

Section 7 – 3.3.2 - Additional Guideline Information

Distribution Company Awareness

A Local Distribution Company (LDC) has requested additional information regarding Section 3.3.2 of the Technical Guideline for Section 7. This bulletin provides the requested additional information.

Technical Guideline for Equipment, Design and Construction:

3.3.2 In many instances, installation work is currently not supported by a formal work instruction. Can this practice continue?

ESA Direction

Yes, this practice can continue as long as the installation work is to Standard Designs or is exempt from the requirements of section 7 of the Regulation.

Examples of installations that would not require a formal work instruction could be:

- a line crew installing a new pole or series of poles with poles constructed according to Standard Designs; or
- a crew installing a new transformer, a cable, a splice or a riser in accordance with Standard Designs; or
- a crew replacing a damaged pole under emergency conditions; or
- a crew replacing a pole and the associated framing under a pole change out program.

Additional Information

Formal referencing of approved standard design drawings is not required to satisfy Section 7 of Regulation 22/04 where installation work is not supported by a formal work instruction and this practice can continue, as outlined in Section 3.3.2 of the Technical Guidelines. In these cases the construction shall use Standard Designs assembled by a person competent in the proper application of the Standard Designs; while written reference to the Standard Designs is not required, see the “ESA RECOMMENDS” section below. ESA reinforces that Section 8 shall include a Record of Inspection and Certificate in order to verify that the construction of the system is in accordance with approved standard design drawings, for the occasions where Section 3.3.2 is used.

ESA wants all LDCs to be aware that this guideline clause shall not be used as a reason to eliminate the need for Plans, Work Instructions, or Standard Designs. This clause would typically be used when a work order was issued and adjacent distribution system work is noted as required by crews when attending the job site or the four bulletin point examples identified in 3.3.2 of the Technical Guideline (see above).

ESA Recommends

- The limited use of construction not supported by a formal work instruction; and
- while written references to the Standard Designs used in the field is not required, it is recommended as this will make the audit process more efficient; and
- Auditors are directed to record the practice of not using formal work instructions under Audit Observations in order to ensure visibility to the Regulator. The Regulator will observe the scope and breadth of the application to ensure appropriate use of this clause; and
- ensure staff understand this is not a “like-for-like replacement”; and
- ensure Construction Verification Programs (CVPs) address work without a formal work instruction.