ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

201 South Main, Suite 2300
Salt Lake City, Utah 84111

December 7, 2011

VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY

Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Julie P. Orchard
Commission Secretary

Re: In the Matter of the Joint Petition of Rocky Mountain Power and Qwest Corporation dba CenturyLink For Approval of an Electronic Notification System for Pole Attachments

Rocky Mountain Power hereby submits for filing to the Public Service Commission of Utah ("Commission") an original and five (5) copies of the Joint Petition of Rocky Mountain Power and Qwest Corporation dba CenturyLink for Approval of an Electronic Notification System for Pole Attachments and the associated exhibit in this matter.

Rocky Mountain Power respectfully requests that notices and orders related to this matter be provided to parties on both the electric utility and telecommunication utility email lists.

Please contact Barbara Ishimatsu at (801) 220-4640 if you have any questions.

Very Truly Yours,

Jeffrey K. Larsen
Vice President, Regulation

cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **JOINT PETITION FOR APPROVAL OF AN ELECTRONIC NOTIFICATION SYSTEM FOR POLE ATTACHMENTS** to be served upon the following by electronic mail or U.S. mail, postage prepaid, to the addresses shown below on this 7th day of December, 2011:

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Attorney for CenturyLink

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Joint Petition of Rocky Mountain Power and Qwest Corporation dba CenturyLink For Approval of an Electronic Notification System for Pole Attachments	DOCKET No. 11-035-___ JOINT PETITION FOR APPROVAL OF AN ELECTRONIC NOTIFICATION SYSTEM FOR POLE ATTACHMENTS

Rocky Mountain Power, a division of PacifiCorp ("Rocky Mountain Power") and Qwest Corporation d/b/a CenturyLink ("CenturyLink") respectfully request that the Public Service Commission of Utah ("Commission") approve the use of an electronic notification system ("ENS") known as "Notify" for establishing and managing the pole attachment relationship between pole owners and attaching entities. The "safe harbor" agreements, approved by the

Commission in Docket 04-999-03, contemplate the use of an ENS following Commission approval. In support of this Joint Petition, Rocky Mountain Power and CenturyLink offer the following supporting information:

1. On March 11, 2004, the Division of Public Utilities filed a Request to Open an Investigation Docket concerning pole attachment issues in Utah.

2. The Commission opened Docket No. 04-999-03 and conducted a series of technical conferences in anticipation of making rule changes and accepting a template "safe harbor" pole attachment agreement that the parties may opt into if they are unable to agree to pole attachment terms through negotiations.

3. In Docket No. 04-999-03, the Commission approved a template "safe harbor" agreement for all pole owners and another specifically for CenturyLink. The Commission's "safe harbor" agreement was filed in Docket 10-035-97 and is available at http://www.psc.state.ut.us/utilities/electric/elecindx/2010/documents/690380499903rrcshpaa.pdf. The CenturyLink "safe harbor" agreement, filed April 17, 2006 in Docket 04-999-03, was approved by Order of August 28, 2006 and is available at http://www.psc.state.ut.us/utilities/misc/04docs/0499903/ExhibitA-Std%20Contract%204-14-06.doc.

4. Both "safe harbor" agreements contemplate that the Commission can approve the use of an electronic notification system with respect to pole attachments.

5. Specifically, the "safe harbor" agreements define Electronic Notification System as follows:

> "Electronic Notification System" or "ENS" means the electronic system or combination of electronic systems that may be approved by the Commission and adopted in Utah. When adopted, the Parties must utilize ENS to submit applications for permission to attach, relocate, or remove Equipment under the terms of this Agreement, and respond to request for work to be performed.

Safe Harbor Agreement, Article I. Definitions.

6. Further, Section 3.01 of the "Safe Harbor" agreements recognize the use of an ENS, and state in part as follows:

> In the event the Commission approves an ENS, the Parties will use the approved ENS to submit, approve and/or deny applications for permission to attach, relocate or remove Equipment and will follow all procedures required by such ENS.

Safe Harbor Agreement, Article III, Section 3.01.

7. Lastly, Section 3.09 of the "safe harbor" agreements refer to an ENS and state in part as follows:

> If Licensee is willing to bear the cost of all Make-ready Work necessary, as determined by Pole Owner, Licensee shall so indicate via ENS or in writing within thirty (30) days of the date of Pole Owner's response to Licensee's initial application.

Safe Harbor agreement, Article III, Section 3.09

8. Given the references to ENS in the "safe harbor" agreements, it is apparent that the Commission contemplated that parties can utilize an ENS after the Commission approves its use.

9. By way of this Joint Petition, Rocky Mountain Power and CenturyLink specifically seek the Commission's approval of an ENS system known as Notify.

10. Notify is a free to use, web based, electronic notification system that can be used to submit applications for permission to attach, relocate, or remove pole attachment equipment, and can be used for other communications between pole owners and pole attachers. Pole attachers do not need any additional computer software or hardware to utilize Notify.

11. Information regarding Notify can be found at www.notify.com.[1] Further, a guide for getting started with Notify is attached hereto as Exhibit 1.

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[1] Registration at www.notify.com is free of charge, and will provide access to more detail about the system.

12. Rocky Mountain Power and CenturyLink affiliated entities have already been using Notify in other jurisdictions, and pole attachers have been very happy with the system.

13. The current system for applications and communications between pole owners and pole attachers is a haphazard, manual process. For example, a pole owner may request a new attachment via telephone, fax, or even a scrap of paper. The current process creates a risk that communications may be easily misplaced or lost, and does not create a good record of the communications.

14. Notify will be easy for parties to use, and effortlessly creates a good record of the communications between the parties.

15. Prior to implementation, Rocky Mountain Power and CenturyLink will work with pole attachers to assist with training.

16. No amendments to the "safe harbor" agreements are needed in order for the Commission to approve the use of Notify. As previously set forth, the current "safe harbor" agreements for Rocky Mountain and CenturyLink contemplated the use of an ENS after Commission approval.

17. Further, the Commission's approval of the Notify ENS will not change the terms of any other existing pole attachment agreement. To the extent an existing pole attachment agreement would permit an ENS if approved by the Commission, Notify will be used as the ENS.

18. Rocky Mountain Power and CenturyLink recommend that the Commission schedule a technical conference so that interested parties can see how easy Notify is to use, and to better understand its functionality.

19. Following the technical conference, if no party files an objection within 14 days, it is recommended that the Commission expeditiously approve the use of Notify as an electronic notification system for pole attachments. To the extent there is an opposition filed within 14

days of the technical conference (or as may otherwise be required by the Commission), Rocky Mountain Power and CenturyLink request that a scheduling conference be set at that time to further discuss how this matter should proceed.

WHEREFORE, Rocky Mountain Power and CenturyLink respectfully request that the Commission approve the use Notify as an ENS as set forth herein.

DATED this 7th day of December, 2011.

ROCKY MOUNTAIN POWER

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Attorney for CenturyLink

GETTING STARTED

notify

WELCOME TO THE NOTIFY™ NETWORK

This training guide will walk you through how to get started in Notify™.

www.notifyweb.com

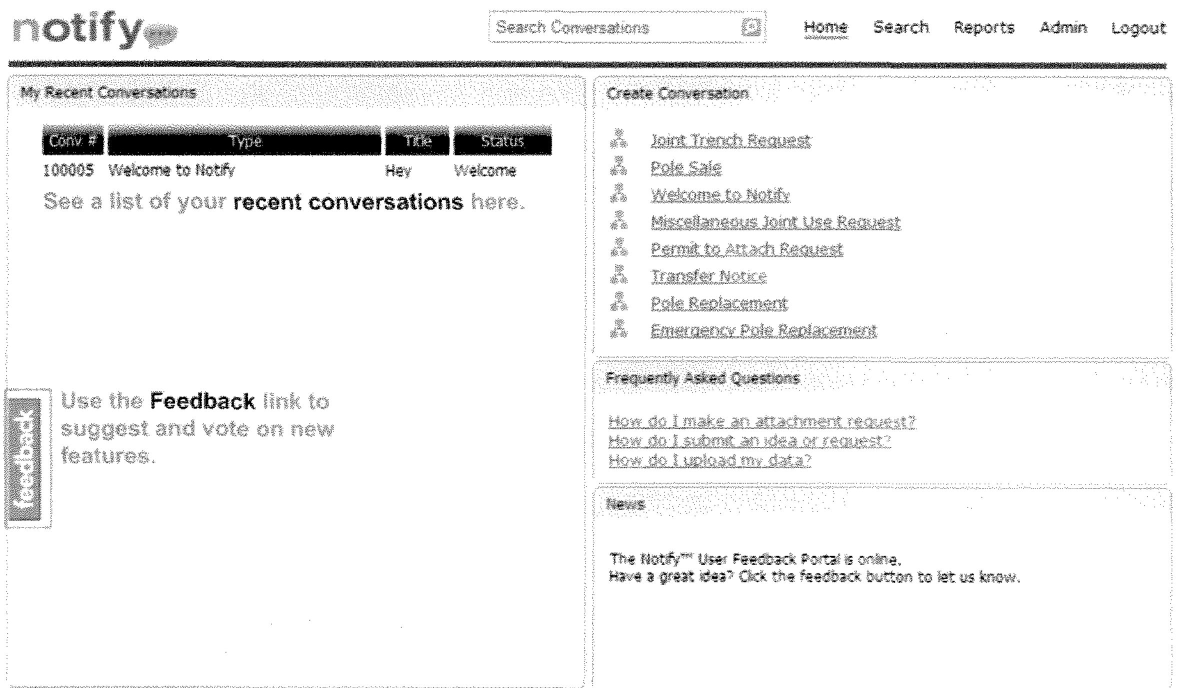
alden

Getting Started in Notify™

Navigating the Home Screen

When you first log into Notify™, you will see the **HOME** screen (shown below). From the **HOME** screen, you can choose to view **Recent Conversations, Create New Conversations, View Frequently Asked Questions** and see the latest **News**.

Type in this box to **search** your conversations.



See a list of your **recent conversations** here.

Select the task you wish to perform from the list of **conversation types.**

Use the **Feedback** link to suggest and vote on new features.

Get help for Frequently Asked Questions.

Read the latest Notify™ **News.**

Selecting a Conversation Type

Work requests or jobs are referred to as **conversations** in Notify™. **To begin a work request or "conversation,"** select the task you wish to perform from the list of conversation types. The conversation type you select will determine the workflow.

Click the **WORKFLOW** icon to view a conversation workflow.

What is a workflow?

A workflow is the set series of steps that make up a conversation type. Each type has its own workflow configured to complete a specific work request. The conversation interface is the same for all the different types of conversations; however, the workflow will change depending upon which conversation type is selected.

Example of a Visual Workflow

The following is an example of a visual workflow for a **Joint Trench Request** conversation type. The workflows are specific to each conversation type.

Initial
- Acknowledge
- Cancel

Review
- Accept
- Reminder
- Decline
- Cancel

Review Overdue
- Accept
- Reminder
- Decline
- Cancel

Deadline Approaching
- Accept
- Decline
- Cancel

In Progress
- Send to Construction

Construction
- Construction Complete

Posting
- Posting Complete

Declined

Cancel

Complete

Create Conversation

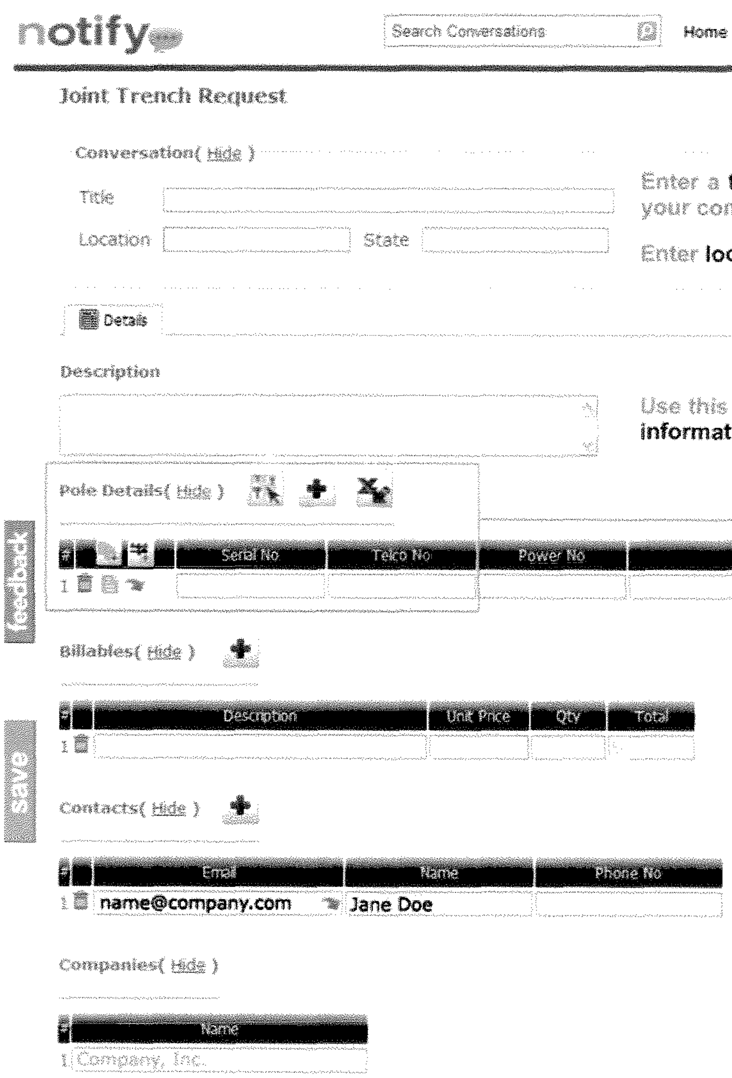
- Joint Trench Request
- Pole Sale
- Welcome to Notify
- Miscellaneous Joint Use Request
- Permit to Attach Request
- Transfer Notice
- Pole Replacement
- Emergency Pole Replacement

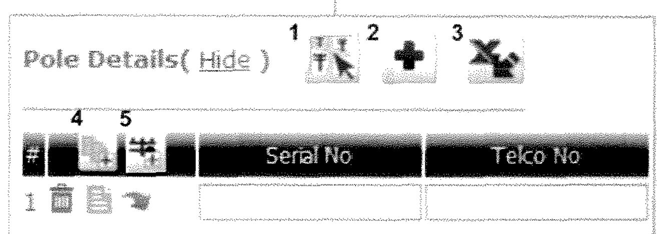
Click the **WORKFLOW** icon to view the visual workflow for a joint trench request or any conversation type.

Starting a Conversation

Understanding the Conversation Interface

Each conversation type has its own workflow, or series of steps that make up each work request. However, the conversation interface (shown below) is the same for each type of conversation.





1. View/Select Poles from Map

You may manually enter your pole information into the fields or click this icon to select your poles directly from the map.

2. Add Pole

Use this icon to manually add poles to your work request.

3. Import Pole List

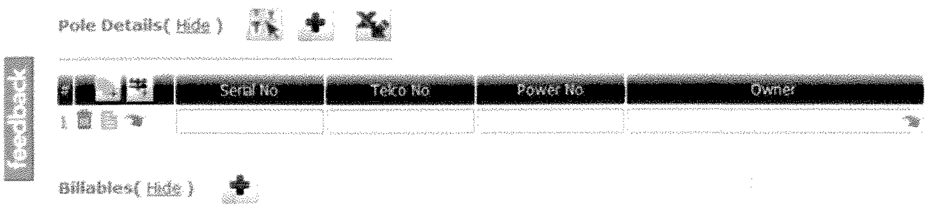
Use this if you wish to import your pole data .txt file.

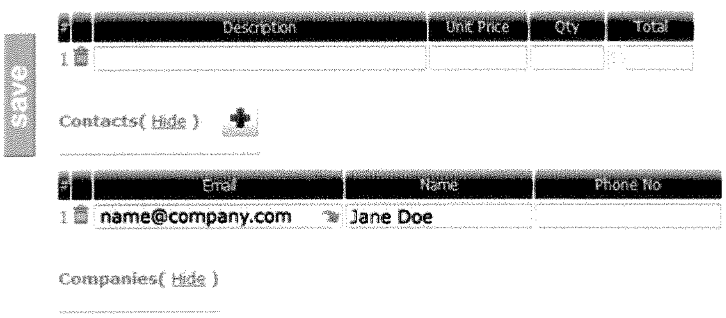
4. Collapse/Expand Pole Details

Click here to hide or show pole details.

5. Add Attachment to all Poles

Use this icon to add an attachment to all the poles in the list.





Add billable items to the conversation, such as a make-ready estimate.

Add additional contacts to the conversation. You, (the conversation initiator) and the joint use admin for the company that owns the pole(s) is added by default when a new conversation is saved.

Add additional companies to the conversation. Your company and the pole owner is added by default when a conversation is saved.

Adding Poles to Work Requests using the Map

You may add your poles manually to each conversation or choose to select them directly from the map.

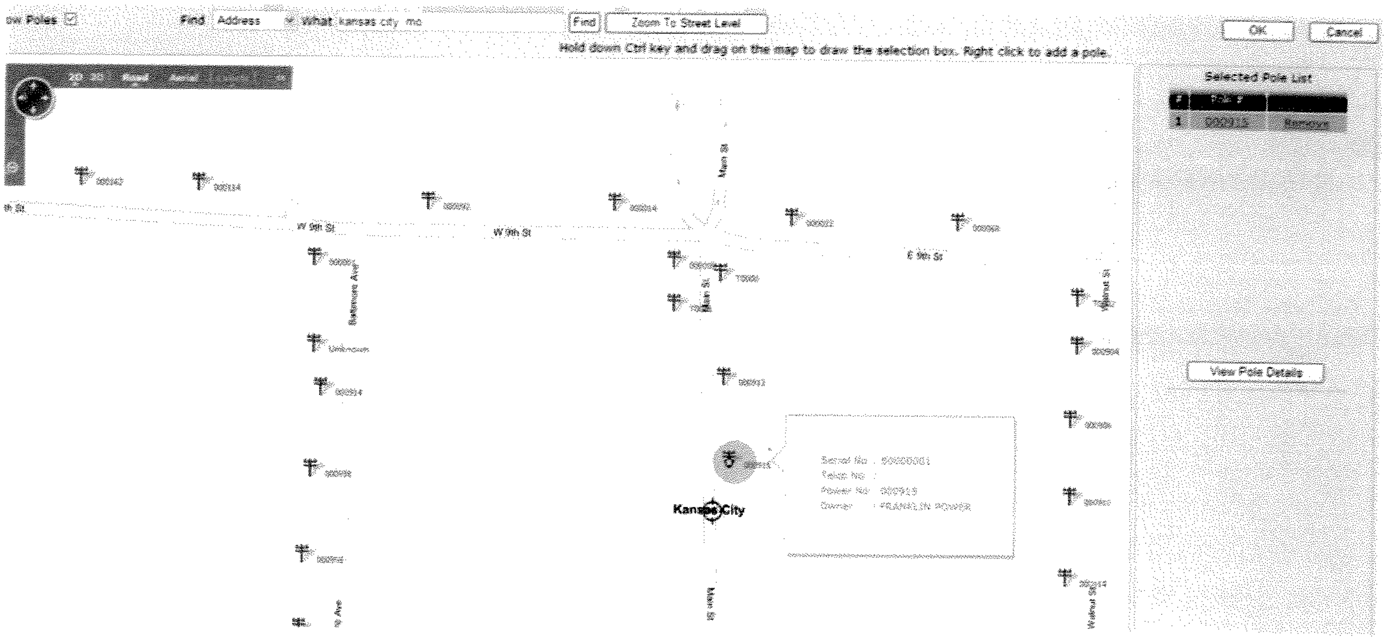
Click the **Select Poles from Map icon to view the map.** This icon is located in the Pole Details section of the conversation screen.

Click **View/Select Poles from Map** to be taken to the map screen to add poles to the conversation.

Enter address information (street address, city, state, zip).
Click **FIND** and then **ZOOM TO STREET LEVEL** to view poles.

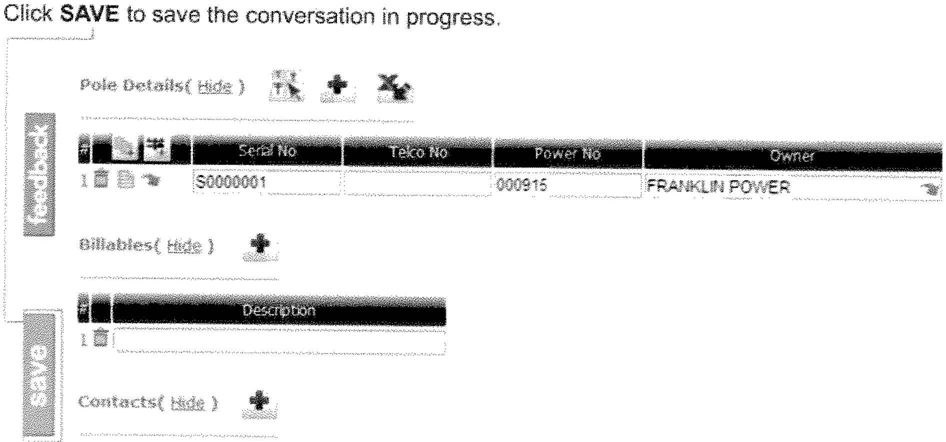
When you have located the work area, select the pole or poles to include. Mouse over each pole to view its details. When you have selected a pole, it will appear in the **Selected Pole list** on the right side of the screen (see below).

Click **OK** when finished adding poles.



The poles that you have selected will now appear in the **Pole Details** list on the conversation page (shown below).

Click **SAVE** to save the conversation in progress.

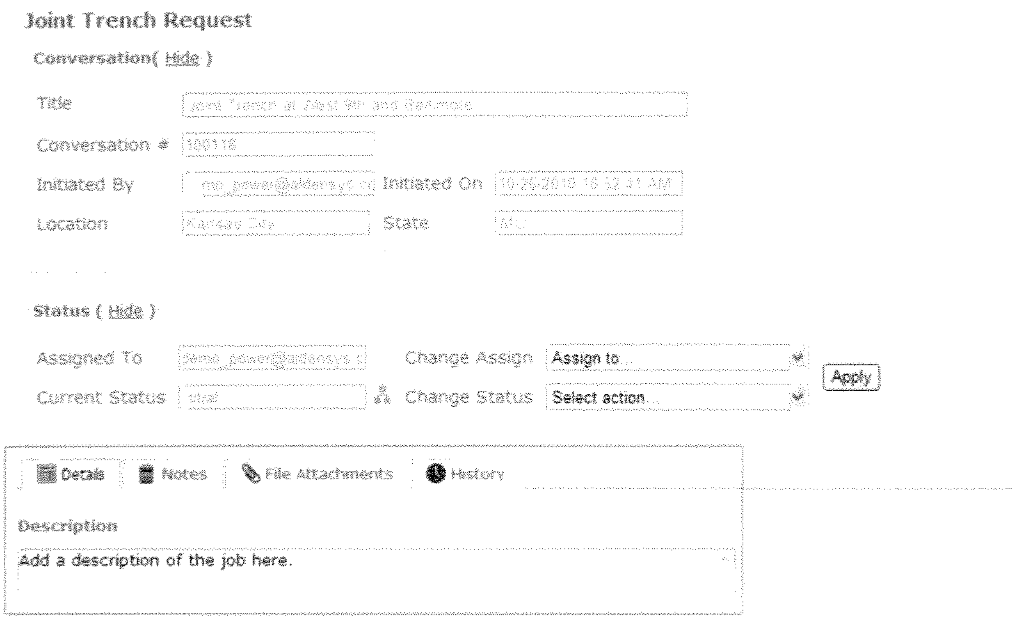


Adding Details, Notes & File Attachments

After you **Save** a conversation initially, a new set of tabs will appear in the **Pole Details** section of the conversation screen. Click the tabs to **Add Notes, Add Files Attachments and View Conversation History**.

Add Details to Conversations

Use this area for adding a **job description** to your conversation.

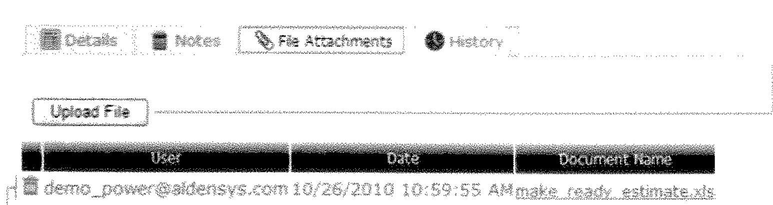


Add Notes to Conversations

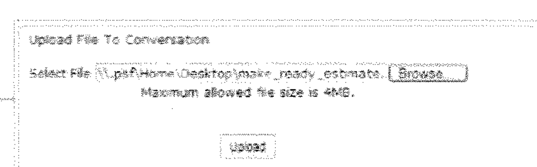
Input **notes** for either your joint use partners or yourself.

Add File Attachments to Conversations

Upload associated files, such as make-ready estimates, digital pictures, contract information and agreements.



Files appear in this list when uploaded.

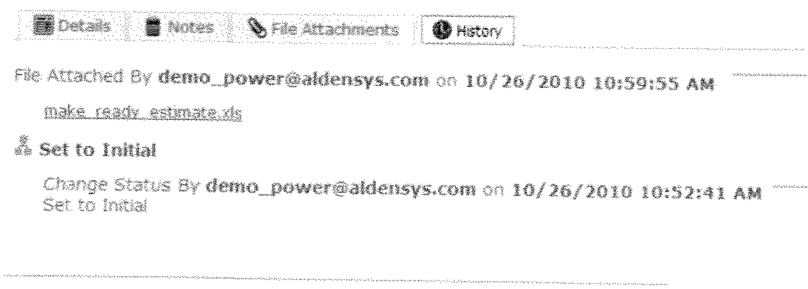


Locate your file attachment and click **UPLOAD** to attach it to the conversation.

Conversation History

View Conversation History

Click this tab to display the entire conversation log. See what step in the workflow the conversation is currently in, along with what work has been performed and by whom.

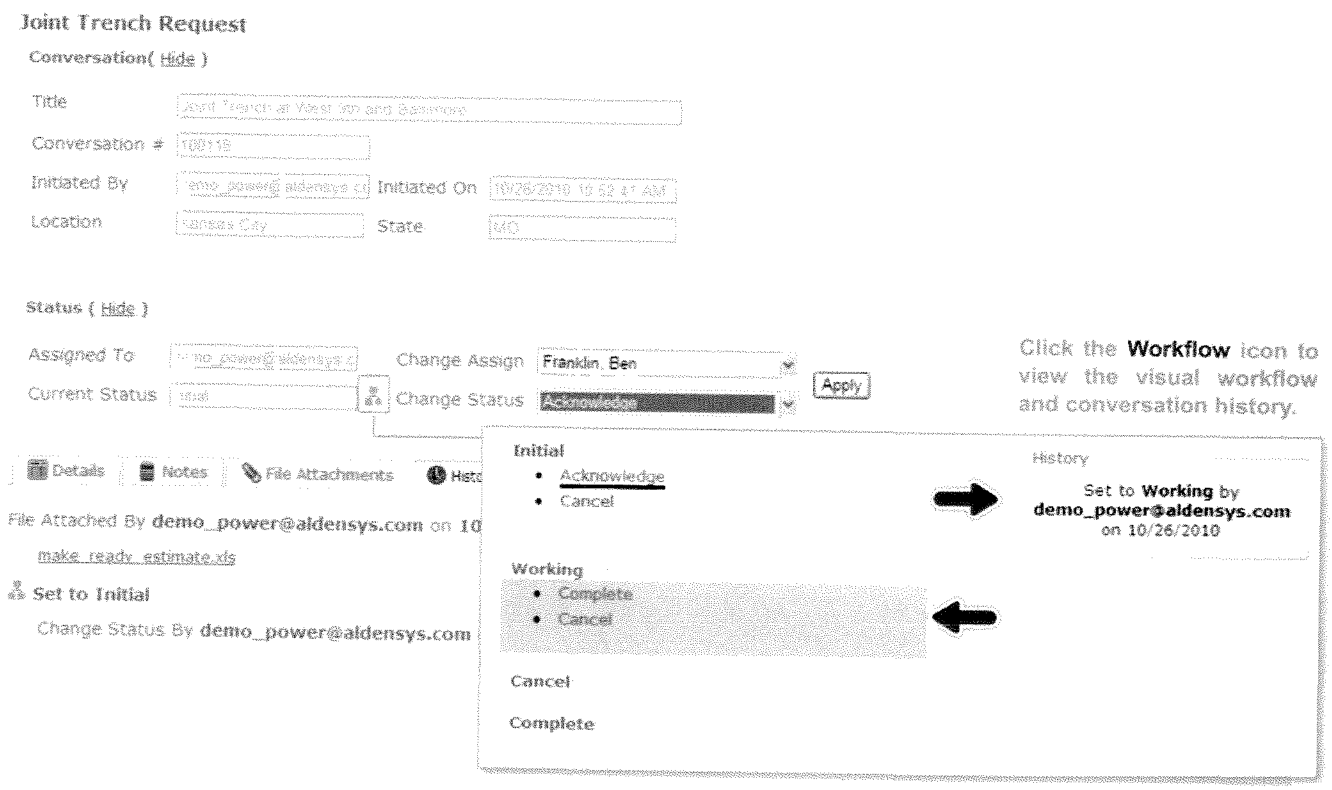


Shows the attached file, who uploaded it and date of upload.

Displays the date when conversation was created, and by whom.

View Conversation History in a Visual Workflow

Click the **WORKFLOW** icon to view current conversation status in a visual workflow and see the History of who performed work and when.



Click the **Workflow** icon to view the visual workflow and conversation history.

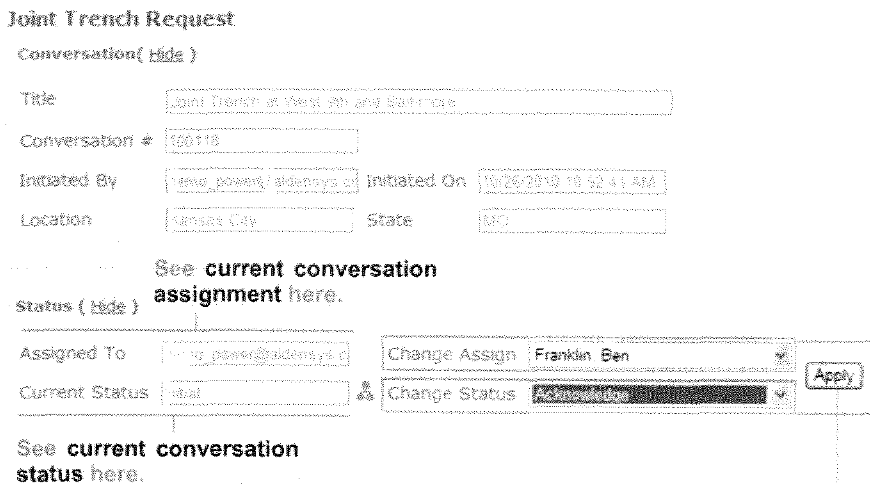
Assigning Conversations and Changing Status

Changing Conversation Assignment

Assign the conversation to the person responsible for the next step of the job. If you have already added the person or persons into the Conversation Contacts, they will appear in the **Change Assign** list.

If you have not added the person to this conversation that you wish to assign the conversation to, add them now by clicking the **ADD icon** under the Contacts section and **Saving** the conversation.

The **CHANGE ASSIGN** drop-down menu contains all the contacts listed in the contacts section of this conversation.



Reassign a conversation by clicking the **CHANGE ASSIGN** list button and selecting the person responsible for the next step.

(If you do not need to change the conversation status after reassignment, simply click Apply. If you do, update the status next.)

Update the status by clicking the **CHANGE STATUS** list button. Select an available status.

When you click **APPLY**, a notification will be sent to the person shown in the **Change Assign** list and will display the status displayed in the **Change Status** list.

Changing Conversation Status

See what steps are next in any conversation's workflow by clicking the **CHANGE STATUS** list button.

The CHANGE STATUS drop-down menu contains all the possible next steps in the life of each work request, which are determined by the workflow of each conversation type.

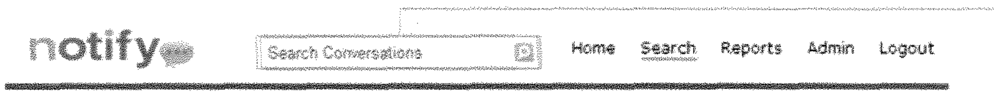
Sending a Notification

When you click **APPLY**, a **notification will be sent** to the person shown in the Change Assign list and will display the status displayed in the Change Status list.

Searching in Notify™

Performing a Search

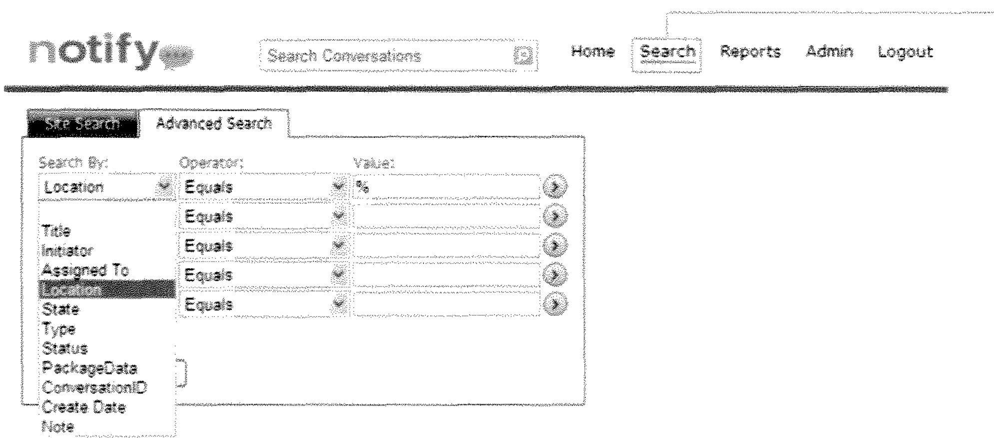
There are a couple of different ways to perform searches in Notify™. There is a search box located at the top of each screen and a search page. The differences and capabilities of each are explained below.



The **Search Conversations** box searches only the conversation and status areas of conversations.

This search includes the following conversation fields:

- **Title**
- **Conversation Number**
- **Initiated by**
- **Initiated on**
- **Location**
- **State**
- **Assigned to**
- **Current Status**

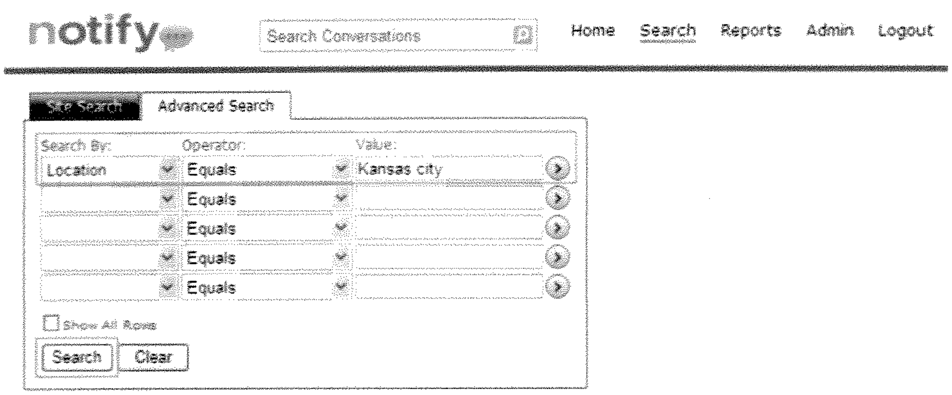


The **Search page** searches all your conversations on a variety of terms and operators.

Entering Search Criteria

If you know exactly what you are searching for, choose the field you wish to search by, the desired operator (equals, contains, etc) and click **SEARCH** to view a list of conversations that meet the search criteria.

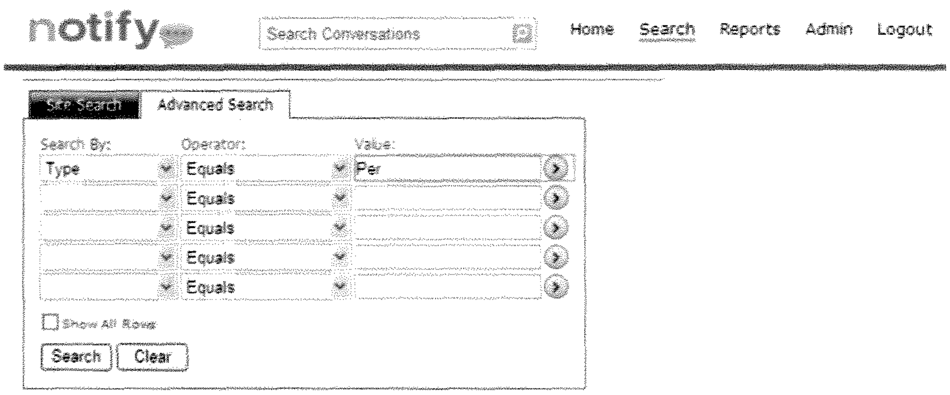
For example, I know I want to search for conversations located in Kansas city (see below).



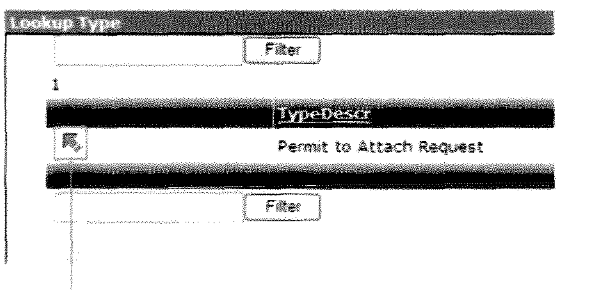
The search returns all the conversations located in Kansas City.

If you DO NOT know exactly what you are searching for, enter all the information you have and perform a lookup. This feature allows you to complete a search even if you only enter partial information.

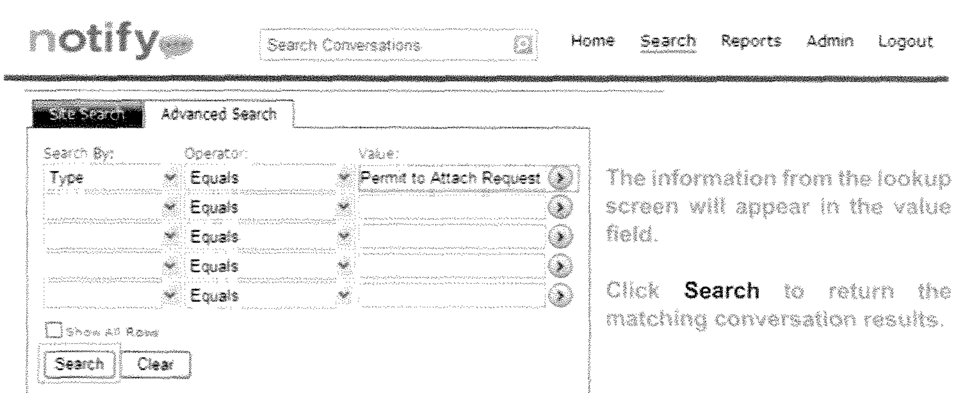
For example, *I know I want to search for Permit to Attach conversations. I type in Per into the value field (shown below) and click Lookup.*



Clicking **Lookup** brings up all the possible choices based on the information you entered, in this case **Permit to Attach**.



Choose your selection from the list and click the **Return arrow** to automatically enter this into the search screen.

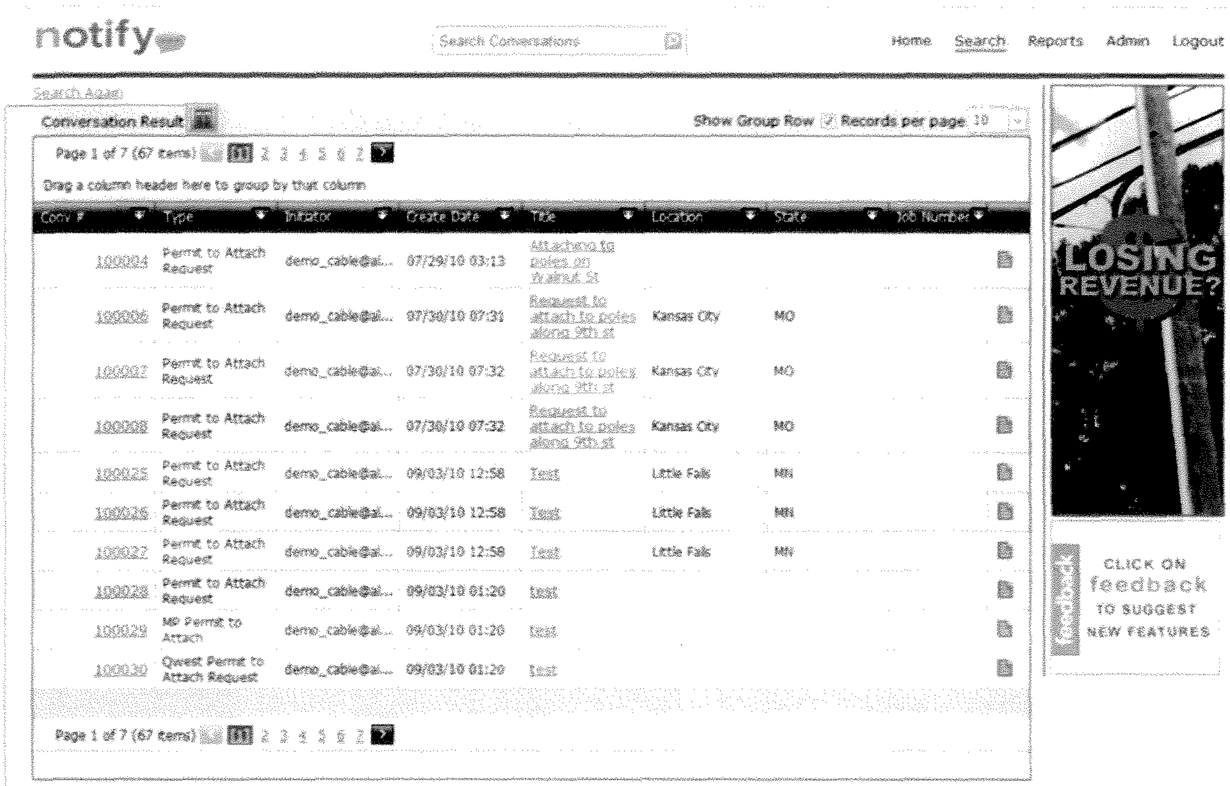


The information from the lookup screen will appear in the value field.

Click **Search** to return the matching conversation results.

Customizing Search Conversation Results

After you have performed your search and returned the matching conversations, you may choose to customize the results view.



This icon brings up the **Field Chooser**, which allows you to customize the view of conversation results. This icon **shows or hides columns by dragging them to and from the grid.**

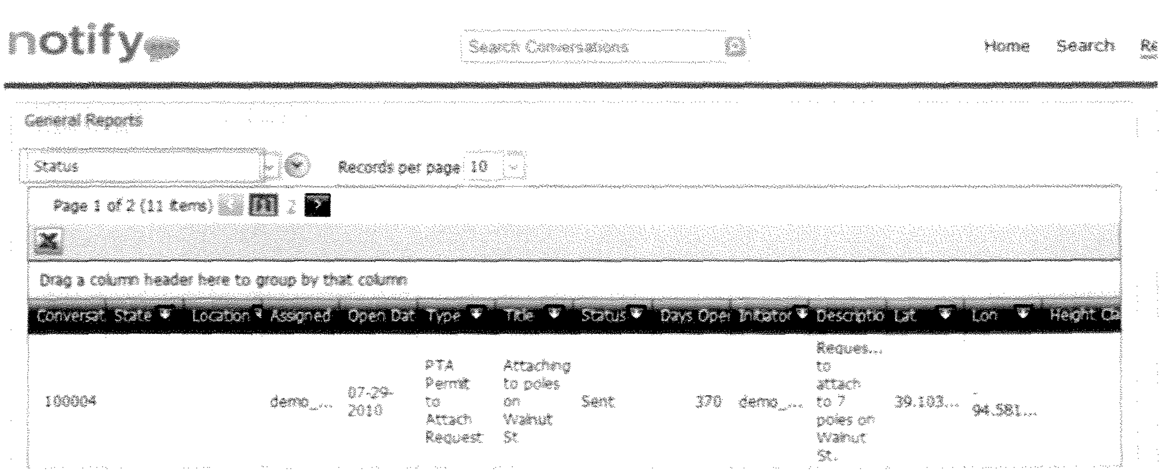
Select columns to drag and drop into the Field Chooser to customize the results view.

Reports

Viewing Reports

To create a **summary report**, click the file icon in the results grid. You can export to an **EXCEL spreadsheet or a PDF document**.

View reports such as the **current status** of all your conversations (shown below).



Available Reports

The following reports are currently available in Notify™.

Status
- View the status of all conversations.
- View by state or type.
- Choose to see only active conversations, if desired.

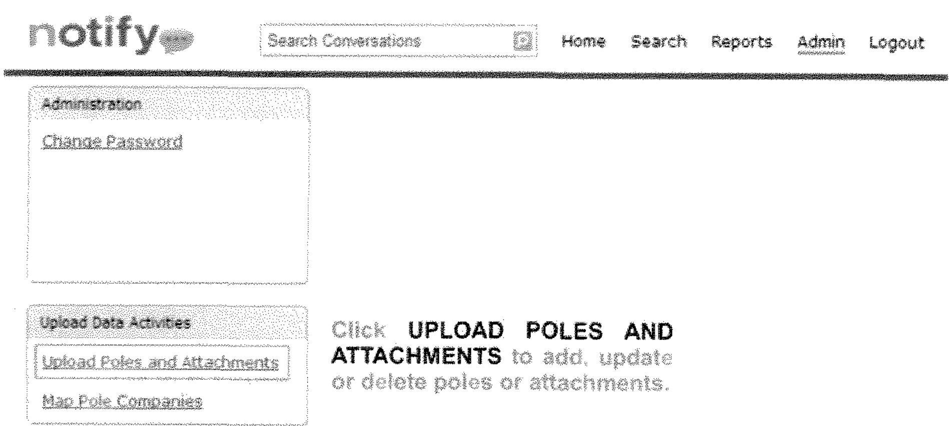
Active Timers
- View conversations that have reminders specified in the workflow.
- See the current status of the conversation and its expiration date. If the expiration date passes, a reminder email is sent out and the conversation may move to an 'overdue' or 'escalated' status, depending on how the workflow is defined.

Conversation Definition By Type
- View the workflow for a conversation type in tabular form.

Administration

Understanding the Admin Screen

Go here to change your password, upload poles and attachments and map pole companies.

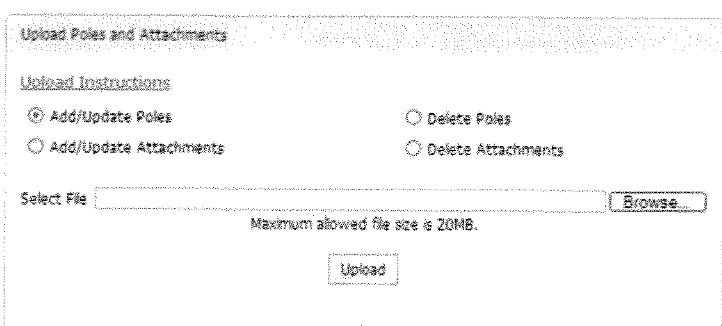


Click **UPLOAD POLES AND ATTACHMENTS** to add, update or delete poles or attachments.

Update, Add, & Delete Poles or Attachments

Select the task you wish to complete from the list below. Browse for the file, select it and click **UPLOAD.**

IMPORTANT: The option you choose will determine how your file needs to be formatted. Visit www.aldensys.com/upload for instructions.



Choose your task from the following options:

1. **Add/Update Poles**
2. **Add/Update Attachments**
3. **Delete Poles**
4. **Delete Attachments**

How to Format Pole Data for Upload

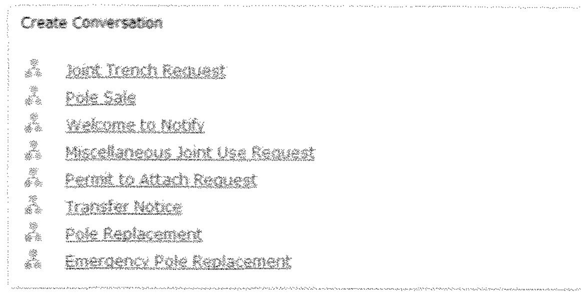
Instructions on how to format your data for each type of file and how to map companies are located at www.aldensys.com/upload.

Conversations for Pole Owners

Types of Conversations Initiated by Pole Owners

As a pole owner or attacher, you may initiate any conversation in the list of Conversation Types.

Pole owners are most likely to be interested in initiating one or more of following conversation types:



- **Pole Sale** - As a pole owner, you may decide to sell a pole and offer it to a potential buyer and/or notify the companies currently attached to the pole it has been sold, once the sale is final.

- **Transfer Notice** - Notify attachers to transfer off a pole or poles.

- **Pole Replacement** - As a pole owner, you may need to notify attachers a pole has been replaced.

- **Emergency Pole Replacement** - Notify attachers a pole has been damaged and was replaced.

- **Joint Trench Request** - Coordinating joint trench work is simplified when Notify™ is used to alert attachers or co-owners.

- **Miscellaneous Joint Use Request** - This type of conversation can be related to any type of request that is not already specified, such as a meeting request with an attacher or another pole owner.

As a pole owner, you may be asked to respond to any of the above requests during a conversation's life-cycle.

Types of Conversations Received by Pole Owners

Pole owners are most likely to receive Permit to Attach requests from attachers.

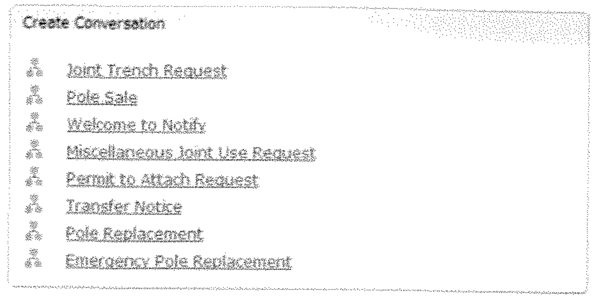
- **Permit To Attach** - As a pole owner, you are responsible for approving attachment requests and/or completing any necessary make-ready work.

  In addition, when an attacher attaches to your pole, you are responsible for inspecting the attachment.

Conversations for Attachers

Conversations Initiated by Attachers

As a pole owner or attacher, you may initiate any conversation in the list of Conversation Types.



Attachers are most likely to be interested in initiating the following conversation types:

- **Permit To Attach** - As an attacher, you will often need to send a request to the owner of the pole for permitting purposes, approve any make-ready work as deemed necessary by the pole owner, attach to the pole and request an inspection of the attachment by the pole owner.

- **Miscellaneous Joint Use Request** - This type of conversation can be related to any type of request that is not already specified, such as a meeting request with an attacher or another pole owner.

Icon Legend

Help with Identifying Icons

A description of icons used in Notify™.

Workflow
View the visual workflow for a conversation.

View/Select Poles from Map
Use this icon to access the map and select poles for work request conversations.

Add
Used to add poles, billable items, contacts and companies to conversations.

Import Pole List
Import a list of poles (.csv) for work request conversations.

Export
Exports a list of pole from a conversation.

Collapse/Expand Pole Details
Expands/collapses ALL pole details.

Add Attachment to all Poles
Adds an attachment to all the poles that appear in the work request conversation.

Delete
Delete the entry.

Show/Hide Details
Show/hide individual pole details.

Lookup
These two icons represent different lookups in Notify™. Grid lookups are denoted by the first icon by the 2nd for search field lookups.

save

Save
Saves your conversation in progress.

feedback

Feedback
Click this icon to suggest new features and vote on favorites.

Add Details
Add descriptions to conversations.

Add Notes
Add notes for other joint use contacts or yourself.

Upload File Attachments
Add file attachments to conversations such as make-ready estimates, digital pictures, contract information and agreements.

View History
See the entire history of a conversation.

Run Summary Report
Export your summary report to Excel or PDF.

Show/Hide Columns by dragging to/from grid
This icon opens the Field Chooser, which allows you to drag and drop to show or hide columns in the grid. Useful for customizing your results view.

Pole icon
How a pole appears on the map

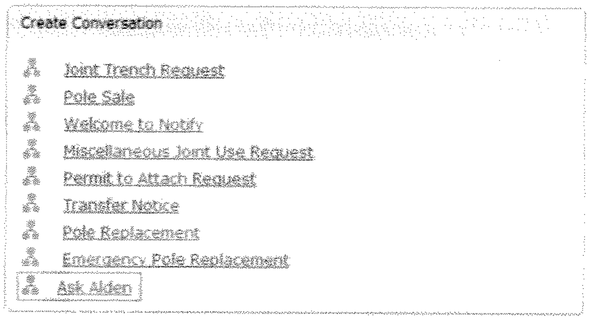
Selected Pole
Highlighted pole indicates active selection.

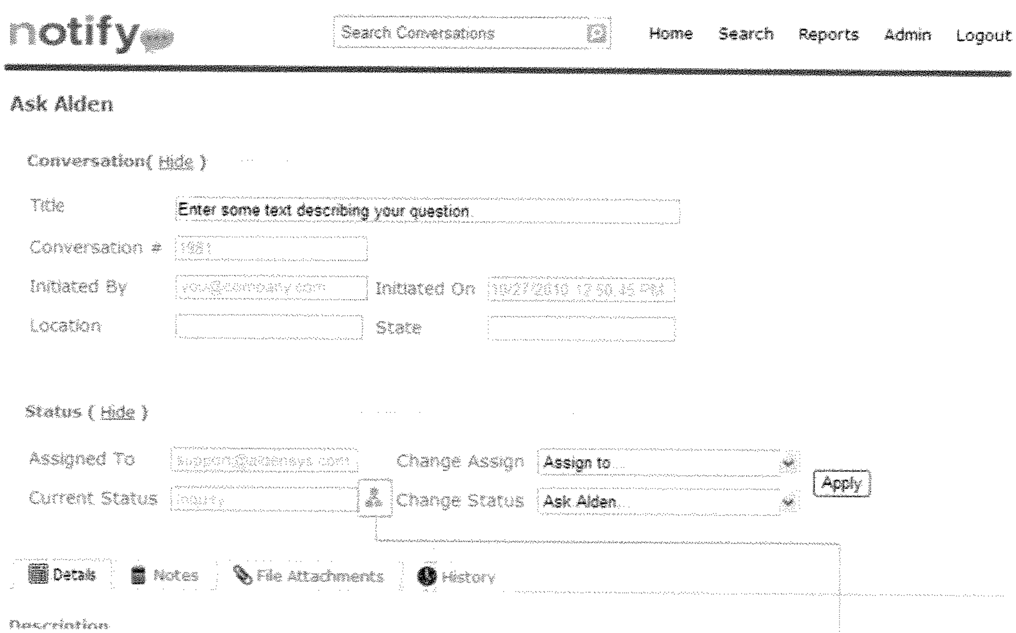
Search Conversations
Enter your search criteria into the search box and click this icon to search previous conversations.

Need Help?

Create a Support Conversation

If you have questions, click on the **ASK ALDEN** conversation type from the list of available Conversation Types located on the Home screen to initiate a support conversation.



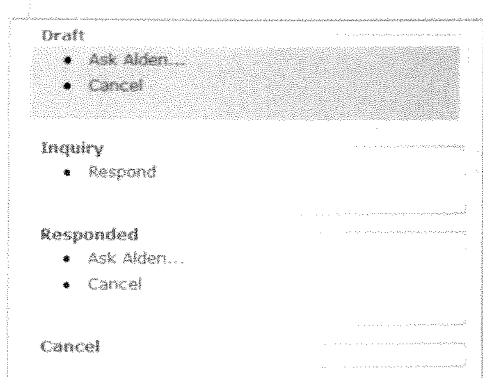


Type your question in the **Details Description** field.

Click the **CHANGE STATUS** drop-down and select **Ask Alden.**

Click **APPLY** to automatically send your question to Alden.

(Note: You do not have to change the assignment here, this conversation has been **auto-assigned** to Alden)



Visual Workflow for an **Ask Alden** Conversation