

Hello Tara,

Please find my input towards the first step in the Consultation Process for the new Electrical Regulatory System Contract.

### 3.2.3. Number of Bodies to be designated.

At the request of the Minister for Public Enterprise, Mary Harney in the year 2000 the CER recommended a Regulatory System for Electrical Contractors that;

- (a) built on the strengths of the Voluntary System.
- (b) addressed the weaknesses that existed.
- (c) provided the CER with Statutory authority to act as the Supervisory Regulator with the power to issue licences to self regulatory bodies in the New Electricity Bill.

It was never envisioned during the period from 2000 to 2014 that the CER would use the 2 self regulatory bodies to register applicants, deal with customer complaints, discipline individuals when action had to be taken, carry out annual inspections, undertake training courses, have all Registered Contractors to sign up to the new CER Criteria, etc, etc, and then when all this tedious work is done the CER may take over the complete regulation of all Registered Electrical Contractors, inclusive of all Certification for financial gain.

The document states, "having one Electrical SSB in place would provide economies of scale through the costs of one body such as rent, directors costs, etc. being shared over a greater number of REC's. This could result in registration fees and certificate prices being lower than they would otherwise have been. this should then lead to lower prices for final customers." The Registered Gas Installers of Ireland (RGII) has shown a very positive approach to all the above words, but the financial pot continues to grow with none of the "Safety Net" passed on to the customer.

Both ECSSAI and RECI are now in their fifth year apprenticeship under the new CER Criteria, having two plus years left of their contract. One would have to say that it is premature to cast judgement while the seven year term is in progress, so the fairest result would be to allocate both Bodies with the new seven year contract before making drastic decisions.

### 3.3.3. Financial Structure of a Designated Body.

The document states, "in relation to reserves relating to core activities, the CER is minded to transfer this money, on receipt to the Body (ies) designated from January 2016". - - - - - This would be in order if both Bodies were re-appointed.

### 3.4.3. Core & Permitted Activities.

The CER should get involved in Emergency Lighting as it is part of the intergraded wiring system within a building. It does not make sense that a SSB inspector inspects part of the wiring installation and a NSAI inspector inspects another part of the same wiring installation. Lightning Protection and ground earthing must also come under the remit of the CER. The document states, "what criteria should be used if prohibiting the Electrical SSB (s) in place from 2016 onwards from participating in any permitted activities?".

Continue as before for the period of the new contract with clarity as to where the Permitted funds will end up.

One could ask the question what would happen with the Permitted funds if both Bodies were not re-appointed? Take RECI for example, permitted funds are acquired from the rental of office space to RGII, emergency lighting courses, Verification & Certification courses, etc, etc.

When RECI was set up in 1992 as a self regulatory body under the Chairmanship of the late Keane Harley the founder members were ESB, ETCI, AECI and ECA. Even though 75% of the members were Independent Electrical Contractors they were not considered to be "Founder Members". The four main parties put forward 5000 Punts each as a start up arrangement, but when the system was up and running the two electrical associations demanded their money back, which they received. To this day the 1800 Independent Electrical Contractors are exempt as founder members even though they provide the bulk of the finance which goes towards the day to day running of the business.

One could say that this is not the problem of, or for the CER, but one must also know who are RECI. At an AGM meeting for example, is it a Regulated AGM or a Permitted AGM, as the same Board of Directors carry out both duties.

### 3.5.2. Term of Designation.

It should remain at seven years mirroring the first term. If the term was pulled back to 5 years the CER would have a further work load as it would have to start looking for new tenders every 3.5 years.

### 3.6.2. Staggered end dates for Electrical & Gas SSB's.

This is a decision that the CER should make due to its own capability and work force.

### 3.7. Electrical SSB Compliance.

The seven year apprenticeship is still in progress. Allow both Regulatory Bodies another 7 years to prove themselves.

### 3.8.2. Qualification of Inspectors.

Minimum time served electricians with 5 years post experience, plus relevant courses.  
A person that was anti CER in 2008/2009 and who canvassed many contractors to vote against the new CER Criteria motion at the AGM, which brought it down is now a contracts inspector, so any change is possible.

### 4.2.3. Criteria Document.

The ETCI were and are the pioneering working groups.  
ESB Networks have distanced themselves from Electrical Contractors since the introduction of self certification and final connection.

### 5.4.2. Assessments.

This section should cover ; set exams, industrial electrical testing & certification, explosive atmospheres electrical testing & certification, earth electrode testing, etc.  
Electrical Engineers should also come under the remit of the CER as it is known that certificates with false readings were accepted and when challenged about this serious offence the reply was "my ass is covered as I have a certificate".

### 6.2. Individual Registration of REC's.

All electricians and apprentices should be registered and held responsible for their own workmanship.

### 6.3.1. Insurance.

Insurance is vital but run on Insurance should not be considered.

### 6.4.2. Categories.

Electrical Installations and Maintenance should be spread across many categories, ie, Domestic, Agricultural, Commercial, Industrial, Provisional, Maintenance, Atex for explosive atmospheres, Specialists (for example Lightning Protection).

#### 7.2.3. Controlled Electrical Works.

The CER should engage in further consultation in the near future.

#### 7.3.3. Restricted Electrical Works.

Report already submitted.

The CER should engage in consultation before a fatality occurs.

#### 7.4.1. Minor Electrical Works.

Public safety versus disproportionate cost on the customer ?

Replacement or relocation of a light fitting where the existing circuit is retained. One would worry about a looped neutral to the light in the next room which may be lighting.

Provision of an additional socket to an existing radial circuit. How does the handy person know a radial circuit from a ring circuit ?

#### 8.2.2. Detection of Unregistered Individuals.

Report to your SSB.

#### 9.1.3. ETCI

If the CER decides to issue all Electrical Certificates the Electro Technical Council of Ireland will be totally obliterated. The ETCI were and are the back bone of the Irish Wiring Rules.

#### 9.2.2. Electronic Certification Scheme.

All certificates should be issued electronically where possible, but one must understand that not all electricians are computer literate.

#### 9.3. Non Compliance Relating to Certification.

- (a) the electronic system will detect the Post Test.
- (b) Inspectors to inspect the paper certificate book.

#### 10.2. Branding.

The Safe Electric logo could be placed on all Certificates and Periodic Inspection reports adjacent to the ETCI logo.

#### 10.3.2. Mandatory display of Logo.

If Registered Electrical contractors are proud of their trade and are seeking new business they will display the Safe Electric logo with pride.  
One could over-kill with the word Mandatory.

#### 10.3.3. Annual Logo.

The Electrical SSB's should be requested to issue revised stickers each year to the Registered Electrical Contractor, including a reference to the year.

#### 10.3.4. Unique Identifier.

The Registered Electrical Contractors ID number could be included as part of the Safe Electric Logo.

#### 10.4.2. Electrical SSB Logo restrictions.

With 2 plus years to go in the present SSB's contract, one would have to say that this is a premature question.

#### 10.5. Reports on Complaints.

If a third party other than the owner/occupier has made a complaint about a suspect electrical installation, it is doubtful if that person may want to attend the Disciplinary meeting, but a report should be forwarded if requested.

#### 11.2. Joint Electrical & Gas SSB.

As the document states it has its advantages and disadvantages.

John Desmond

Former RECI Chairman.