

1 **Q. In reference to the evidence of Earl Ludlow, page 36, line 4, please provide a**
2 **statistical analysis to support the statement of a more coordinated response for the**
3 **intake of trouble calls after the system control center in St. John's centralized that**
4 **responsibility.**

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6 A. No statistical analysis has been conducted that would demonstrate that the centralization
7 of trouble call intake results in a more coordinated response. The timeliness of the
8 Company's trouble call response is dependent on a number of factors. Under normal
9 operating circumstances, the number of trouble calls may be minimal. Responding in a
10 timely fashion may simply require that the call be communicated to the trouble crew in a
11 timely way. In such circumstances, the management of the process in individual offices
12 by means of ad hoc staffing arrangements may suffice.

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14 However, when severe weather conditions begin to affect wide areas, and the Company is
15 faced with multiple calls from customers experiencing problems with their electrical
16 service, responding in a timely fashion is a more challenging exercise. In such
17 circumstances, having the responsibility placed with an assigned individual in a central
18 location allows for a broader view to be taken of the situation, enabling a better
19 assessment of the nature of the troubles being experienced, and ensuring that resources
20 are allocated and coordinated in the most efficient manner.