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*Via electronic mail to*

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**Re: ESA Active Consultation on Public Electrical Safety Awareness Survey –  
Comments by Toronto Hydro-Electric System Limited (“THESL”)**

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On October 8, 2015, the Electrical Safety Authority (ESA) invited stakeholders to comment on the draft Public Electrical Safety Awareness Survey (“the Survey”), to be administered by licensed electricity distributors for the purposes of the Ontario Energy Board’s (OEB) Electricity Distributor Regulatory Scorecard. Toronto Hydro-Electric System Limited (“Toronto Hydro” or “the utility”) participated in the earlier ESA-led consultations and working group activities related to the Public Safety Scorecard Measure development, where it provided its input on many of the issues raised in the course of the survey development. Toronto Hydro also reviewed the submissions of the Electricity Distributors Association (“EDA”) and the Coalition of Large Distributors (“CLD”) and endorses their positions. As such, Toronto Hydro has no further feedback on the specific questions posed as a part of this consultation, but offers the following general comments for the ESA’s consideration.

### **Survey Participants**

Consistent with its comments from the initial round of Public Safety Scorecard Measure consultation in January 2015, Toronto Hydro respectfully re-iterates its practical concerns with the intended approach of targeting the Survey to the residents of the distributors’ service territories, rather than their customers. While proliferation of public safety electrical awareness among Ontario residents is a crucial objective, the modes of communication licensed electricity distributors use today to convey information are largely limited to direct-to-customer channels such as bill inserts, website advertising, and direct mail. While social media platforms like Facebook and Twitter offer additional opportunities, the number of

people utilities like Toronto Hydro's reach within these media streams remains small relative to the population of its service territory,<sup>1</sup> while opportunities to expand its presence are a function of individual user choice.

Given the above considerations, effectively reaching broader audiences, as contemplated by the policy underlying the survey, requires utilization of other forms of mass media, such as TV, radio and newspaper advertising, which necessitates incremental resources beyond the existing communications and public affairs budgets. Absent such funding (and the ensuing awareness campaigns), Toronto Hydro respectfully submits that electric distributors are not in a position to effectively control the scale and/or pace of proliferation of electrical safety information across the general population of their service territories, and as such should not be held accountable for survey results administered to residents. Toronto Hydro's strong preference would be to administer the Survey to representatives of its customer base. Should this recommendation not be acceptable to the ESA, Toronto Hydro proposes that the ESA recommend that the OEB share in the responsibilities of advancing electrical safety awareness across the province with distributors and the ESA from both a financial and operational standpoint, particularly in light of its continually expanding consumer education mandate.

### **Correct Answers**

Toronto Hydro respectfully submits that in light of the above-noted issues related to proliferation of electrical safety awareness information among the members of the public, utilities should leverage the Survey process itself as an additional channel of spreading correct information. This can be accomplished with minimal incremental costs by ensuring that survey administrators provide the respondents with correct answers to all survey questions once the survey is completed. In Toronto Hydro's submission, this is particularly important with respect to the more technical questions, such as Questions 7, and 9, where the respondents are more likely to answer with their "best guess," should they not know the actual answer. In these circumstances, and in light of the subject matter at hand, it is advisable that the respondent receives confirmation (if their answer is correct), or is given a correct answer. In Toronto Hydro's submission, this minor modification would enhance the value of the survey

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<sup>1</sup> Toronto Hydro had approximately 7,200 Facebook likes and 80,000 Twitter followers as of October 30, 2015.

itself to the utilities, their customers and the OEB's objectives underlying the creation of the survey and the associated Scorecard measure.

### **Additional Utility-Specific Questions**

It is Toronto Hydro's understanding that during the Working Group sessions on the development of the Survey, the ESA indicated that utilities would be able to supplement the core survey questions with additional questions that they felt were of use for their own customer engagement efforts. The utility respectfully requests the ESA to clarify its proposed position on this issue, as it is not explicitly addressed in the consultation document. In Toronto Hydro's submission, an opportunity to ask additional questions would allow utilities to maximize the value of each instance of respondent interaction, without significant incremental costs, or added inconvenience to the respondents.

Toronto Hydro thanks the ESA for the opportunity to provide these comments and for the ESA's leadership role in the development of the Public Safety Scorecard measure more generally. We look forward to working with the ESA in the future and welcome any comments and questions regarding this submission.

All of which is respectfully submitted.

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