

1 Wirebury Connections Inc. INTERROGATORY #17

2
3 Interrogatory

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5 Networks contends that overlapping service areas will create operating inefficiencies and
6 the need for extensive safety protocols.

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8 Reference: p. 19 L25-30

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- 10 a) How does Networks deal with the interaction and interconnection of its service
11 territory with the 195 bordering LDC service territories? How many safety
12 protocols are currently in place?
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- 14 b) Are there safety issues in Networks' operations with over 88 new distributors
15 being acquired recently or have the differences in operating practices been
16 fully mitigated by proper procedures and protocols.
- 17
- 18 c) Why could the same processes/protocols not be used in the case of overlapped
19 service areas? Please explain your response in detail indicating the degree of
20 incompatibility within Networks and how it has been or will be mitigated and
21 the ability to use the same mitigation approach for overlapping service areas.

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24 Response

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26 (a) The protocols Networks normally has in place for LDCs served by Networks'
27 distribution system are:

- 28
- 29 • Operating protocols
 - 30 • Connection Agreements
 - 31 • Safety protocols and rules as established under the Occupational Health and
32 Safety Act.
- 33

34 (b) No, all operations and assets have been fully integrated into Networks' system.

35
36 (c) The existing overlapping is currently very limited. The current protocols are adequate
37 for these circumstances, however, if the level overlapping were increased, Networks
38 believes additional protocols would need to be established. Networks believes that
39 expanding overlapping service areas will lead only to increased complexity, safety
40 problems, and inefficiency. Please see Networks' Exhibit J8-10-14.