

1 **Q. Please explain how the timelines for the Support Structure Work Request Forms set**
2 **out in Sections 4.04 and 4.05 and the compliance process in Section 4.06 of the**
3 **Administration Practices will allow for a response time which is always as good as**
4 **or better than current response times.**

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6 A. The timelines for the Support Structure Work Request Forms set out in Sections 4.04 and
7 4.05 and the compliance process in Section 4.06 of the Administration Practices in the
8 2011 Joint Use Agreement (“the 2011 JUA”) are identical to the timelines and process
9 provided for in the 2001 Joint Use Facilities Partnership Agreement (“JUFPA”).

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11 These timelines are guidelines for processing day-to-day Support Structure requirements
12 and completing construction to accommodate such requirements. A Support Structure
13 Work Request Form (“SSWR”) is required for (i) requests to place additional attachments
14 on a Support Structure belonging to the other party; (ii) requests to upgrade existing
15 attachments on a Support Structure; (iii) replacement or relocation of a Support Structure
16 that will require the other party to replace, transfer or rearrange its attachments; and (iv)
17 installation of additional Support Structures.

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19 From an electrical customer service perspective, the guidelines are engaged when
20 Support Structure work is required to meet a Newfoundland Power customer’s request for
21 electrical service in an area where Bell Aliant owns the Support Structures. Upon receipt
22 of the customer’s request for service, Newfoundland Power will determine (i) whether
23 Support Structure work is required and (ii) when the customer requires service. If
24 Support Structure work is required, Newfoundland Power will forward a SSWR to Bell
25 Aliant requesting that the work be completed within the desired time.

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27 Under the JUFPA, it was Newfoundland Power that was expected to meet these
28 timelines. Accordingly, the timelines are based upon Newfoundland Power’s experience
29 as to reasonable response times in the specified circumstances. They are, in effect,
30 Newfoundland Power’s standards. Newfoundland Power and Bell Aliant have agreed
31 that the guidelines are reasonable and expect that Bell Aliant will meet the required
32 timelines. Accordingly the response times should be as good as, or better than, those that
33 are currently provided.

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35 Section 4.04 of the Administrative Practices requires Bell Aliant and Newfoundland
36 Power to respond to the SSWR within the times set out in Table 4.01. The response will
37 indicate whether the desired schedule can be met and, if not, when the work can be
38 completed. If the suggested time is not acceptable, the matter can be resolved by either
39 party proceeding to have the work completed using its own resources, and resolving the
40 matter, if necessary, at the Joint Use Working Committee.¹

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42 Guidelines will, in some circumstances, not be reasonable due to exceptional, or even
43 unusual, conditions. This sometimes occurs now in circumstances where Newfoundland
44 Power is performing work. There is no reason to expect the incidence of such
45 circumstances will increase under the 2011 JUA as compared to the JUFPA.

¹ Please refer to the Response to Request for Information PUB-NP-53 for further information on remedies for non-compliance with the Administrative Practices of the 2011 JUA.