1 Q. How will the costs associated with emergency maintenance, in particular Level 3 2 referred to in Section 20 of the Administration Practices where there appears to be a 3 high degree of cooperation, be tracked and recovered? 4 5 A. Newfoundland Power will continue to respond to customer trouble calls as it has in the 6 past. This includes call out Level 3 response as defined in Section 20 of the 7 Administration Practices. See Response to Request for Information PUB-NP-55 and 8 PUB-NP-58. 9 10 A Level 3 response involves extensive damage to the electrical/communications system 11 where service restoration is expected to take more than 6 hours. In this situation, a System Control Centre operator notifies both the Newfoundland Power on call supervisor 12 13 and the Joint Use partner, Bell Aliant. 14 A Level 3 response will sometimes require Support Structure repair or replacement.<sup>1</sup> 15 16 Such replacement work would be directed to the appropriate Bell Aliant or Newfoundland Power contractor.<sup>2</sup> After completion of Support Structure work, the 17 contractor will invoice the Support Structure owner directly. Invoices will provide detail 18 19 by Support Structure, including pole identifier, as is the current practice. Verification of 20 the pole identifier on the invoice by reference to ownership records will confirm billing 21 accuracy. 22 23 During major system events, the focus is on safety and timely restoration of service. 24

While the scale of response is greater, the same response processes including invoicing

25 requirements apply. This represents no change from the current practice for 26 Newfoundland Power Support Structures.

Excluding severe weather events, there are typically approximately 50 incidents per year which involve damage to and replacement of individual Support Structures. For example, a vehicle may accidentally strike a pole adjacent to the roadway.

Upon completion of the ongoing pole count survey, all Joint Use Support Structures will be identified with a unique pole number. This pole number, supported by local knowledge of the on call supervisor, will be used to verify Support Structure ownership.