

To whom it may concern,

On October 24, 2022, Manitoba Hydro released an Informative Note to clarify the electrical installations in or on buildings structures and premises.

The text reads as follows:

“The scope of the Manitoba Electrical Code indicates that this applies to all electrical work and electrical equipment operating or intended to operate at all voltages in electrical installations for buildings, structures, and premises.

This means that we can only apply the Manitoba Electrical Code to each premise, structure or building individually. Each premise is one property.

Therefore you cannot cross property lines or public right of ways with your electrical installation.

Note 1: An agricultural customer that owns more than one adjacent property, and the property does not cross any public right of ways, will be treated as one property.

Note 2: For irrigation Manitoba Hydro will follow note 1. The contractor must supply Manitoba Hydro’s Energy Sales Advisor or the estimator/planner with documentation approving the installation from the applicable Federal and Provincial jurisdiction.”

I believe that this note should and must be revoked for the following reasons:

1. There is no legal or safety grounds for this rule. There is no reference to, or interpretation of any CEC code rule.
2. There are thousands of existing installations crossing property lines and rights-of-way. Hydro has presented no justification for why this is suddenly no longer OK.
3. This is beyond the scope of MB Hydro’s authority. If the Municipality permits such installation, MB Hydro has no grounds whatsoever to object. Municipal Easements are the legal means to allow for such installations. Hydro is effectively claiming this authority for itself.
4. As of last year at least, these installations were permitted for oilfield work. The agricultural economy is no less important than resource extraction.
5. In agriculture, it is often necessary to run wires across adjacent fields with no developed road, or across roads with municipal approval. It is impractical and cost prohibitive to install a new service every time this must happen.
6. Control systems for irrigation often depend on an entire network being interconnected. If unable to power installations from a single source due to crossing municipal rights-of-way, it adds huge complexity and unreliability to said control systems.

7. Many Manitoba Hutterite colonies straddle Municipal Roads or rights-of-way. It is impractical, unreasonable, and cost prohibitive to expect every colony in this situation to install a separate electrical service for each side of the property.
8. This rule encourages or even forces contractors and colonies to perform uninspected and unpermitted electrical work. If a contractor or colony knows that their project will not be approved because of this rule, but it is really the only reasonable option, they will perform the work without taking out a permit or getting it inspected.
9. New electrical services cost a lot of money and can take a long time to install. It makes no sense to build a new service when a perfectly suitable one exists across a public right-of-way, in a municipality that has no objection to such a crossing.
10. Using an existing service is much more efficient than installing a new one. MB Hydro claims to be "green." By enforcing this rule, tons of greenhouse gasses are produced to:
 - a. The use of diesel generators to power equipment because it is not feasible to install an additional service.
 - b. Manufacture unnecessary electrical equipment
 - c. Install unnecessary power lines
 - d. Maintain and repair these unnecessary hydro lines after a storm.
11. These unnecessary increased costs are being passed along to customers and ratepayers, which stifles economic growth and prosperity in Manitoba.

Based on these, and more reasons along a similar vein, I feel that this is a rule that never should have been implemented, and now that it has been, must be revoked.

Thank you, have a pleasant day,