



# Auditor Debrief

October 30, 2025



# Disclaimer

The information in this presentation was prepared as discussion points for the auditor meeting. In some cases more information may be required to understand the issue fully, as discussed during the meeting. For more information please contact

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# AGENDA

1. Review of 2024 Audit Results & Brainstorming
2. ESA Direction – Notable
3. Connection Authorizations
4. ESA's Guideline Updates
5. Broadband Infrastructure Update
6. 2025 Questions & Issues / Auditor Feedback
7. CSA Standard No. 1 & 7 – Changes (1 year)
8. Focus of 2025 Audits
9. Audit Date Rescheduling Feedback
10. Other Information

# Summary of Audit Findings for 2024

## Total of 55 LDC Audit reports (all submitted)

- 18 completed (October 17, 2025).

53 LDCs - Full Compliance ('23- 1 LDC on fully compliant).

## In the 2024 Audits

- 0 LDC - Non-Compliance findings
- 2 LDC - Needs Improvement findings

# Section 4 - 8 Audit Findings

## Sections 4-8

Nothing appears to be common.

- Staying with linear-analysis for Overhead Systems
- Connection Authorization added to scope of 22/04

Accurate?



# NEW ESA BULLETINS

Information and Direction

## Notable ESA Direction – Since last year

1. DB-01-25 – Maintenance Inspections (**OEB – DSC – Appendix C or C22.3 No.11 are acceptable**)
2. DB-02-25 – Pole Steps (**Recommends to be part of maintenance inspections – 2.5m vs 3.0m**)
3. Coming Soon – Direction on Distributor-owned equipment interactions with Customer-owned equipment.

## Notable ESA Direction – Since last year

4. DFN-01-25 – Excavating with Vacuum Technology  
**(IHSA – Safe Practice Guide)**

# Connection Authorizations

# Connection Authorizations

A Connection Authorization is required when the installation has been disconnected or cut off from any service or source of supply.

This includes unplanned work such as the customer or their Licensed Electrical Contractor (LEC) altering or replacing customer-owned electrical equipment or downed lines.

ONLY ESA can authorize a reconnection of service, including after hours and there are exemptions to the rule.

**Regulation 22/04 now issues “Compliance Reviews” of N/I or N/C.**

# Connection Authorizations

Meter-mounted transfer devices installed by LEC do not require a “Notification” or “Connection Authorization” (CA).

- A “Notification” is required to hardwire a generator to a transfer switch
- A “CA” is required if Distributor requires it
- Devices shall not be installed where a neutral is not present in the meter-mounting device such as a “Tee” (T) Service.



# Connection Authorizations

## Plug-in Meter Base Transfer Switches



**Step 2a**  
Hi-Lug Installation



**Step 2b**  
Split-nut Installation



**Parallel Tap Connector**

# Section 10 (1) (2) & 11 Guidelines

# Guidelines

Revisions to the Guidelines will now include a “Significant Revisions” Document, which is posted with the Guideline on ESA’s website.

## Next Guidelines for Revision:

- **Distributed Energy Resources**
- **Equipment Approval**

# Section 10 – Proximity Guideline

## Published (or will be soon)

### Highlights

1. “Permanent Structures” & “Non-permanent Structures” defined.
  - Regulation 22/04 addresses “permanent structures”
  - Electricity Act may address “non-permanent structures”
2. Guideline clarifies this term to include the CSA terms (clearance, separation, distance and spacing).
3. How to involve ESA with Proximity issues

# Section 11 – Disconnection of Unused Lines

**Published October 2025**

## **Highlights**

1. Distributor-owned equipment that the Distributor does not locate (e.g. within the footprint of the building), the equipment must be included in the records.
2. Removed reference to the ORCGA Best Practice documentation, as it references CSA S250.
3. Clarifies that a Professional Engineer includes a holder of a licence, a limited licence or a temporary licence holder.



Building Broadband Faster Act (BBFA)

or

Accelerated Broadband Program (ABP)



# BUILDING BROADBAND FASTER ACT (BBFA)

- ESA is noticing a significant increase in work around Communication Attachments. Mostly Hydro One Networks Inc.
- Regulation 22/04 requirements are unchanged, there is not special direction for this program



**2025**

**Questions & Issues**

**Auditor Feedback**



# Auditor Feedback

## Audits: Remote vs Hybrid vs In-Person

- Should Hybrid & In-Person be the default?
- Exemptions for illness or severe weather?
- Best Practices
  - Stores and outdoor equipment storage walkthroughs
  - Process Audits

# Auditor Feedback

## Auditor Conflicts of Interest

- Auditors are reminded that if there are questions regarding conflicts of interest, Auditors are encouraged to reach out to ESA for information
- Auditors perceived to violate conflicts of interest will be removed from the Approved Auditor list.

# Auditor Feedback

## Audit Preparation of Distributors

- ESA received feedback from Auditors that Distributors should be reminded/encouraged by ESA to be better prepared for Audits.

Global Issue - ESA can address UAC, create Bulletins

Localized Issue – ESA can contact Distributor contact

- Auditors may choose to highlight in Audit reports and ESA can highlight in Assessments or Discussions.

## CVPs and Non-Section 8 Information

- ESA's practice is to highlight non-section 8 content. It is requested to be removed, if the Distributor desires the content to exist in the CVP. ESA notes that only Section 8 content is being approved.

# Auditor Feedback

## CVPs and Revision Submissions to ESA

- ESA has a “CVP Received” notification process on the “To-Do” list
- ESA always has informed Distributors of when CVPs are “approved” with information regarding previously approved CVPs

# Auditor Feedback

## Partial Inspections – Issues?

- How much of an issue is this?
- Note ESA has a CVP template that is available to Distributors in the event they struggle with the requirements.
- Next Slide – Example of ROI & Certificate

## Appendix C-1 - Record of Inspection and Certificate

### Record of Inspection and Certificate

Project Name or Description:	Work Order Number:
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Item:	Complies:			Comments:
	Yes	No	N/A	
Approved Plan has been followed				
Standard Designs have been applied correctly				
Approved Equipment has been used				
No Undue Hazards exist				
Non-conformance referred to Superintendent				
Legacy Construction has been used				
I have received training on CONSTRUCTION VERIFICATION Program				

**Inspector's Comments:**

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Inspector's Name (print) \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

#### Certificate

This is to certify that the construction recorded on these documents for Company is consistent with the approved Plan, Standard Designs, Work Instructions and that approved equipment has been used.

Check only one:  Partial Certificate  Final Certificate  Statement of No Undue Hazard

\_\_\_\_\_  
Name (Print) \_\_\_\_\_ Date \_\_\_\_\_

\_\_\_\_\_  
Signature \_\_\_\_\_ Position \_\_\_\_\_



# Auditor Feedback

## Statement of No Undue Hazard Issues?

- Created for “minor work” (e.g. like for like replacement) and emergency work
- When work is reasonably done without the documentation representing plans, a standard design or work instruction.
- Is this an issue all Auditors are seeing?

# Auditor Feedback

## Maintenance

- Do Auditors need any documentation from ESA?  
OEB – DSC – Appendix C – Summary  
C22.3 No.11 - Summary

# Auditor Question(s) / Request(s)

## Guideline Review Update

# Proposed schedule – Order in which to address guidelines **(Note 1)**

- 1) Year 1 - Guideline for Excavation in the Vicinity of Utility Lines (Section 10)
- 2) Year 1 - Guideline for Third Party Attachments (Section 7 & 8)
- 3) Year 2 - Technical Guideline (Section 7)
- 4) Year 2 - Technical Guideline (Section 8)
- 5) Year 3 - Technical Guideline (Section 6)
- 6) Year 3 – Distributed Energy Resources

**Note: Order may be changed as needed to address new requirements, stakeholder feedback, etc (e.g. Regulation amendments).**

# Proposed schedule – Order in which to address guidelines

- 6) Year 4 - Guideline for Change of Ownership (Section 3)
- 7) Year 4 - Guideline for Proximity to Distribution Lines (Section 10)
- 8) Year 4 - Guideline for Disconnecting Unused Lines (Section 11)
  
- 9) Year 5 - Guideline for Reporting of Serious Electrical Incidents (Section 12)
- 10) Year 5 - Guideline for Audit (Section 13)
- 11) Year 5 - Guideline for Declaration of Compliance (Section 14)

C22.3 No.1 & 7

Highlights of 2025 Editions

# Overhead Systems

## C22.3 No. 1

# Overhead System

## $\Delta$ GMT, Subsection 4.1 and Annex J

Overhead systems shall be designed, constructed, and make allowance for future climate projections to provide for the intended reliability, resiliency, and safety

**For assets with a projected service life up to 60 years, projected future values corresponding to +2.0°C GW, are indicated. For assets with a longer service or design life, future values corresponding to +2.5°C GW are recommended.**

Distributors will have use new tables and a min-max approach, where they will choose worst case conditions between current and future climate. Example, wind and snow loading.

# Overhead System

## Return Period Data:

- Often misunderstood. Think of it as the percentage chance per year of an event occurring. Inverse of the time in percentage terms
- Examples:
  - 50 year event = 2% chance in a year
  - 100 year event = 1% chance in a year

Table 1 – Likelihood of Flooding Occurrence

Return Period	Percent Chance in 15 Years	Percent Chance in 30 Years	Percent Chance in 50 Years
5 Year	96.5%	99.9%	100%
10 Year	79.4%	95.8%	99.5%
20 Year	53.7%	78.5%	92.3%
50 Year	26.1%	45.5%	63.6%
100 Year	14.0%	26.0%	39.5%
200 Year	7.2%	14.0%	22.2%
500 Year	3.0%	5.8%	9.5%

# Overhead and Underground System

## Maintenance

Unless stated otherwise, all requirements in this Standard are to be maintained for the life of the installation according to **CSA C22.3**

**No. 11**

# ADDITIONAL MATERIAL

# Focus of 2025 Audits

ESA is looking for the Auditors to focus on the following items in the next Audit Year.

- Partial Inspections
- Statements of No Undue Hazard
- Maintenance
- Who is moving to the Part III – 2025 standards

# Other Issues

1. Configurations of Concern – On-going
2. Broadband - On-going
3. Guidelines (Equipment & DER) - Working Group sit in 2025
4. CSA (O/H & U/G) standards - On-track (2027 amendment possible for Overhead)
5. Load Serving Entities / DSOs - On-going (No new news)



# Questions

Any Questions?