DOMINICA ELECTRICITY SERVICES LIMITED

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22 February 2019

Justinn Kase
Executive Director
Independent Regulatory Commission
42 Cork Street
Roseau
DOMINICA



Dear Mr. Kase,

From September 2017, DOMLEC has been engaged in both the installation and removal of poles around island. The pole sharing agreement with communication utilities, Marpin, Flow, and Digicel has hampered actions in that regard, where leaning poles had to be abandoned due to lack of action by other users. In 2016, during a partial audit (78% of poles), DOMLEC was identified as owning majority of poles installed on the island. An excerpt from the report is as follows:

14,958 – Poles surveyed.

■ 13,493 – Domlec poles.

■ 1,465 – Non Domlec poles.

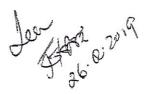
■ 10,295 - Domlec poles shared with Lime.

9,719 – Domlec poles shared with Digicel Play.

8,853 – Domlec poles shared with Marpin.

The above is intended to give the IRC an idea of the level of pole sharing and consequent reliance on other pole users to remove their hardware and lines from joint use poles to facilitate their removal. In September 2018, efforts were increased to address the issue of abandoned DOMLEC poles occupied by communication utilities which posed an immediate danger to the public.

Attached hereto is the schedule for addressing the list of poles the IRC submitted to DOMLEC for action. On receipt, the team prioritized their removal. However, the recovery was delayed by lack of prompt action from communication utilities attached to some of the poles.



22 February 2019

Dear Mr. Kase,

The following schedule is in effect to address abandoned DOMLEC poles.

Activity	Period	Commencement Date
Conduct island-wide survey report on DOMLEC owned poles	3 months	Feb 4, 2019
While the audit is in progress, continue removal of poles in coordination with communication utilities, utilizing initial audit results to prioritize the removals.	Ongoing	Feb 4, 2019
Develop a schedule for removal of abandoned DOMLEC poles, and share with relevant users and IRC	2 weeks	May 1, 2019

DOMLEC continues to work with the other utilities to remove their lines from occupied poles. All resources, labor, digger derricks, and bucket trucks, which were involved in restoration of service during the period September 2018 to February 2019 were this month re-allocated to recovery duties in efforts to eliminate existing hazards.

Sincerely,

Dominica Electricity Services Limited

Lemuel Lavinier

Engineering Transmission and Distribution Manager

c.c. Mrs. Bertilia McKenzie, General Manager - DOMLEC



DOMINICA ELECTRICITY SERVICES LIMITED Removal Schedule for list of poles submitted by the IRC

Item	Pole Number	Location	No. of poles	Removal Date	Status	Comments
1	SX1132	Potterville - Int. Elliot Ave and Goodwill Rd.	2	Feb. 12,2019	Complete	·
2	SX1166	Pottersville - Int. Potter St. and Goodwill Rd.	1	Jan. 20, 2019	Complete	
3	SX1178	Pottersville - Int. Federation Dr and Goodwill Rd.	1	Jan. 20, 2019	Complete	
4	SX0371	Goodwill - Int. Federation Dr and Solomon Ln.	1	Feb. 28, 2019		Utility lines still attached
5	SS8696	Federation Dr - PMH Compound (with 3-phase bank)	1	Dec. 27, 2018	Complete	
6	SS8793	St. Aroment - Int. Federation Dr and James Ln.	2	Dec. 20, 2018	Complete	
7	SS9707 (opposite)	St. Aroment - Federation Dr opposite Greens	1	Feb. 12,2019	Complete	
8	SS9707	St. Aroment - Int. Federation Dr and Edens Ln.	1	Feb. 12,2019	Complete	
9	SS9808	St. Aroment - Federation Dr - 3-phase Bank	1	Feb. 12,2019	Complete	
10	SS9915	St. Aroment - Federation Dr H13I (double circuit)	1	Dec. 20, 2018	Complete	
11	SS9801	St. Aroment - Federation Dr	2	Dec. 20, 2018	Complete	
12	ST9120	St. Aroment - Federation Dr	1	Dec. 20, 2018	Complete	
13	ST9245	St. Aroment - Federation Dr (Entrance to Carbon)	1	Dec. 20, 2018	Complete	
14	ST9245	St. Aroment - Federation Dr (3-phase Bank near Ossie Davis)	2	Feb. 12, 2019	Complete	
15	SS0691	Fond Cole Housing Scheme above FC Power Station	1	Feb. 27, 2019		Vehicle was preventing access to the pole
16	SX6420	Roseau - Castle St. near Mc. Millan's Fuel Station	1	Feb. 17, 2019	Complete	
17	SX5492	Roseau - Castle St. opposite Mc. Millan's Fuel Station	1	Feb. 17, 2019	Complete	
18	SX7591	Roseau - Victoria St. opposite DBS	1	Mar. 10, 2019		Utility lines still attached/ DOMLEC
19	SX8501	Roseau - Inside DBS Compound	1	Jan. 20, 2019	Complete	
20	SX8536	Victoria St. near Cliff Top Cleaners	1	Mar. 10, 2019		Utility lines still attached
21	SX7634	High St. near Tennis Court	1	Jan. 20, 2019	Complete	
22	SX6649	Bath Rd Public Cemetary Switch Site	1	Jan. 20, 2019	Complete	
23	SX3613	Bath Rd by Gardens Gate	1	Jan. 20, 2019	Complete	
24	SX1931	Bath Estate - after bridge and speed bump (Transformer Pole)	1	Feb. 28, 2019		Utility lines still attached/DOMLEC
25	SX1933	Bath Estate - Before the Chinese Apts. Entrance	1	Feb. 28, 2019		Utility lines still attached
26	SY1018	Bath Estate - After the Chinese Apts. Entrance	1	Feb. 28, 2019		Utility lines still attached
27	SY1112	Bath Estate - After the Chinese Apts. Entrance	1	Feb. 28, 2019		Utility lines still attached
28	SY0193	Bath Estate - near Switch Site	1	Feb. 28, 2019		Utility lines still attached
29	SY0390	Bath Estate - Upper Int. Valley and Dead End Rd.	1	Feb. 28, 2019		Utility lines still attached