

Appendix 1 – ESA Response to Stakeholder Feedback

Stakeholder Group	Comment	Response
Licensed Electrical Contractor	<p>1) I am totally opposed to any wiring fee increase to licensed electrical contractors. The do-it-yourselfers on the other hand should see annual fee increases of 10%!</p> <p>2) No time frame is acceptable for an increase to the licensed contractors. The market is far too competitive at this time and many customers balk at prices that include ESA Inspection fee costs. I even had an engineering company direct me to eliminate it (ADDED ESA INSPECTION COST FOR INCREASED QUANTITIES) from a change-order that I quoted them on a project to add an additional receptacle and a breaker to an on-going institutional construction installation.</p>	<p>Thank you for taking the time to respond to ESA’s wiring fee adjustment consultation.</p> <p>While the overall planned wiring fee adjustment is an average of 2.65%, licensed electrical contractor paid wiring fees would increase an average of 2.6%, while non-contractor paid wiring fees (e.g. homeowner do-it-yourselfers) would increase by 2.9% reflecting the typically greater amount of service and support effort required.</p> <p>While they are legally allowed to perform electrical work, ESA actively encourages homeowners to hire Licensed Electrical Contractors (LECs) including through our bi annual ‘Hire an LEC’ campaigns.</p> <p>We understand that business owners need time to implement any sort of fee change. ESA launched this consultation process six months in advance of the planned implementation date in order to provide significant advance awareness. Once finalized contractors will receive a minimum of 60 days notice of the new fee schedule.</p> <p>We have also timed adjustments to occur in January based on past stakeholder feedback.</p> <p>We know that many end consumers/ clients do not understand the requirement of the permit/inspection process or the value of it. We have been working to raise awareness of the importance of them and will continue to work in this area.</p>
Licensed Electrical Contractor	<p>I am only partially in agreement with this.</p> <p>While inflation forces all of we contractors and service providers to raise our rates from time to time, it seems that this is somewhat premature. I say this because there was very recently a raise in the rates at ESA and costs are becoming very high for the average consumer.</p> <p>I would suggest you cut it back to half the amount, and set the maximum increase over the next 2 years at only 2.65 %.</p>	<p>Thank you for taking the time to respond to ESA’s wiring fee adjustment consultation.</p> <p>ESA has endeavoured to keep wiring fee adjustments as low as possible while still ensuring cost recovery.</p>

	<p>Ontario is fast becoming a very expensive place to do business. Look at all the manufacturing companies that have moved out in the past several years, and are continuing to leave our country. Why is this happening? Is this not alarming to we Canadians? It should be!</p> <p>I say there are several reasons for this exodus, and to name a few:</p> <ol style="list-style-type: none"> 1. High Hydro power rates. (ESA fees would fall into this category) 2. Too much red tape, regulations, & restrictions causing too much grief & headaches for small and large business owners. Unrealistic demands are placed on the owners of small business. 3. An obsession with everyone trying to protect themselves against litigation and liability. This has its place, but it is going way too far, and thereby raising costs in our economy and society too high. 4. A lack of faith and trust in God, and a resulting decline in moral values and standards and the families & relationships of our society. Honesty and integrity, & personal commitment is becoming short in supply! 	
Licensed Electrical Contractor	I am opposed to the wiring fee increase.	<p>Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.</p> <p>ESA has endeavoured to keep wiring fee adjustments as low as possible while still ensuring cost recovery.</p>
Licensed Electrical Contractor	<p>General Accepted</p> <p>I think it is a great idea to increase the costs. ESA needs to be profitable and continue to be able to provide great service.</p> <p>I would find it hard to attend meeting right now, but would like to have input into the Fee Schedule</p>	<p>Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.</p> <p>The 2015 Fee Schedule will be available on our website near the end of the calendar year. Please feel free to submit input regarding the fee schedule to ESA at any time by emailing us at stakeholder.esa@electricalsafety.on.ca</p>
Licensed Electrical Contractor	I'm definitely opposed to the increase in wiring fees. As a non profit organization there is no reason there should be enough extra fee money to make \$25,000 donations as ESA does yearly that fee money should be put back in for the next year to decrease wiring fees for contractors and	<p>Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.</p> <p>The donation to which you are referring is support given to an Electrical Safety and Injury Treatment Program at a major Ontario hospital and rehabilitation facility. The program is the</p>

	customers.	<p>leading centre of expertise in Canada for medical research, maintaining clinical and incident data and driving treatment options for individuals who have sustained an electrical burn injury. It also works to help victims of electrical injuries rehabilitate.</p> <p>The decision to support the program was made in conjunction with stakeholders, particularly the ECRA Advisory Council, because of the high relevance and importance of this program to ESA's mandate. While ESA seeks to focus the majority of our efforts on preventing safety incidents before they occur we felt it was important to support those who have already suffered an injury so that they could be more likely to recover well.</p>
Advisory Council Member	<p>The fee increases seem necessary and reasonable to me. The relative increase for contractors vs. the general public is also sensible; however, the increases will likely be passed on to consumers in any case. It would be irresponsible to proceed with deficit funding and I don't have the sense that ESA is over-staffed. Indeed, I believe ESA is very likely not fully prepared to scale up in the event of significant increases in demand – due to volatility in weather, for example. In conclusion, I see no alternative but to increase fees.</p>	<p>Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.</p> <p>As you note, ESA has been experiencing increased workloads due to more frequent extreme weather events – storms, flooding, etc.</p>
Licensed Electrical Contractor	<p>I am opposed to a fee increase since I have not been able to increase my rate for the last 5 years. Competition drives me to change business practices to reduce costs in order to be competitive.</p> <p>The changes to WSIB (all part of government over-regulation) prevents me from doing commercial work without paying WSIB. As a one man shop this serves no one since I have never made a claim nor would I. But for certain, all commercial business is now off limits to me, not because of my qualifications, but due to an arbitrary government change that now forces me, a former sole proprietor, to pay WSIB rates if I want to do commercial work, even though I have no staff.</p> <p>I also used to work for Ontario Hydro (1986 – 1990) and I am fully aware of why the current ESA's pension as formerly part of Ontario Hydro is now underfunded. Neither the employees or employer were contributing nearly the same amount as other provincial and federal employees. (roughly 60%</p>	<p>Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.</p> <p>We recognize the impact of increased costs, and have taken steps to achieve operational improvements before considering a wiring fee increase. ESA has absorbed increases in fleet costs and gas prices, IT systems maintenance and up-dates, and labour costs through cost cutting and expense controls.</p> <p>The historical low interest rates of recent years have resulted in dramatically increased annual expenses for the pension plans of ESA and many other organizations. ESA has sought to manage the impact through increased employee contributions, optimizing our pension investment management, ongoing monitoring of key pension metrics, and participating in discussions with government on pension management.</p> <p>ESA appreciates your suggestions on decreasing mailing costs. It is likely you are on one list as a Licensed Electrical Contractor and a second list as a Master Electrician. We do occasionally need to send communications to both lists. This is an area ESA will review as we continuously look for</p>

	<p>less than the federal staff and government contributions of the same time period). Now in 2014 the ESA has the audacity to cite a pension shortfall as one of the reasons to charge me and my customers over a 5% rate increase.</p> <p>You cannot continue to increase your own salaries. You must look at ways to improve business practices. A good example would be to start with your business practice of sending me two complete packages each time you communicate with me. You know there is only one employee, me living at the same address.</p> <p>Thank goodness there is an election today. Perhaps we can all hunker down and improve our practices and reduce costs together.</p>	ways to increase administrative efficiencies.
Licensed Electrical Contractor	<p>I have reviewed the fee increase explanation and have found it to be reasonable.</p> <p>As an electrical contractor, however, I have one suggestion:</p> <p>Reduce the fee for Pools/Hot tub/Splash pads by half. At \$141.00 it constitutes a one hour site visit by an inspector which is unreasonable and unlikely. Customers are understandably upset when they are presented with the onerous bill. The \$141.00 fee only encourages homeowners to install their hot tubs etc without an ESA inspection application.</p>	<p>Thank you for your comments.</p> <p>Thank you for the idea to reduce the fee for pools/hot tubs/splash pads. We will take it into consideration in future business planning cycles.</p>
Licensed Electrical Contractor	<p>Hello, - thanks for the opportunity.</p> <p>1) Your response to the proposed wiring fee changes: generally accepting; somewhat accepting; neutral; or opposed.</p> <p>neutral</p> <p>2) Your thoughts on the proposed timing and any challenges you may face implementing the proposed fee adjustments</p> <p>Early in a new year may be best. Challenges would include justifying and</p>	<p>Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.</p> <p>Through previous consultations, stakeholders have recommended that January is the best time of year to implement wiring fee adjustments. ESA will give a minimum of 60 days notice before any wiring fee change is implemented.</p> <p>ESA does continue to pursue enforcement action against unlicensed individuals. We are also working to raise awareness of the consequences of such unlicensed work so as to deter others.</p> <p>ESA also undertakes mass market awareness campaigns that encourage consumers to hire Licensed Electrical Contractors, rather than perform their own electrical work. The "Hire an LEC" campaign focuses on the services that consumers can trust LECs to provide. LECs:</p>

	<p>deferring the extra cost to a customer</p> <p>Rather than increasing the fees have you thought of conducting more inspections? There are thousands of General contractors, trades and handymen who take away work from a licensed contractor - having fees paid to you for all these projects would most certainly help with your cost recovery and make a wiring project less expensive and more attractive to the end user and who would be more willing to pay a smaller fee, rather than seeking to find someone who can do their project for less cost.</p> <p>Reward us for reporting a wiring project - since we have costs to justify as well, it's really difficult to keep up with all the expenses associated with operating a contracting business.</p>	<ul style="list-style-type: none"> • are fully insured • will arrange permits • are qualified to perform the type of electrical work you require • can offer a Certificate of Inspection • can provide references • will provide a written cost estimate of the work
Licensed Electrical Contractor	<p>Disagree with any increases for fees.</p> <p>If there is to be an increase leave the residential fees alone. We as ACP contractors play more than our share to the income of ESA.</p> <p>Increase the fees to the homeowner since they generally require 3 to 4 times the amount of time by your inspector. Change the fees to match.</p> <p>Increase the fees to HVAC contractors and do the inspections. The workmanship I have seen in the past would result in either warnings or defects to contractors.</p> <p>The timing is not right. With the construction industry going through a slowdown, it is hard enough to explain the cost of permits. In residential renovation where the inspector has the option of going try to explain to the customer that the fees are justified.</p> <p>Increase the small job amount to \$1000.00 and increase the permit to \$40.00. For example when we do a bathroom renovation the three LED potlights, and bathroom exhaust fan can cost over \$500.00. We are not doing any more work just the material cost is more.</p>	<p>Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.</p> <p>While the overall fee adjustment across the wiring fee guide is proposed at 2.65%, licensed electrical contractor paid fees would increase an average of 2.6%, while non-contractor paid wiring fees (e.g. homeowner do-it-yourselfers) would increase by 2.9% reflecting the typically greater amount of service and support effort required. At this time, there are no plans to increase the wiring fees solely for HVAC contractors.</p> <p>In past consultations, ESA has heard that January is the best time to implement wiring fee changes, and a multiyear approach for wiring fee increases is preferred.</p> <p>Thank you for your suggestion for increasing the small job and permit amount. We will take it into consideration in future business planning cycles.</p>
Licensed Electrical Contractor	I wanted to comment on the proposed wiring fee increase.	Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.

	<p>I am accepting of the changes and feel they will improve the overall performance of the ESA. As the Governing Body, I believe ESA has a great responsibility to our province.</p> <p>Regarding your second question; implementation and comment; I support all fee increases. I especially support all ECRA Licensing fee increases!</p> <p>For \$395 anyone can become an ECRA Certified Contractor and start wiring in Ontario!!!??? No wonder we have problems!</p> <p>The # of my contracting peers that hold valid ECRA Licences 'for the odd side job' is very frustrating. Get in or get out!! You just fill out a form, have little accountability, and frequently customers 'want to hire/wish they'd never hired' these part time business people! That fee should be \$1K - \$5K (Min.) Could it be tiered? \$1K gets you \$XX in annual sales (small guys) \$5K gets you \$XXX in sales and some ESA perks? (Interested Parties)</p>	<p>Regarding licensing fees, Master Electrician and Licensed Electrical Contractor fees are annual flat rates and were last adjusted in 2013 after a six-year period without change in order to achieve cost recovery.</p> <p>To clarify, there are a number of requirements needed to become an LEC. Among other things, an LEC must:</p> <ul style="list-style-type: none"> • be a Master Electrician, or employ at all times at least one Designated Master Electrician • Have a place of business in Ontario • Have public liability and property damage insurance coverage of at least \$2,000,000 • Be registered with the Workplace Safety and Insurance Board
Licensed Electrical Contractor	<p>1/ I am opposed to the wiring fee changes being proposed.*</p> <p>2/ It is important that electrical contractors receive at least 6 months advance notice of fee increases so that we have an appropriate time frame in which to adjust our own pricing and quoting procedures.</p> <p>I find it interesting that when you seek our input, we (electrical contractors) are referred to as 'stakeholders' and 'industry partners', however the rest of the time we are treated like doormats and second class persons.</p> <p>I question why ESA assumes they can automatically increase fees every year while phone wait times increase, service to the electrical contractor declines and inspector contact and scheduling becomes more problematic and expensive for us as electrical contractors</p>	<p>Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.</p> <p>We understand that business owners need time to implement any sort of fee change. ESA has endeavoured to consult with stakeholders 6 months in advance of a proposed wiring fee adjustment; with a minimum of 60 days notice should the proposed wiring fee adjustment be implemented.</p> <p>The proposed wiring fee adjustment and consultation plans were first reviewed with ESA's Contractor Advisory Council (CoAC). CoAC is comprised solely of Licensed Electrical Contractors and provides views and advice specific to the electrical contracting sector to ESA senior management.</p> <p>In addition to holding License Holder meetings twice a year, ESA conducts a labour intensive LDC satisfaction survey every three years, and we release an LEC newsletter "Plugged In" four times a</p>

		<p>year. Last year, 1,000 people attended ESA's Regional Contractors Meetings throughout the province.</p> <p>We understand your frustration with call wait times at our call centre. We are reviewing processes to improve service in that area.</p>
Licensed Electrical Contractor	<p>I feel that ESA should seriously take a look at the ESA wages/pension which make up 75% of their costs or you will be seeing a sunshine list like Hydro One 110,000 employees on it?</p> <p>This may not be a good time coming right after the provincial election and hoping the economy picks up.</p>	<p>Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.</p> <p>Labour makes up the largest portion of ESA's costs as the vast majority of our work is delivered through people: Inspectors, Call Centre Representatives, Technical Advisors, Investigators, technical specialists, etc.</p> <p>Before considering fee increased ESA has sought to reduce our own operating costs through expense controls, cost cutting and improved administrative efficiencies, etc.</p>
Industry Association	<p>Introduction Consulting Engineers of Ontario (CEO) thanks the Electrical Safety Authority (ESA) for the opportunity to comment on the proposed adjustments to wiring fees for 2015-2016.</p> <p>CEO member firms collectively employ over 20,000 individuals. Professionals in these firms are not only comprised of engineers, but also technicians and technologists, geoscientists, architects, and planners. These multidisciplinary firms work extensively with public sector clients to enhance the social, environmental and economic quality of life for all Ontarians.</p> <p>CEO's response to the proposed wiring fee changes CEO finds the document well-presented and appears to include justification for the requested fee increase.</p> <p>CEO's thoughts on the proposed timing and any potential challenges that may be encountered implementing the proposed fee adjustments CEO notes that the formula for fee calculation is not presented and we would assume that it is not changing. Fees for the Plans Examination process are not</p>	<p>Thank you for taking the time to respond to ESA's wiring fee adjustment consultation.</p> <p>ESA's wiring fees are based on rate book with specific line item fees for a range of types of installations. Fees are set based on cost recovery requirements.</p> <p>ESA is a not-for-profit corporation, and only seeks operate on a cost recovery basis. Before considering fee increased ESA has sought to reduce our own operating costs through expense controls improving administrative efficiencies, etc.</p> <p>We are pleased that the Consulting Engineers of Ontario appreciates ESA's important role in the electrical safety system, and we look forward to working together to ensure Ontarians are safe from electrical harm.</p>

	<p>mentioned, but these have previously been done at an hourly rate with no clear method to determine an estimated fee in advance. It is our belief that a calculation formula would be of value to the required users of this service.</p> <p>The consulting engineering sector has seen many of the same pressures on the cost of doing business as noted in the consultation document. However, our fee climate does not allow our members to exercise an increase to account for greater expenses realized over recent years or for projected increased costs next year; we have had to manage our services and business operations accordingly.</p> <p>We suggest that perhaps additional measures of cost control should also be considered by ESA as they plan for the future. CEO notes that one of the most significant costs for our member firms is labour. Our members have had to negotiate with their staff accordingly to remain competitive in the marketplace.</p> <p>CEO views the ESA as playing an important role in safety and the maintenance and development of Ontario's electrical infrastructure and should continue to do so.</p> <p>We appreciate the opportunity to comment and provide input and are interested in participating in future consultations. Please do not hesitate to contact the undersigned with any questions.</p>	
--	---	--