

BOARD STAFF INTERROGATORY #4

INTERROGATORY

How might a duplication of distribution assets and increased technical complexity, resulting from over-lapping service areas, result in an increase in the risk of electrical safety problems? Which party should be responsible for coordinating emergency preparedness and response should there be a catastrophic event?

RESPONSE

Wirebury does not believe that overlapping service areas will automatically result in a duplication of distribution assets. In specific cases, there may be a second set of wires providing incremental capacity but the specific assets used to serve a subdivision, building, or customer will not be duplicated. Wirebury submits that in most instances it will be uneconomic to duplicate distribution assets and that a singular set of unique assets will, in most cases, serve specific customers within an established operating area.

It is also important to note that duplication of distribution assets does not necessarily mean there will be increased technical complexity. It definitely does not lead to increased risk and/or electrical safety problems. In today's electricity market, especially in highly congested urban settings, it is important that all utilities have accurate records of their existing infrastructure and that they are knowledgeable of the location as well as the specific functions of these assets before commencing operations or maintenance. In addition, all utilities have established procedures and protocols for working on their own assets as well as operating in, on and around the interconnected assets owned by others. This situation would not change with overlapping service areas even if assets were duplicated.

In the case of an emergency or a catastrophic event, similar response protocols and reporting procedures will be followed that exist today between the current 95 LDC's operating in 202 unique service territories. These protocols and procedures are the same as those that functioned well, from an electrical safety perspective, when there were approximately 300 LDC's in the province. These safety and procedure protocols need not change because of an overlap in service areas or the addition of new entrants. The fact that under the new regulations high-rise buildings can be and are being operated safely and efficiently as unlicensed embedded distributors is further proof that the existing protocols are working effectively and will continue to do so as the



distribution industry evolves. Each LDC (embedded, licensed or otherwise) is responsible for responding to emergencies on their own infrastructure and for notifying impacted upstream or downstream connected electrical utilities. Emergency preparedness and response is a responsibility of all utilities and effective co-ordination between utilities has and will continue to be an ongoing requirement.

