



March 30, 2022

Hon. Logan Kanapathi
c/o Isaiah Thorning
Standing Committee on General Government
99 Wellesley Street West
Room 1405, Whitney Block
Queen's Park
Toronto, ON M7A 1A2

RE: Bill 93, Getting Ontario Connected Act

The Residential and Civil Construction Alliance of Ontario (RCCAO) is pleased to provide comments to the Standing Committee in support of Bill 93, *Getting Ontario Connected Act*.

As a unique labour-management organization derived from the residential and civil construction sectors, RCCAO welcomes the Government of Ontario's commitment to building and expediting critical infrastructure that is reflected in the Act. A primary focus for RCCAO since our inception has been the importance of investing in core public works – from transit and water systems to roads and bridges – and doing so smartly and efficiently for taxpayers and daily users of infrastructure.

The bill proposes necessary and long-awaited regulatory reforms to the Ontario One Call utility locate systems and processes. RCCAO applauds the Government of Ontario for tabling this bill as it serves an important step toward meaningful improvements to a system that has caused considerable difficulties for the infrastructure and construction industry. These crucial reforms will be an important element of addressing the current lack of timely locate responses, removing duplicative system requirements and alleviating the costly delays that hold up construction projects in Ontario.

A key component of infrastructure and construction projects, particularly in the civil and residential sectors, is the timely delivery of utility locates. Locate requests are overseen through the One Call System, which is a mandatory system under the *Ontario Underground Infrastructure Notification System Act, 2012*. The system allows homeowners, construction contractors, developers, builders and other excavators to make one locate request to a call centre instead of the previous practice of separate calls to each of the utilities.

While the current system legally mandates locate requests be responded to within five business days, as high as 85 percent of requests are late. One Call's own reported data shows that half of call tickets for September 2021 took longer than 15 days across the province, with only 14 percent being completed within the legislated five-day timeline.

The consequences of unpredictable and late utility locates information can cause significant and escalating havoc for critical infrastructure and construction projects. Contractors have regularly faced lengthy wait times, which can have serious and multi-faceted repercussions, including work stoppages, significant delays in project competition and increased project cost.

These costs can mount quickly – for example, each hour of idle time in the sewer and watermain sector incurs \$1,000 in additional costs, while that figure is \$10,000 per day in the roads sector.

Under Schedule 2 of the Bill, which amends the *Ontario Underground Infrastructure Notification System Act*, there are several elements that RCCAO supports, including:

- Extending the validity period of a locate to at least 60 days, up from the current minimum of 30 days, with the possibility of longer validity period if so specified. Longer locate ticket validity periods will reduce the number of locate requests and likely the number and/or severity of late locates.
- Provisions allowing excavators to share locate information that they receive with other excavators. Frequently, multiple contractors bidding on a common construction project, or already working on a common construction project are required to each request their own locates, which creates significant duplication within the locate request system. Allowing contractors on the same dig site to share locates will reduce the workload of One Call members and the locating industry, and thereby reduce locate response backlogs.
- Introducing the concept of dedicated locator, or a locator who will respond to all locate requests by the project owner in respect of the project. This one locator model has the potential to eliminate the need to wait on several locators to service every infrastructure projects. This would streamline the locates work and significantly reduce wait times.

RCCAO also applauds the proposal to have One Call be required to make certain information about members' locate performance available to the public on its website. We would ask that as part of that, information be made available differentiating between the service levels for single address locates and construction project locates since the biggest impacts are occurring on infrastructure projects. By publicly sharing information on performances, it provides an additional layer of accountability and transparency while making it easier to identify problem areas related to the late delivery of locates and focus on enforcement efforts.

These proposed legislative changes come at a crucial time for industry with the beginning of this year's digging season right around the corner. Thus, we urge the



passing of this Bill and more importantly, look to One Call to implement the proposed regulatory changes quickly and efficiently.

RCCAO see this legislation as an important step toward long-term and meaningful changes to a crucial part of building critical infrastructure in Ontario. We will remain involved in efforts to improve the locates system and will continue to work collaboratively with industry and government to make that happen.

Sincerely,

A handwritten signature in black ink that reads "Nadia Todorova".

Nadia Todorova
Executive Director