



State of Utah
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Division of Public Utilities

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To: Public Service Commission

From: Phil Powlick, Director
Artie Powell, Energy Section Manager
Joni Zenger, Technical Consultant

Date: September 15, 2010

Re: In the Matter of the Application of Rocky Mountain Power for Approval of Standard Non-Reciprocal Pole Attachment Agreement

RECOMMENDATION

The Division recommends that the Commission consolidate the two standard pole attachment applications into a single new docket. The Division also requests that notification of the new docket number and existing Scheduling Order in Docket No. 10-035-43 be sent to the broad telephone and electric standard service lists.

DISCUSSION

On or about April 27, 2010, Rocky Mountain Power (“Company”) filed with the Public Service Commission (“Commission”) an application for approval of a Standard Non-Reciprocal Pole Attachment Agreement (“Agreement”). On July 27, 2010, the Commission held a scheduling conference in the above-captioned proceeding. As a result, two technical conferences have been scheduled on October 11 and October 18, 2010, respectively.

On August 31, 2010, the Company filed an application for approval of a Standard Reciprocal Pole Attachment Agreement as well as a motion to consolidate the filing with Docket No. 10-035-43 (the non-reciprocal application). At the July 27 scheduling conference the Company notified the parties that it intended to file the second pole attachment application, and the parties

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agreed it would simplify matters to combine the non-reciprocal and reciprocal proceedings into one docket.

The Division notes that many of the parties that intervene or participate in the standard reciprocal agreement docket would most likely be the same, or at least a subset, of the parties interested in participating in the non-reciprocal case. Many of the particular issues and legal sections that will be discussed in analyzing the reciprocal pole attachment agreement would be duplicative of those in the non-reciprocal agreement. The Division notes that there are differences, but these can be addressed in a single docket, eliminating travel and duplicative legal expenses for intervening parties.

RECOMMENDATION

The Division recommends that Docket No. 10-035-43 and the Company's August 31, 2010 Application for Approval of Standard Reciprocal Pole Attachment Agreement be consolidated into a new docket. Although the Company's Motion to consolidate requests the August 31, 2010 filing be consolidated into Docket No. 10-35-43, the Division requests that a new docket be open and assigned to both the standard reciprocal and the standard non-reciprocal applications. The existing dates in the Commission's Scheduling Order in Docket No. 10-035-43 can be applied to the new docket without changes.

CC Michele Beck, Office of Consumer Services

Dave Taylor, Rocky Mountain Power