

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
AR 506 AND AR 510**

In the Matter of

Rulemaking to Amend and Adopt Rules in
OAR 860, Divisions 024 and 028, Regarding Pole
Attachment Use and Safety (AR 506)

and

Rulemaking to Amend Rules in OAR 860, Division
028 Relating to Sanctions for Attachments to Utility
Poles and Facilities (AR 510)

IDAHO POWER COMPANY'S
SUPPLEMENTAL OPENING COMMENTS

At the October 12 Workshop, Idaho Power Company ("Idaho Power" or "the Company") representative Brent Van Patten presented a rate proposal offered by the Company as an alternative to that proposed by Oregon Public Utility Commission Staff ("Staff"). Idaho Power hereby formally offers its proposal in supplemental comments. In addition, the Company offers specific language implementing its exemption proposal discussed in its Opening Comments.

A. Idaho Power's Rate Proposal

Electric utilities such as Idaho Power recover all costs associated with installation, inspection, and maintenance of their poles from two sources: (1) the customers who purchase the utility's electricity ("Utility Customers"), and (2) the joint use carriers and operators who rent space on those poles ("Licensees"). Because the costs associated with poles are built into Utility Customers' electric rates, any revenues received from Licensees reduce the Utility Customers' electricity charges. Thus, it is critical that the rental rates paid by the Licensees reflect a fair allocation of the costs associated with the Licensees' use of electric utilities' poles. The prices charged to Licensees should fairly reflect the amount of space that is occupied by their attachments, and in particular, the amount by which space on the pole is reduced for the Utility Customers' benefit when a joint use attachment (or "attachment") is made.

1 Unfortunately, the rate proposal offered by Staff would **not** result in a fair allocation of
2 costs between Utility Customers and Licensees. Indeed, if adopted, the rules would force Utility
3 Customers to subsidize the services offered by the Licensees. For that reason, Idaho Power
4 opposes the Staff rate proposal and offers the alternative discussed below.

5 **1. Staff’s Proposal**

6 Staff’s rate proposal is contained in proposed OAR Section 860-028-110(2.)
7 Pursuant to that proposal, the rental rate per foot of pole is calculated by multiplying the pole
8 cost by the carrying charge and then dividing this value by the useable space as defined in
9 section 860-028-0020(33). As proposed, the useable space includes only that portion of the pole
10 that is above 20ft from ground level, excluding the Communication Worker Safety Clearance
11 Space (“Safety Clearance Space”). Using the rebuttable assumptions of a 40ft pole buried 6ft
12 below ground level, the calculated useable space is 10.67ft. A single joint use attachment
13 (assumed to occupy 1ft of space) would incur an annual rental rate of 9.4% of the adjusted pole
14 cost. If the adjusted pole cost is \$50, the rental rate per attachment would be \$4.69.

15 The problem with Staff’s proposed formula is that it does not account for all of the space
16 that is taken up when a Licensee makes an attachment. In particular, the reduction of space
17 available to the electric utility includes the space needed to allow for the sag of the Licensee’s
18 cables while maintaining (1) minimum ground clearance in adjacent spans, (2) the clearance
19 between multiple Licensees’ attachments, and (3) the Safety Clearance Space between the
20 highest communication attachment and the lowest power attachment.¹ Once this fact is taken
21 into account, it is clear that Staff does not allocate sufficient space on the pole to the Licensee.

22 For example, assuming a 40ft pole buried 6ft below grade with a required minimum
23 ground clearance of 18ft, the electric utility would have 16ft of space available for its use when
24 there are no attachments. With one attachment, the useable space available to the electric utility
25 is 10.67ft (a reduction of 5.33ft). This space is further reduced by one additional foot for each
26

¹ This clearance is required to protect the Licensees’ workers from injury while working on their facilities

1 additional attachment. The following table outlines: (a) the reduction of space available to the
 2 electric utility as increasing numbers of attachments are made, (b) the proportion of original
 3 useable pole space these reductions represent, and (c) the proportion of adjusted pole costs to be
 4 borne by each Licensee.

5 **Table 1: Space Used for Various Number of Joint Use Attachments**

Joint Use Attachments	Space Remaining for Utility Customers' Benefit (ft)	Space Used for Attachments (ft)	Proportion of Useable Space Used for Attachments	Proportion of Useable Space Allocated for each Attachment
0	16	0	0.0%	0.0%
1	10.67	5.33	33.3%	33.3%
2	9.67	6.33	39.6%	19.8%
3	8.67	7.33	45.8%	15.3%
4	7.67	8.33	52.1%	13.0%
5	6.67	9.33	58.3%	11.7%
6	5.67	10.33	64.6%	10.8%
7	4.67	11.33	70.8%	10.1%
8	3.67	12.33	77.1%	9.6%
9	2.67	13.33	83.3%	9.3%

14 Thus, unless a pole bears 9 attachments, Staff's proposal unfairly allocates a
 15 disproportionately low percentage of pole use to the Licensee, and results in Utility Customers
 16 subsidizing the Licensee.

17 **2. Suggested Changes to Staff's Proposal**

18 In order to fairly divide pole costs between Licensees and Utility Customers the
 19 Commission should consider changing the definition of Useable Space to include all of the pole
 20 above minimum ground clearance height (18ft). The minimum fair allocation of space used for
 21 each Licensee's attachment is calculated using the following formula:

$$SpaceUsed = \frac{(Ht - Ground Clearance) + CWSC + (N - 1)}{N}$$

Where:

Space Used = the Authorized Space charged for each attachment (ft)

Ht = attachment height above the ground of the lowest communications cable (ft)

Ground Clearance = minimum required ground clearance (ft)

CWSC = Communication Worker Safety Clearance (ft)

N = average number of joint use attachments per pole (each)

The rental rate for each attachment is then calculated by the following formula:

$$Rate = Pole Cost \times Carrying Charge \times \frac{Space Used}{Useable Space}$$

The allocation of space used for joint use attachments (as calculated above) and the resulting rental rate are the minimum values required to prevent Utility Customers from being forced to subsidize Licensee services.

3. Comparison of Proposed Formulas

As discussed above, under assumed conditions, Staff's proposal would allocate 9.4% of the pole per attachment, resulting in a charge of \$4.69, regardless of the number of attachments on the pole. However, as shown above, the proportional space used for each attachment varies with the number of attachments on the pole. This is due to the fact that the Safety Clearance Space and the space between the lowest attachment and the minimum required ground clearance remain constant but are evenly divided among the number of attachments. Naturally, the corresponding rental rate for each attachment should vary with the number of attachments on the pole. Using the same assumptions outlined above, the following table highlights the differences between the rental rate per attachment calculated using Staff's and Idaho Power's proposed formulas. For comparison purposes, Table 2 also includes the rental rate per attachment

1 calculated using the FCC Telecommunications formula. Rental Rates in Table 2 that require
2 Utility Customers to subsidize Licensee services are shown in bold.

3 **Table 2: Comparison of Joint Use Rental Rates per Attachment**

4 Joint Use Attachments	Idaho Power Allocation Formula	OPUC Staff Formula	FCC TelCom Formula
5 0	\$0.00	\$0.00	\$0.00
6 1	\$16.66	\$4.69	\$21.25
7 2	\$9.89	\$4.69	\$11.25
8 3	\$7.64	\$4.69	\$7.92
9 4	\$6.51	\$4.69	\$6.25
10 5	\$5.83	\$4.69	\$5.25
11 6	\$5.38	\$4.69	\$4.58
12 7	\$5.06	\$4.69	\$4.11
13 8	\$4.82	\$4.69	\$3.75
14 9	\$4.63	\$4.69	\$3.47

15 While Table 2 above compares the rental rates charged for joint use attachments using
16 various formulas, it is important also to consider the value of useable pole space available to
17 benefit Utility Customers. From the Utility Customers' perspective, the addition of joint use
18 attachments should not increase the cost for each foot of remaining pole space that is available
19 for the Utility Customers' benefit. If this cost increases due to additional attachments, then the
20 Utility Customers are clearly subsidizing the Licensees' attachments. Using the same
21 assumptions outlined earlier, the following table highlights the Utility Customers' costs per foot
22 of useable pole space calculated using Staff's and Idaho Power's proposed formulas, and the
23 FCC formula. Costs shown in Table 3 that are too high to prevent Utility Customers from
24 subsidizing joint use attachments are shown in bold.

Table 3: Comparison of Rate Payers' Rates per Foot

Joint Use Attachments	Idaho Power Allocation Formula	OPUC Staff Formula	FCC TelCom Formula
0	\$3.13	\$3.13	\$3.13
1	\$3.13	\$4.25	\$2.69
2	\$3.13	\$4.20	\$2.84
3	\$3.13	\$4.15	\$3.03
4	\$3.13	\$4.08	\$3.26
5	\$3.13	\$3.98	\$3.56
6	\$3.13	\$3.86	\$3.97
7	\$3.13	\$3.68	\$4.55
8	\$3.13	\$3.41	\$5.45
9	\$3.13	\$2.93	\$7.02

Both Tables 2 and 3 show that when using Staff's proposed formula, at least nine joint use attachments per pole are necessary to prevent the Utility Customers from subsidizing the joint use attachments. In addition, as long as there are fewer than four joint use attachments per pole, the FCC formula prevents the Utility Customers from subsidizing the joint use attachments.

For all of these reasons the Commission should make the following changes to Staff's Proposed Rules in order to implement Idaho Power's rate proposal as follows:

- "Useable Space" should be defined as:

860-028-0020(33) "Useable space" as used in OAR 860-028-110(2) means all the space on a pole except: (a) the portion of the pole below ground level, and (2) the portion of the pole above ground but below the minimum ground clearance height of 18 feet.

- The Commission should add the following definition for "Space Used":

860-028-0020(XX) "Space Used" is the authorized space that is assumed to be used for each attachment. Space Used is calculated by subtracting the minimum required ground clearance (in feet) from the height above ground of the lowest communication cable attachment (in feet), and then adding the communication worker safety clearance (in feet) and further adding the average number of Joint Use attachments per pole minus one. This figure is then divided by the average number of Joint Use attachments per the utility's pole to determine Space Used.

- The Staff proposed rental rate rules in 860-028-0110(2) should be replaced with the following rule:

1 **860-028-0110(2)** The rental rate for each attachment is calculated by multiplying
2 the pole cost by the carrying charge and multiplying the result by ratio of Space
Used divided by Useable Space.

3 **B. Idaho Power's Exemption Proposal**

4 In Idaho Power's Opening Comments, the Company argued that it should be exempt
5 from the regulations adopted in Phase II of this docket. Idaho Power supplements that proposal
6 by offering language that it requests that the Commission include in the regulations adopted in
7 this docket. Specifically, Idaho Power proposes that the Commission adopt the following
8 language:

9 An electric utility serving fewer than 25,000 customers in Oregon that has its
10 headquarters located in another state will be exempt from complying with the rate
11 and sanctions regulations contained in Sections 860-028-0020 through 860-028-
310.

12 Respectfully submitted this 25th day of October, 2006.

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October 25, 2006

VIA ELECTRONIC MAIL AND US MAIL

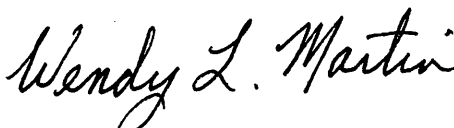
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Re: AR 506 and AR 510 – Idaho Power Company's
Supplemental Opening Comments

Dear Sir or Madam:

Enclosed for filing in the above-referenced docket are Idaho Power Company's Supplemental Opening Comments. Please contact me with any questions.

Very truly yours,


Wendy L. Martin

Enclosures

cc: AR 506 and AR 510 Service List

CERTIFICATE OF SERVICE

AR 506 and AR 510

I hereby certify that a true and correct copy of IDAHO POWER COMPANY'S SUPPLEMENTAL OPENING COMMENTS was served via U.S. Mail and/or electronically on the following parties on October 25, 2006.

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