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Division of Public Utilities

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Date: July 1, 2015

To: The Public Service Commission of Utah

From: Chris Parker, Director
William Duncan, Manager, Telecommunication

Re: Proposed changes to R746-360

The Utah Division of Public Utilities (DPU) submits the following comments regarding the proposed changes to rule R746-360 Universal Public Telecommunication Service Support Fund (USF) recently proposed by the Public Service Commission of Utah (PSC).

The DPU has reviewed the rule change submitted by the PSC, and believes that the language proposed by the PSC strengthens and clarifies the purpose of the USF, that while the fund allows for recovery of reasonable and prudent costs, the funds should be used as efficiently as possible. The DPU has certain objectives that are defined by statute in Utah Code, Section 54-4a-6. Among those objectives are:

- (1) Promote the safe, healthy, economic, *efficient*, and reliable operation of all public utilities and their services, instrumentalities, equipment and facilities;
- (4) (b) promote the *efficient* management and operation of public utilities; (emphasis added)

The DPU is the administrator of the USF. As such, the DPU audits and investigates all applications for companies seeking USF disbursements. By strengthening the language requiring efficiency in operations, the rule becomes more aligned with the objectives of the DPU and the public interest.

For these reasons, the DPU supports the changes proposed by the PSC to rule R746-360.

