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ACTION REQUEST RESPONSE

**To:** Public Service Commission

**From:** Chris Parker, Director  
Artie Powell, Energy Section Manager  
Joni Zenger, Technical Consultant

**Date:** January 25, 2018

**Re:** Docket No. 17-035-70, Rocky Mountain Power/Berkshire Hathaway Energy Companies Common Guidelines for Small Cell Antenna Installation.

**RECOMMENDATION (NO ACTION REQUIRED)**

The Division of Public Utilities (Division) recommends no action by the Public Service Commission (Commission) as a result of Rocky Mountain Power's (Company) notice and filing of common guidelines for small cell antenna installations with Berkshire Hathaway Energy (BHE) Companies.

**ISSUE**

In the course of investigating the Company's Application for Approval of a Pole Attachment Agreement for Small Cells between the Company and Crown Castle NG West, LLC (Crown Castle) in Docket No. 17-035-09, the Division met with the Company on March 20, 2017, to obtain further information and clarification on questions pertaining to the filing. At the March 20, 2017 meeting, the Company's engineer, Mr. Joshua Jones, described plans to develop a common application guideline for BHE companies, including Rocky Mountain Power, Pacific Power, NV Energy, and MidAmerican Energy Company. The Company stated that it expected the standardized BHE guidelines to be integrated across the BHE Companies by the end of 2017.

In the Division's April 7, 2017 comments to the Commission in Docket No. 17-035-09 referenced above, the Division recommended that the Company provide copies to the Commission of the standardized BHE guidelines upon completion. In its May 16, 2017 Order in this matter the Commission directed the Company to keep the Division informed of its progress towards developing a common application within the BHE companies.<sup>1</sup>

On December 27, 2017, the Company filed notice that it had completed the development of the common BHE guidelines. Also, on December 27, 2017, the Commission issued an Action Request to the Division requesting comments and a response to the Company's filing. This memorandum responds to the Commission's Action Request.

## **DISCUSSION AND FINDINGS**

With its notification of the standardized guidelines, the Company filed a copy of a document titled, "BHE Companies Common Guidelines for Small Cell Antenna Installation, BHE DSG-JU-01" (BHE Small Cell Guidelines). The BHE Small Cell Guidelines supplement the Company's joint use distribution construction standards, policies, and procedures that accompany the Company's Electric Service Schedule No. 4 (p.1, Scope). The distribution overhead and underground joint use guidelines for small cell pole attachments is contained in Section 6 of the Company's Engineering Handbook and provides basic installation guidelines for small cell technologies on distribution poles.

The BHE Small Cell Guidelines add a new definition for the governmental authority exercising jurisdiction over the installation (p. 1, Section 3.1) and explain that where changes or conflicts in requirements exist, the more stringent requirements apply (p. 1, Section 2). The BHE Small Cell Guidelines also expand the definition of Small Cell as listed below (p. 1, Section 3.1):

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<sup>1</sup> Dockets No. 17-035-08, 17-035-09, 17-035-10, Application of Rocky Mountain Power for Approval of the Pole Attachment Agreement between Rocky Mountain Power and Crown Castle, the Pole Attachment Agreement for Small Cells between Rocky Mountain Power and Crown Castle NG West, LLC, and the Pole Attachment Agreement for Small Cells between Rocky Mountain Power and New Path Networks, LLC, May 16, 2017.

**Small Cell:** Types of small cells include femtocells, picocells and microcells – broadly increasing in size from femtocells (the smallest) to microcells (the largest). Any or all of these small cells can be based on ‘femtocell technology’ – i.e. the collection of standards, software, open interfaces, chips, and know-how that have powered the growth of femtocells.

‘Small cell’ is an umbrella term for operator-controlled, low-powered radio access nodes, including those that operate in licensed spectrum and unlicensed carrier-grade Wi-Fi. Small cells typically have a range from 10 meters to several hundred meters.

Note: This definition of small cell is derived from the Small Cell Forum, <http://www.smallcellforum.org/>.

Other sections of BHE Small Cell Guidelines are similar or identical to portions of Section 6, e.g., Pole Selection Criteria, Acronyms, Antenna Locations, General Installation Requirements, Supply Space, Grounding, and Conduit. The examples and figures in BHE Small Cell Guidelines are the same examples and pictures currently in Section 6 of the Company’s Engineering Handbook. As explained in BHE Small Cell Guidelines, this supplemental information is not considered all-inclusive (p. 2, Supplemental Information).

Inasmuch as small cell applications are emerging technologies expected to continue to increase in the near future, the supplemental guidelines should provide beneficial guidance to communications workers and personnel installing antenna on the Company’s poles. The standardized BHE guidelines provide common best practices that comply with applicable safety codes and ordinances.

The Division appreciates the Company keeping the Division informed of its progress in developing a common application within the BHE companies. While the Commission has the authority to regulate the terms and conditions for pole attachments according to Utah Admin. R746-345-1 (including small cell attachments), it does not appear the Commission is required to take any action with respect to the guidelines. The BHE Small Cell Guidelines supplement the Company’s current engineering and design guidelines.

The Commission is not responsible for approving or developing the Company’s Engineering Handbook. The installation and code requirements are developed, approved, and administered

by many other governing bodies, including the Federal Communications Commission, the National Electric Safety Code, the Federal Aviation Administration, the Occupational Safety and Health Administration, and other agencies. The Division recommends no further action is required by the Commission with respect to the Company's notice and filing.

## **CONCLUSION**

The Division has reviewed the Company's notice and filing of the BHE Small Cell Guidelines that provide supplemental design and standardized installation guidelines for small cell pole attachments on the Company's distribution poles. The Division commends the Company for notifying the Commission of the standardized guidelines and finds no further action is required by the Commission with respect to this matter.

CC: Jana Saba, RMP  
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