

December 28, 2015

***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: Gary Widerburg
Commission Secretary

Re: Reply Comments
In the Matter of Rocky Mountain Power's Application for Approval of a Pole Attachment Agreement with Rocky Mountain Power and TDS Baja Broadband, LLC – Docket No. 15-035- 82

On November 17, 2015, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment period in the above referenced matter, allowing parties to file comments by December 14, 2015, and reply comments by December 29, 2015. The Division of Public Utilities (“DPU”) filed comments on December 8, 2015. Rocky Mountain Power (“Company”) provides these reply comments in response to the DPU’s comments.

The Company agrees with the DPU that the Company’s current Joint Use Distribution Construction Standards are in conformance with Utah Admin. Code § R746-310-1 (B)(13) which requires adherence to the 2007 version of the National Electric Safety Code. The Company also suggests that the definition of “National Electric Safety Code” in Utah Admin. Code R746-310-1 (B)(13) could be changed to define the most current version of the NESC, rather than the 2007 version. The Company is also in agreement that the National Electric Safety Code is updated every five years and the current version of the National Electric Safety Code is dated 2012. The Company notes that while the National Electric Safety Code is updated every five years, oftentimes there are very few substantive changes made.

To reply to the DPU’s inquiry regarding the Company’s procedures for updating its construction standards, the Company states that beginning in 2014, the Company implemented a documentation process in order to formerly document its reviews of its Construction Standards (Standards). Prior to this, individual users performed reviews in order to ensure that the most recent NESC standards were being used, but the review date was not formerly documented. If the new version of the National Electric Safety Code requires changes to the Standards, it is issued a new “published and reviewed date”. If the National Electric Safety Code does not require changes to the Standards the document will be issued a new review date and no change will be made to the published date. Instances wherein the last review date shown in the footer of the Standards is earlier than 2012 are likely minor oversight by the user in failing to update the review date in the footer of the Standards.

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The Company has completed a subsequent review of the Standards and identified three items that need to be modified. In EU 101, section 6 and EU 401, section 9 a reference is made to NESC Rule 279A3. This is a typo. The correct reference is NESC 279B3. The Standard itself is current. In EU 281, the clearance shown in Figure 1 requires 24 inches from supply service to communication cross-arm and was in conformance with the 2007 version of the National Electric Safety Code. EU 281 will be updated to require 30 inches from supply service to communication cross-arm in conformance with the 2012 version of the National Electric Safety Code.

Informal inquiries regarding this filing may be directed to Bob Lively (801) 220-4052.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey M. Kent". The signature is written in a cursive, flowing style.

Jeffrey M. Kent

Director, Distribution Support | Joint Use Administration

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Reply Comments of Rocky Mountain Power to be served upon the following by electronic mail to the addresses shown below on December 28, 2015:

Michele Beck
Cheryl Murray
Office of Consumer Services
160 East 300 South, 2nd Floor
Salt Lake City, UT 84114
mbeck@utah.gov
cmurray@utah.gov

Christopher Parker
William Powell
Dennis Miller
Division of Public Utilities
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84114
chrisparker@utah.gov
wpowell@utah.gov
dennismiller@utah.gov

Patricia Schmid
Justin Jetter
Utah Division of Public Utilities
Heber M. Wells Bldg., Fifth Floor
160 East 300 South
Salt Lake City, UT 84114
pschmid@utah.gov
jjetter@utah.gov

Rex Olsen
Office of Consumer Services
Heber M. Wells Bldg., Fifth Floor
160 East 300 South
Salt Lake City, UT 84114
rolsen@utah.gov

New Path Networks, LLC
c/o Crown Castle USA Inc.
E. Blake Hawk, General Counsel
Attn: Legal – Real Estate Dept.
2000 Corporate Drive
Canonsburg, PA 15317
Jason.sears@crowncastle.com



Amy Eissler
Coordinator, Regulatory Operations