is not framed as a strict compliance obligation, but its inclusion reflects the EC's expectation that electrical safety management should evolve rather than sit still. A licensee that is aware of better-practice approaches in its sector but has not engaged with them is in a more exposed position than one that has particularly if an incident occurs.

The ESMP Checklist

The Guidelines include a preparation and assessment checklist covering each of the six elements, with each item graded as compliant, non-compliant or an opportunity for improvement. The checklist must be signed by a responsible officer and approved by a management representative.

This is worth treating with some care. A completed checklist that identifies non-compliance or opportunities for improvement, without an accompanying remediation plan or evidence of follow-through, is not a satisfactory compliance position and it creates a record that may be unflattering in a regulatory inspection or post-incident review. The checklist is most useful when treated as a live management tool: completed honestly, used to drive remediation and updated as gaps are addressed.

Conclusion - What Licensees Should Do Now?

The ESMP Guidelines are operative. There is no transition period. The EC has the power to issue directives and pursue enforcement action against licensees who are not in compliance, and that power exists whether or not a licensee has been formally inspected.

The most productive starting point is an honest gap assessment using the ESMP checklist not as a form-filling exercise, but as a structured review of where existing governance arrangements, operational procedures, documentation practices and contractor management processes fall short of what the Guidelines require. The areas most likely to reveal gaps are not the technical safety controls themselves but the management, documentation and oversight structures that sit around them.

Contractual arrangements should be reviewed in parallel. Where electrical works, maintenance or asset management services are performed by third parties, licensees should confirm that competency requirements, training obligations, reporting duties and ESMP-related compliance obligations are clearly allocated in the relevant agreements, and that the licensee has adequate audit and monitoring rights to satisfy itself that those obligations are being met.

Licensees who identify material gaps should take advice and move to remediate. An assessment conducted proactively, before a regulatory inspection or incident, leaves considerably more room to address what is found.

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