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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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COMCAST CABLE COMMUNICATIONS, )	
INC., )	
)	
Claimant, )	<b>Docket No. 03-035-28</b>
v. )	
)	<b>PREPARED DIRECT TESTIMONY</b>
PACIFICORP, dba UTAH POWER, )	<b>OF SARA JOHNSON</b>
)	<b>FOR PACIFICORP</b>
Respondent. )	
)	<b>July 2, 2004</b>

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1 **Q. Please state your name and business address.**

2 A. My name is Sara Johnson. My business address is 650 NE Holladay, Suite 700,  
3 Portland, Oregon 97232.

4 **Q. By whom are you employed and what is your position?**

5 A. I am employed by PacifiCorp as Business Administrator/Project Coordinator  
6 within Transmission & Distribution Infrastructure Management (“T&D  
7 Infrastructure”). I am primarily responsible for coordination of the 2002/2003 Audit,  
8 including communications between vendors, contractors, and internal employees  
9 associated with the Audit. I am also responsible for the processing and analysis of  
10 collected data once the Audit data for a particular area is compiled by the contractor  
11 conducting the Audit. In my position, I report to James Coppedge.

12 **Q. Attached to your written testimony are Exhibits PC 3.1 through 3.2. Were these**  
13 **prepared by you or under your direction?**

14 A. Yes.

15

1 **Q. What are your qualifications to testify in this proceeding?**

2 A. I have listed my qualifications in Exhibit PC 3.1. I have been employed with  
3 PacifiCorp for the last two years. Prior to that, I served as a contractor to PacifiCorp  
4 for approximately six months. I have a B.A. in Communications Arts from  
5 Marymount Manhattan College.

6 **Q. What areas will your testimony address?**

7 A. My testimony will address PacifiCorp's joint use permitting process and  
8 PacifiCorp's management of joint use data, including the input, recording, and  
9 maintenance of joint use data in PacifiCorp's joint use database.

10 **JOINT USE PERMITTING PROCESS**

11 **Q. Please describe PacifiCorp's permitting process in the state of Utah.**

12 A. Communications companies wishing to attach to PacifiCorp's facilities must  
13 first fill out an application and submit the application to the Administrative Service  
14 Coordinator ("ASC") assigned to a particular region. ASCs are located in PacifiCorp's  
15 T&D Infrastructure Management in Portland, Oregon.

16 The ASC then verifies the information on the application and ensures that all  
17 key fields are filled out. If any key information, such as the mapstring, pole number, or  
18 address is missing, the ASC requests that the licensee provide the missing information.  
19 When all key fields are filled out, the ASC sets up a request for inspection. The  
20 application is sent to a Utility/Field Specialist who will perform an initial inspection to  
21 determine the existing integrity of the pole and whether the pole has adequate clearance



1 **Q. Were you trained in entry and maintenance of data contained on the JTU**  
2 **mainframe?**

3 A. Yes. I was trained in the functions of joint use data management while I was  
4 serving as an ASC for PacifiCorp from July 2002 to January 2003. When I first started  
5 as an ASC, my direct supervisor was Corey Fitz Gerald. She trained me in general  
6 matters relating to the electric utility industry, including joint use. She also provided  
7 general training regarding use of the JTU system. I then received more detailed JTU  
8 training from other ASCs. My JTU training consisted of learning how to navigate the  
9 system, inputting, analyzing and processing application information, and processing  
10 PacifiCorp's own internal pole work.

11 **Q. What information is contained in the JTU mainframe?**

12 A. The JTU mainframe contains all of PacifiCorp's attachment information for  
13 third-party attachments to PacifiCorp's facilities, including utility codes for attaching  
14 companies, attachment information for specific poles in specific regions, a list of  
15 PacifiCorp poles by pole number, records of safety and construction violations by  
16 third-party attachers and any corrective action taken to remedy such violations, billing  
17 data, and unauthorized attachment identifications, along with any subsequent  
18 authorization for such attachments.

19 **Q. Please describe how data is input, recorded, and maintained on the JTU**  
20 **mainframe.**

21 A. Once an ASC receives a permit/application, the ASC enters the data contained  
22 on the application form into the JTU database. The ASC is also responsible for  
23 inputting the records and results of field inspections conducted by the field specialists.

1           Once the inspection process is completed and any make-ready work or other corrective  
2           actions have been performed, the permit is approved and is given an “active” status in  
3           JTU. If upon subsequent inspections safety or construction violations are discovered,  
4           such violations are entered into JTU by entering the utility code of the entity owning  
5           the attachment, PacifiCorp’s pole tagging number for the pole on which the attachment  
6           is located, and a description of the violation. Once the company whose attachment is  
7           found to be in violation notifies PacifiCorp that the corrective action has been taken to  
8           remedy the violation, a record of the corrective action is entered into the JTU database.

9   **Q.   Please describe how the results of the 2002/2003 Audit were verified.**

10   **A.**           For the 2002/2003 Audit, PacifiCorp hired a company called Osmose Holdings,  
11           Inc. (“Osmose”). To conduct the physical audit, we used “fielders.” A fielder was an  
12           individual, typically an Osmose employee, who was required to go into the field and  
13           physically visit every distribution pole. Fielders entered the data collected in the field  
14           into an IPAQ PDA hand-held device. To direct the fielders conducting the audit,  
15           PacifiCorp would take an extract of an area from FastGate and send it to Osmose.  
16           FastGate, an Osmose proprietary software system, is another system used by  
17           PacifiCorp to manage joint-use activities. PacifiCorp uses FastGate primarily as a  
18           digital connectivity tool.

19           Osmose would then take the FastGate extract and break it down into work  
20           packets to be distributed to fielders. The software used to compile this data on the  
21           hand-held device was called FastGate Mobile. Once the work packet was “fielded”  
22           (i.e., all data for the poles in the extract collected), a sample set of the work packet was

1 put through quality control (“QC”) by Osmose to ensure accuracy. If the sample set  
2 did not pass the Osmose QC, it was “refielded,” or redone. Once the sample sets had  
3 passed the Osmose QC, the larger work packets were then sent to PacifiCorp for  
4 additional QC. During the 2002/2003 Audit, PacifiCorp retained four Customer  
5 Acceptance Quality Control (“CAQC”) inspectors. These inspectors were contract  
6 workers provided by Volt and managed by James Coppedge and myself. The CAQC  
7 inspectors would take a percentage of previously QC’d data and a percentage of non-  
8 QC’d data and perform an additional QC of this material. The accuracy threshold for  
9 the QC was 97%. If the threshold was not met, the data was returned to Osmose to be  
10 refielded.

11 Once the QC process was completed, Osmose assembled all the data passing  
12 QC inspection into a larger data set. The completed data was then sent electronically to  
13 PacifiCorp. The information on FastGate was then compared with existing data  
14 maintained in JTU. This comparison was performed in order to detect whether the  
15 information in JTU documented the existence of a company’s attachment on a  
16 particular pole. The results of this comparison were generated in a Mismatch Report.  
17 The Mismatch Report was generated by JTU through an information technology  
18 process using the JTU mainframe to conduct the comparison.

19 Nothing was updated in JTU at that point. Instead, more analysis was  
20 conducted to ensure that the data listed on the Mismatch Report were indicative of the  
21 existence of unauthorized attachments. As part of my job duties, I performed this

1 analysis. The first step was to validate the utility codes. Next, I checked to make sure  
2 that the reported attachment was not subject to an existing permit or a pending permit.  
3 I also compared the data contained in the Mismatch Report to a Removal Summary  
4 Report to ensure that poles listed on the Mismatch Report actually reflected poles  
5 currently existing in the field. The Removal Summary Report documented attachments  
6 not found in the 2002/2003 Audit, but which were recorded in the JTU. I also  
7 performed a validation of facility coordinates, including pole numbers, to make sure  
8 the reported attachments were plotted correctly.

9 Once the Mismatch Report was validated, the unauthorized attachments were  
10 uploaded and entered into JTU. The batch upload did not update any attachments that  
11 had existing or pending permits. JTU then generated a billing statement and printed  
12 out a Billing Summary Report. In short, the Billing Summary Report listed only those  
13 unauthorized attachments for a particular utility identified in the corresponding  
14 Mismatch Report, and also identified each pole by latitude and longitude coordinates. I  
15 then checked to make sure that the Billing Summary report accurately reflected the  
16 information entered into JTU.

17 **Q. How were safety violations discovered during the 2002/2003 Audit treated?**

18 A. Safety violations detected during the 2002/2003 Audit were also entered into  
19 JTU once an inventory for a particular district was completed. The company whose  
20 attachments were in violation of safety and construction standards was provided with  
21 notice of the detected violations. The company was then required to present a plan of

1 correction to PacifiCorp. As soon as PacifiCorp received notice that the violations had  
2 been corrected, JTU was updated to reflect the date of correction and the corrective  
3 action taken.

4 **Q. Who did the Mismatch Reports for Comcast?**

5 A. I did. Prior to that, Peggy Russell was responsible for this task. We both were  
6 supervised by James Coppedge.

7 **Q. What did the Mismatch Reports for Comcast show?**

8 A. There were numerous Mismatch Reports for Comcast, containing pages and  
9 pages of data identifying poles where data collected in the 2002/2003 Audit did not  
10 match data currently recorded in JTU. Attached as a representative example is Exhibit  
11 PC 3.2, a Mismatch Report for Comcast for the American Fork District, Map String  
12 11406002.0.

13 The first column identifies the type of PacifiCorp facility on which an  
14 attachment was found, which in all instances here was “PPLD”—essentially, a  
15 PacifiCorp distribution pole, *i.e.*, not a transmission pole—used for joint use. The next  
16 column identifies the Map String, a geographic location index used by PacifiCorp to  
17 identify a particular area within the American Fork District (or another district). The  
18 third column – “Point” – identifies the facility identification number. The Map String  
19 Number, together with the point number, constitutes a unique and specific pole number  
20 for each pole in PacifiCorp’s infrastructure. The next column, “Ut Cd,” stands for  
21 utility code, and is a specific code assigned by PacifiCorp to each communications  
22 attacher. Here, “0877” is the code for Comcast.



1           The next three columns, “INV,” “JTU” and “DIFF” tell, respectively, how  
2 many attachments were identified on the particular pole in the inventory, how many  
3 attachments to the pole were recorded in the JTU database at the time of the 2002/2003  
4 Audit, and the reason for any discrepancy. The eighth column, “Reason,” explains the  
5 reason for any discrepancy between the number of attachments found in the 2002/2003  
6 Audit and the number then in JTU. Finally, the last column on the Mismatch Report,  
7 “Tag Discrepancy,” indicates whether the tag number on the pole—the combination of  
8 both the Map String and Point numbers—matches the pole identification information in  
9 JTU.

10           Putting together all of the above, one can see that beginning on the second page  
11 of Exhibit PC 3.2, which is Bates-labeled with PC 2647 in the bottom right hand  
12 corner, numerous unauthorized Comcast attachments are identified in the Mismatch  
13 Report. For example, the first line of data shows that on a distribution pole identified  
14 by Map String 11406002.0 and Point 010000, the utility coded 877 – Comcast – has  
15 one attachment identified in the 2002/2003 Audit which was not previously reflected in  
16 JTU. The reason for this is explained as being discovered “in inventory”; *i.e.*, in the  
17 2002/2003 Audit. In addition, there was no tag discrepancy, as the tag number on the  
18 pole matched the identifying numbers in JTU. (Some tag discrepancies are reflected  
19 about halfway down this page of the exhibit, where some poles are listed with  
20 “missing” tags.) In short, in Exhibit PC 3.2, each time utility “877” has one attachment

1 in the “Inventory” column and none in the “JTU” column, the 2002/2003 Audit has  
2 identified an unauthorized attachment.

3 **Q. Who is responsible for inputting information into the JTU mainframe?**

4 A. Approximately twelve individuals within PacifiCorp’s T&D Infrastructure are  
5 responsible for some aspect of data entry into JTU relating to PacifiCorp’s service area,  
6 but the primary persons responsible for data entry are ASCs. The ASCs are supervised  
7 by Laura Raypush. Additional individuals within T&D Infrastructure who may be  
8 responsible for aspects of data entry into JTU include billing coordinators and myself.

9 **Q. How often is the JTU mainframe updated?**

10 A. Because the JTU mainframe is PacifiCorp’s primary tool for maintaining joint  
11 use permitting data, the JTU mainframe is updated on a daily basis as part of the job  
12 responsibilities of individual ASCs. Any time new information is received regarding  
13 an existing attachment or any time an application is received, the ASCs will enter such  
14 information into the JTU database.

15 **Q. Does this conclude your testimony?**

16 A. Yes it does.