

1 **Ontario Energy Board (Board Staff) INTERROGATORY #14 (Prefiled Evidence)**

2
3 **Interrogatory**

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5 Please explain more fully the point on Page 17 regarding the increase in risk to electrical
6 safety problems because of the duplication of lines and increased technical complexity.

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9 **Response**

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11 The duplication of lines would add more poles and wire that would be vulnerable to
12 damage, exposing customers and the general public to electrical and material hazards.
13 Two sets of poles and wires could exist on the same right-of-way. These situations could
14 be the result of automobile accidents, equipment failure or weather, etc. Customer safety
15 would also be compromised in terms of underground electrical cable locates requested
16 from the wrong service provider. For instance, an "all clear" could be provided to a
17 customer when in fact it is the other service provider's customer.

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19 Emergency restoration and response could be compromised due to the existence of other
20 LDC lines in an area, leading to the delays in responding to police and fire departments,
21 which could adversely affect public and customer safety.

22
23 Additional or expanded operating agreements would need to be established, additional
24 joint use agreements put in place, and an identification process established so that
25 workers from either company could determine the ownership of lines and associate them
26 to an operating map to ensure they are working on the correct feeder.

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28 Currently well-defined service territories are in place to limit the duplication of lines and
29 technical complexity.

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31 While there are many embedded LDCs, these are legacy situations. Networks does not
32 believe that additional overlapping should be permitted.