



Vorys, Sater, Seymour and Pease LLP  
Legal Counsel

52 East Gay Street  
P.O. Box 1008  
Columbus, Ohio 43216-1008

614.464.6400 | www.vorys.com

Founded 1909

Gretchen L. Petrucci  
Direct Dial (614) 464-5407  
Direct Fax (614) 719-4793  
Email glpetrucci@vorys.com

December 10, 2018

Ms. Barcy F. McNeal, Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street, 11th Floor  
Columbus, OH 43215

Re: Case No. 18-564-EL-ATA

Dear Ms. McNeal:

This correspondence responds to the November 29, 2018 filing from Ohio Edison Company (“Ohio Edison”) in this proceeding proposing a modified pole attachment rate. By way of background, the Ohio Cable Telecommunications Association (“OCTA”) challenged Ohio Edison’s pole attachment rate of \$11.82 that was proposed in this proceeding.<sup>1</sup> The OCTA filed objections opposing the pole attachment rate. The OCTA’s Application for Rehearing is pending before the Commission.

Pursuant to the stipulation in Case No. 18-1604-EL-UNC, et al., Ohio Edison filed a request in this proceeding on November 29, 2018, to modify the pole attachment rate to \$11.48. The pole attachment rate of \$11.48 reflects the inclusion of Ohio Edison’s excess accumulated deferred income tax (“EDIT”) balance as of December 31, 2017 (along with the other year-end 2017 data). The OCTA does not oppose the \$11.48 pole attachment rate and there are no other intervenors in this proceeding.

Through this letter, the OCTA notifies the Commission that, contingent upon the Commission approving Ohio Edison’s proposed pole attachment rate of \$11.48, the OCTA agrees to withdraw its Application for Rehearing filed on July 30, 2018. The Commission’s approval of the \$11.48 pole attachment rate would resolve the rate-calculation issue in this proceeding.

---

<sup>1</sup> Ohio Edison originally proposed a pole attachment rate of \$11.72 in this proceeding and then revised its proposal on June 14, 2018, to \$11.82.

Additionally, it is the OCTA's understanding based on discussions with Ohio Edison that when this revised rate is approved, Ohio Edison's next pole attachment invoices will charge for the attachments over the annual period at the \$11.48 per-pole rate and not apply the \$11.82 rate at all. Accordingly, the Commission should not delay in resolving this matter and the OCTA urges the Commission to issue a ruling promptly approving the \$11.48 pole attachment rate based on the totality of year-end 2017 data.

Thank you for your assistance in this matter.

Very truly yours,



Gretchen L. Petrucci  
Attorney for the Ohio Cable Telecommunications  
Association

GLP/jaw

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**12/10/2018 10:41:26 AM**

**in**

**Case No(s). 18-0564-EL-ATA**

Summary: Correspondence Correspondence regarding modified pole attachment rate electronically filed by Mrs. Gretchen L. Petrucci on behalf of Ohio Cable Telecommunications Association