



ONTARIO
SOCIETY
OF PROFESSIONAL
ENGINEERS

Sent via email

March 2, 2016

The Standing Committee on General Government

Re: Bill 161, Elimination of Ground Current Pollution Act, 2016

On behalf of the Ontario Society of Professional Engineers (OSPE), we are pleased to submit this letter to help the Standing Committee on General Government prepare Bill 161 before it becomes legislation.

Our first observation is that mechanisms do exist to address the low voltage "tickle" currents and other electrical ground current faults that occur across the distribution network. Appreciating that certain infrastructural projects in Ontario, as well as infrastructure aging, may be considered as contributors to the increased incidence of such events, the call for legislative protections is understandable. However, as a first step, OSPE would advise the Government of Ontario to follow the guidance of the Canadian Standards Association as well as local electrical utilities involved in power distribution and generation to address such situations. This type of event is part of current field assessment and remediation activities; if these activities are not meeting public needs, then this might be an area to address directly.

We also noted that the preamble to Bill 161 does not correctly express the dynamics of electrical power distribution, generation and the fault conditions that do occur in the field. OSPE strongly encourages MPP Rick Nicholls (Chatham-Kent-Essex), or any other Member of Provincial Parliament, to engage the services and expertise of Professional Engineers in the field, such as from the Independent Electricity System Operator (IESO), a utility company, or the Canadian Standards Association, to provide expert input to Bill 161. It is important that the Bill be accurate and correct in its technical descriptions if it is to carry any weight in future deliberations.

The approach of engaging with Professional Engineers in the topic area will have the additional benefit for the government, namely obtaining valuable feedback from key stakeholders. While a matter of government policy, such consultation would serve to elevate the rights of its citizens by allowing them to participate in the development of sound legislation.

As you know, OSPE recently had the privilege of providing this Committee with feedback on *Bill 135, Energy Statute Law Amendment Act, 2016*. OSPE also had the

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opportunity to submit new sections to *Bill 6, The Infrastructure for Jobs and Prosperity Act, 2015*, which were included in the final piece of legislation.

OSPE's Energy Task Force is comprised of Professional Engineers with expertise in this area. This committee would be pleased to look at the revised Bill 161 and provide input from an engineering perspective. If you would like further recommendations, please contact Lee Weissling, OSPE's Manager of Policy and Government Relations, at lweissling@ospe.on.ca or (416) 223 – 9961 ext. 230.

Sincerely,



Karen Chan, P. Eng.
President and Chair
Ontario Society of Professional Engineers



Sandro Perruzza
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