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State of Utah
Department of Commerce
Division of Public Utilities

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REQUEST FOR EXTENSION OF TIME

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Joni Zenger, Technical Consultant

Date: March 10, 2017

Re: Docket Nos. 17-035-08, 17-035-09, and 17-035-10

RMP's Applications for approval of Pole Attachment Agreements with Crown Castle NG West, LLC (Crown Castle), Crown Castle Small Cell Attachments, and NewPath Networks LLC (NewPath) Small Cell Attachments.

On February 7, 2017, Rocky Mountain Power (Company) filed applications in the three dockets referenced above for approval of contracts that would allow various types of pole attachments to be attached to the Company's electric distribution poles that differ from the standard attachments and agreements contained in the Commission-approved Safe Harbor contract in Docket No. 10-035-97.

Each of the respective applications include new tariff appendices to the Company's Electric Service Schedule No. 4 that contain definitions and construction standards for relatively newer technologies, such as small cell, wireless technologies, and antenna attachments.

The Company's respective applications specify changes from the Safe Harbor contract to the Insurance and Bonding requirements, as well as Security and Indemnification clauses due, in part, to the potential exposure to radio frequency (RF) emissions and other potential safety and reliability issues surrounding the attachment of small cell, wireless, and antenna equipment and receivers to the Company's electric poles.

The Division has several concerns it is working to resolve and has a scheduled March 13, 2017 meeting with the Company to clarify the new definitions and appendices added to Electric Service Schedule No. 4. As previously mentioned, the Division's initial concerns pertain to safety, reliability, and access to space on the Company's poles, especially as industries trend toward big data and newer technologies to collect the data.

The Commission issued an Action Request to the Division to review the Company's filings for compliance and make recommendations by March 10, 2017. The Division is unable to provide a thorough recommendation in these dockets until some of its questions are clarified and better understood. The Division issued a request for information, and the Company is working diligently to provide this information so the Division can complete its analysis.

The Division respectfully requests a 30-day extension in this matter, which would result in a revised Action Request due date of approximately April 10, 2017. This will allow the Division time to conduct a more thorough review of the Company's filings and to make a confident and complete recommendation to the Commission in the three respective pole attachment applications referenced herein.

In conclusion, the Division respectfully requests the Commission to issue revised Action Request due dates in Dockets No. 17-035-08, 17-035-09, and 17-035-10, extending the due dates to April 10, 2017.

CC: Bob Lively, RMP
Michele Beck, OCS