



State of Utah
Department of Commerce
Division of Public Utilities

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ACTION REQUEST RESPONSE

To: Public Service Commission

From: Division of Public Utilities
Chris Parker, Director
Artie Powell, Energy Section Manager
Joni Zenger, Technical Consultant
Casey Coleman, Technical Consultant

Date: December 27, 2017

Re: Docket No. 17-999-01, Rocky Mountain Power's Notice of Changes to the Electronic Notification System.

RECOMMENDATION (NO ACTION REQUIRED)

The Division of Public Utilities (Division) recommends no action by the Public Service Commission (Commission) as a result of the changes to the Electronic Notification System (ENS) used for processing pole attachment applications and other related matters.

ISSUE

Recently the software manufacturer of Alden Notify™ notified PacifiCorp, dba Rocky Mountain Power (Company) and Century Link (collectively, the Applicants) that Alden Notify™ is being replaced by new software called Alden One®. This means that pole attaching entities that submit applications to attach, relocate, or remove pole attachment equipment in Utah, will be required to use the new ENS software beginning late in the first quarter of 2018.

It does not appear that Commission action is required to adopt or approve this change. However, the Applicants request approval or action from the Commission that may be required to adopt this change in the event the Commission determines a formal process is necessary.

On December 6, 2017, the Commission issued an Action Request to the Division for a review of the joint letter and associated ENS changes. This memorandum is in response to the Commission's Action Request.

DISCUSSION

On December 6, 2017, the Applicants filed a joint letter to the Commission informing the Commission of minor changes to the electronic software program that is currently used to process pole attachment applications in Utah. The current ENS software, called Alden Notify,TM was approved by the Commission in Docket No. 11-035-199, pursuant to a joint petition by the Company and Century Link filed on December 7, 2011. The ENS software is used to establish and manage pole attachment relationships between pole owners and attaching entities. With ENS, attaching entities are able to submit applications to pole owners (such as the Company or Century Link) for permission to attach equipment to their poles. The pole owner is able to approve make-ready work, track the status of pole attachment applications in the system, and communicate approvals or denials of an application in a streamlined process. The Alden NotifyTM software that has been used for many years has worked effectively in managing pole attachment fees, permit costs, inspections, and project workflows.

The Commission recognized the efficiencies, the ease of reporting inspection reports, and the simplified process for attaching entities and pole owners. Therefore, the Commission approved the use of the Alden NotifyTM electronic notification software and required its use by pole owners and attaching entities.¹ Any entity attempting to attach to a pole owner's poles must use the electronic system to submit a pole attachment application, work order, or other pole-related work. This is codified in the Commission's approved Safe Harbor pole attachment agreement

¹ The Commission approved the Alden NotifyTM software in Docket 11-035-199 on April 27, 2012.

(Standard Agreement) that serves as a template for pole owners and pole attaching entities to use in negotiations.²

As previously stated, the Commission approved the use of an electronic system to process pole attachment applications and notifications pursuant to a joint petition by the Company and Century Link in Docket No. 11-035-199.³ The pole owners and the attaching entities have been using this software, Alden Notify™, since that time. The Company states that because Alden Notify™ is based on Microsoft's technology that includes Silverlight, this software is at the end of its useful life, and Microsoft is no longer supporting the outdated technology. Updates to the Windows operating system or browser may potentially make Alden Notify™ unusable.

The Company and Century Link propose using Alden One® software that is based on future HTML5 technology and can be accessed from a wide range of applications. Pole owners and attaching entities in Utah can begin using the new software immediately through a browser in a Windows or Mac computer. The new software can also be used with iOS and Android mobile devices to submit and approve pole attachment applications or related work items. The Company states that Alden began notifying users of the change in July of 2017 via email announcements and logon messages. Alden has been providing free training to users and will continue to provide this through the first quarter of 2018. Users may continue to use Alden Notify™ until it is decommissioned or unusable.

The Commission-approved Standard Agreement defines ENS as follows:

“Electronic Notification System” or “ENS” means the electronic system or combination of electronic systems that may be designated by Pole Owner or mandated by the Commission. When an ENS is available, the Parties must utilize ENS to submit Applications for permission to attach, relocate, or remove Equipment under the terms of this Agreement, and to respond to requests for work to be performed.

² Docket No. 10-035-97, Report and Order, November 21, 2012.

³ Docket No. 11-035-199, Joint Petition for Approval of an ENS for Pole Attachments, December 7, 2011. The Commission issued its approval order on April 27, 2012. <https://psc.utah.gov/2016/06/21/docket-no-11-035-199/>.

According to this definition, the electronic system may be designated by the pole owner or the Commission, but the particular software that the ENS system uses does not require approval to be consistent with the language in the Agreement above. The newer software technology provides efficiencies for users so that pole attaching entities can submit applications through the new ENS platform on a cell phone or web browser, regardless of the type of operating system used. This should make it easier to process work orders and applications, as well as receive pole attachment notifications in a prompt manner and within the timeframes specified in the Standard Agreement.

While the Commission has the authority to regulate the terms and conditions for pole attachments according to Utah Admin. R746-345-1, it does not appear the Commission is required to take any action with respect to the ENS software change. The Applicants agree that the new Alden One® technology will have little to minimal change for its users. Further, the software vendor has been providing training and will continue to provide training to users as they migrate to the new Alden One® software.

CONCLUSION

After reviewing the Applicant's joint notice of changes to the ENS software, as well as the Commission's Standard Agreement, it appears the change to the Alden One® platform should be easy to implement and will result in improvements and efficiencies to the current Alden Notify™ ENS software with minimal to no impact on its users. The Division recommends the Commission take notice of the change in the ENS platform to the Alden One® software. The Division recommends no action is required in this matter. The ENS software that is currently in use will likely become outdated and unusable.

The Alden One® software that has been mutually agreed upon by the Company and Century Link is reasonable and should be allowed for use in processing pole attachment work orders, applications, equipment relocations, or other pole attachment requests in Utah. The software vendor agrees to provide customer support through the transition in order to make the change seamless for users. The change in the ENS software does not conflict with the current ENS

definition in the Commission's approved Standard Agreement for pole attachments or require further action by the Commission.

CC: Jana Saba, RMP
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