

ESA conducted a **public consultation** regarding the Proposed Amendments to the Administrative Rules under the Ontario Electrical Safety Code – “*An Application for Inspection Not Required*” from June 29 – August 25, 2011. During this process, stakeholders were asked to provide their feedback on each of six proposals being considered, which are as follows:

1. Clarify the meaning of utilization equipment and expand the exemption from a single dwelling unit to an owner occupied dwelling unit if undertaken by a licensed electrical contractor (EC).
2. Allow the installation of replacement light fixtures and switches rated not more than 20 amperages and 130 volts in an owner occupied single dwelling if installed by the owner.
3. Allow the installation of wiring from an approved class-2 power supply by the owner or qualified person within an owner-occupied single dwelling unit, provided it is not part of a lighting installation in certain circumstances.
4. Allow the replacement of certain specified appliances rated at not more than 30 A and 240 volts, in single dwellings if performed by specified qualified persons.
5. Allow the repair of certain existing installed electrical equipment in an owner-occupied dwelling unit if performed by specified qualified persons, if the repair does not include extending or altering the original wiring installation.
6. Allow a licensed electrical contractor to extend a single branch circuit for an associated piece of equipment not to exceed 20 amperages, and 240 volts.

During the public consultation period ESA received a variety of questions, comments, and feedback from external stakeholders that were either general in nature and/or related specifically to one or more of the proposals.

In addition, 2 public consultation webinars were conducted on July 16 and *28, 2011, and 1 webinar specific for the Ontario Provincial Code Committee members was conducted on July 6, 2011.

Ontario-specific rules in the OESC are developed by ESA based on input from stakeholders and reflect changes in technologies and respond to reports of electrical incidents. The proposed amendments are then voted on by the Ontario Provincial Code Committee, which is an advisory committee of the ESA and includes a variety of affected stakeholders.

In response to the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.

Also, after much deliberation and based on the feedback/comments received, ESA will not be considering Proposal Six , Extension of a Branch Circuit, for recommendation at this time.

ESA would like to thank all participants for taking the time to submit comments into the Basic Exemption Public Consultation.

Responses to specific comments are included below.

**Please note: there were no participants at the July 28, 2011 public consultation webinar.*

**All comments / feedback received from stakeholders has not been altered or revised. The comments / feedback received are presented in this document as was received.*

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Results of the Public Consultation

GENERAL COMMENTS		
Company / Organization / Individual	Stakeholder Comment / Feedback submitted to ESA & Suggestions for Improvement / Alternatives	ESA response
Member of the Consumer Advisory Council	I think all are important points, but again, the issue is the definition of "certain", "specified", etc. They are written in legislative terms and while less than clear, require the analysis to define those very technical terms. At the beginning of the day, the distillation is to allow lesser qualified folks to work on lesser dangerous ? installations. And does that increase efficiency in terms of accessibility versus impact	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposal has been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the upmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p> <p>ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.</p>
Electro-Fed Canada	I have consulted with our EFC Council affected by this OESC and confirm EFC has not issues with the proposal	Thank you for participating in the Basic Exemption Public Consultation and providing your comments.
Licensed Electrical Contractor	Allowing exemptions just because permits are not being taken out does not improve safety. Although many installations are simple to the qualified electrician, the average home owner does not know when they are doing something wrong. They do not have the knowledge to know better. It's one thing when they do work in their own home and they are the only ones at risk, but the average owner moves every 5 to 7 years. These unsafe conditions will be inherited by the new owner. Who is protecting them? It's one thing to not require a permit for a small job if it is performed by a licensed contractor and his licensed electrician. but even then it must still be policed. To allow home I property owner to do any work without a permit, even changing a switch to a dimmer is a recipe for disaster. We need to make it more difficult for unqualified people to do electrical work, not easier. Some of the proposals are unclear and too open ended. More detail is needed to properly comment on the changes.	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposal has been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the upmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>Safety statistics show no evidence that injuries or fires have resulted from the installation of the millions of light fixtures and switches sold at retail outlets throughout Ontario every year.</p> <p>Additionally, it is clear that the existing permit and inspection requirements have not acted as a deterrent to unsafe installations as very few permits for inspection are submitted for these applications (fewer than 200 per year compared to 10 million fixtures sold.) Yet as noted there is no evidence of injuries or fires resulting.</p> <p>The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:</p> <ul style="list-style-type: none"> • ESA is focussed where the greatest safety risks exist; • Our resources are used in the most effective manner possible to ensure the greatest safety value for the public; • The rules do not create unnecessary burden for consumers or industry with little safety value; and • The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada.

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<p>Licensed Electrical Contractor</p>	<p>The timing of this 47 page document is quite suspicious. Are they trying to appease an otherwise conveniently compliant stakeholder? Could any interested parties let me know who they are? Some of you probably don't feel that this directly affects your business. I disagree! It indirectly affects us all. Here are a couple of point: 1)At a time when permit fees are increasing, why are they walking away from revenue? 2) Isn't it a MUCH easier message that ALL electrical work requires a permit? Unless performed by... 3) Homeowners and Handymen do not understand “Grounding and Bonding” or the importance of temperature ratings. Both are important considerations when simply changing a light fixture. In fact many Handymen often turn the power back on and if the light switch illuminates the light they simply presume that they have correctly installed whatever it is they are installing. 4) If they seek advice they ask the clerk at Home Depot. Maybe the ESA should have an information hotline to assist those determined to do their own wiring. This is NOT what they have TA's for. I say this as they will no doubt (and in a condescending manner) explain that this is why they have TA's. 5) The recent public awareness campaign was quite well done. It would be a shame to see all of the efforts that lead to this point (including the formation of ESA/ECRA) be wasted. 6) I thought everyone in our industry was working toward “Only Licensed Electrical Contractors Doing Electrical Work!” 7) I for one would like to see the Management at ESA hold the Enforcement Officers to the same standards as the rest of the staff. In my experience (here in the GTA) they are quite slow to respond. How about putting the level of effort needed for this 47 page document into analyzing the effectiveness of the existing enforcement officer staff.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposal has been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the utmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>Safety statistics show no evidence that injuries or fires have resulted from the installation of the millions of light fixtures and switches sold at retail outlets throughout Ontario every year.</p> <p>Additionally, it is clear that the existing permit and inspection requirements have not acted as a deterrent to unsafe installations as very few permits for inspection are submitted for these applications (fewer than 200 per year compared to 10 million fixtures sold.) Yet as noted there is no evidence of injuries or fires resulting.</p> <p>The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:</p> <ul style="list-style-type: none"> • ESA is focussed where the greatest safety risks exist • Our resources are used in the most effective manner possible to ensure the greatest safety value for the public; • The rules do not create unnecessary burden for consumers or industry with little safety value; and • The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada. <p>In regards to the concerns raised in relation to the financial impact to ESA, our primary concern is safety and using our resources to have the greatest safety impact. As a responsible regulator, we must always be concerned about our effectiveness and our impact. In pursuit of better and smarter regulation we have to push ourselves to review current requirements and determine whether they continue to provide meaningful public safety protection.</p> <p>Secondly, we must be mindful of our impact on the marketplace and of participants' abilities to comply with regulation. ESA, as the regulator of electrical safety in Ontario, is reviewing the current electrical safety requirements to ensure the regulatory framework continues to provide the appropriate balance between the need to ensure safety while supporting modernization and eliminating unnecessary encumbrance on industry. This initiative aims at creating smarter and streamlined government-to-business services through the establishment of a more modern system of government that reduces burden on business and</p>

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		<p>the cost to consumers. This is a key part of the government’s commitment to make Ontario more attractive to business while continuing to protect the public interest.</p> <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p> <p>Additional exceptions to the proposals have also been added to address identified safety concerns. ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.</p> <p>Rules that do not make sense can have a negative impact on compliance with the OESC in general and the public value of electrical inspection. By rationalizing the circumstances where an application for inspection is required, ESA is able to provide appropriate electrical safety oversight and focus on those areas or electrical installations that are of the highest risk.</p> <p>The timing of the public consultations is part of the 3 year cycle of the OESC, which also includes proposing recommendations and options to the Ontario Provincial Code Committee, ESA’s Board of Directors and the provincial government. The next edition of the Code is anticipated to be implemented for spring of 2012 therefore the timing was part of the current code cycle.</p>
<p>Provincial Chief Electrical Inspector - Halifax NS</p>	<p>As the Chief Electrical Inspector for NS I appreciate and understand the direction that you are taking with these changes. I fully support the changes in general and have only a few reservations on a few of the items that you have listed or have not listed in some of the rules.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposal has been amended to address/mitigate concerns raised by stakeholders.</p> <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p> <p>Additional exceptions to the proposals have also been added to address identified safety concerns. ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.</p>
<p>Individual</p>	<p>These appear to realize the public make changes regardless of code requirements. This should extend to removal of tamper resistant receptacles.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments.</p> <p>Your suggestion for extending the proposals to include tamper proof receptacles will be reviewed and may be considered for future Code proposals.</p>
<p>Greater Toronto Electrical Contractors Association</p>	<p>It appears the underlying premise of this proposal is to exempt unqualified persons, contractors and repair workers to do electrical work as defined by the OESC without a permit or inspection. We do not support this premise and the resulting proposal. We firmly believe that electrical work as defined by the OESC should only be done by qualified electrical workers.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the upmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:</p> <ul style="list-style-type: none"> • ESA is focussed where the greatest safety risks exist • Our resources are used in the most effective manner possible to ensure the greatest safety value for the public;

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Ontario Electrical League	In order to provide the best feedback possible, we would recommend that these types of consultations not be conducted over the months of July and August. These are the busiest months of the year and the most difficult to get detailed feedback from all members. We do appreciate the opportunity to provide feedback, however if it is to be conducted over these months, we would recommend extending the deadline to the end of September	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments.</p> <p>The timing of the public consultations is part of the 3 year cycle of the OESC, which also includes proposing recommendations and options to The Ontario Provincial Code Committee, ESA's Board of Directors and the provincial government. The next edition of the Code is anticipated to be implemented for spring of 2012. However, for future Code cycles your feedback will be considered for options to improve the consultation process.</p>
Licensed Electrical Contractor	<p>A) By the “homeowner exemption” approach, ESA is creating the single largest disservice to electrical safety. It is publicly affirming and reinforcing the public perception that “electricity is not dangerous”. There are many instances of unsafe installations across the province...particularly in home owners’ basements. More importantly, the homeowner is also an industry manager, apartment building owner, millwright, etc. and carries that mentality to work. The answer is not exemptions for homeowners. Since ESA is not able/willing to go after homeowners, then the very least that should be done is a compulsory safety inspection every time a home is sold. (This is already done for vehicles!)</p> <p>B) The ESA is basing its proposal on the following rational.</p> <ol style="list-style-type: none"> 1) Few homeowners are taking out permits for certain types of work. Therefore, there should be an exemption for taking out permits. 2) There is no evidence of fatalities, serious injuries or fires. Therefore, it is low risk. 3) Other provinces have these types of exemptions. Therefore, it is acceptable to do so in Ontario. <ol style="list-style-type: none"> a) The logic used to make this proposed exemption is applied only to homeowners. ESA cannot be selective about one area and ignore the rest. They need to apply the logic across 	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the upmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>Safety statistics show no evidence that injuries or fires have resulted from the installation of the millions of light fixtures and switches sold at retail outlets throughout Ontario every year.</p> <p>Additionally, it is clear that the existing permit and inspection requirements have not acted as a deterrent to unsafe installations as very few permits for inspection are submitted for these applications (fewer than 200 per year compared to 10 million fixtures sold.) Yet as noted there is no evidence of injuries or fires resulting.</p> <p>The proposals <u>do not</u> include the finishing of a basement or the completion of any new installation. It only relates to the like for like replacement of fixtures or switches by homeowners.</p> <p>The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:</p> <ul style="list-style-type: none"> • ESA is focussed where the greatest safety risks exist • Our resources are used in the most effective manner possible to ensure the greatest safety value for the public; • The rules do not create unnecessary burden for consumers or industry with little safety value; and • The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada.

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	<p>the board or not at all. b) Follow the “logic” of 1) and 2) and apply it to non-homeowners. For example, there would be an exemption for wiring unapproved equipment! Here is that situation: In the fall of 2009, the Ministry of Labour (MOL) and the ESA conducted a joint venture in visiting 16 industrial facilities regarding electrical equipment. Of the 16, 13 (80%) were non-compliant. There were some 125 unapproved items. Consider there are some 500,000 industrial/commercial/institutional/multi-family/agricultural facilities in Ontario. If we extrapolate very conservatively, there are at least 1M unapproved items in Ontario, which means 1M permits not taken. There is no evidence of incidents on unapproved equipment; otherwise it would be high on MOL’s radar. c) Follow the “logic” of 3) in comparing to other Provinces. ESA is acknowledging that the permit system used by Quebec is acceptable. A full comparison of the total permit system in each Province should be done.</p> <p>An overall system approach to review exemptions/permits and licensing.</p> <p>This should include 1) Applying the definition of “low risk” as it pertains to qualified electricians / master electricians and their need for permits.</p> <p>2) Examining why ESA receives only 500K permits a year when there should be at least 1.5M.</p> <p>NOTE: Especially important is the definition, by ESA, of “low risk”: “...persons undertaking the work to be exempted, have sufficient knowledge rendering the risk of harm significantly mitigated”.</p>	<p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p> <p>Additional exceptions to the proposals have also been added to address identified safety concerns. ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.</p> <p>The proposals do not change the current trade jurisdiction; they merely eliminate the need for an inspection in areas where little safety value is provided by an inspection. Most of the proposals provide exemptions for licensed electrical contractor or other qualified individuals that are permitted to do certain electrical work according to his/her designation. All of the proposals being considered are low-risk work. Either the work being undertaken is relatively straightforward or the persons undertaking the work are expected to have sufficient knowledge rendering the risk of harm significantly mitigated.</p> <p>Rules that do not make sense can have a negative impact on compliance with the OESC in general and the public value of electrical inspection. By rationalizing the circumstances where an application for inspection is required, ESA is able to provide appropriate electrical safety oversight and focus on those areas or electrical installations that are of the highest risk.</p> <p>ESA continues to address any reported use of unapproved products in the province. Only approved products are permitted to be offered for sale or used in Ontario. If you are aware of unapproved products being installed, used or offered for sale, please report these non-compliances so that compliance and enforcement efforts can be undertaken.</p>
<p>Electrical Distributors Association</p>	<p>The EDA supports the proposed amendments as they would assist customers to reduce needless burdens and inconveniences while not impacting safety. In particular we note that the third proposal would greatly assist local distribution companies’ efforts with respect to conservation programs which involve installing new equipment such as controllable thermostats. As noted in the ESA’s discussion paper, during a pilot program to install programmable thermostats into homes, issues were raised by consumers who were required to pay for the inspection of the thermostat installation. Customers argued about the potential additional cost for inspection given their perception of the safety benefit. In addition, to require a permit for this type of installation not only needlessly burdens</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments.</p> <p>First and foremost, safety is of the upmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:</p> <ul style="list-style-type: none"> • ESA is focussed where the greatest safety risks exist • Our resources are used in the most effective manner possible to ensure the greatest safety value for the public; • The rules do not create unnecessary burden for consumers or industry with little safety value; and • The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada.

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	<p>and inconveniences homeowners, but also creates an unlevel playing field across the industry as regulated distribution companies comply with the rules and other service providers or homeowners typically do not. The EDA agrees that rules that do not make sense can have a negative impact on compliance with the OESC in general and the public value of electrical inspection. Rationalizing the circumstances where an application for inspection is required, would allow ESA to focus on those areas of electrical safety that are of the highest risk. The rules should be clear and consistently applied across the industry and across the province. The proposed amendments would create consistency and a more level playing field within the industry and as such as supported by the EDA.</p>	<p>We agree; rules that do not make sense can have a negative impact on compliance with the OESC in general and the public value of electrical inspection. By rationalizing the circumstances where an application for inspection is required, ESA is able to provide appropriate electrical safety oversight and focus on those areas or electrical installations that are of the highest risk.</p>
<p>BC Safety Authority</p>	<p>The thoroughness of your public consultation documents puts us to shame. A huge amount of work. 1. I agree in principle. If you can't enforce the rules anyway (underground is hard to police) then why get in the way? What value is the regulator providing in these circumstances? 2. We are looking at changing our regulations around work that can be done without permit. One of the changes we're considering making is to state that no live work is allowed. (Obviously, with better wording than that). We see this as important when dealing with owners, who may not be technically qualified and may be unaware of the hazards associated with the work. We currently allow ballast changes, but we want to change that to lighting fixtures—nobody gets a permit to change a fixture. 3. In BC, our act specifically includes “lessee” (read tenant) in the definition of owner. I'm guessing this isn't the case in Ontario, but if you're specifically targeting the owner, you might need to verify there isn't a legal definition in general use that affects this.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments.</p> <p>First and foremost, safety is of the utmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:</p> <ul style="list-style-type: none"> • ESA is focussed where the greatest safety risks exist • Our resources are used in the most effective manner possible to ensure the greatest safety value for the public; • The rules do not create unnecessary burden for consumers or industry with little safety value; and • The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada. <p>We agree; rules that do not make sense can have a negative impact on compliance with the OESC in general and the public value of electrical inspection. By rationalizing the circumstances where an application for inspection is required, ESA is able to provide appropriate electrical safety oversight and focus on those areas or electrical installations that are of the highest risk.</p>
<p>Licensed Electrical Contractor</p>	<p>However after a conversation with [REDACTED] I am passing this comment on. I spoke with [REDACTED] in regards to him proposing to [REDACTED] the CSS program. I have some issues which [REDACTED] and I spoke about. Firstly I am not shooting the messenger so to speak, [REDACTED] has a Job to do and I do appreciate the fact he is giving me a heads up about inspections. The problem as I see it is, If rule 2-004 states that an inspection must be called for ANY WORK. Home owners or certain qualified persons must take out Inspections as well. Should be no two headed coin here. I know [REDACTED] wants to have the public places on the CSS program and I think this good for the Towns and for me as the Service Contractor. I don't believe I should have to take an inspection out just to replace a ballasts or a receipt, or replace a fan motor like to like. Surely as an Ontario Licensed Electrical Contractor there must be some trust I, or</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the utmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>Safety statistics show no evidence that injuries or fires have resulted from the installation of the millions of light fixtures and switches sold at retail outlets throughout Ontario every year. Additionally, it is clear that the existing permit and inspection requirements have not acted as a deterrent to unsafe installations as very few permits for inspection are submitted for these applications (fewer than 200 per year compared to 10 million fixtures sold.) Yet as noted there is no evidence of injuries or fires resulting.</p> <p>The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:</p>

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	<p>any contractor will do the right thing. The CSS program is the only one where I can do this change out work and not have to pull out an inspection and log it on the CSS site, which does not get inspected for at least a year. So after one year you come and look at this work, maybe I made a mistake and now you may find a defect, it has been a year, now what? One of the things my guys talked to me about this morning is how much are you going to inspect? Will you pull the roof housing apart and make sure I have correctly wired the motor and bonding? Will you have PPE to do a proper inspection on a motor that I connected like for like? Will you just issue a C of I under the ACP program? These are really good thoughts and I hope ESA can find some exemptions for the Contractors of Ontario, and not home owners or certain qualified persons who do not hold an Ontario Electrical License.</p>	<ul style="list-style-type: none"> • ESA is focussed where the greatest safety risks exist • Our resources are used in the most effective manner possible to ensure the greatest safety value for the public; • The rules do not create unnecessary burden for consumers or industry with little safety value; and • The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada. <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p> <p>Additional exceptions to the proposals have also been added to address identified safety concerns. ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.</p> <p>The proposals do not change the current trade jurisdiction; they merely eliminate the need for an inspection in areas where little safety value is provided by an inspection. Most of the proposals provide exemptions for licensed electrical contractor or other qualified individuals that are permitted to do certain electrical work according to his/her designation. All of the proposals being considered are low-risk work. Either the work being undertaken is relatively straightforward or the persons undertaking the work are expected to have sufficient knowledge rendering the risk of harm significantly mitigated.</p> <p>Rules that do not make sense can have a negative impact on compliance with the OESC in general and the public value of electrical inspection. By rationalizing the circumstances where an application for inspection is required, ESA is able to provide appropriate electrical safety oversight and focus on those areas or electrical installations that are of the highest risk.</p>
<p>Power Workers Union</p>	<p>General Comments also made with respect to the Proposals not aligning with ESA's mission, vision, safety mandate etc.</p> <p>Please see supporting documentation provided by PWU.</p> <p>To see the supporting documentation please refer to ESA corporate website under “Stakeholder Engagement”: http://esasafe.com/Corporate/se_006_d.php?s=17</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the upmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>Safety statistics show no evidence that injuries or fires have resulted from the installation of the millions of light fixtures and switches sold at retail outlets throughout Ontario every year. Additionally, it is clear that the existing permit and inspection requirements have not acted as a deterrent to unsafe installations as very few permits for inspection are submitted for these applications (fewer than 200 per year compared to 10 million fixtures sold.) Yet as noted there is no evidence of injuries or fires resulting.</p> <p>The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:</p> <ul style="list-style-type: none"> • ESA is focussed where the greatest safety risks exist • Our resources are used in the most effective manner possible to ensure the greatest safety value for the public; • The rules do not create unnecessary burden for consumers or industry with little safety value; and • The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada.

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Additional exceptions to the proposals have also been added to address identified safety concerns. ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.

The proposals do not change the current trade jurisdiction; they merely eliminate the need for an inspection in areas where little safety value is provided by an inspection. Most of the proposals provide exemptions for licensed electrical contractor or other qualified individuals that are permitted to do certain electrical work according to his/her designation. All of the proposals being considered are low-risk work. Either the work being undertaken is relatively straightforward or the persons undertaking the work are expected to have sufficient knowledge rendering the risk of harm significantly mitigated.

Rules that do not make sense can have a negative impact on compliance with the OESC in general and the public value of electrical inspection. By rationalizing the circumstances where an application for inspection is required, ESA is able to provide appropriate electrical safety oversight and focus on those areas or electrical installations that are of the highest risk.

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Comments received on specific proposals:

Proposal 1: Clarify the meaning of utilization equipment and expand the exemption from a single dwelling unit to an owner occupied dwelling unit if undertaken by a licensed electrical contractor (EC).

Company / Organization / Individual	Stakeholder Comment / Feedback submitted to ESA & Suggestions for Improvement / Alternatives	ESA response
Ontario Electrical League	<p>Changing the rule to expand into owner occupied dwelling units has some issues. The single dwelling is in itself a standalone distribution system. Work that is performed on the system will only affect the single system. In an owner occupied dwelling unit where the unit is part of a larger distribution system, there is greater risk for affecting the distribution systems of other dwelling units than just the unit having work done. Since the dwelling unit is a sub-distribution of a larger system, where the owner only has control over their sub-distribution, there is potential to have to conduct work on other parts of the system that is owned by another person.</p> <p>We do support the change to the rule expanding the definition to include all dwelling units since the work is to be conducted only by Licensed Electrical Contractors. The Licensed contractor has the training and experience to conduct the work with little risk.</p> <p>We have no suggestions on how to improve the proposal at this time.</p> <p>We do not have an alternative proposal to present at this time</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the upmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>This proposed amendment only applies to licensed electrical contractors.</p> <p>The proposed amendment only expands the current exemption regarding like for like replacements from a single dwelling to an owner occupied dwelling unit but does not expand the exemption to other types of replacements or alterations of the distribution system.</p> <p>The proposed exemption does not apply to the branch panel board inside each dwelling unit. This limitation mitigates the concern raised since the panel boards provide the connection to the overall distribution system. Any work on a panel board still requires an application for inspection in order for ESA to verify that there are no potential safety concerns.</p>
Consumer Association of Canada	<p>LEC requirement needs to be moved up to the beginning part of the paragrap, and not to be written as a condition. This applies elsewhere.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposal has been amended to address/mitigate concerns raised by stakeholders.</p> <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p>

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Proposal 2: Allow the installation of replacement light fixtures and switches rated not more than 20 amperages and 130 volts in an owner occupied single dwelling if installed by the owner.

Company /Organization / Individual	Stakeholder Comment / Feedback submitted to ESA & Suggestions for Improvement / Alternatives	ESA response
Ontario Electrical League	<p>Allowing anyone to change electrical equipment has a fair amount of risk involved. Unqualified persons do not understand the risk involved in working with electricity. Even changing an existing fixture with an identical replacement has risk. Does an untrained person know that they must de-energize the circuit? Do they check for other hazards such as water when working in a kitchen (light fixture above sinks)? Do they know what the proper wiring is for the device being replaced (see photo beside of a dimmer replaced by a homeowner with the neutral and ground tied together)?</p> <p>We would change the proposal to replace the word “anyone” with “a Licensed Electrical Contractor”. A Licensed Electrical Contractor has the training and experience to reduce risk with the work and ensure that work is done to code</p> <p>An alternative to add to the proposal would be to include section 38 relating to elevators. Since several homes are being built with elevators due to high density and an aging population, there are light fixtures within residential elevators</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the utmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>Safety statistics show no evidence that injuries or fires have resulted from the installation of the millions of light fixtures and switches sold at retail outlets throughout Ontario every year.</p> <p>Additionally, it is clear that the existing permit and inspection requirements have not acted as a deterrent to unsafe installations as very few permits for inspection are submitted for these applications (fewer than 200 per year compared to 10 million fixtures sold.) Yet as noted there is no evidence of injuries or fires resulting.</p> <p>The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:</p> <ul style="list-style-type: none"> • ESA is focussed where the greatest safety risks exist • Our resources are used in the most effective manner possible to ensure the greatest safety value for the public; • The rules do not create unnecessary burden for consumers or industry with little safety value; and • The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada. <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community. In this case, the proposal has been amended to make it clear that the exemption only applies to an owner. If an owner hires someone to do the replacement, it must be a licensed electrical contractor.</p> <p>Additional exceptions to the proposals have also been added to address identified safety concerns. ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.</p> <p>Due to the certain technical and safety concerns re elevators, this proposed amendment does not include section 38 of the Code. However, your suggestion will be reviewed and may be considered for future Code proposals.</p>
Power Workers Union	ESA should be the Leader in Electrical Safety as they have proclaimed to be in North America. A leader does not follow others. They lead the way and SAFETY should be the measuring factor, do the right thing, do the	Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.

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Inspections that have been mandated in the Regulation to protect the PUBLIC of Ontario. Stop trying to get out of the core Business Electrical Safety inspections. There is only one question to be asked here, "Does this enhance Electrical Safety in the Province of Ontario?" and if the answer is "No", which we believe it should be, then this proposal should be cancelled. ESA has introduced Contractor Licensing. This has reinforced that the General Public of Ontario use Licenced Contractors as per ESA advertising. By recognizing and allowing others to do electrical work this undermines the Licensed Electrical Contractors of Ontario.

Remove Proposal

First and foremost, safety is of the upmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.

Safety statistics show no evidence that injuries or fires have resulted from the installation of the millions of light fixtures and switches sold at retail outlets throughout Ontario every year.

Additionally, it is clear that the existing permit and inspection requirements have not acted as a deterrent to unsafe installations as very few permits for inspection are submitted for these applications (fewer than 200 per year compared to 10 million fixtures sold.) Yet as noted there is no evidence of injuries or fires resulting.

The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:

- ESA is focussed where the greatest safety risks exist
- Our resources are used in the most effective manner possible to ensure the greatest safety value for the public;
- The rules do not create unnecessary burden for consumers or industry with little safety value; and
- The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada.

Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community. In this case, the proposal has been amended to make it clear that the exemption only applies to an owner. If an owner hires someone to do the replacement, it must be a licensed electrical contractor.

Additional exceptions to the proposals have also been added to address identified safety concerns. ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.

This proposal does not change the current trade jurisdiction; it merely eliminates the need for an inspection in certain specified circumstances. Most of the proposals provide exemptions for licensed electrical contractors. All of the proposals being considered are low-risk work.

Rules that do not make sense can have a negative impact on compliance with the OESC in general and the public value of electrical inspection. By rationalizing the circumstances where an application for inspection is required, ESA is able to provide appropriate electrical safety oversight and focus on those areas or electrical installations that are of the highest risk.

Proposal 3: Allow the installation of wiring from an approved class-2 power supply by the owner or qualified person within an owner-occupied single dwelling unit, provided it is not part of a lighting installation in certain circumstances.

Company/Organization / Individual	Stakeholder Comment / Feedback submitted to ESA & Suggestions for Improvement / Alternatives	ESA response
Ontario Electrical League	Limiting the scope of work to 42.4v and below as well as 100VA and below,	Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have

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<p>the risk for such work is minimal. Due to the low voltage and rating of the transformer, we do not see a great deal of risk with this installation.</p> <p>We support this change even though it allows anyone to perform the work. We feel that the risk is low enough that even an untrained individual could complete this type of work with minimal risk.</p> <p>We have no suggestions on how to improve the proposal at this time.</p> <p>We do not have an alternative proposal to present at this time</p>	<p>been amended to address/mitigate concerns raised by stakeholders.</p> <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p> <p>Additional exceptions to the proposals have also been added to address identified safety concerns. ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.</p>
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Proposal 4: Allow the replacement of certain specified appliances rated at not more than 30 A and 240 volts, in single dwellings if performed by specified qualified persons.

Company/Organization / Individual	Stakeholder Comment / Feedback submitted to ESA & Suggestions for Improvement / Alternatives	ESA response
Ontario Electrical League	<p>The exemption allows for individuals specifically trained for the work to be performed. Since these are qualified persons, we see that there is minimal risk in performing the work.</p> <p>We support his change as it low risk and the work is being performed by individuals with the required skills and training to properly conduct the work. This proposal also limits scope of work to owner-occupied dwelling units.</p> <p>We have no suggestions on how to improve the proposal at this time.</p> <p>We do not have an alternative proposal to present at this time.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p> <p>We agree; the proposal does not change the current trade jurisdiction; it merely eliminates the need for an inspection when the specified appliances are replaced. This proposal extends the exemption to qualified individuals that are permitted to perform this type of electrical work according to his/her trade designation. The work being undertaken is relatively straightforward and the persons undertaking the work are expected to have sufficient knowledge rendering the risk of harm significantly mitigated.</p>
Consumer Association of Canada	<p>Installed should be corrected to "repaired". Also, the requirement for LEC to perform the work needs to be moved up, and not to be listed as a condition as it might be missed.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p>
Power Workers Union	<p>ESA should be the Leader in Electrical Safety as they have proclaimed to be in North America. A leader does not follow others. They lead the way and SAFETY should be the measuring factor, do the right thing, do the Inspections that have been mandated in the Regulation to protect the PUBLIC of Ontario. Stop trying to get out of the core Business Electrical</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the utmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p>

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Safety inspections. There is only one question to be asked here, "Does this enhance Electrical Safety in the Province of Ontario?" and if the answer is "No", which we believe it should be, then this proposal should be cancelled.

The PWU does not support the proposal. This change would cause serious "Safety" issues in the field. This represents a significant amount of work we now inspect, that we would no longer require a work order for or an inspection. There would be a significant loss of revenue at a time ESA is already in a deficit budget. There is a real concern staffing would be impacted by such a change to this code rule. As written, 30A/240 volt would include such devices as air conditioners, heat pumps, Geo Thermal units and many other devices (air compressor, welder) rated 5 H.P. or less. The inspection of hot water tanks, furnaces and air conditioners should not be eliminated. These inspections are important as they give the Inspectors the opportunity to enter homes and find existing hazards, which enhances ESA's 5 year Harm Reduction Priority - Aging Infrastructure.

ESA does not have any data to indicate how often the Inspectors find hazardous wiring in existing dwellings while conducting these types of inspections. The Work Order itself may or may not pass inspection. What is often found during these inspections is overfused, overloaded panels, hazardous knob and tube wiring issues, new circuits that have been added unsafely and non licensed want-to-be contractors doing electrical work. These are High Risk situations that need to be addressed for public safety.

There is an assumption by ESA the previous installation was completed in a code compliant manner, thus making the change out simplistic. Once again, ESA has no data on existing installations and what hazards go undetected until an inspection is done on site. If the original installation was not done correctly and in contradiction to the Code, the change out will mostly likely remain as NON code compliant.

We do not support ESA recognizing the IMR Group or the Pre Apprentice Training Institute to do repair and replacement. Neither of these groups are recognized by the Ministry of Training, Colleges and Universities. Furthermore, should consideration be given to recognizing these groups, they should be trained by ESA, followed by a written test conducted by ESA. A registered data base of these individuals should be set up and controlled by ESA. ESA makes the comment if this proposal is passed, it would allow

ESA is in agreement with the concerns raised in relation to a HVAC system installation; that is why the proposed exemption does not include HVAC systems. This proposal is limited to certain types of appliances as listed in the proposal; dishwashers, cook tops, garburators, trash compactors, ovens, exhaust fans, baseboard heaters, furnaces, and hot water tanks.

Safety statistics show no evidence that injuries or fires have resulted from these types of installations. Additionally, it is clear that the existing permit and inspection requirements have not acted as a deterrent to unsafe installations as very few permits for inspection are submitted for these applications. Yet as noted there is no evidence of injuries or fires resulting.

The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:

- ESA is focussed where the greatest safety risks exist
- Our resources are used in the most effective manner possible to ensure the greatest safety value for the public;
- The rules do not create unnecessary burden for consumers or industry with little safety value; and
- The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada.

Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.

ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.

The proposal does not change the current trade jurisdiction; it merely eliminates the need for an inspection when the specified appliances are replaced. This proposal extends the exemption to qualified individuals that are permitted to perform this type of electrical work according to his/her trade designation. The work being undertaken is relatively straightforward and the persons undertaking the work are expected to have sufficient knowledge rendering the risk of harm significantly mitigated.

In terms of OEMs, appliance technical training courses are provided to OEM technicians, thereby creating a basic level of training to mitigate the risk of working with electrical circuits. The service installation industry through the Installation, Maintenance and Repair Sector Council and Trade Association (IMR) confirms that there is very little safety concern with these types of replacements and reconnections and the current requirements are burdensome and provide little safety value.

To further mitigate the risk, IMR worked with the Pre-Apprentice Training Institute in 2009 to launch a new Entry Level Appliance Service Technical Program. Part of the program curriculum is centred on basic electricity and safety. There are several modules of the program dedicated to electrical safety. This program includes a strong mix of practical and hands on learning experience. The creation of this program has resulted in individuals who have an enhanced level of knowledge and competency; thereby warranting a different approach by ESA.

In order to have an impact on issues related to aging infrastructure (such as aluminum wiring and knob and tube wiring, ESA is

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	<p>ESA to focus on higher risk inspections. We believe these inspections are being done daily by staff. ESA has no tracking system to know who, when and where the high risk inspections are being done at present. Question to ESA: Please supply a list of high risk inspections (sites) to the PWU ESA Inspectors are not doing? When speaking to Electrical Contractors, they want this work inspected to keep a level playing field for all Contractors and they feel this is a down grade to their C of Q and their Contractor Licence with ESA. Remove Proposal.</p> <p>The current Authorized Contractor Program (Audited Based) system that is in place has achieved and maintained a high level of safety while addressing the contractors concerns of fees and recognizing the work of the quality contractors who perform work of a repetitive nature. The ACP process continues to require applications be filed for this work while the ESA monitors the quality of the electrical installation. Public Safety remains a high priority thru the due diligence of the inspection process.</p>	<p>considering a number of options that will have a more direct impact and provide a more effective solution to this issue.</p> <p>Rules that do not make sense can have a negative impact on compliance with the OESC in general and the public value of electrical inspection. By rationalizing the circumstances where an application for inspection is required, ESA is able to provide appropriate electrical safety oversight and focus on those areas or electrical installations that are of the highest risk.</p>
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Proposal 5: Allow the repair of certain existing installed electrical equipment in an owner-occupied dwelling unit if performed by specified qualified persons, if the repair does not include extending or altering the original wiring installation.

Company /Organization / Individual	Stakeholder Comment / Feedback submitted to ESA & Suggestions for Improvement / Alternatives	ESA response
Ontario Electrical League	<p>The same rationale applies in this proposal as the previous proposal. It limits the scope of work to individuals specifically training and licensed to perform the work.</p> <p>We have no suggestions on how to improve the proposal at this time.</p> <p>We do not have an alternative proposal to present at this time.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p> <p>We agree; the proposal does not change the current trade jurisdiction; it merely eliminates the need for an inspection when the specified appliances are repaired. This proposal provides the exemption for a licensed electrical contractor or other qualified individuals that are permitted to perform this type of electrical work according to his/her trade designation. The work being undertaken is relatively straightforward and the persons undertaking the work are expected to have sufficient knowledge rendering the risk of harm significantly mitigated.</p>
Consumer Association of Canada	Installed should read "repaired"	Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.

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		<p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community.</p> <p>The suggestion has been accepted and the proposal has been revised to address comment.</p>
<p>Power Workers Union</p>	<p>ESA should be the Leader in Electrical Safety as they have proclaimed to be in North America. A leader does not follow others. They lead the way and SAFETY should be the measuring factor, do the right thing, do the Inspections that have been mandated in the Regulation to protect the PUBLIC of Ontario. Stop trying to get out of the core Business Electrical Safety inspections. There is only one question to be asked here, "Does this enhance Electrical Safety in the Province of Ontario?" and if the answer is "No", which we believe it should be, then this proposal should be cancelled. ESA has introduced Contractor Licensing. This has reinforced that the General Public of Ontario use Licenced Contractors as per ESA advertising. By recognizing and allowing others to do electrical work this undermines the Licensed Electrical Contractors of Ontario.</p> <p>The PWU does not support the proposal. This change would cause serious "Safety" issues to go unaddressed in the field. This represents a significant amount of work we now inspect, that we would no longer require a work order or an inspection. There would be a significant loss of revenue at a time ESA is already in a deficit budget. There is a real concern staffing would be impacted by such a change to this code rule. The proposed rule as written states "repair or installation". Allowing an agent of an original equipment manufacturer or an HVAC Mechanic to do "installation" work is NOT acceptable in any fashion. These individuals are NOT qualified. As written, 30A/130 volt and 50A/240 volt would include such devices as air conditioners, heat pumps, Geo Thermal units and many other devices (air compressor, welder) rated 7.5 H.P. or less. The inspection of hot water tanks, furnaces and air conditioners should not be eliminated. These inspections are important as they give the Inspectors the opportunity to enter homes and find existing hazards, which enhances ESA's 5 year Harm Reduction Priority - Aging Infrastructure.</p> <p>ESA does not have any data to indicate how often the Inspectors find hazardous wiring in existing dwellings while conducting these types of inspections. The Work Order itself may or may not pass inspection. What is often found during these inspections is overfused, overloaded panels,</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments. The proposals have been amended to address/mitigate concerns raised by stakeholders.</p> <p>First and foremost, safety is of the upmost concern for ESA. ESA would not be proposing these exemptions unless we felt it was in the public interest to do so and consistent with our mission and vision.</p> <p>This proposal is limited to the repair of certain types of utilization equipment. It does not include the installation or any work performed on the wiring of these appliances.</p> <p>Safety statistics show no evidence that injuries or fires have resulted from the installation of the millions of replacement dishwashers or other appliances listed in the proposal. Additionally, it is clear that the existing permit and inspection requirements have not acted as a deterrent to unsafe installations as very few permits for inspection are submitted for these applications. Yet as noted there is no evidence of injuries or fires resulting.</p> <p>The proposed amendments are being considered as a means of clarifying the current requirements to ensure that:</p> <ul style="list-style-type: none"> • ESA is focussed where the greatest safety risks exist • Our resources are used in the most effective manner possible to ensure the greatest safety value for the public; • The rules do not create unnecessary burden for consumers or industry with little safety value; and • The rules in Ontario are not unnecessarily more burdensome than those in other jurisdictions in Canada. <p>Based on the feedback received, the proposal has been revised to ensure that the intent is clear. Each proposal has been modified to specifically state in which circumstances the exemption applies, who is exempted from the requirement and what equipment the exemption applies to; making the exemption clearer for both the public and the regulated community. This proposal specifically limits the exemption to the repair of the appliance and does not apply to the installation of the equipment.</p> <p>ESA plans to undertake communications to stakeholders to raise awareness of permit requirements for homeowners and other stakeholders.</p> <p>The proposal does not change the current trade jurisdiction; it merely eliminates the need for an inspection when the specified appliances are repaired. This proposal provides the exemption for a licensed electrical contractor or other qualified individuals that are permitted to perform this type of electrical work according to his/her trade designation. The work being undertaken is relatively straightforward and the persons undertaking the work are expected to have sufficient knowledge rendering the risk of harm significantly mitigated.</p>

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hazardous knob and tube wiring issues, new circuits that have been added unsafely and non licensed want-to-be contractors doing electrical work. These are High Risk situations that need to be addressed for public safety. There is an assumption by ESA the previous installation was completed in a code compliant manner, thus making the change out simplistic. Once again, ESA has no data on existing installations and what hazards go undetected until an inspection is done on site. If the original installation was not done correctly and in contradiction to the Code, the change out will mostly likely remain as NON code compliant. We do not support ESA recognizing the IMR Group or the Pre Apprentice Training Institute to do repair and replacement. Neither of these groups are recognized by the Ministry of Training, Colleges and Universities. Furthermore, should consideration be given to recognizing these groups, they should be trained by ESA, followed by a written test conducted by ESA. A registered data base of these individuals should be set up and controlled by ESA. ESA makes the comment if this proposal is passed, it would allow ESA to focus on higher risk inspections. ESA has not supplied any data to indicate these types of high risk inspections are NOT being done. Question to ESA: Please supply a list of high risk inspections (sites) to the PWU ESA Inspectors are not doing! When speaking to Electrical Contractors, they want this work inspected to keep a level playing field for all Contractors and they feel this is a down grade to their C of Q and their Contractor Licence with ESA. Remove Proposal.

The current Authorized Contractor Program (Audited Based) system that is in place has a achieved and maintained a high level of safety while addressing the contractors concerns of fees and recognizing the work of the quality contractors who perform work of a repetitive nature. The ACP process continues to require applications be filed for this work while the ESA monitors the quality of the electrical installation. Public Safety remains a high priority thru the due diligence of the inspection process.

In terms of OEMs, appliance technical training courses are provided to OEM technicians, thereby creating a basic level of training to mitigate the risk of working with electrical circuits. The service installation industry through the Installation, Maintenance and Repair Sector Council and Trade Association (IMR) confirms that there is very little safety concern with these types of replacements and reconnections and the current requirements are burdensome and provide little safety value.

To further mitigate the risk, IMR worked with the Pre-Apprentice Training Institute in 2009 to launch a new Entry Level Appliance Service Technical Program. Part of the program curriculum is centred on basic electricity and safety. There are several modules of the program dedicated to electrical safety. This program includes a strong mix of practical and hands on learning experience. The creation of this program has resulted in individuals who have an enhanced level of knowledge and competency; thereby warranting a different approach by ESA.

In order to have an impact on issues related to aging infrastructure, ESA is considering a number of options that will have a more direct impact and provide a more effective solution to this issue.

Rules that do not make sense can have a negative impact on compliance with the OESC in general and the public value of electrical inspection. By rationalizing the circumstances where an application for inspection is required, ESA is able to provide appropriate electrical safety oversight and focus on those areas or electrical installations that are of the highest risk.

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Proposal 6: Allow a licensed electrical contractor to extend a single branch circuit for an associated piece of equipment not to exceed 20 amperages, and 240 volts.

Company / Organization / Individual	Stakeholder Comment / Feedback submitted to ESA & Suggestions for Improvement / Alternatives	ESA response
Ontario Electrical League	<p>Although this section is deemed new construction, it is added to the existing electrical circuit. A Licensed Electrical Contractor recognizes the requirements to add to existing circuits, such as whether there is enough capacity on the circuit to allow expansion</p> <p>We have no suggestions on how to improve the proposal at this time.</p> <p>We do not have an alternative proposal to present at this time.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments.</p> <p>After much deliberation and based on the feedback/comments received, ESA will not be considering this proposal for its recommendation at this time.</p>
Member of the Ontario Provincial Code Committee	<p>Confusion over whether this was for more than just LEC's. Should there be an Exclusion for 2 wire systems? Some contractors may use this exemption to wire an entire home without taking out a permit. The intent of the Exemption needs to be made clearer.</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments.</p> <p>After much deliberation and based on the feedback/comments received, ESA will not be considering this proposal for its recommendation at this time.</p>
Power Workers Union	<p>ESA should be the Leader in Electrical Safety as they have proclaimed to be in North America. A leader does not follow others. They lead the way and SAFETY should be the measuring factor, do the right thing, do the Inspections that have been mandated in the Regulation to protect the PUBLIC of Ontario. Stop trying to get out of the core Business Electrical Safety inspections. There is only one question to be asked here, "Does this enhance Electrical Safety in the Province of Ontario?" and if the answer is "No", which we believe it should be, then this proposal should be cancelled. ESA has introduced Contractor Licensing. This has reinforced that the General Public of Ontario should use Licenced Contractors as per ESA advertising. By recognizing and allowing others to do electrical work this undermines the Licensed Electrical Contractors of Ontario.</p> <p>The PWU does not support the proposal. This change would cause serious "Safety" issues to go unaddressed in the field. This represents a significant amount of work we now inspect, that we would no longer require a work order or an inspection. There would be a significant loss of revenue at a time ESA is already in a deficit budget. There is a real concern staffing would be impacted by such a change to this code rule.</p> <p>The proposed rule as written would eliminate the need for a work order to be filed for most renovations. Example #1, an existing circuit feeding a single outlet could be extended to allow 11 more outlets on the circuit. This would mean the wiring of a recreation room would NOT be inspection. Example #2, an existing small kitchen with existing circuits (splits, fridge, microwave, separate dining circuit) is renovated, the updated kitchen is now doubled in size with a new attached dining room (3M x 3M) added, a electrical inspection work order and inspection would NOT be required. Example #3, you could have an existing 20A/240V circuit feeding an existing detached garage. The owner decides to tear the old single garage down and replace it with a new double garage. With this code change you could reroute the 20A/240V circuit to the new garage and wire the garage with no inspection work order or inspection. This is NOT acceptable. ESA would be acting irresponsibility by not inspecting this type of installation. Public Safety would be impacted. Base on Section 0 - Definition - outlet - "a point in the wiring installation at which current is taken</p>	<p>Thank you for participating in the Basic Exemption Public Consultation and providing your comments.</p> <p>After much deliberation and based on the feedback/comments received, ESA will not be considering this proposal for its recommendation at this time.</p>

**Public Consultation on the Proposed Amendments to the Administrative Rules under the Ontario Electrical Safety Code –
“An Application for Inspection Not Required”**

to supply utilization equipment". Thus a number of devices could be wired in without the benefit of electrical inspection. As written, 20A/240 volt would allow the extension of existing circuits to such devices as air conditioners, heat pumps, electric baseboard heater, Geo Thermal units and many other devices (air compressor, welder) rated 3 H.P. or less.

The inspection of hot water tanks, furnaces and air conditioners and similar electrical devices should not be eliminated. These inspections are important as they give the Inspectors the opportunity to enter homes and find existing hazards, which enhances ESA's 5 year Harm Reduction Priority - Aging Infrastructure. ESA does not have any data to indicate how often the Inspectors find hazardous wiring in existing dwellings while conducting these types of inspections. The Work Order itself may or may not pass inspection. What is often found during these inspections is overfused, overloaded panels, hazardous knob and tube wiring issues, new circuits that have been added unsafely and non licensed want-to-be contractors doing electrical work. These are High Risk situations that need to be addressed for public safety.

There is an assumption by ESA the previous installation was completed in a code compliant manner, thus making the change out simplistic. Once again, ESA has no data on existing installations and what hazards go undetected until an inspection is done on site. If the original installation was not done correctly and in contradiction to the Code, the change out will mostly likely remain as NON code compliant. When speaking to Electrical Contractors, they want this work inspected to keep a level playing field for all Contractors and they feel this is a down grade to their C of Q and their Contractor Licence with ESA. ESA makes the comment if this proposal is passed, it would allow ESA to focus on higher risk inspections. Question to ESA: Please supply a list of high risk inspections (sites) to the PWU ESA Inspectors are not doing!

Remove Proposal

The current Authorized Contractor Program (Audited Based) system that is in place has achieved and maintained a high level of safety while addressing the contractors concerns of fees and recognizing the work of the quality contractors who perform work of a repetitive nature. The ACP process continues to require applications be filed for this work while the ESA monitors the quality of the electrical installation. Public Safety remains a high priority thru the due diligence of the inspection process.