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*Attorneys for the Utah Rural Telecom Association*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Consolidated Applications of Rocky Mountain Power For Approval of Standard Reciprocal and Non-Reciprocal Pole Attachment Agreements		Docket 10-035-97
		Utah Rural Telecom Association's First Set of Data Requests To   Rocky Mountain Power
		April 13, 2012

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**The following are Utah Rural Telecom Association's First Set of Data Requests to  
Rocky Mountain Power**

**Please email your responses to [kslawson@blackburn-stoll.com](mailto:kslawson@blackburn-stoll.com)**

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- 1.1 Please provide copies of all RMP responses to data requests submitted by all parties in this docket. Please include both formal and informal responses.
- 1.2 Please provide copies of all RMP data requests served on all parties to this docket. Please include both formal and informal requests.
- 1.3 Have the Management Expenses listed on Pacificorp's "215540 Exhibit F-2010 Per Pole App Fee Calc 2-9-2012.xlsx" been included in the development of any other rates that (1) have been historically charged by Rocky Mountain power, (2) are presently charged by Rocky Mountain Power, or (3) are proposed to be charged by Rocky Mountain Power.
- 1.4 If the answer to DR 1.3 is "yes", please explain fully: (1) what rates or charges reflect

such costs, (2) when such rates became effective, and (3) in what State, including its Docket Number a Commission ordered such rates into effect.

- 1.5 Please identify all fee categories that comprise the “Pre-Inspect” amounts contained in 215540 Exhibit F-2010 Per Pole App Fee Calc 2-9-2012.xlsx for each separate jurisdiction (CA, ID, OR, UT, WA, and WY). Please provide the specific amounts for each such fee category by jurisdiction.
- 1.6 Please identify how many of the 12,215 poles identified in 215540 Exhibit F-2010 Per Pole App Fee Calc 2-9-2012.xlsx” were located in Utah.
- 1.7 Please identify what how the figures for JU Application Management and JU Make Ready Management expenses listed on “215540 Exhibit F-2010 Per Pole App Fee Calc 2-9-2012.xlsx” were calculated. Identify whether the management expenses include Management Expenses that are not Utah-specific. If the Management Expenses do include expenses that are not Utah-specific, please identify any amounts that are not Utah-specific.
- 1.8 RMP’s “215536 Exhibit B-Tariff Pages 2-9-12.doc” indicates that the Per Pole Application Fee of \$58.30 will cover “the expected costs for performing the work necessary to determine what make ready work must be done to accommodate the application.” Please explain what is meant by “expected costs”. Is it RMP’s position that “unexpected costs” would be passed on to the Licensee in addition to the Application fee as, perhaps, a Miscellaneous Fee?
- 1.9 RMP’s “215536 Exhibit B-Tariff Pages 2-9-12.doc” identifies “Miscellaneous Fees” that will be invoiced at the Company’s actual cost. Exhibit B provides that “this fee is applicable to recover the cost of work necessitated by Licensee requests not otherwise recovered in the Annual Charge or other fee categories, such as actual or estimated charges for make ready work and labor for emergency restoration work.”
  - a. Does RMP intend to charge Licensees a Miscellaneous Fee for preparing an estimate of Make-Ready work?
  - b. Please identify any additional fee categories (and amounts) besides Make-Ready Work and Labor for Emergency Restoration Work that could be included in “Miscellaneous Fees.”
  - c. Will return trip or topping fees be included in Miscellaneous Fees?
- 1.10 Does RMP contemplate providing Make Ready Work Estimates in each instance when a Application for Attachment is filed?

- 1.11 In RMP's Amended Application, 125535 Exhibit A – Redline Version of Pole Attach Agreement, page 4, Section 3.01, you indicate that Licensee may overlash forty-eight (48) and fewer count fibers. Please identify the criteria you used to determine that limitation. Why has RMP limited this to 48 count fibers, rather than permitting 96 count fibers?
- 1.12 In RMP's Amended Application, 125535 Exhibit A – Redline Version of Pole Attach Agreement, page 5, Section 3.02 deals with Service Drops. Under Section 3.02 as proposed, if a Licensee has applied for an attachment to a Pole for the purpose of installing a service drop, and has paid the Application Fee of \$58.30, if the customer terminates service and the service drop is pulled off the pole, will the Licensee be required to pay another Application Fee if and when the customer reinstates service, necessitating installation of another service drop.

cc: Service List