

Torry R. Somers
CenturyLink
6700 Via Austi Pkwy.
Las Vegas, NV 89119
Ph: (702) 244-8100
Fax: (702) 244-7775
torry.r.somers@centurylink.com

Attorney for CenturyLink

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Consolidated Applications of Rocky Mountain Power for Approval of Standard Reciprocal and Non-Reciprocal Pole Attachment Agreements	Docket No. 10-035-97 CENTURYLINK'S QUESTIONS FOR TECHNICAL CONFERENCE
--	--

Below are initial questions that CenturyLink has for Rocky Mountain Power for discussion purposes at the April 26, 2012 technical conference. CenturyLink may have additional questions at the time of the technical conference, and additional question may arise based upon Rocky Mountain Power's responses to CenturyLink's data requests. The main purpose of the following questions is twofold. One, to provide assurance that there is no double recovery of costs via the recurring pole attachment rates and any separate fees (e.g. Pole Attachment Fee), or via costs that are included in the general revenue requirement under review in the general rate case proceeding. And two, to insure that the costs utilized in determining special fees, such as the Application Fee, are costs that were incurred for that specific purpose only. In addition there are some questions regarding the new language in the redlined pole attachment agreement.

1. Discussion regarding the costs that are being included in the Exhibit F to the testimony of Jeffrey Kent:
 - a. What FERC account(s) are employed to record the costs identified in Exhibit F? If more than one FERC is employed, identify the costs recorded in each FERC account.
 - b. Explain whether/how the included costs/work functions are directly/exclusively related to pole attachment applications?

- c. Are all of the costs identified in Exhibit F excluded from the calculation of the pole attachment rate formula? If yes, explain how, if no explain why not.
 - d. Is Rocky Mountain Power able to verify that costs identified in Exhibit F are not being recovered through some other charge or fee, including the pole attachment rate or RMP's general rates charged to its electric customers? If yes, please be prepared to discuss the removal of such costs.
 - e. Explain how the costs and the Application Fee charge depicted in Exhibit F are/would be handled in the determining electric rates during a general rate case proceeding. If these costs/fees are employed in the general rate case, or pole rental rate change, rate setting processes, how would the costs/fees be affected if either one or both are modified during the general rate case or pole rental rate establishment processes?
2. Discussion regarding to the Per Pole Application Fee of \$58.30:
 - a. In order to better understand the application fee, please assume the following: If a party submitted a single application that included 10 new pole attachments what would be the total cost charged for that application?
 - i. Are there any additional per pole fees that would be added?
 - ii. Would the cost be the same if the applicant submitted an application to overlash existing permitted facilities on the 10 poles?
 - b. Explain how the regional costs comprised in developing the Pole Application Fee were used in developing the revenue requirement in the general rate case proceeding. If they were not used, explain why not.
3. Discussion regarding the Un-authorized Attachment Charge of \$100.
 - a. Assuming the tariff is approved, would this charge be applied retroactively to attachments that were determined to be placed before the tariff became effective?
4. Discussion regarding the language in the redlined pole attachment agreement.
 - a. "Licensee shall have the right to install service drops, without prior approval by or prior notification to Pole Owner. This would include service drops made from Poles on which the Licensee may not originally have had an Attachment, as long as the Pole is adjacent to Poles on which the Licensee does have authorized Attachments. However, when Licensee installs service drops, Licensee must follow all procedures applicable to Attachments generally, except that filing Applications and payment of fees occurs after installation. Notwithstanding the above, no notification or approval shall be required for service drops that are not directly attached to Poles. Further, where a service drop installed on a Pole for

which no permit exists, or where the installed service drop is outside of the existing permitted Attachment Space, an Application pertaining to the service drop must be submitted to Pole Owner no later than ten (10) Business Days after installation of the service drop is completed. Where the service drop is within the existing permitted Attachment Space, Licensee must provide written notice to Pole Owner no later than ten (10) Business Days after installation of the service drop is completed. Required notifications of service drop installations shall contain information identifying the pole to which the service drop was added.”

- i. In regards to the (10) Business Days application and notification requirement, what is the reason that (10) Business Days is being proposed, instead of (20) days or some other number?
- ii. Would RMP consider a longer time frame than 10 days?

DATED this 13th day of April 2012.

CENTURYLINK



Torry R. Somers
CenturyLink
6700 Via Austi Pkwy.
Las Vegas, NV 89119
Ph: (702) 244-8100
Fax: (702) 244-7775
torry.r.somers@centurylink.com

Attorney for CenturyLink