



November 4, 2015

Electrical Safety Authority  
155 Matheson Boulevard West  
Mississauga, ON L5R 3L5

To Whom It May Concern:

**Re: Electrical Safety Authority public consultation on a Public Electrical Safety Awareness Survey**

The Electricity Distributors Association (EDA) is the voice of Ontario's local electricity distribution sector, which consists of municipally and privately owned local distribution companies (LDCs). The distribution sector delivers electricity to 5 million residential, commercial, industrial and institutional customers throughout the province. The sector employs 10,000 people directly and holds \$19 billion in assets; it has \$1.9 billion in annual capital spending and \$1.6 billion in annual operational spending; and makes hundreds of millions in direct contributions to both municipal and provincial revenues.

The EDA welcomes the opportunity to provide comments on the Public Electrical Safety Awareness Survey that is being developed by the ESA and will become part of the Safety Performance Category of the OEB's annual LDC scorecard. Public safety is paramount for the LDC operations and many LDCs have undertaken initiatives over the years to educate customers regarding safety around LDC electrical equipment. The ESA, as the provincial authority mandated to oversee and enhance public electrical safety across the province, has also undertaken several campaigns to increase electrical safety literacy. With public awareness of electrical safety now being part of the LDC scorecard, the LDC industry will be looking to collaborate with the ESA in the coming years in raising awareness of electrical safety.

**The importance of educating customers about electrical safety**

While we understand that the survey is intended to reflect efforts of the LDCs in promoting safety and advancing prevention amongst the general public, it can also be a great opportunity for the industry to further educate customers. It is imperative from a public safety perspective that customers being surveyed actually know the correct answers to the core survey questions by the end of the survey, since the customers may come across or experience a lot of the activities mentioned in the survey questions. Therefore, the EDA recommends that the survey company provides the customers with the correct answers once they have completed the survey. For LDCs conducting phone surveys, the surveyor can provide the information at the end of the survey and for LDCs conducting the online survey, the answers can be provided as a

link at the end of the survey. LDCs view that this extra step will go a long way in educating customers and preventing many avoidable accidents.

Since some questions may require information in more detail to explain the correct answer, such as questions 7, 8 and 9, the EDA recommends that the ESA engage the same working group to develop some short answers. The EDA's Councils would also be willing to provide input into this process.

Please see below for the EDA's comments in detail on the draft Public Electrical Safety Awareness Survey.

### **Question 1**

No comments

### **Question 2**

#### Recommendation

Please remove the first option "Younger than 18" since it is already being addressed in Question no.1.

### **Question 3**

No comments.

### **Question 4**

#### Recommendation

Please replace the word "sex" with "gender".

### **Question 5**

If you were to undertake a household project that required digging- such as planting a tree or building a deck- how likely are you to call a locate electrical or other underground lines?

#### Recommendation

*When someone is undertaking a project that requires digging, should they call before digging to locate electrical or other underground lines?*

### **Question 6**

How dangerous do you believe it is to touch- with your body or any object- an overhead power line?

#### Recommendation

The EDA recommends that the answer options for Q#6 be changed to the following:

1.00 pt Very Dangerous

0.00 pt Not Dangerous

0.00 pt Don't know

The rationale for this recommendation is that LDCs want customers to have a clear understanding that touching power lines is dangerous. Having a range of options available may lead to customer confusion and an ambiguous impression of the level of danger.

### **Question 7**

When undertaking outdoor activities – such as, standing on a ladder, cleaning windows or eaves, climbing or trimming trees – how closely do you believe you can safely come to an overhead power line with your body or an object? Would you say...

#### Recommendation

*How closely do you believe you can safely come to an overhead power line with your body or an object? Would you say...*

The EDA also recommends that the answer options for Q#7 be changed to the following to provide the customer with a clearer understanding of the options:

- 0.00 pt You can safely touch an overhead power line
- 0.00 pt Less than 1 metre (less than 3 feet)
- 0.00 pt Greater than 1 metres (greater than 3 feet)
- 1.00 pt Greater than 3 metres (greater than 9 feet)
- 0.75 pt Greater than 6 metres (greater than 20 feet)
- 0.00 pt Don't know

### **Question 8**

Some electrical utility equipment is located in or on the ground, such as locked steel cabinets that contain transformers.

How dangerous do you believe it is to try to open, remove contents, or touch the equipment inside? Would you say ...

#### Recommendation

Some electrical utility equipment is located in or on the ground, such as locked steel cabinets (*typically green in colour*) that contain transformers.

How dangerous do you believe it is to try to open, remove contents, or touch the equipment inside? Would you say...

The EDA also recommends that the answer options for Q#8 be changed to the following:

- 1.00 pt Very Dangerous
- 0.00 pt Not Dangerous
- 0.00 pt Don't know

Similar to Q#6, LDCs want customers to have a clear understanding of the level of potential danger. Having a range of options available may lead to customer confusion and an ambiguous idea of the degree of danger.

#### **Question 9**

How closely do you believe you can safely come to a downed overhead power line, such as a downed line caused by a storm or accident? Would you say...

#### Recommendation

The EDA recommends that the answer options be changed to the following to provide the customer with a clearer understanding of the options:

- 0.00 pt You can safely touch a downed power line
- 0.00 pt Less than 1 metre (less than 3 feet)
- 0.00 pt Greater than 1 metre (greater than 3 feet)
- 0.00 pt Greater than 5 metres (greater than 16 feet)
- 1.00 pt At least 10 metres, or the length of a typical school bus (at least 33 feet)
- 0.00 pt Don't know

#### **Question 10**

If you were in a vehicle – such as a car, bus or truck - and an overhead powerline came down on top of it, which of the following options do you believe is generally safer?

#### Recommendation

If you were in a vehicle – such as a car, bus or truck - and an overhead powerline came down on top of it, which of the following options do you believe is generally *safest*?

The correct answer (1.00 pt) should also be changed to the following:

- 1.00 pt Stay in the vehicle *unless directed otherwise by emergency or utility personnel*

#### **Question 11**

Does your job regularly cause you to come close to energized power lines?

#### Recommendation

Does your job regularly cause you to come close to energized *overhead or underground* power lines?

#### **Question 12**

#### Recommendation

Change “*Don't know/ Refuse*” to “*Don't know/ Decline to Answer*”.

#### **Question 13**

No comments

**Question 14****Recommendation**

Change *“Don’t know/ Refuse”* to *“Don’t know/ Decline to Answer”*.

**Methodology Guide**

The EDA does not have any specific comments regarding the methodology guide of the survey, and appreciates the flexibility LDCs are being provided with in terms of having the option to conduct the survey online or by telephone. The EDA does recommend that the ESA clarify if LDCs are allowed to ask additional questions regarding electrical equipment safety or what educational tools have been/can be effective in increasing electrical safety literacy.

We thank you again for the opportunity to participate in the ESA’s working group and to provide comments during the consultation process. We look forward to the next steps in this consultation.