



Electrical Safety Authority

For Your Safety

20101027

Kirsten Walli
Board Secretary
Ontario Energy Board
PO Box 2319, 2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

RE: Initiative to Develop Electricity Distribution System Reliability Standards
Board File No: **EB-2010-0249**

Thank you for inviting the Electrical Safety Authority to the Reliability Standards Stakeholder Conference on October 15, 2010 and raising the question regarding safety and its relationship to reliability standards.

The Electrical Safety Authority (ESA) welcomes the opportunity to provide comments to the Ontario Energy Board regarding the Initiative to Develop Electricity Distribution System Reliability Standards. The ESA supports the initiative undertaken by the Board and commends the Board staff for the thorough customer survey and jurisdictional research documents.

Maintaining or improving reliability performance particularly in established communities is directly associated with maintaining safety standards of existing overhead distribution systems. The most prevalent safety concerns that correlate to good reliability performance are sufficient levels of maintenance namely vegetation management, pole strength assessment and other preventative maintenance practices.

Vegetation management including tree trimming is conducted to maintain a safe clearance between trees and high voltage wires. Arcing between high voltage wires and trees is unsafe particularly in urban, residential or recreational settings. Pole strength assessment is important to ensure there is sufficient strength to maintain safe clearances and to prevent high voltage wires from falling during normal weather conditions. Important attention to preventative maintenance practices lessens the need to expose electric distributor workers to emergency and potentially unsafe situations.

The ESA looks forward to further participation in the Board's consultation process.

A handwritten signature in blue ink that reads "Jenifer Robertson". The signature is fluid and cursive, with the first name being the most prominent.

Jenifer Robertson, P. Eng
Director Safety and Business Strategy
Electrical Safety Authority
Phone – 905-712-5652 Fax – 905-507-4572
e-mail – Jenifer.robertson@electricalsafety.on.ca