

2018-OA-001 Rule 2-005(h) – New Application for inspection not required for elevating devices			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Consultant	<p><u>Support:</u> Agree with rationale provided.</p> <p><u>Suggestion for improvement:</u> Improve wording of proposed Appendix B note to the Rule. “Dwelling house” is not a defined term.</p> <p><u>Alternative Proposal:</u> Change “dwelling house” to “single dwelling or dwelling unit”</p> <p><u>Support:</u> Agree with rationale provided.</p> <p><u>Suggestion for improvement:</u> Appears as though the wrong word was used at the end of the Appendix B note. “... unless the owner requires in wiring that...”</p> <p><u>Alternative Proposal:</u> Should “wiring” be “writing”?</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p>	<p><i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i></p> <p>2018-OA-001.pdf</p>
2018-OA-002 Section 2 Replace “inspection department” with “Electrical Safety Authority”			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Electricity Distributors Associations (EDA)	<p><u>Support:</u> Support in general; propose a wording change that enhances clarity.</p> <p>The Electricity Distributors Association’s proposed changes will clarify the responsible body and overcome the need to reference</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this</p>	<p><i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i></p> <p>2018-OA-002.pdf</p>

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	<p>back to the definitions to correctly understand the responsible party.</p> <p><u>Suggestion for improvement:</u></p> <ul style="list-style-type: none"> • Replace “Inspection Department” with “Electrical Safety Authority”. • Remove definition for “Inspection Department” and make consistent reference to the “Electrical Safety Authority” (rather than adding a new definition just for “authority”). • Define the “Supply Authority” as the Local Distribution company (LDC)). 	<p>discussion, selected changes have been made based on the submitted comments.</p> <p>“Supply Authority” is definition in Canadian Electrical (CE) Code. Also, the term “Supply Authority” does not necessarily refer to Local Distribution Company (LDC), as it may refer to the transmission entity.</p> <p>Should you wish to submit a definition change proposal to the CE Code, please refer to Appendix C of the CE Code for process on submitting a request for amendments.</p>	
Licensed Electrical Contractor (LEC)	<p><u>Support:</u> Good logic</p>	<p>Thank you for your feedback.</p>	
Cornerstone Hydro Electric Concepts Association’s (CHEC)	<p><u>Oppose:</u> LDCs are currently using “Controlling/Issuing/ Establishing Authority” terminology under the Utility Work Protection Code. “Supply Authority” is also terminology used within the Electrical Safety Authority. The addition of another reference to Authority may result in confusion within the industry.</p> <p><u>Suggestion for improvement:</u> It is suggested that perhaps an acronym or other</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p>	

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	<p>term could be used to limit confusion and maintain consistency in terminology used. An additional suggestion would include more clearly defining these terms in the list of definitions.</p> <p><u>Alternative Proposal:</u> No specific alternative proposal noted at this time.</p>		
2018-OA-003 Section 2			
A) Change “Application for Inspection” to “Notification”			
B) Modify Rule 2-004(7) when a connection authorization is issued with individual or group installations			
C) Modify 2-004(8) to identify that the contractor needs to follow the requirements of Licensing, as per the Regulations			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Supply authority	<p><u>Suggestion for improvement:</u> 2018-OA-003 (page 3 of the document – Bullet 8 (a) first row 1 Ontario Reg. is shown as 7/70/05 – should be 570/05.</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered and implemented.</p>	<p><i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i></p> <p>2018-OA-003.pdf</p>
Licensed Electrical Contractor (LEC)	<p><u>Support:</u> Good logic</p>	<p>Thank you for your feedback.</p>	
2018-OA-004 Rule 2-005(c)			
Clarification to exemptions from an application for inspection			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Licensed Electrical Contractor (LEC)	<p><u>Support:</u> Clearer</p>	<p>Thank you for your feedback.</p>	<p><i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i></p> <p>2018-OA-004.pdf</p>
Consultant	<p><u>Oppose:</u> Although we can agree with the proposed</p>	<p>Thank you for your feedback.</p>	

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	<p>changes meeting the intent of the Rule as it is currently written, we think ESA is heading the wrong direction in requiring that LED lighting, wiring and associated components, on the output side of a LPS or Class 2 power supply, require inspection. The Rules already require that the equipment be approved and given the restrictions on the power supply itself (30RMS is not a shock hazard and 100VA is not a fire/ignition hazard) it is hard to understand why a new installation of this equipment by an LEC is more hazardous than allowing a homeowner to do any work (replacing luminaires and switches), and as such requires a notification.</p> <p><u>Suggestion for improvement:</u> Delete the requirement to omit the exception for LED lighting and associated equipment/wiring, where such wiring is installed on the output side of a LPS or Class 2 power supply. Should ESA decide this point of view is non-germane, we still suggest amending the Subrule to reflect 3 (c) (d) and (e) as the current wording highlighting 3(c) only implies that other than electrical medical equipment installed on the output of the Class 2 or LPS does not require a</p>	<p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p> <p>Application for inspection is required for LED lighting, wiring and associated components, on the output side of a LPS or Class 2 power supply that ensure continuity of mandatory lighting (required by the Ontario Building Code and Rules 30-500 to 30-510).</p>	
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	notification. It appears as though the intent was to include all of 2-022(3), which makes adding 30RMS to Item (iii) redundant.		
2018-OA-005 Rule 2-010(1) A) Add requirements for Plan Review of energy storage installations B) Add requirements for Plan Review of standby generation that supports life safety loads			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Public transport agency	<p><u>Oppose:</u> Understand that plan review is important for large systems, especially those for life safety. But 10KVA and the sometimes ambiguous definition of Life Safety make this a little nebulous.</p> <p><u>Suggestion for improvement:</u> But proposal 2018-OA-015 specifically excludes UPS's. Will that continue?</p> <p>What about emergency lighting? Will all emergency light systems using wall-packs be subject to plan review?</p> <p><u>Alternative proposal:</u> Suggest increasing threshold to 20KW.</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p> <p>The 10 kW limit is applicable to electric-power-generating and energy storage systems, based on Ontario Energy Board (OEB) definition for micro size. There is no support in OEB requirements for 20 kW limit.</p> <p>Based on the new item (d), plan review will not be required for installation of emergency power supply that only supplies emergency lighting such as wall-packs.</p>	<p><i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i></p> <p style="text-align: center;">2018-OA-005.pdf</p>
Licensed Electrical	<p><u>Support:</u> Will save lost revenue and time. Adds safety</p>	Thank you for your feedback.	

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Contractor (LEC)	level.		
Electricity Distributors Associations (EDA)	<p><u>Support</u> Support in general; propose wording to address the status of storage devices installed behind the meter</p> <p>The EDA's proposed amendment is expected to reduce the likelihood of undocumented installations that could back feed into the distribution system. The proposed revision could also result in more devices and installations being formally communicated and reported. Finally, it is expected to increase visibility that enhances safety and provides other valuable services (e.g., system reliability). Some LDC customers are installing devices without contacting the utility. LDCs propose this change to enhance safety, not to administer legal vs. illegal installations.</p> <p><u>Suggestion for improvement</u> The EDA recommends that the ESA add a requirement that proponents installing storage or generation behind the meter contact the supply authority (the LDC).</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p> <p>OESC, Section 84 requires interconnection arrangements to be in accordance with the requirements of the supply authority.</p> <p>Where a plan review submittal includes the installation of ESS with the intent, or potential, to operate in parallel with the supply authority, the submitter MUST provide documentation from the supply authority indicating they are aware of the installation.</p> <p>As part of the business process at ESA, inspectors are required to send a connection authorization to the supply authority indicating interconnected electrical power production sources with or without</p>	

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		energy storage such as batteries.	
Cornerstone Hydro Electric Concepts Association's (CHEC)	<u>Support:</u> CHEC is in support of adding plan review requirements for energy storage installations and standby generation that supports life safety loads. The inclusion of energy storage installations would reflect current and ongoing grid modernization.	Thank you for your feedback.	
2018-OA-006 Rule 2-010 Editorial change to clarify when Plan Review is not required			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Licensed Electrical Contractor (LEC)	<u>Support:</u> Removes ambiguity	Thank you for your feedback.	No change in the proposal 2018-OA-006.pdf
2018-OA-007 Rule 2-022(3) and Appendix B Note Amend requirements for lighting equipment approval			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Licensed Electrical Contractor (LEC)	<u>Support:</u> Good logic	Thank you for your feedback.	<i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i> 2018-OA-007.pdf
Consultant	<u>Support:</u> Agree with rationale provided. <u>Suggestion for improvement:</u> “Lighting device” is neither a defined term, nor does it align with other defined terms in the OESC. <u>Alternative Proposal:</u> Change “lighting device” to “lighting	Thank you for your feedback. The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, the suggested change has been made based on the submitted comment.	

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	equipment” which is more in line with the defined term <i>electrical equipment</i> .		
2018-OA-008 Rule 10-116(6) Relocate Ontario Amendment about the use of a metal frame of a building as a grounding conductor			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Cornerstone Hydro Electric Concepts Association’s (CHEC)	<u>Support:</u> CHEC is in support of relocation of this Ontario amendment and terminology of separately derived systems.	Thank you for your feedback.	No change in the proposal 2018-OA-008.pdf
Electricity Distributors Associations (EDA)	<u>Support:</u> The amendment clarifies a common situation.	Thank you for your feedback.	
2018-OA-009 Rule 12-022 - New Requirements for cables and raceways installed in metal corrugated roof decking			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Roofing Canada	<u>Support:</u> Proposed amendment mitigates electrical shock and fire hazards thereby reducing risk of injury and property damage.	Thank you for your feedback.	No change in the proposal 2018-OA-009.pdf
Consultant	<u>Oppose:</u> The submitter states that “installing conductors concealed in the roof decking is a hazard as there are no visible conductors” and provides no rationale as to why this is hazardous. Even in the image shown the cable was not cut or damaged, and even if it has been what would the likely result have been? We would guess that the overcurrent device would operate and the risk of fire or shock would be low. How many fires or	Thank you for your feedback. The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). Roof decking material is often repaired or replaced after the initial raceway or cabling and roofing	

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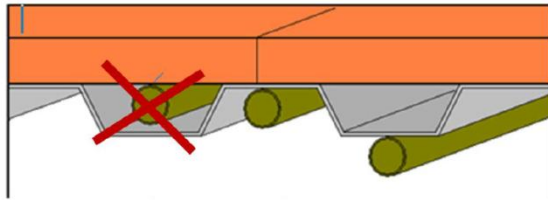
	<p>shock/electrocution incidents has ESA investigated related to this perceived hazard? The OESC is NOT intended to be a design specification and this proposal is crossing that line. Leave the design specifications to Engineers and Project Managers and keep them out of the OESC.</p> <p>Additionally, there are numerous places throughout buildings and premises where wiring is concealed, where does the submitter stop when extending the rationale that concealed wiring is dangerous? In walls, in floors, in concrete slabs, underground?</p>	<p>installation and may be penetrated by the screws or other mechanical devices designed to provide “hold down” strength of the waterproof membrane or roof insulating material.</p> <p>Roof replacement materials are fastened in place with long screws, which penetrate the roof decking installation and could continue into cables and raceways installed below. This could result in electrical shock or fire hazards.</p> <p>This proposal is a first step in preventing conductors in a concealed location, allowing the roofing industry to work on CE Code changes regarding exposed locations. It is harmonized with National Electrical Code (NEC) requirements for conductors installed in corrugated roof-decking.</p>	
<p>Infrastructure Health and Safety Association (IHSA)</p>	<p><u>Support:</u> During roof system removal operations or when mechanically attaching rigid board insulation or membranes, roofing professionals sometimes find electrical conduit embedded within roof systems or</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC).</p>	

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	<p>placed directly below roof decks. Cables and raceways installed in proximity to roof systems or roof decks may be subject to mechanical damage during roof installation or repairs. Nails and screws used to penetrate the roofing from the top during the roof installation process could easily penetrate electrical cables and raceways installed within or adjacent to roof systems or roof decks. This could result in electrical shock or fire hazards.</p> <p>Proper placement of electrical cables can prevent damage to electrical equipment below metal roof decks and significantly reduce the risk of electrical related injury and death. Employees in the service sector such as the roofers and industrial maintenance workers will benefit directly from the improved level of safety. There will also be savings for building owners, building tenants and employers of the workers because of the reduced electrical contact incidences.</p> <p><u>Suggestion for improvement:</u> The pictogram in the proposal does not address the potential electrical contacts due to the close proximity of the cable (i.e. the cable in the middle of the picture). Replace</p>	<p>The pictogram included in the proposal reflects the intent of the proposed rule to prohibit the installation of cables or conductors <u>concealed within</u> a corrugated roof.</p> <p>This proposal is a first step in preventing conductors in a concealed location, allowing the roofing industry to work on CE Code changes regarding exposed locations.</p>	
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the pictogram in the current proposal with the picture below. Please note that the extra “X” over the middle cable would indicate to avoid installing the cable in this area to prevent electrical contact during repair work. The cable installed on the far right would be the most appropriate position and the safest location.



Alternative proposal:

1. A cable, raceway, or box, installed in exposed or concealed locations under metal-corrugated sheet roof decking, shall be installed and supported so there is not less than 38 mm (1.5 in) measured from the lowest surface of the roof decking to the top of the cable, raceway, or box.
2. All electrical equipment shall be protected from mechanical injury by a steel plate not less than 5 mm (3/16 in) thick extends at least 38 mm (1.5 in) beyond the electrical equipment on each side.

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Licensed Electrical Contractor (LEC)	<u>Support:</u> Higher level of potential fire prevention	Thank you for your feedback.	
2018-OA-010 Rule 16-222 and Appendix B Note Amend requirements for equipment connected to Class 2 circuits			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Consultant	<p><u>Oppose:</u> Do not agree with the submitter that the wording of the CE Code Rule is confusing. In fact, we spent far more time trying to make sense of what the submitter is proposing and attempting to defend than we did following the intent of Rule 16-222 as it is currently written in the 2018 CE Code.</p> <p><u>Suggestion for improvement:</u> Keep Rule 16-222 as it is currently written in the 2018 CE Code and amend only the reference to the product approval Rule.</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC).</p> <p>CE Code 2018, C22.1-18, Rules 16-222 (1)(b) and (2) that deal with product approval requirements are deleted since we have Ontario Rules 2-022 and 2-024 that cover approval requirements.</p> <p>The intent of Rule 16-222(3) is to specify the voltages where no live parts should be accessible.</p>	<p>No change in the proposal 2018-OA-010.pdf</p>
2018-OA-011 Rule 24-104(2) Delete current Ontario Amendment to Rule 24-104(2)			
Submitted by	Stakeholder Comment	ESA response	Proposed change
No comments received			<p>No change in the proposal 2018-OA-011.pdf</p>
2018-OA-012 Rule 26-724 Delete current Ontario Amendment to Rule 26-724(f)(i) (2015)			

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Submitted by	Stakeholder Comment	ESA response	Proposed change
No comments received			No change in the proposal 2018-OA-012.pdf
2018-OA-013 Rule 28-500(4) and Appendix B Note – New Add new requirement for use of manual motor controllers not suitable as disconnecting means			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Public transport agency	<p><u>Support:</u> A good clarification. Motor Starters were already not necessarily a disconnecting means unless explicitly stated.</p> <p><u>Suggestion for improvement:</u> What about all existing devices?</p>	<p>Thank you for your feedback.</p> <p>Please be advised that the OESC is not retroactive. The proposed amendment will not be enforced retroactively, and will not apply to existing installations.</p>	<p><i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i></p> <p>2018-OA-013.pdf</p>
Consultant	<p><u>Oppose:</u> As sad as the incident is, this is not a change that should be part of the installation Code, instead a proposal to amend the product standard should be considered. Additionally Rule 28-602 already very clearly lays out the requirements for disconnecting means and basically lays out the requirement proposed in (3)(b). It's unfortunate that the individual involved in this fatality was neither properly trained on the requirements of the Code, lock-out/tag/out or ensuring equipment is in an electrically safe condition before attempting to work on it.</p> <p><u>Suggestion for improvement:</u> Reject the proposal.</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC).</p> <p>This proposal serves an important purpose to apply field marking to identify the appropriate disconnecting means for a motor. A proposal to Part II standard to amend the marking requirements for manual motor controllers will be submitted to require additional marking when it is not suitable for disconnecting means.</p>	

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		Once Part II standard is amended to recognize this new marking for motor controllers “Not suitable as disconnecting means”, this Ontario Amendment may be changed at that time.	
2018-OA-014 Rule 30-200(1) Delete existing Ontario Amendment to CE Code Rule 30-200(1)			
Submitted by	Stakeholder Comment	ESA response	Proposed change
No comments received			No change in the proposal 2018-OA-014.pdf
2018-OA-015 Rule 64-000 and 64-900s – New Include energy storage systems in Section 64			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Public transport agency	<p><u>Oppose:</u> The plaque requirement in 64-906(2) is ambiguous. What dimensions and such should this plaque be?</p> <p><u>Suggestion for improvement:</u> Have a sample plaque in Appendix B.</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p> <p>There are several requirements for marking in OESC and it is not common practice to specify the dimensions of the required mark. However, the suggestion was considered and typical Code language for marking requirements has been</p>	<p><i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i></p> <p>2018-OA-015.pdf</p>

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	<p><u>Oppose:</u> For Appendix B, it says that Uninterruptible Power Systems (UPS) certified to CSA C22.2 101.3 are not ESS. What about battery banks feeding DC systems below 750VDC? What about Battery banks feeding emergency power through old Inverters or Motor/Alternators? Are these also except?</p> <p><u>Suggestion for improvement:</u> Clarify the reason for the exemption.</p> <p><u>Alternative proposal:</u> Perhaps include grandfather clause for older battery systems that are in service but would not be counted as UPS</p>	<p>used.</p> <p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC).</p> <p>Please be advised that the OESC is not retroactive. The proposed amendment will not be enforced retroactively, and will not apply to existing battery installations.</p>	
Consultant	<p><u>Support:</u> Agree with rationale provided.</p> <p><u>Suggestion for improvement:</u> Multiple editorial suggestions – see next column in track changes for complete list.</p> <p>Reference to the ANSI/CAN/UL 9540 standard should be moved to Appendix B or A and not be in the body of the Rule as it is assumed all equipment must be approved to some Standard.</p> <p>“The Public” is not a defined term. Suggest re-wording to “unauthorized persons”</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p>	

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	<p>“Authority” is not a defined term. It is not clear whether the intent is for the Electrical Safety Authority to have jurisdiction or the Supply Authority. An additional Appendix B note may be required to clarify the intent.</p> <p>The term “can” and “may” are not permitted under C11.2 and should be changed to the appropriate term “shall be permitted”.</p> <p>Changing “stored energy” into “electrical energy” is a bit confusing. Suggestion for improved wording in tract changes in next column.</p> <p><u>Alternative Proposal:</u> Energy storage systems (ESS) — Equipment or systems that receive electrical energy and then provides a means to store that energy in some form for later use in order to supply electrical energy when needed.</p> <p>Energy storage systems, Self-contained - Energy storage systems where the components such as cells, batteries, or modules and any necessary controls, ventilation, illumination, fire suppression, or alarm systems are assembled, installed, and packaged into a single singular energy storage container or unit. They are required to be approved to the standard ANSI/CAN/UL-9540.</p> <p>Energy storage systems, Other - Energy storage</p>		
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	<p>systems that are not self-contained but instead are composed of individual devices assembled as a system.</p> <p>Rules 64-050 to 64-078 apply to energy storage systems a, except where otherwise specified</p> <p>Energy storage systems with maximum voltages higher than 750 Volts dc but not exceeding 1500 Volts dc shall not be required to comply with Rules 36-204, 36-208 and 36-214 provided that a) the installation is serviced only by qualified persons; b) the part of the installation exceeding 750 V dc is inaccessible to the public unauthorized persons;</p> <p>Any structure or building with an ESS shall have a permanent plaque or directory installed on the exterior of the building or structure at a location acceptable to the Authority <u>Having Jurisdiction</u>.</p> <p>Energy storage systems can <u>shall be permitted to</u> include but is <u>are</u> not limited to batteries, capacitors, and kinetic energy devices (e.g., flywheels and compressed air). These systems can <u>shall be permitted to</u> have ac or dc output for utilization and can include inverters and converters to change transmit stored energy <u>to power into electrical energy utilization equipment</u>.</p>		
Supply authority	<p><u>Oppose 64-904:</u> Photovoltaic sources and circuits are mentioned, which are not relevant to Energy</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered</p>	

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	<p>Storage Systems.</p> <p><u>Suggestion for improvement:</u> Remove 64-904(c)</p> <p><u>Alternate proposal:</u> Add a qualifying statement: where energy storage systems are installed with photovoltaic systems</p> <p><u>Additional comments:</u> Proposal Number 2018-OA-015 – Background Information: 1) The following statement “ESSs provide the benefit of having electricity available onsite to help reduce peak utility demand and/or usage when generation is unavailable” conflicts with anti-islanding requirements. 2) Typical layout of “Integrated Distributed Energy Resource System” should indicate two (2) separate inverters (one for storage, one for PV) connected to load center. 3) In regards to statement “systems be evaluated, tested (self-contained) and installed to ensure safe operation”: Testing should be of the complete integrated distributed energy resource system and not individual components.</p>	<p>by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p> <p>Energy storage systems and devices that operate in parallel with a supply authority are required to meet the applicable standards’ requirements for supply authority interconnection and be marked as “Utility Interconnected” or equivalent.</p>	
<p>Cornerstone Hydro Electric Concepts</p>	<p><u>Support:</u> CHEC is in support of the introduction of energy storage systems into Section 64 of the Code to</p>	<p>Thank you for your feedback.</p>	

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Association's (CHEC)	reflect current and ongoing grid modernization.		
2018-OA-016 Rule 68-072 – New Add new requirement for disconnecting means for pools and hot tubs			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Licensed Electrical Contractor (LEC)	<u>Support:</u> Prevent servicing “live” if disconnect location is unknown or in an inaccessible place	Thank you for your feedback.	<i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i> 2018-OA-016.pdf
Consultant	<u>Support:</u> Agree with the rationale provided. Have some concerns with the proposed wording. <u>Suggestion for improvement:</u> Have provided suggestions to improve wording in tract changes in the next column. The wording proposed by the submitter was not clear that the disconnecting means must be horsepower rated when motors are installed and rated for all the connected loads which may include lighting, heaters, etc. The appendix B note needs to be clear that simply installing a plug and cord cap on a hot tub, pool or spa is not permitted in place of a properly selected disconnecting means. <u>Alternative proposal:</u> A <u>single</u> disconnecting means rated to interrupt the connected load shall be	Thank you for your feedback. The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.	

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	<p>provided for each pool pump, spa, and hot tub, and shall be: (a) readily accessible; (b) within sight from its equipment; and(c) located not closer than 1.5m from the inside walls of the pool, spa or hot tub unless behind a permanent barrier that will prevent the occupant from contacting the device; <u>and</u> <u>(d) have suitable horsepower and continuous current ratings to open all circuit conductors under load</u></p> <p>For <u>a cord-connected</u> pump, spa or hot tub, <u>with a factory</u> installed attachment plug and <u>field installed</u> receptacle are permitted to serve as <u>the</u> disconnecting means. For <u>a</u> disconnecting means that <u>incorporate</u> slide the a GFCI, it is the equipment must required to be located not less than 3 m from the inside wall of the pool, spa or hot tub as per Rule 68-068</p>		
<p>2018-OA-017 Rule 75-904 Amend Specification 41 to include height requirements for a pole mounted transfer device</p>			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Supply Authority	<p><u>Suggestion for improvement:</u> Comment 1 – Description of the change should be expanded to capture all other changes to Spec 41. Only heights are mentioned. It should also mention – “clarification for the bonding conductors for the transfer device and the</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this</p>	<p><i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i></p> <p>2018-OA-017.pdf</p>

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	<p>meter base”.</p> <p>Comment 2 – There is arrows pointing to the meter base and to the old item 8 that either need to be removed or further clarified. Especially the one for the meter base that references “to ground”.</p> <p>Comment 3 – For the new Note 7 on Spec 41 – I find it need bit more clarity. Something like “Meter Base bond wire not required at this location, if supply authority installs Meter Base bond wire per their standards and at the weatherhead elevation” – potentially also adding “by using size #10 bonding wire/conductor”.</p> <p>Comment 4 – (related to comment 3) – We use #10 wire for the bond when we bring the bond wire through the conduit and attach it at the weatherhead elevation to the down ground. So new part #10 – should be #4 bare copper at meter base or #10 wire at weatherhead elevation or part 11 should be created.</p> <p>Comment 5 – I noticed Part #4 is pointing to connector but actually specifies the down ground wire. Part# 4 should point to the down ground wire. This connector should be either removed or used to specify/show the bond covered in Comment 4 as an alternate location to bond the meter base.</p>	<p>discussion, selected changes have been made based on the submitted comments.</p>	
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	<p>Comment 6_– All my comments and ESA proposed changes should apply to the Specification 42 and potentially Specification 43, especially the bonding part of the meter base, since they cover the same/similar scope.</p>		
<p>Electricity Distributors Associations (EDA)</p>	<p><u>Support:</u> The EDA supports the language that the “supply authority may have additional clearance requirements” (amendment 24) as there may be unique circumstances requiring the LDC to impose additional clearance requirements. This language provides the LDC the flexibility to do so. The proposed amendments impose appropriate clearances between conductors and other devices hung on poles.</p> <p><u>Suggestion for improvement:</u> The ESA must have adequate information to identify potential safety issues prior to luminaries being installed. The EDA suggests that the ESA require that developers demonstrate that their plan (i.e. parking lot systems) meets or exceeds minimum clearance requirements, for example through a plan approval process.</p> <p><u>Additional comments:</u> The ESA explained that the requirements in amendment 23 are more detailed and specific than those in amendment 24 as the rule for road lighting systems is acceptable. The ESA</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p> <p>Currently, ESA does not have requirements for area lighting submission to Plan review, unless the installation includes any of the requirements in Rule 2-010(1).</p>	

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	noted that the proposed amendment allows the supply authority the flexibility to apply roadway lighting standards.		
Cornerstone Hydro Electric Concepts Association's (CHEC)	<u>Support:</u> CHEC is in support of including height requirements for a pole mounted transfer device in Specification 41. This rule does not largely affect CHEC LDCs as their service territories deal with little rural installations.	Thank you for your feedback.	
2018-OA-018 Appendix A Amend Appendix A as non-mandatory			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Consultant	<u>Oppose:</u> The rationale provided by the submitter is already addressed in the current Note (4) to Appendix A in the 2018 CE Code, which makes the additional wording in this proposal redundant. Furthermore, there is a much greater potential for misinterpretation in making Appendix A informative rather than normative as the revised language proposed suggests it is optional to get products approved to the listed standards, not required. <u>Suggestion for improvement:</u> Reject the proposal.	Thank you for your feedback. Although Appendix A is not linked or referenced by any code Rule in the OESC, and Rule 2-024 deals with product approval requirement, ESA in consultation with Ontario Provincial Code Committee (OPCC) will not pursue the proposed Ontario Amendment as it may create undue confusion to the industry at this point.	Reject the proposal

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Manufacturer	<p><u>Oppose:</u> A <u>normative</u> Appendix A establishes a formal integral link between the Part I and the Part II of the CE Code. An informative Appendix A would technically break this linkage.</p> <p><u>Suggestion for improvement:</u> CSA can make the Appendix A more real-time, to include other SDOs' Part II Standards.</p>		
2018-OA-019 Appendix B Note to Rule 2-024 Amend to recognize other certification bodies			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Licensed Electrical Contractor (LEC)	<p><u>Not sure:</u> Will this not mean more complex "monitoring"?</p> <p><u>Alternative Proposal:</u> Each country should test anything before entry by own single standard</p>	<p>Thank you for your feedback.</p> <p>The proposal is rejected by Ontario Provincial Code Committee (OPCC). Standards Council of Canada (SCC) is facilitating the implementation of the Protocol on the mutual acceptance of the results of conformity assessment in The Comprehensive Economic and Trade Agreement (CETA) on behalf of the Government of Canada. SCC will address the required language that permits European notification bodies in Canada.</p>	<p>Reject the proposal</p> <p>Note: Only editorial changes have been made. Please see revised proposal draft. 2018-OA-019.pdf</p>
2018-OA-020 Rule 78-000, 78-200 to 78-210 and 78-052 Delete current Ontario Amendment to Rules 78-000 and 78-200 to 78-210, and amend Rule 78-052 (CE Code 2018) to clarify GFCI requirements for branch circuits			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Licensed	<u>Oppose:</u>	Thank you for your feedback.	No change in the proposal



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<p>Electrical Contractor (LEC)</p>	<p>Loss of lighting due to ground fault in a receptacle creates a danger of personal injury or worse (drowning)</p> <p><u>Suggestion for improvement:</u> Ground fault protection required for receptacles.</p> <p><u>Alternative proposal:</u> branch circuit outlets ground fault protection required as well as feeder</p>	<p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC).</p> <p>Installation of ground fault circuit interrupters (GFCI) could eliminate drowning because of electric shock. The benefit of GFCI protection overrides the inconvenience of lost lighting. Drowning because of loss of lighting is very unlikely.</p>	<p>2018-OA-020.pdf</p>
<p>Consultant</p>	<p><u>Oppose 78-052(3):</u> Disagree with rationale provided for amended wording. The submitter postulates that “the rule as written is debatable”. We disagree and find the current wording to 78-052(3) to be perfectly clear and the proposed amended wording to duplicate requirements already set out in the Rule and add confusion.</p> <p><u>Suggestion for improvement:</u> Do not amend the wording of 78-052(3) as it is written in the 2018 CE Code.</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC).</p> <p>The proposal intends to clarify the CE Code Rule 78-052(3), and remove any ambiguity.</p>	

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2018-OA-021 Rule 30-1400 and Appendix B Note Clarification that Rules 30-1402 to 1410 apply to LED luminaires supplied by Power over Ethernet			
Submitted by	Stakeholder Comment	ESA response	Proposed change
No comments received			No changes in the proposal 2018-OA-021.pdf
2018-OA-022 Rule 26-656 – New Increased AFCI requirements in dwelling units			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Licensed Electrical Contractor (LEC)	Increase AFCI in dwellings? Most of breakers in a panel are those now. And what a pain, they are	Thank you for your feedback. The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC).	Reject the proposal
Licensed Electrical Contractor (LEC)	<u>Oppose:</u> The existing rules should remain in place, with the following “new” exemptions. Remove the AFCI requirement for garages, and exterior plugs, and over range microwaves. <u>Suggestion for improvement:</u> Onsite tests with Siemens has proven that proper operation of safely functioning equipment cannot be maintained with current AFCI protection in place. <u>Alternative proposal:</u>	Reports have been received from contractors, homeowners, and builders regarding unwanted AFCI breakers’ tripping. There is a current proposal under CE Code, Section 26 to discuss AFCI requirements. As a result, and in consultation with Ontario Provincial Code Committee (OPCC), it has been decided to reject the proposed Ontario Amendment and wait for the resolution on the current proposal under CE Code.	

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	<p>Remove the requirement for AFCI protection in garages, exterior plugs, and over range microwaves to permit properly functioning power tools to operate normally.</p> <p>Received from EFC (March 26, 2018):</p>		
Manufacturer	<p><u>Support:</u> Attached is an articles on the history and the benefits of the AFCI technology (the referenced youtube links are also compiled in a separate file):</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  AFCIs </div> <div style="text-align: center;">  AFCIs - links </div> </div>		
2018-OA-023 Rule 30-1009 – New Clearances of poles supporting luminaires			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Supply authority	<p><u>Suggestion for improvement:</u> Comment 1 – For the new Rule 30-1009 (1) at the end of the new rule instead of “without touching the conductor at rest.” Recommendation is to add following text “including the maximum conductor swing.”</p> <p>Comment 2_– Create new Appendix B note to rule 30-1009(1) - to clarify the maximum conductor swing or maximum conductor swing</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p>	<p><i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i></p> <p style="text-align: center;">2018-OA-023.pdf</p>

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	<p>at the location where pole is installed in relation to the distribution/power line.</p> <p>Comment 3_– For the new Appendix B note to rule 30-1009(2) – covers only max sag above the pole supporting luminaire. Recommendation is to add the “maximum swing” in the text.</p> <p>Comment 4 – Related to Comment 3 – The dimensions specified seems to be too short compare to our standard DL6-104.1 (see attached for reference) where we also specify minimum horizontal and vertical clearances and we also consider the option that you can potentially stand and/or walk on some of the structures.</p> <p>Comment 5 – I find this rule/change needs bit more clarification especially in the Description of Change (similar to what was done in 30-1300) Is this new rule only for separate pole structures near power lines or applies to distribution/power line poles that support luminaires and it is only focused on the clearances? Background and rationale are clearer.</p> <p>Comment 6 - Note or cross-reference should be added to reference new 30-1300 and explain the difference from this rule.</p> <p>Comment 7 - Note or cross-reference should be</p>		
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	<p>added to clarify the difference and reference Rule that covers the requirements and clearances when roadway lighting is installed on distribution/power line pole – if different than this rule.</p> <p>Comment 8 – Potentially expand the scope of this change to include Freestanding Signs, Traffic Lights, Street Lights and similar plant – if not already captured in the OESC – as specified on DL6-104.1.</p>		
Cornerstone Hydro Electric Concepts Association's (CHEC)	<p>CHEC is in support of proposed clearances of poles supporting luminaires. This amendment would limit time and resources spent by LDCs when sending a crew to verify that minimum clearances have been met when a public safety concern letter is issued.</p>	Thank you for your feedback.	
<p>2018-OA-024 Rule 30-1300 Amend requirement for roadway lighting systems near distribution lines</p>			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Supply authority	<p><u>Suggestion for improvement:</u></p> <p>Comment 2 – 30-1300 (5) requires further clarification – do we need to add “only” to this new rule as described in the rationale or this rule covers also installation on the distribution/power line poles? “Poles that are installed to support <u>only</u> roadway lighting...”</p> <p>Comment 3_ - Note or cross-reference should be added to clarify the difference and reference Rule that covers the requirements and</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC). After this discussion, selected changes have been made based on the submitted comments.</p>	<p><i>All changes in this revised draft have been highlighted and underlined (for additions) or strikethrough (for deletion)*</i></p> <p>2018-OA-024.pdf</p>

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	<p>clearances when roadway lighting is installed on distribution/power line pole – if different than this rule.</p> <p>Comment 4 - Note or cross-reference should be added to reference new 30-1009 and explain the difference from this rule.</p>		
Cornerstone Hydro Electric Concepts Association's (CHEC)	<p><u>Support:</u> CHEC is in support of amending requirements for roadway lighting systems near distribution lines. Consistent with Proposal No. 023, it is anticipated that this amendment would also limit time and resources spent by LDCs when sending a crew to verify that minimum clearances have been met when a public safety concern letter is issued.</p>	Thank you for your feedback.	
2018-OA-025 Rule 16-310 and 16-330 (8) – New Amend ampacity rating of Power over Ethernet (PoE) source equipment			
Submitted by	Stakeholder Comment	ESA response	Proposed change
<p>Ontario Electrical Industry Training Trust, the proposal submitter</p>	<p><u>Oppose:</u> Revise the proposal to match the proposed amendment to the Canadian Electrical Code, Part I, Section 16, Subject No. 4270</p> <p>The proposed revision deletes the references to Nominal Current providing clarity to the subrule.</p> <p><u>Suggestion for improvement:</u> DELETE (A) Add additional term</p>	<p>Thank you for your feedback.</p> <p>The suggestion has been considered by the ESA and has been discussed with the Ontario Provincial Code Committee (OPCC).</p> <p>There is a current proposal under CE Code, Section 16 to discuss the proposed changes.</p> <p>As a result, and in consultation with</p>	Reject the proposal

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	<p>16-310 Special terminology (see Appendix B) Nominal Current - The designated current per conductor as specified by equipment design limits.</p> <p>DELETE (B) Add new Appendix B Note Rule 16-310 Nominal Current One example of nominal current is 4-pair Power over Ethernet (PoE) applications based on IEEE 802.3-2015, IEEE Standard for Ethernet, that supplies current over 2 or 4 twisted pairs. The nominal current for 60-watt PoE power-sourcing equipment is 0.3 amperes per conductor, where the current in one conductor can be 0.36 amperes and the current in another conductor can be 0.24 amperes.</p> <p>REVISE FROM: (C) Subrule 16-330(8) as follows: 16-330 Cables and conductor ampacity (see Appendix B)</p> <p>8) Notwithstanding Subrules 2) and 3), where communications equipment rated at 60 W or less is powered by power sourcing equipment rated at a nominal current not</p>	<p>Ontario Provincial Code Committee (OPCC), it has been decided to reject the proposed Ontario Amendment and wait for the resolution on the current proposal under CE Code.</p>	
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	<p>exceeding 0.3 amperes in any load conductor and where this power sourcing equipment is connected to a communications cable having a minimum conductor size of 24 AWG, such communications cable shall not be required to comply with bundling requirements.</p> <p><u>Alternative proposal: REVISE TO:</u> Subrule 16-330(8) as follows: 16-330 Cables and conductor ampacity (see Appendix B)</p> <p>8) Notwithstanding Subrules (2) and (3), where communications equipment rated at 60 W or less is powered by power sourcing equipment controlled to supply not more than 0.3 A to any load conductor, and where this power sourcing equipment is connected to a communications cable having a minimum conductor size of No. 24 AWG, such communications cable shall not be required to comply with bundling requirements.</p>		
NEW proposals			
Submitted by	Stakeholder Comment	ESA response	Proposed change
Consultant	<p>I would like to recommend an amendment to art. 2-306 to be more in line with the CSA-Z462.</p> <p>It should specify, "Electrical equipment, 30V and</p>	<p>Thank you for your feedback.</p> <p>Unfortunately we are unable to consider new code proposals at this</p>	

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	<p>above, such as switchboards etc...."</p> <p>After performing numerous Short Circuit, Coordination and Arc Flash Studies it has become quite relevant of the importance of including the entire electrical distribution system and not limit the study to the 600V system and/or 125KVA transformers and above.</p> <p>The 120/208V equipment can have the potential of high levels of incident energy; by not including them in the study, the worker may be exposed to potential risks.</p> <p>In the CSA-Z462 2018 it requires to perform a Risk Assessment Procedure, this is required on all equipment 30V and above. We should harmonize the Electrical Code to reflect this.</p> <p>There should be no shortcuts when dealing with safety; there should be no doubt left in the field, and cutting corners is endangering lives.</p>	<p>point in the process. Should you wish to submit a code change proposal to the CE Code, please refer to Appendix C of the CE Code for process on submitting a request for amendments.</p>	
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