

Information Update - Third Party Attachments

Third party attachments such as telecommunication equipment, street lighting, signs etc. are not part of the distribution system. However, to the extent that these attachments may affect the safety of the distribution system then the third party attachments are subject to Regulation 22/04.

There have been questions raised regarding compliance with Regulation 22/04. As a result, ESA has initiated a Working Group sponsored by the Utility Advisory Council to develop a guideline. The goal of the guideline is to provide direction to the LDCs and the third party attachment owners on the implementation and application of the Regulation.

The interested parties have met twice. The initial meeting took place on April 26, 2005 followed by a Working Group meeting on June 7, 2005. The Working Group was well represented by various LDCs and Telecom companies.

Mr. Casey Malone from Hydro Ottawa was elected Chairperson. Members of the Working Group are:

Casey Malone
Hydro Ottawa

John Armstrong
Rogers

Lloyd Frank
Kitchener-Wilmot Hydro

Wayne Corrigan
Bell

Gerry Murphy
Toronto Hydro

Kris Eby
Fibretech

Peter German
Burlington Hydro

Ernie Vidovic
Enersource Telecom

Alex Korakianitis
Waterloo North Hydro

Claude Pothier
Telecom Ottawa

Steven Vance
Hydro One Networks

Ralph von Eppinoven
Cygnal Technologies

Jac Vanderbaan
Festival Hydro

Electrical Distribution Safety

Jenifer Robertson
ESA

Martin Post
ESA

Kris Paszkowiak
ESA

Bill Murphy
ESA

The Working Group goal is to develop a guideline on third party attachments through a consensus based process. The Utility Advisory Council will approve the final version of the Guideline.

Two main acceptable approaches are being developed to meet the requirements of Section 7 (Design) and Section 8 (Construction) of the Regulation.

The first approach is based on an LDC developed design approved by a P. Eng, which allows for various third party attachments of predetermined construction types. The third party attachment owner needs to supply required information to the LDC to ascertain that the design is in accordance with the standards by a competent person and in accordance with the safety criteria specified in Section 4 of the Regulation. After review and approval by the LDC the permission is granted to the contractor to proceed with construction.

Following construction, a qualified person identified in the LDC's Construction Verification Program produces a record of inspection. The third party attachment owner may employ the qualified person. The LDC is responsible for keeping the record of inspection for audit purposes. The as-built drawings may be used as the record of inspection.

The second approach is based on the third party attachment owner developed design approved by a P. Eng. The LDC grants permission to proceed after review of the design. The third party attachment owner produces a record of inspection and a certificate to indicate that safety objectives of Section 4 of the Regulation have been met.

Where a safety issue has been identified during the review and approval of standard designs for new telecom circuits being added to an existing installation, the LDC needs to ensure as a minimum that no "undue hazards" are being created by the proposed addition by the third party.

The LDC is to ensure that third party attachments to its distribution system meet the safety requirements of the Regulation.

The next Working Group meeting is scheduled for August 10, 2005.