



Cornerstone Hydro Electric Concepts Association Inc.

November 9, 2015

Electrical Safety Authority

esa.stakeholder@electricalsafety.on.ca

Re: Electrical Safety Authority Public Consultation #15-02

Included in this letter are the comments of the Cornerstone Hydro Electric Concepts (CHEC) Association with regards to the Electrical Safety Authority Public Consultation #15-02. CHEC is an association of fifteen local distribution companies (LDC's) that has been working collaboratively since 2000. The comments over the following pages express the views of the CHEC members.

The suggested format has been followed to provide the input.

1. Draft Core Questions: It is noted that the final "draft" questions have been modified significantly from the initial draft questions. The current questions better reflect the desired behaviour and are less likely to suggest to customer inappropriate behaviour.

With regards to specific comments the following are noted:

- **Question #5:** The question is posed to an individual who may be considering a "home project" which would require digging as per the appropriate examples. The awareness of this need may vary significantly depending whether the individual owns or lives in a structure with a yard or is a tenant in an apartment or other form of multi residence without care and control over outside space. How does the scoring take this into account?
- **Question #6:** This question implies to some degree that one would want to touch an overhead power line. Would this statement not be better stated: How dangerous do you believe it is to come in contact – with your

body or an object - - to an overhead power line? Restating the question does not lead the reader into the misconception of “touching an overhead line”.

- **Question #7:** A restatement of the question is again suggested to not suggest approaching power lines. Could it not be stated as follows: When undertaking outdoor activities – such as, standing on a ladder, cleaning windows or eaves, climbing or trimming trees – what distance do you believe you need to keep your body or an object from an overhead power line to be safe? Would you say ...
- **Question #8:** This question actively suggests “vandalizing” utility equipment which is not the intent of the survey or most likely the intent of the vast majority of the public. As such it is suggested that the wording be altered to continue to test the awareness without suggesting inappropriate behaviour. Suggested wording could be similar to:
Some electrical equipment is located on the ground such as locked steel cabinets that contain transformers. Why do you think the electrical utility company has placed these in a locked cabinet?

The equipment is very dangerous

The equipment may be somewhat dangerous

The equipment is not very dangerous they just wanted to lock it.

Don't know

This format of the question tests the understanding of the public and the potential hazard without suggesting behaviour which could be harmful to the individual or public.

- **Question #9:** Could this not also be turned around to say – How far do you believe you need to stay away from the downed line to remain safe?

2. Draft Proposed Scoring Scales and Index: The scoring appears to not be related to the demographics in any way. There is no indication that the scoring should be weighted by the other information gathered or that there is any “standard” evaluations or conclusions which should be made based on the supporting data.

For instance if the outcome of these questions could be related to the type of residence the individual lives in. If they are apartment dwellers their awareness may be impacted by their receptiveness to the task as they do not anticipate the need to do. Hence the score is not weighted within the population and may not provide a true “awareness level” of those who require it.

Concern exists that the scoring system does not take into account the demographics, the impacts of these and whether the target population is getting the message. If a survey is to be completed it is suggested that a more robust scoring be incorporated. To report as outlined could be misleading on both the effectiveness of utility education and the resulting risk mitigation.

3. Proposed Methodology: The use of a survey is not supported due to the cost and the public’s general lack of receptiveness with regards to surveys. A review of the input received on the ESA initial consultation showed very little support with regards to a survey and which is voiced once again. However the decision of both ESA and the OEB, without further public consultation, was to adopt the survey format.

It is noted that there is choice with regards to the method of survey. It is further noted that the general public is to be surveyed rather than the customer base. Certainly the LDC interest is to maintain the public safe however this is not the traditional relationship which the LDC undertakes when reaching out to their “customers”. The ability to ensure a representative sample will be a challenge which will need to be passed onto the survey companies. It is hoped that this can be accomplished at a reasonable cost.

The margin of error and number of survey participants provides a challenge to midsize and smaller LDCs as the concentration of surveys per 1000 customer becomes much higher than with larger LDCs. This results in the higher costs for the LDCs to achieve the same margin of error. Many customers have already become frustrated with the cost of doing surveys and the impact this has on rates. On a similar note, many of the CHEC members have recently completed a 2015 Customer Satisfaction Survey. Conducting multiple surveys in close proximity to one another will result in survey oversaturation. The end result is many customers become unwilling to participate in surveys, making it increasingly difficult to ensure a valid representative sample is achieved.

Based on the above, consideration for a combined survey of similar LDCs should be incorporated into the methodology. This would allow LDCs, such as CHEC members, to share the cost of a survey covering similar areas and customer base. The need for an individual report for each service territory should be removed from the methodology and some criteria as to when to allow a combined survey would be included. The CHEC LDCs would be pleased to work with the ESA and their consultant to determine appropriate criteria.

We trust these comments are of value and look forward to further opportunity to work on this important initiative.

Regards,

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CHEC Members	
Centre Wellington Hydro	COLLUS PowerStream
Innpower	Lakefront Utilities
Lakeland Power Distribution	Midland Power Utility
Niagara-on-the-Lake Hydro	Orangeville Hydro
Orillia Power	Ottawa River Power
Renfrew Hydro	Rideau St. Lawrence Distribution
Wasaga Distribution	Wellington North Power
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