



**2020 RBO Fees and Fee Guide Update Consultation - Stakeholder Feedback and ESA Response**

No.	Business	Comments	ESA Response
1	LEC	<p>Just wanted to ask about the fees for Solar PV. Originally the fees were set very high due to the complexity and training required for ESA inspectors and engineering. The fees have stayed high even as time has gone on. If inspectors were on site for a very large amount of time doing the inspections I would not bring this up however we've seen many times where our inspector is on site no more than 3-5hrs for the whole project to final inspection.</p> <p>Furthermore, the ESA fees being high has made the ROI financials of Solar PV an additional challenge. The solar industry has worked hard to reduce costs and be competitive. On projects on the low end of the &gt;10kW to 250kW tranche the cost is between 1-3% of turn-key installed costs plus the costs of plan review.</p> <p>We hope ESA can review these fee schedules and provide justification for the fees</p>	<p>Thank you for taking the time to provide your feedback. ESA's wiring fees cover the cost of oversight of the electrical safety system for the province of Ontario. These costs include such items as processing of wiring notifications, enforcement and oversight of the Ontario Electrical Safety Code, investigations of Code violations, enforcement efforts against illegal work, maintaining and up-dating the Code to cover technological or marketplace changes, and public awareness efforts re: safe electrical work, among other related activities.</p> <p>With this in mind, ESA plans to undertake a review of solar fees in future fee consultations.</p>
2	LEC	<p>Hello</p> <p>Under 4.2.1 "renovation of residential units", you have the fee jumping by \$40 each increment of 20 outlets, this is quite a jump, so to go from 10 outlets to 11 a customer has to pay \$40 more. Can this increase happen more gradually say \$20 for each group of 10, that would be far more easy to explain and pass on to the customer. Or past 10 then \$2 each. Think about it if we are charging \$80 each then all of a sudden the 11th costs \$120, then slowly declining with each outlet till it hits the next 20th.</p>	<p>Thank you for taking the time to provide your feedback. Within Section 4.2.1 Renovation of Residential Units, ESA proposed to significantly lower the R026 fee 1-10 outlets from \$79 to \$40. As a result, the fee for 11-30 outlets is reduced from \$124 to \$79. This actually represents a reduction in the current price difference (from \$45 to \$39). The rest of the scale from 30+ outlets remains the same. Changing the manner in which the fee for residential renovations is calculated would not allow ESA to introduce the significantly lower notification fee of \$40 for 1-10 outlets for all contractors, which was well received during ESA's Town Hall presentations across the province.</p>

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3	LEC	<p>1. What impact would you expect these changes to have on you or your organization?            Increase in competitiveness against the "underground economy" as it will make it easier to provide notifications for prospective clients without having to pass on the increased fees to the client.</p> <p>2. Do you have any comments specific to the RBO portion (slides 6-12) of the fee consultation?            It will make it easier for contractors to provide compliance with reduced fees and not having to schedule for an inspection for less complex or simple installations, as these factors contribute to determining costs that are passed on to the client, which in turn may affect their desire to turn to the "underground economy". As well, inspection scheduling needs to be reduced to a maximum 2 hour window in order to stay competitive and closer coordination needs to occur between the contractor and inspector regarding which job the inspector wishes to see and which ones he does not.</p> <p>3. What actions would you or your business need to take if this change(s) were implemented?            Although these fee implementations will make it easier to be in compliance with the requirements for notifications, very little changes would need to take place on our part.</p> <p>4. Do you anticipate any significant negative or positive consequences from this change? If so what?            (please be as specific as possible)            2020 Fee Consultation Feedback Form            Positive changes would include more compliance to the requirements from contractors and an increased competitiveness for legitimate contractors versus the "underground economy" as well as more notifications being taken out on smaller jobs or less complex/simpler installations. Negative consequences would include a surge of new notifications under RBO where contractors believe the inspector won't "Vito" the inspection algorithm and instead, now need to eat the cost of needing to meet the inspector for an inspection on a low risk job.</p> <p>5. Do you have any other comments?            In our opinion RBO is a step in the right direction, however there is more that needs to be done to make the system easier and friendlier to navigate as well as more cost efficient. The issue at hand is the level of oversight that contractors in the electrical industry are subjected to, which in turn create an undue hardship respecting costs not only on the contractors themselves, but also on the clients.</p>	<p>Thank you for taking the time to provide your feedback. Should there be an increase in new notifications under RBO, ESA will have protocols in place to ensure business continuity. For every five low-risk notifications for a particular contractor, one will receive a site visit, and for every two medium-risk notifications for a particular contractor, one will have a site visit. ESA believes that RBO will reduce the burden on electrical contractors, and make it easier to do business with us. ESA also believes it will allow us to shift our resources to work with higher safety value - that is, addressing illegal electrical work in the underground economy. ESA also looks forward to working with electrical contracting businesses like yours, to ensure we make it easier for you to interact with ESA.</p>

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4	LDC Industry Association	<p>Thank you for the opportunity to comment on the Electrical Safety Authority's (ESA) Inspection Fee Guide that is proposed to take effect in 2020. The Electricity Distributors Association (EDA) seeks clarification of the ESA's proposals on the inspections of pole lines, and the inspections of the wiring of electricity storage systems (ESS). The EDA recognizes the benefits of increasing information sharing between the ESA and individual local distribution companies (LDCs) with respect to the deployment of ESSs in the LDC's service area as it will enhance electrical visibility and the provision of distribution service. The EDA notes that the ESA's 2020 Inspection Fee Guide states:  To protect the public, electrical inspections are required by provincial legislation through the Ontario Electrical Safety Code (OESC) for any electrical installation performed by a licensed electrical contractor or other party in Ontario.</p> <p>This article must be read with knowledge of O Reg 22/04 that applies to installations and gear used to provide distribution service and exempts LDCs from complying with the OESC.</p> <p><u>Pole Line Inspections</u></p> <p>As stated above, the EDA recognizes that O Reg 22/04 will continue to apply to LDC owned and operated pole line infrastructure and related gear. The EDA seeks clarification that the provision and fees set out in section 5.4.3 of the 202 Electrical Inspection Fee Guid apply to pole line infrastructure and related gear that is not used to provide electricity distribution services by an Ontario Energy Board licensed LDC.</p> <p><u>Energy Storage Systems</u></p> <p>The ESA's fees for ESS inspections are set out at sections 4.4.5, 5.1.6 and 8. LDCs note that the fees prescribed in 4.4.5 apply to ESSs at residences, and therefore, the fees do not impact LDCs. LDCs would benefit from the ESA sharing information of the ESSs that it inspects at residences. Section 5.1.6 applies to ESSs operating at 1500kV or greater. LDCs understand that O REg 22/04 will apply to ESSs that LDCs use to provide distribution service and that the OESC, and hence the INspection Fee GUide, will apply to ESSs that LDCs use for other purposes (e.g., for continuity of supply at LDC owned premises). LDCs are experienced in how inspections of renewable energy systems under section 8 will impact the distribution system and anticipate that the inspection of ESSs will impact them similarly. This is another instance where LDCs can improve the electrical visibility of the ESSs</p>	<p>Thank you for taking the time to provide your feedback. The provisions and fees set out in Section 5.4.3 of the ESA fee Guide apply to pole line infrastructure and related gear that is not used to provide electrical distribution services by an OEB-licensed LDC. Ontario Regulation 22/04 applies to ESSs that LDCS use to provide distribution service and the OESC and the Fee Guide applies to ESSs that LDCs use for other purposes. ESA has produced a Guideline for Energy Storage and Generation which defines for LDCs when they are providing a "distribution service" and when the equipment is "for other purposes", available here <a href="http://www.esasafe.com/utilities/guidelines/overview">www.esasafe.com/utilities/guidelines/overview</a>. ESA agrees that partnerships with industry can be beneficial to the electrical safety of Ontarians.</p>

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5	LEC	<p>Please advise why mechanical contractors who aren't even LEC's have the cheapest wiring fee at \$35.00. I brought this up at the contractor advisory committee and it seem that I am just wasting my time. LEC pay tons of money to ESA so this is a slap in the face. Mechanical contractor just upwards to \$6000.00 for a funance and a/c installation and they only pay \$35.00 for a permit. Meanwhile we do a panel change for \$1200.00 and we need to pay \$74.00 for the permit.</p>	<p>Thank you for taking the time to provide your feedback. The HVAC fee proposal of \$35 is for any and all Contractors whether they are an LEC or HVAC Installer. All contractors will pay the same fee provided they are performing installations for qualified equipment. The list of equipment that is covered under the \$35 fee can be found under the proposed Section 4.4.1 Mechanical HVAC and related Equipment.</p>
6	LEC	<p>1. What impact would you expect these changes to have on you or your organization?  Non Contractor designation should not exist as an option, how does a Non Contractor qualify?? This designation carries a huge burden on health and safety reduction within ESA and its abilities to reduce casualties within its mandate.</p> <p>2. Do you have any comments specific to the RBO portion (slides 6-12) of the fee consultation?  If ESA is a non for profit organization then are fees not to be aligned with bottom line financial statements as opposed to asking the question are these fees inline.  What actions would you or your business need to take if this change(s) were implemented?  Peace of mind.</p> <p>4. Do you anticipate any significant negative or positive consequences from this change? If so what?  (please be as specific as possible)  Increase ESA abilities to reduce casualties within its members.</p>	<p>Thank you for taking the time to provide your feedback. By law, Ontarians are able to perform electrical work in their own home; however, they are required to take out a notification with ESA and are subject to site visits by ESA Inspectors. ESA has a number of activities that help fulfill its safety mandate. Oversight of the electrical safety system includes enforcement and oversight of the Ontario Electrical Safety Code, investigations of Code violations, enforcement efforts against illegal work, maintaining and up-dating the Code to cover technological or marketplace changes, and public awareness efforts re: safe electrical work, among other related activities.</p>