

## Existing LDC Attachments on 3rd Party Poles

### Distribution Company Awareness

ESA has received a request for direction with respect to meeting Safety Standards, when LDC attachments exist on 3rd Party's poles. This bulletin focuses on maintaining equipment to reduce the probability of exposure to electrical safety hazards, and provides direction to satisfy the Regulation 22/04 requirements. ESA's mission is to improve electrical safety for the well-being of the people of Ontario and will assist parties seeking to ensure Regulation 22/04 compliance.

### Regulation 22/04 Excerpt

Section 4(2) of Regulation 22/04 states:

*All distribution systems and the electrical installations and electrical equipment forming part of such systems shall be designed, constructed, installed, protected, used, maintained, repaired, extended, connected and disconnected so as to reduce the probability of exposure to electrical safety hazards. O. Reg. 22/04, s. 4 (2).*

### ESA Direction

Although the LDC may not own the structure (pole) to which its equipment is attached, there remains a requirement to ensure all distribution systems and the electrical installations and electrical equipment meet the Safety standards as detailed in Section 4(2) of Regulation 22/04.

In the scenario where LDC equipment is attached to a 3rd Party's pole, ESA expects that the LDCs follow their processes for maintaining and inspecting their equipment. ESA recognizes that LDCs may satisfy their maintenance requirements by meeting or exceeding the requirements defined in Appendix C of the Ontario Energy Board's Distribution System Code, entitled "Minimum Inspection Requirements".

In cases where the 3rd Party's pole, to which the LDC's equipment is attached, is altered or damaged, information may be provided to the LDC from the pole owner to confirm the safety standards are continuing to be met. If no information is provided to the LDC, the expectation is that the LDC's established processes for maintaining and inspecting the distribution equipment will identify **obvious structural problems and hazards**. It is expected that appropriate follow up corrective actions will be taken regarding problems identified during the patrol inspection. By performing and recording regular maintenance and inspections, LDCs will satisfy the requirements of the Regulation.

## ESA Recommends

ESA recommends that 3rd Parties and LDCs review current agreements and ensure processes are defined which address safety when alterations are made to 3rd Party structures (poles), with existing distribution systems.