

**Sent:** Wednesday, October 14, 2020 2:43 PM  
**To:** Commission, Secretary  
**Subject:** Request to Intervene

**Date Submitted:** October 14, 2020

**Proceeding name:** BCUC Inquiry into the Regulation of Safety

## **Participant contact information**

**Organization or individual name:** Technical Safety BC

**City:** Vancouver

**Province:** British Columbia

**Email:**

**Phone number:**

## **For organizations only - representative contact information**

**Name:** Clint Abbott

**Organization (if different from above):**

**City:** Vancouver

**Province:** British Columbia

**Email:** Clint.Abbott@technicalsaftybc.ca

**Phone number:** 778 875 7632

**Also representing (if applicable):**

## **Additional information**

**Please state your reasons for intervening in this proceeding:**

Technical Safety BC is the provincial regulator responsible for overseeing the safety of technical systems and equipment under the Safety Standards Act for electrical and gas equipment in BC (among other technologies including boilers, pressure vessels, refrigeration and elevating devices). Our mission includes promoting “safe technical systems everywhere” - our reason for intervening is to influence the future of safety regulation in BC that results in clear and consistent application of effective and innovative safety oversight throughout the Province.

**Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:**

The safety of the technical systems and equipment that is owned, controlled or deployed by utilities falls within the Safety Standards Act subject to some exemptions in that Act and the applicability of the Hydro and Power Authority Act. As such, decisions relating to BCUC’s role in safety may have a direct impact on the application of the Safety Standards Act and Technical Safety BC’s role in safety oversight. Furthermore, decisions or recommendations made by the Commission may affect the overall design and balance of safety oversight by various regulators and other involved parties in BC, which can profoundly impact safety outcomes. Technical Safety BC has extensive policy and technical experience and expertise in the design and application of leading safety oversight programs for multiple technologies, including low and high voltage electrical systems and low and high pressure gas systems. The organization employs a risk based approach to oversight, which includes the application of risk algorithms, machine learning and artificial intelligence to guide resource allocation.

**Please list the key issues you intend to address in the proceeding:**

Technical Safety BC intends to address the key topics outlined as part of the Inquiry, including: - What is the mandate of BCUC with respect to the safety of technical systems and equipment? - What current legislative gaps exist as it relates to safety oversight of technical systems and equipment associated with public utilities, and what role could BCUC or other regulators such as Technical Safety BC play in resolving these discrepancies? - What areas of legislative overlap exist as it relates to safety oversight of technical systems and equipment associated with public utilities, and what role could BCUC or other regulators such as Technical Safety BC play in clarifying jurisdictional confusion?

## **For administrative purposes only**

**Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?:** Yes

**Do you intend to request PACA funding? This does not impact your ability to participate:** No

**Have you or your organization web-registered as an intervener or interested party in the past 12 months?:** No

**If yes, please provide your username:**