## BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO
In the Matter of the Application of The ) Toledo Edison Company for Approval of ) a Tariff Change

) Case No. 19-1039-EL-ATA

## OBJECTIONS OF

THE OHIO CABLE TELECOMMUNICATIONS ASSOCIATION TO THE TOLEDO EDISON COMPANY'S APPLICATION FOR APPROVAL OF A TARIFF CHANGE

## I. Introduction

The Ohio Cable Telecommunications Association ("OCTA") objects to the pole attachment rate increase proposed by The Toledo Edison Company ("Toledo Edison") in this proceeding because Toledo Edison overstated its investment in poles included in the pole rate calculation, or understated the units of poles associated with that investment, or perhaps both This is due to the significant amount of "non-unitized" pole investment costs that are part of Toledo Edison's total Account 364 investment and were used to calculate the proposed pole attachment rate. The sizeable amount of the non-unitized pole investment has a significant impact on Toledo Edison's rate calculation and therefore it is important to go beyond checking the correctness of Toledo Edison's formulaic computations. Toledo Edison's formula inputs must be validated for their accuracy and produce a proper economic matching of pole investment and the corresponding units of investment. In this matter, inclusion of the significant amount of non-unitized pole investment is unsupported and economically inappropriate (and an adjusted rate should be ordered). Lastly, Toledo Edison proposed to revise the text of its Tariff Sheet No. 2 to state in part: "[t]he rates will become effective within sixty days unless otherwise ordered by the Commission." The proposed text should not be adopted as it is not necessary or correct
given the review process currently in place today, and it may not be consistent with what the Commission concludes on the subject (which is pending before it in a separate docket).

## II. Argument

## A. The non-unitized pole investment costs should not be included in the pole attachment rate calculation.

In preparing its proposed rate, Toledo Edison used the investment costs contained in Account 364 "Poles, Towers and Fixtures" of its Continuing Property Records to develop its appurtenance factor (Application Exhibit C, line 15). As shown in the attached spreadsheet, "TE - Appurtenance Factor 12/2018," many investment costs in Account 364 are unitized and associated with specific classifications of physical poles (e.g., jointly owned pole, steel poles fully dressed, and wooden poles). ${ }^{1}$ A portion of the investment costs in Toledo Edison's Account 364, however, is categorized as "non-unitized" investment, which is investment that has not yet been associated with any specific units or specific plant. Specifically, 1.8 percent of the investment is listed as non-unitized (highlighted in the attached spreadsheet). Toledo Edison included those non-unitized investment costs in the rate formula ${ }^{2}$ without demonstrating that it included an appropriate, if any, corresponding increase in the units of poles to which the investment costs will ultimately relate. Since the formula is based on a net per-unit pole cost, the effect is to inflate the per-unit cost.

Toledo Edison also included those non-unitized costs in the rate formula assuming all the costs related to poles. But, these costs have not yet been associated with any particular plant and

[^0]therefore it has not been demonstrated to be exclusively poles. Some portion of the non-unitized investment, for example, could relate to appurtenances. If that were the case, then Toledo Edison would be understating the costs associated with appurtenances, which could have the effect of artificially lowering the appurtenance factor while simultaneously artificially inflating per-unit costs. Another example is that some of the non-unitized investment could relate to non-pole-related plant (rather, it could be related to entirely different electric distribution plant). If that were the case, it would be inappropriate to include those investment costs in the pole attachment rate calculation. The effect is the same - to inflate the amount of investment costs and to inflate the per-unit cost.

The mismatch of the non-unitized investment and units cannot be appropriately used in the rate calculation presented. Some of these non-unitized investment costs pertain to costs booked to Account 364 for periods as many as five or more years prior than the cost year used to calculate the proposed pole attachment rate. ${ }^{3}$ Any claim that as these investment costs are unitized, the rates will correct themselves down the road ignores that each and every rate calculated should be just and reasonable for the applicable period and that the pole formula must be based on investment costs properly matching the number of pole units for that period. The OCTA estimates that, if the non-unitized costs are fully removed from the rate calculation (as should be done in the absence of any validating data on associated pole counts or the percentage of included appurtenance investment included in the non-unitized costs), the Toledo Edison pole attachment rate would be $\$ 9.67$ per pole (not the proposed $\$ 9.83$ ). For the above reasons, the record does not adequately demonstrate that the rate proposed by Toledo Edison is just and reasonable.

[^1]
## B. The rate effectiveness language proposed by Toledo Edison should not be adopted.

Toledo Edison proposed to revise the text of its tariff Sheet No. 2 as well. It proposes in part to add: "[t]he rates will become effective within sixty days unless otherwise ordered by the Commission." While that language is close to the automatic approval process in effect today, ${ }^{4}$ it is not a match. Today, proposed pole attachment rates are effective on the $61^{\text {st }}$ day after an application is filed unless the Commission rules otherwise or the automatic approval process is suspended (the latter can be done by the Commission, Legal Department Director or an Attorney Examiner). Since Toledo Edison's proposed language does not match the current process, it should not be adopted. Additionally, the Commission is currently considering adoption of new rules that would set forth a procedural process. ${ }^{5}$ That pending matter is decisional. There is the possibility that the procedural process could change as a result of that pending matter, which is an additional basis for not accepting the above-quoted language proposed by Toledo Edison.

## III. Conclusion

The OCTA has been an active participant in the Commission's pole attachment rate proceedings and has advocated for and supported the pole rate formula adopted by the Commission. Nothing in these objections should be construed otherwise. The OCTA is closely reviewing rate proposals because of the financial impact of the rate increases. The OCTA's review seeks to ensure not only that the calculations are computationally accurate, but also the inputs are economically appropriate. The OCTA has discovered errors and mismatches in the past, with which the Commission has agreed. Upon close inspection of Toledo Edison's

[^2]proposal in this proceeding, the non-unitized pole investment should be excluded from the calculation. Finally, Toledo Edison's proposed language referencing the time period for rates to take effect should not be approved since it is not consistent with the current process and may not be consistent with what the Commission decides in its pending rule-review docket.

> Respectfully submitted,
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## CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served (via electronic mail) on the $21^{\text {st }}$ day of November 2019 upon the persons listed below.

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Gretchen L. Petrucci

TE - Appurtenance Factor 12/2018

| cription | description | description |
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| TECO Toledo Edison Co. | 36400 - Poles, Towers And Fixtures | Crossarm |
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| TECO Toledo Edison Co. | 36400 - Poles, Towers And Fixtures | Non-Unitized |
| TECO Toledo Edison Co. | 36400 - Poles, Towers And Fixtures | Pole Banding Wrap |
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| TECO Toledo Edison Co. | 36400 - Poles, Towers And Fixtures | Pole Banding Wrap |
| TECO Toledo Edison Co. | 36400 - Poles, Towers And Fixtures | Steel Pole Fully Dressed |
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| TECO Toledo Edison Co. | 36400 - Poles, Towers And Fixtures | Steel Pole Fully Dressed |


| compute_0004 | start_month | act_cost | 364 not included |
| :---: | :---: | :---: | :---: |
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| 1951 | 12/1/2018 0:00 | 602.31 |  |
| 1952 | 12/1/2018 0:00 | 712.94 |  |
| 1953 | 12/1/2018 0:00 | 220.69 |  |
| 1954 | 12/1/2018 0:00 | 2,536.66 |  |
| 1955 | 12/1/2018 0:00 | 3,082.09 |  |
| 1956 | 12/1/2018 0:00 | 5,593.21 |  |
| 1957 | 12/1/2018 0:00 | 4,565.45 |  |
| 1958 | 12/1/2018 0:00 | 1,595.02 |  |
| 1964 | 12/1/2018 0:00 | 455.81 |  |
| 1965 | 12/1/2018 0:00 | 7,461.87 |  |
| 1966 | 12/1/2018 0:00 | 9,876.04 |  |
| 1967 | 12/1/2018 0:00 | 7,570.77 |  |
| 1968 | 12/1/2018 0:00 | 5,294.82 |  |
| 1969 | 12/1/2018 0:00 | 2,438.42 |  |
| 1970 | 12/1/2018 0:00 | 23,053.71 |  |
| 1971 | 12/1/2018 0:00 | 25,986.34 |  |
| 1972 | 12/1/2018 0:00 | 43,941.80 |  |
| 1973 | 12/1/2018 0:00 | 43,745.43 |  |
| 1974 | 12/1/2018 0:00 | 49,459.70 |  |
| 1975 | 12/1/2018 0:00 | 36,634.03 |  |
| 1976 | 12/1/2018 0:00 | 31,848.82 |  |
| 1977 | 12/1/2018 0:00 | 50,639.96 |  |
| 1978 | 12/1/2018 0:00 | 56,657.10 |  |
| 1979 | 12/1/2018 0:00 | 69,493.36 |  |
| 1980 | 12/1/2018 0:00 | 86,283.28 |  |
| 1981 | 12/1/2018 0:00 | 68,392.35 |  |
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| 1983 | 12/1/2018 0:00 | 87,153.95 |  |
| 1984 | 12/1/2018 0:00 | 65,449.38 |  |
| 1985 | 12/1/2018 0:00 | 93,026.20 |  |
| 1986 | 12/1/2018 0:00 | 89,410.68 |  |
| 1987 | 12/1/2018 0:00 | 139,734.76 |  |
| 1988 | 12/1/2018 0:00 | 95,438.62 |  |
| 1989 | 12/1/2018 0:00 | 83,668.24 |  |
| 1990 | 12/1/2018 0:00 | 102,487.53 |  |
| 1991 | 12/1/2018 0:00 | 89,666.31 |  |
| 1992 | 12/1/2018 0:00 | 89,930.28 |  |
| 1993 | 12/1/2018 0:00 | 115,807.65 |  |
| 1994 | 12/1/2018 0:00 | 102,619.03 |  |
| 1995 | 12/1/2018 0:00 | 101,360.56 |  |
| 1996 | 12/1/2018 0:00 | 148,667.26 |  |
| 1997 | 12/1/2018 0:00 | 150,694.27 |  |
| 1998 | 12/1/2018 0:00 | 115,386.94 |  |
| 1999 | 12/1/2018 0:00 | 138,816.30 |  |
| 2000 | 12/1/2018 0:00 | 219,897.05 |  |
| 2001 | 12/1/2018 0:00 | 216,994.11 |  |
| 2002 | 12/1/2018 0:00 | 216,221.05 |  |
| 2003 | 12/1/2018 0:00 | 526,285.13 |  |
| 2004 | 12/1/2018 0:00 | 261,017.98 |  |
| 2005 | 12/1/2018 0:00 | 192,564.22 |  |
| 2006 | 12/1/2018 0:00 | 416,124.91 |  |
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| 2008 | 12/1/2018 0:00 | 1,247,034.38 |  |
| 2009 | 12/1/2018 0:00 | 1,271,362.80 |  |
| 2010 | 12/1/2018 0:00 | 870,153.48 |  |
| 2011 | 12/1/2018 0:00 | 1,019,125.73 |  |
| 2012 | 12/1/2018 0:00 | 2,844,741.97 |  |
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| 2014 | 12/1/2018 0:00 | 1,275,042.17 |  |
| 2015 | 12/1/2018 0:00 | 889,665.17 |  |
| 2016 | 12/1/2018 0:00 | 1,041,337.03 |  |
| 2017 | 12/1/2018 0:00 | 1,086,582.39 |  |
| 2018 | 12/1/2018 0:00 | 572,804.46 |  |
| 2003 | 12/1/2018 0:00 |  | 3,946.96 |
| 2007 | 12/1/2018 0:00 |  | -134,011.43 |
| 2008 | 12/1/2018 0:00 |  | 118,201.39 |
| 2009 | 12/1/2018 0:00 |  | 8,403.83 |
| 2010 | 12/1/2018 0:00 |  | 6,850.72 |
| 2011 | 12/1/2018 0:00 |  | -9,365.72 |
| 2012 | 12/1/2018 0:00 |  | -14,371.06 |
| 2013 | 12/1/2018 0:00 |  | 18,913.96 |
| 2014 | 12/1/2018 0:00 |  | -302.72 |
| 2015 | 12/1/2018 0:00 |  | 10,509.07 |
| 2016 | 12/1/2018 0:00 |  | 15,598.97 |
| 2017 | 12/1/2018 0:00 |  | 39,040.47 |
| 2018 | 12/1/2018 0:00 |  | 3,212,637.65 |
| 2008 | 12/1/2018 0:00 | 97,808.59 |  |
| 2009 | 12/1/2018 0:00 | 111,445.51 |  |
| 2011 | 12/1/2018 0:00 | 135,433.61 |  |
| 2012 | 12/1/2018 0:00 | 123,294.02 |  |
| 2014 | 12/1/2018 0:00 | 326,589.07 |  |
| 2015 | 12/1/2018 0:00 | 167,980.30 |  |
| 2016 | 12/1/2018 0:00 | 746,834.69 |  |
| 2017 | 12/1/2018 0:00 | 665,756.82 |  |
| 1922 | 12/1/2018 0:00 |  | 1,082.25 |
| 1927 | 12/1/2018 0:00 |  | 3,321.72 |
| 1932 | 12/1/2018 0:00 |  | 118.00 |
| 1937 | 12/1/2018 0:00 |  | 2,345.44 |
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| mpute_0004 | start_month | act_cost | 364 not included |
| :---: | :---: | :---: | :---: |
| 1945 | 12/1/2018 0:00 |  | 1,424.89 |
| 1947 | 12/1/2018 0:00 |  | 16,890.00 |
| 1948 | 12/1/2018 0:00 |  | 13,833.03 |
| 1951 | 12/1/2018 0:00 |  | 3,352.00 |
| 1952 | 12/1/2018 0:00 |  | 929.00 |
| 1953 | 12/1/2018 0:00 |  | 772.00 |
| 1954 | 12/1/2018 0:00 |  | 2,006.00 |
| 1955 | 12/1/2018 0:00 |  | 111.00 |
| 1956 | 12/1/2018 0:00 |  | 1,580.00 |
| 1957 | 12/1/2018 0:00 |  | 505.00 |
| 1958 | 12/1/2018 0:00 |  | 184.00 |
| 1959 | 12/1/2018 0:00 |  | 133.42 |
| 1960 | 12/1/2018 0:00 |  | 359.62 |
| 1961 | 12/1/2018 0:00 |  | 189.63 |
| 1962 | 12/1/2018 0:00 |  | 674.60 |
| 1965 | 12/1/2018 0:00 |  | 3,329.27 |
| 1966 | 12/1/2018 0:00 |  | 1,526.65 |
| 1967 | 12/1/2018 0:00 |  | 7,808.28 |
| 1968 | 12/1/2018 0:00 |  | 29,010.17 |
| 1969 | 12/1/2018 0:00 |  | 51,276.15 |
| 1970 | 12/1/2018 0:00 |  | 8,809.04 |
| 1971 | 12/1/2018 0:00 |  | 28,546.39 |
| 1972 | 12/1/2018 0:00 |  | 21,764.39 |
| 1973 | 12/1/2018 0:00 |  | 84,384.83 |
| 1974 | 12/1/2018 0:00 |  | 50,257.49 |
| 1975 | 12/1/2018 0:00 |  | 3,301.02 |
| 1976 | 12/1/2018 0:00 |  | 2,080.08 |
| 1977 | 12/1/2018 0:00 |  | 694.08 |
| 1978 | 12/1/2018 0:00 |  | 4,263.05 |
| 1979 | 12/1/2018 0:00 |  | 491.97 |
| 1980 | 12/1/2018 0:00 |  | 944.98 |
| 1981 | 12/1/2018 0:00 |  | 5,291.82 |
| 1982 | 12/1/2018 0:00 |  | 315.80 |
| 1983 | 12/1/2018 0:00 |  | 1,326.79 |
| 1984 | 12/1/2018 0:00 |  | 632.48 |
| 1986 | 12/1/2018 0:00 |  | 1,268.42 |
| 1987 | 12/1/2018 0:00 |  | 2,170.95 |
| 1988 | 12/1/2018 0:00 |  | 1,530.47 |
| 1991 | 12/1/2018 0:00 |  | 1,267.37 |
| 1992 | 12/1/2018 0:00 |  | 611.00 |
| 1993 | 12/1/2018 0:00 |  | 481.83 |
| 1996 | 12/1/2018 0:00 |  | 16,955.18 |
| 1997 | 12/1/2018 0:00 |  | 618.70 |
| 2001 | 12/1/2018 0:00 |  | 1,401.41 |
| 1948 | 12/1/2018 0:00 | 22,418.58 |  |
| 1951 | 12/1/2018 0:00 | 6,500.35 |  |
| 1952 | 12/1/2018 0:00 | 17,415.67 |  |
| 1953 | 12/1/2018 0:00 | 103,619.20 |  |
| 1954 | 12/1/2018 0:00 | 118,767.68 |  |
| 1955 | 12/1/2018 0:00 | 165,891.70 |  |
| 1956 | 12/1/2018 0:00 | 318,323.60 |  |
| 1957 | 12/1/2018 0:00 | 424,554.29 |  |
| 1958 | 12/1/2018 0:00 | 376,520.58 |  |
| 1959 | 12/1/2018 0:00 | 269,353.94 |  |
| 1960 | 12/1/2018 0:00 | 343,975.63 |  |
| 1961 | 12/1/2018 0:00 | 560,658.20 |  |
| 1962 | 12/1/2018 0:00 | 655,376.87 |  |
| 1963 | 12/1/2018 0:00 | 631,959.22 |  |
| 1964 | 12/1/2018 0:00 | 538,258.51 |  |
| 1965 | 12/1/2018 0:00 | 497,806.51 |  |
| 1966 | 12/1/2018 0:00 | 29,949.52 |  |
| 1967 | 12/1/2018 0:00 | 474,736.61 |  |
| 1968 | 12/1/2018 0:00 | 1,018,269.44 |  |
| 1969 | 12/1/2018 0:00 | 1,098,648.39 |  |
| 1970 | 12/1/2018 0:00 | 887,581.77 |  |
| 1971 | 12/1/2018 0:00 | 1,268,080.05 |  |
| 1972 | 12/1/2018 0:00 | 2,001,314.61 |  |
| 1973 | 12/1/2018 0:00 | 1,904,369.50 |  |
| 1974 | 12/1/2018 0:00 | 2,057,749.71 |  |
| 1975 | 12/1/2018 0:00 | 1,699,928.50 |  |
| 1976 | 12/1/2018 0:00 | 1,773,000.65 |  |
| 1977 | 12/1/2018 0:00 | 1,886,349.08 |  |
| 1978 | 12/1/2018 0:00 | 1,947,369.27 |  |
| 1979 | 12/1/2018 0:00 | 2,648,075.24 |  |
| 1980 | 12/1/2018 0:00 | 2,288,828.91 |  |
| 1981 | 12/1/2018 0:00 | 2,662,131.71 |  |
| 1982 | 12/1/2018 0:00 | 2,470,369.56 |  |
| 1983 | 12/1/2018 0:00 | 2,704,513.43 |  |
| 1984 | 12/1/2018 0:00 | 2,557,737.90 |  |
| 1985 | 12/1/2018 0:00 | 2,262,368.42 |  |
| 1986 | 12/1/2018 0:00 | 2,604,435.91 |  |
| 1987 | 12/1/2018 0:00 | 2,757,945.02 |  |
| 1988 | 12/1/2018 0:00 | 2,410,380.58 |  |
| 1989 | 12/1/2018 0:00 | 3,002,165.86 |  |
| 1990 | 12/1/2018 0:00 | 2,054,378.42 |  |
| 1991 | 12/1/2018 0:00 | 1,784,226.16 |  |
| 1992 | 12/1/2018 0:00 | 3,576,166.94 |  |
| 1993 | 12/1/2018 0:00 | 1,963,502.53 |  |
| $\begin{aligned} & 1994 \\ & 1995 \end{aligned}$ | $\begin{aligned} & 12 / 1 / 2018 \text { 0:00 } \\ & 12 / 1 / 20180: 00 \end{aligned}$ | $1,944,564.58$ $1,585,001.99$ |  |


| description | description | description |
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| compute_0004 | start_month | act_cost | 364 not included |
| :--- | ---: | :--- | :--- |
| 1996 | $12 / 1 / 2018$ | $0: 00$ | $1,989,193.56$ |
| 1997 | $12 / 1 / 2018$ | $0: 00$ | $2,836,915.65$ |
| 1998 | $12 / 1 / 2018$ | $0: 00$ | $2,446,403.72$ |
| 1999 | $12 / 1 / 2018$ | $0: 00$ | $4,037,138.66$ |
| 2000 | $12 / 1 / 2018$ | $0: 00$ | $3,025,983.93$ |
| 2001 | $12 / 1 / 2018$ | $0: 00$ | $3,651,039.57$ |
| 2002 | $12 / 1 / 2018$ | $0: 00$ | $3,143,564.22$ |
| 2003 | $12 / 1 / 2018$ | $0: 00$ | $5,598,050.24$ |
| 2004 | $12 / 1 / 2018$ | $0: 00$ | $3,283,780.58$ |
| 2005 | $12 / 1 / 2018$ | $0: 00$ | $3,893,050.44$ |
| 2006 | $12 / 1 / 2018$ | $0: 00$ | $4,259,439.37$ |
| 2007 | $12 / 1 / 2018$ | $0: 00$ | $5,828,560.62$ |
| 2008 | $12 / 1 / 2018$ | $0: 00$ | $4,655,065.91$ |
| 2009 | $12 / 1 / 2018$ | $0: 00$ | $7,396,238.91$ |
| 2010 | $12 / 1 / 2018$ | $0: 00$ | $5,195,818.72$ |
| 2011 | $12 / 1 / 2018$ | $0: 00$ | $4,777,131.29$ |
| 2012 | $12 / 1 / 2018$ | $0: 00$ | $6,235,522.73$ |
| 2013 | $12 / 1 / 2018$ | $0: 00$ | $4,098,744.34$ |
| 2014 | $12 / 1 / 2018$ | $0: 00$ | $4,196,008.39$ |
| 2015 | $12 / 1 / 2018$ | $0: 00$ | $3,786,937.62$ |
| 2016 | $12 / 1 / 2018$ | $0: 00$ | $4,081,927.80$ |
| 2017 | $12 / 1 / 2018$ | $0: 00$ | $4,912,718.23$ |
| 2018 | $12 / 1 / 2018$ | $0: 00$ | $2,904,944.03$ |
|  |  | $181,510,887.49$ | $3,661,606.29 \quad 185,172,493.78$ |

This foregoing document was electronically filed with the Public Utilities

## Commission of Ohio Docketing Information System on

11/21/2019 5:02:51 PM
in

## Case No(s). 19-1039-EL-ATA

Summary: Objection electronically filed by Mrs. Gretchen L. Petrucci on behalf of Ohio Cable Telelcommunications Association


[^0]:    ${ }^{1}$ Toledo Edison provided the OCTA underlying data in accordance with the agreement that the parties reached last year and that the Commission approved earlier this year. See, Case Nos. 18-1604-EL-UNC et al. The data included a worksheet regarding the excess deferred income tax that allowed for verification of the unamortized amounts. The OCTA appreciates this cooperation and intends to continue to work with Toledo Edison. The OCTA files these objections to raise these issues of concern within the timeframe set forth under the Commission's procedural process for revising pole attachment tariffs.
    ${ }^{2}$ Toledo Edison excluded the non-unitized investment from the total pole investment used to calculate the appurtenance rates due to its non-classified nature.

[^1]:    ${ }^{3}$ The cost data is as of year-end 2018. The attached spreadsheet shows remaining unclassified non-unitized investment for years dating back to 2012 and earlier.

[^2]:    ${ }^{4}$ See, In the Matter of the Adoption of Chapter 4901:1-3, Ohio Administrative Code, Concerning Access to Poles, Ducts, Conduits, and Rights-of-Way by Public Utilities, Case No. 13-579-AU-ORD, Entry at $\mathbb{I} I 7$ (November 30, 2016).
    ${ }^{5}$ See, In the Matter of the Commission's Review of Ohio Adm. Code Chapter 4901:1-3, Concerning Access to Poles, Ducts, Conduits, and Rights-of-Way, Case No. 19-834-AU-ORD.

