

February 10, 2026

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Ref. R-4316-2025 Proposed modifications to Conditions of Service

Bonjour

Most of this letter is based upon **6-408** of Quebec's electrical code. This rule appears to be central to many responses by Hydro-Quebec (HQ) (*pièce* B-0008) to corresponding *demandes* by the *Régie* within *pièce* A-0005. The *demandes* are numbered between **7.1** and **9.2**.

Background

Last year, by way of *pièces* D-0001, D-0002 and D-0003 (R-4270-2024), I submitted comments and observations touching upon some of the subjects now in B-0008 of the newer file (R-4316-2025). My interests remain as originally stated in D-0001 and focus on avoidance of obstacles to conversion to clean energy. Furthermore I initiated the complaint leading to the decision referred to in the *Préambule* which appears on page 27 of B-0008. Decision D-2021-056 (paragraph 57) asked for:

. . . le cadre réglementaire applicable à une modification de l'ampérage d'une installation électrique, notamment les motifs au soutien de l'obligation de déplacer l'embase du compteur à l'extérieur du bâtiment . . .

HQ's *Livre Bleu* calls for outdoor location of meters, both for original location as well as subsequent relocations in the context of modifications of service. Neither the order in D-2021-056, nor the fundamental question in my original complaint (file **P-110-3461**) concerned new installations. The context was only modifications. *Demandes 9.1* and *9.2* would not have been required had HQ been able to provide a **cadre réglementaire** asked for by the *Régie* in the 2021 decision.

Rule **6-408** Code de construction du Québec, Chapitre V – Électricité

Without reproducing any of the context or exact wording of rule **6-408**, HQ asserts that:

“l'emplacement du compteur et de l'appareillage de mesure doit être conforme aux exigences du distributeur d'électricité”. (B-0008, top of page 22)

The above differs from what rule “**6-408 Emplacement des compteurs**” actually states:

“1) Les compteurs et l'appareillage de mesure doivent :

. . .

f) être conformes aux exigences du distributeur d'électricité.

2) . . . “

(Highlighting added)

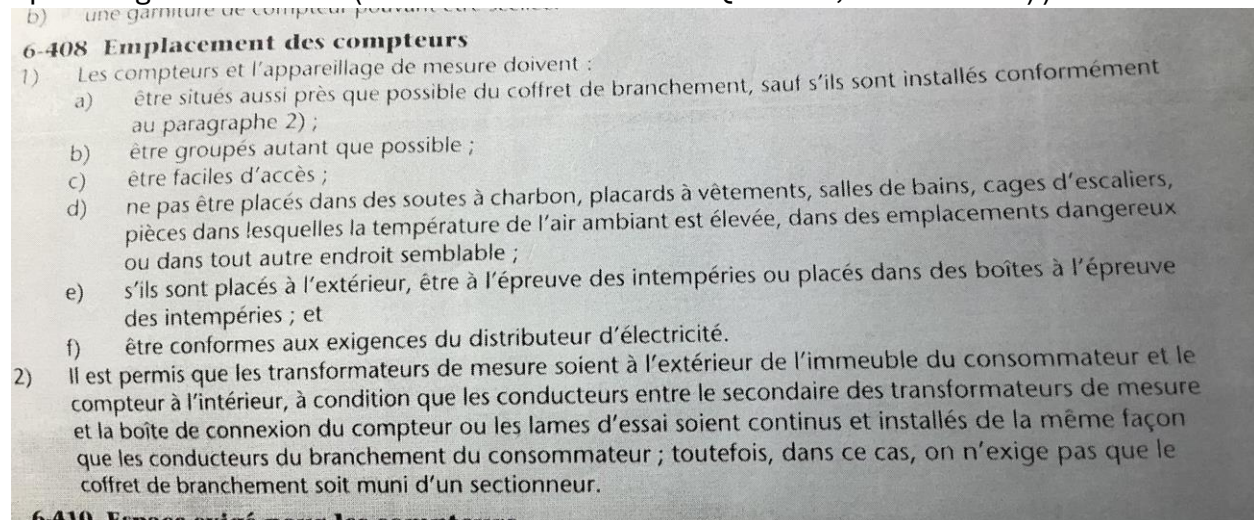
Terminology: Per Canadian Electrical Code, the “rule” is **6-408**;

1) is called a “sub-rule”; **f)** is called an “item”.

HQ does not mention the items preceding item **f)**. For correct interpretation, the Civil Code requires that **f)** be viewed in context with **a), b), c), d), e)**, and “sub-rule” **2)**.

1427 Les clauses s’interprètent les unes par les autres, en donnant à chacune le sens qui résulte de l’ensemble du contrat.

The image below is taken from a 2010 edition of *Chapitre V*. To the best of my knowledge, there has been no change to rule **6-408** in the 2018 edition, nor in the proposals for the upcoming 2026 edition. (GAZETTE OFFICIELLE DU QUÉBEC, 5 mars 2025)



Wording

Beyond the syntax which differs from HQ’s rendering, one observes that in item **f)**, the word *conformes* is plural, not singular. It therefore refers to the meter and metering equipment, and not to *L’emplacement*. (In contrast, one can note the syntax of rule **6-206** where *conforme* is singular.) One can see consistency with 1427 of Civil Code in the provisions of chapter 3 of the Conditions of Service as they reflect the syntax and wording of **6-408**.

Context of item **f)** within 6-408

Item **e)** suggests that the location of meters would normally be located indoors and precautions must be made if located outdoors. This is an indication that indoor locations are safer than outdoor. Given the presence of item **c)**, the term *facile d'accès* has no bearing on whether a meter should be indoors or outdoors, otherwise there would be conflict with item **e)**. Items **c)** and **e)** are also significant because the terms *faciles d'accès* and *sécuritaires* appear in 14.2 of the conditions of service. This article was referred to in responses to *demandes 8.2* and *8.6* and is part of the theme on page 20 of B-0008.

Item **a)** is discussed below and within Appendix 1 of this letter.

Location vs relocation

In new construction, architects and designers can consider all applicable code provisions and those of *Livre Bleu* without concern over one contradicting the other. In modifications however, relocating a meter would theoretically always be a violation of item **a)** unless the *coffret de branchement* is also moved outdoors. Per **6-206 1)c)** the *coffret* must be indoors (with a few exceptions). This is an example of where contradictions arise between *Livre Bleu* and codes (*Chapitre V*).

6-408 1)a) and rule 6-208

Appendix 1 of this letter illustrates on one page many of the above-mentioned points by way of an example of HQ's views in the context of a service upgrade. Upon request I can send images of homes with similar configurations, although I do not know if those upgrades had received approval by *Régie du Bâtiment*, perhaps by way of a dérogation. Referring to the "croquis" in the Appendix:

- As regards **6-408 1)a)**:
Currently the meter is about 2 centimeters from the *coffret de branchement*. The new distance would be about 3 meters (assuming conduits along straight lines).
- As regards **6-208**:
The new conduits would be on the garage ceiling as opposed to being buried under concrete slabs. (This appears elsewhere in P-110-3461)

For consideration by experts:

- (1) Extent to which *croquis* corresponds to any diagram within codes or other standards (*normes*), including HQ's *Livre Bleu* and *Guide de bonnes pratiques* (fiches 1 & 7. See last page of D-0003).
- (2) Jurisdiction of HQ *en aval du pointe de raccordement*. (See page 55 of D-2001-259, R-3439-2000)
- (3) Interpretation of **6-408 1)f)**
- (4) Safety, as compared to leaving meter in present indoor location
- (5) Who is the *autorité compétente* as regards this *croquis*?
- (6) Is this a *cas particulier*? (*Livre Bleu* 6.4.2.2 e) Who decides, electrician, HQ, or client?
- (7) Accountability: Are there any minutes of meetings of *Groupe de rédaction du Livre Bleu* documenting how decisions are made? Is only one person at HQ accountable?
- (8) Balance between costs to client, Quebec's Charter (No. 7), safety, and government priorities on conversion to clean energy, and verifiable requirements of HQ; in other words, considering the role of the *Régie* per article 5 of the *Acte*.

Hierarchy of requirements

Through HQ's presentation and interpretation of rule **6-408**, item **f** would take priority, not only over all other items in the rule, but also over article **14.2** of the conditions of service calling for client approval ("agreed upon"), and "safe" locations. A lopsided rationality is reflected in *Livre Bleu* 6.4.2.2 c) where it "indirectly directs" electricians to respect item **b)**. Yet no permission, indirect or otherwise, is granted to respect item **a)**. *Livre Bleu* 6.4.2.2 e calls this type of permission an *autorization* of a *cas particulier* without indicating criteria.

Important: May the *Regie* be aware that proposals for the 2026 code include changing the word **dérogation** (used by *Régie du Bâtiment*), to **autorization**.

The rationality seems more lopsided in view of HQ's assertion that a *maître électricien* is the *autorité compétente* per article 15.2.1 of the Conditions of Service. (See top of page 28, B-0008). *Livre Bleu* directs electricians. It is not the other way around. (See D-0002, bottom of page 1).

