BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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**

REPLY COMMENTS OF DUKE ENERGY OHIO, INC. AND THE OHIO POWER COMPANY

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REPLY COMMENTS

Duke Energy Ohio, Inc. ("Duke") and the Ohio Power Company ("AEP") respectfully submit the following reply comments regarding the comments filed in the above-referenced docket in response to the July 17, 2019 Entry by the Public Utilities Commission of Ohio (the "Commission") and the draft proposed changes to the Commission's pole attachment rules (Ohio Admin. Code 4901:1-3).

I. No Party Submitted Initial Comments in Support of the Commission's Proposed ILEC Presumptions Rule.

There were no initial comments submitted in favor of draft Rule 4901:1-3-05(B) regarding ILEC rates. That fact is consistent with AEP and Duke's position, as set forth in their Initial Comments, that such a rule is unnecessary and should not be adopted for all those reasons set forth in those comments. *See* AEP and Duke's Initial Comments at 1-10.

II. The Commission Should Adopt Overlashing Rules that (1) Define Overlashing to Include the Lashing of Cables Only, (2) Allow Electric Utilities to Request the Information Needed from Attaching Entities to Pre-Engineer Proposed Overlashing, and (3) Provide Utilities with Advance Notice of Third-Party Overlashing.

A. The Definition of Overlashing Should be Confined to the Lashing of Cables Only, and Should Exclude Any Equipment, Incidental or Otherwise.

Duke and AEP support OCTA's suggested revisions to the proposed definition of "overlashing" in draft Rule 4901:1-3-01(N) to include the lashing of cables only, and to exclude "incidental equipment." *See* OCTA Initial Comments at 2. The OCTA's statement that "similar incidental equipment such as fiber splice enclosures" should not be included in the definition of overlashing "because cable companies do not consider that to be overlashing" is consistent with

Duke and AEP's statement in their initial comments that such incidental equipment is outside of the historical understanding of overlashing within the industry. *See Id.*; *see* AEP and Duke Initial Comments at 20-21.

The Commission should reject Crown Castle's proposal to expand the definition of overlashing to include strand mounted wireless equipment (*see* Figure 1 below for an example of a strand mounted wireless equipment array).

Figure 1[1]

Crown Castle concedes that its purpose in seeking to expand the definition of "overlashing" is to avoid permitting and engineering requirements associated with pole attachments. Crown Castle

[1] Reply Comments of Crown Castle International Corp., *In the Matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, p. 6 (FCC Feb. 16, 2018), available at: https://ecfsapi.fcc.gov/file/10216525008395/Reply%20Comments%20of%20Crown%20Castle%20-%20Overlashing%20FNPRM%20-%20WC%20Docket%20No.%2017-84%20-%20Final%202-16-18.pdf.

Initial Comments at 4. However, the fact that equipment is mounted on the strand does not exclude it from the laws of physics. The same engineering analysis necessary when placing wireless antennas and ancillary equipment (such as radios, backup battery power supplies, RF disconnect switches, etc.) on a pole is equally necessary when that equipment is mounted on the strand. Whether equipment is pole-mounted or strand-mounted, it places a new load on the pole. Electric utilities must have an opportunity to analyze the impact of the equipment on the pole from an engineering perspective prior to attachment.

A 15-day period (the proposed deadline to review overlashing proposals under draft Rule 4901:1-3-03(A)(7)(c)) is not enough time to perform the necessary engineering analysis on the multiple pieces of equipment that comprise a strand-mounted wireless array. Strand mounted wireless equipment can be approximately one foot high, over one foot deep, several feet long, and significantly heavier than fiber optic cable. *See, e.g.*, Ohio Rev. Code Ann. § 4939.01(H) (defining "micro wireless facility" as a "small cell facility that is not more than twenty-four inches in length, fifteen inches in width, and twelve inches in height and that does not have an exterior antenna more than eleven inches in length suspended on cable strung between wireless support structures."). Further, strand mounted wireless equipment has a significantly greater loading profile than a single overlashed fiber optic cable, and thus has an even higher potential for impact on electric infrastructure safety and reliability. For these reasons, electric utilities need the same period of time available to them under the rules applicable to a new attachment in order to evaluate strand mounted wireless equipment proposals. Aside from the engineering issues, allowing strand mounted wireless equipment to evade the application process would discriminate against licensees that attach their wireless equipment directly to the pole (and are thus subject to the full application process).

Crown Castle, in the FCC rulemaking proceeding that lead up to the adoption of the FCC's new overlashing rule upon which the Commission's draft Rule 4901:1-3-03(A)(7) is based, advanced similar arguments to the ones it asserts here. Despite Crown Castle's specific request, the FCC ultimately chose **not** to define overlashing to include strand mounted wireless equipment. The Commission should do the same here.

B. The Commission Should Reject OCTA's Proposed Additions to 4901:1-3-03(A)(7)(b).

OCTA proposes two additions to draft Rule 4901:1-3-03(A)(7)(b). First, OCTA argues that the Commission should add the phrase "A public utility may not prohibit overlashing" to draft Rule 4901:1-3-03(A)(7)(b). OCTA Initial Comments at 6. Insofar as the purpose of this statement is to prohibit blanket bans on overlashing, AEP and Duke do not object. But the problem with this proposed addition is its overbreadth, as it fails to account for the important right of electric utilities to deny access—including in the case of overlashing—for reasons of capacity, safety, reliability, or generally applicable engineering purposes. *See* Rule 4901:1-3-03(A)(1). The Commission could resolve this overbreadth by simply stating that "blanket bans on overlashing are prohibited."

Second, OCTA also argues that the Commission should add the following language to draft Rule 4901:1-3-03(7)(b): "The advance notice should identify **at most** the location, size and type of cable, and anticipated date to conduct the overlashing. **Nothing in this paragraph entitles the public utility to require additional information in the advance notice of an attacher's planned overlashing**." OCTA Initial Comments at 7 (emphasis added). The Commission should reject OCTA's proposed addition because its description of the information an electric utility can require in connection with an overlashing notice is overly narrow.

Duke and AEP agree with OCTA that the "location, size and type of cable and the anticipated date to conduct the overlashing" is important information that electric utilities *must* be able to require.[2] For example, the specifications for one particular fiber optic cable manufacturer indicate that a 97 count, .55 inch outer diameter fiber optic cable weighs 85 pounds per kilofoot, while a 217 count, 64 inch outer diameter line of that same fiber optic cable weighs 102 pounds per kilofoot. Those two different sizes of fiber optic cable by the same fiber manufacturer would thus have significantly different loading impacts on a pole.

However, electric utilities should not be restricted to requiring only the location, size, and type of cable, as proposed by OCTA. Electric utilities must also be able to require any additional information to be submitted with the overlashing notice that the electric utility deems necessary under applicable codes and the utility's particular engineering standards to evaluate the proposed overlashing from an engineering perspective. In the future, AEP and Duke may wish to require, for example, that in lieu of providing fiber specifications, an overlashing entity provide a loading study from an approved contractor illustrating the effect the overlashing will have on the poles at issue. In light of same, OCTA's proposed addition should be revised to state: "The advance notice should identify the location, size and type of cable, the anticipated date to conduct the overlashing, and any other information reasonably required by the public utility."

[2] Although the FCC's overlashing rule is silent on the information that a utility can require in association with advance notice of overlashing, the FCC stated as follows in the body of its 2018 Order: "We also reject Southern Company's proposal to permit utilities to require an overlasher to submit specifications of the materials to be overlashed with the notice of overlashing…Such a requirement could unduly slow deployment with little offsetting benefit." *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Third Report and Order and Declaratory Ruling, 33 FCC Rcd 7705, 7765 n. 444 (August 3, 2018) (the "2018 Order"). This baseless (and reckless) finding by the FCC is currently on review in the Ninth Circuit. *Am. Elec. Service Corp. v. FCC*, No. 19-70490 (9th Cir. filed October 19, 2018).

C. Third Party Overlashers Should be Required to Provide Advance Notice of Overlashing to Pole Owners.

In its Initial Comments, Sprint makes several proposals with respect to third party overlashing. Though Duke and AEP take no position regarding the propriety of Sprint's proposals, the Commission should make clear that its draft rule requiring advance notice to public utilities of overlashing applies to third party overlashers (in addition to original attaching entities). Whether the overlasher is the original attaching entity or a third-party entity, electric utilities must have advance notice of the proposed overlashing in order to pre-engineer the additional proposed load.

III. The Commission Should Reject Crown Castle's Proposal to Adopt the FCC's Dangerous Power Supply Space Self-Help Remedy.

Crown Castle urges the Commission to adopt the FCC's power supply space self-help remedy. *See* Crown Castle Initial Comments at 7 (citing 47 C.F.R. § 1.1411(e)(2)) (allowing an attacher to use a utility-approved contractor to perform power supply space make-ready where the utility does not meet the FCC's power supply space make-ready deadlines). Crown Castle asserts that "many applications in Ohio involving complex make-ready above the communications space exceed applicable make-ready timelines." Crown Castle Initial Comments at 7. However, Crown Castle fails to provide any evidence in support of that bald assertion. The Commission should not consider adopting a rule as dangerous as power supply space self-help where there is simply no evidence that such a remedy is even needed in Ohio. Further, it does not appear that any party to this proceeding has asked for such a rule, other than Crown Castle.

A power supply space self-help remedy such as the one adopted by the FCC (which is currently subject to a petition for review pending in the Ninth Circuit) presents a serious danger to the safety of workers and the public by placing attaching entities in control of contractors working

in the power supply space. This is extremely dangerous for several reasons. First, attaching entities are more concerned with speed to market than safety and reliability. Second, allowing entities that are not the electric utility (or contractors working under its direct supervision) to work in the electric supply space creates a situation where entities working in that space may not be familiar with essential safety protocols such as lock-out-tag-out procedures (under which electricity is suspended to a particular feeder while work is performed on certain poles). While the FCC ignored the dangers inherent in this remedy in the name of promoting broadband deployment, this Commission, which has jurisdiction over electric utilities and understands how this could lead to outages, injuries and even deaths, should not.

It is also worth noting that the FCC's Broadband Deployment Advisory Committee, the industry group comprised largely of attaching entity representatives that helped create consensus rules upon which much of the 2018 Order is based, did not propose a power supply space self-help remedy. Further, no state public utility commission to date has adopted such a rule. If this Commission is giving serious consideration to adopting a power supply space self-help remedy, it should publish a proposed rule and provide an opportunity for interested parties to comment further on this grave safety and reliability issue.

IV. The Commission Should Decline to Adopt Crown Castle's Proposed Pre-Existing Violations Rule.

Crown Castle argues that the Commission should adopt a pre-existing violation rule for new attachments similar to the one recently adopted by the FCC. Crown Castle states:

> In order to mitigate any delays or economic barriers to deployment brought about by pre-existing non-compliance, the Commission should add the following sentence at the conclusion of Rule 4901:1-03(E):

> Provided, however, that a public utility may not charge an attaching entity to bring poles, attachments, or third-party equipment into compliance with current published safety, reliability, and public utility pole owner construction standards and guidelines if such poles, attachments, or third-party equipment is out of compliance because of work performed by (or which has failed to be performed by) a party other than the attaching entity prior to the new attachment.

Crown Castle Initial Comments at 10. Crown Castle's proposed pre-existing violations rule is meant to mimic recently adopted FCC Rule 1.1411(d)(4), which provides:

> A utility may not charge a new attacher to bring poles, attachments, or third-party equipment into compliance with current published safety, reliability, and pole owner construction standards and guidelines if such poles, attachments, or third-party equipment were out of compliance because of work performed by a party other than the new attacher prior to the new attachment

47 C.F.R. § 1.1411(d)(4). While Duke and AEP agree that a new attacher should not be financially responsible for fixing a preexisting violation caused by a third-party attacher, the problem with the FCC's approach is that, as a practical matter, it leaves the electric utility and its customers holding the bag. That is one of the reasons Duke, AEP, and a number of other electric utilities have appealed the FCC rule to the Ninth Circuit. Of the three potential payors (the new attacher, the attacher who caused the violation and the electric utility), it makes the least sense for the electric utility to bear this cost.

The Commission can solve the problem that the FCC's preexisting violations rule left open by adopting the rule Duke and AEP proposed in their initial comments in this docket in the context of preexisting violations and overlashing. *See* AEP and Duke Initial Comments at 19-20 (advocating for a new rule that existing attaching entities must correct violations identified by a public utility within 15 days of notice to the existing attaching entity, and where the existing attaching entity fails to correct the violation, the new attaching entity can perform such work, or cause such work to be performed, at the existing attaching entity's sole risk and expense). Such a

rule would be consistent with, and would build upon, existing Rule 4901:1-3-03(B)(8), which states that "If safety violations are found to exist on a pole requested for attachment, the attacher that is found not to be in compliance with the utility's applicable engineering and construction standards shall be financially responsible for correction of the violation." Ohio Admin. Code 4901:1-3-03(B)(8). The rule proposed by AEP and Duke not only would clarify which party is responsible for performing the work to correct the violation by requiring the party that caused the violation to correct the violation, but also provide that the new attacher can perform the corrective work at the existing attaching entity's expense, if the existing attacher fails to timely perform such work.

V. The Initial Comments in this Docket Indicate Many Parties Support the Commission's Adoption of a One-Touch Make-Ready Rule.

The record in this proceeding shows that many parties, including Crown Castle, the Ohio Telecom Association ("OTA"), as well as Duke and AEP, support the adoption of a one-touch make-ready ("OTMR") rule by the Commission. As stated in their initial comments, AEP and Duke support the Commission's adoption of an OTMR rule with safeguards similar to those in the FCC OTMR rule—i.e., constrained to simple make-ready work in the communications space only. *See* 47 C.F.R. § 1.1411(j) (limiting OTMR to "attachments involving simple make-ready"). However, with respect to OTA's proposal that the Commission incorporate FCC Rule 1.1411(j) into its rules by reference, if the Commission does so, it should clarify that it is only adopting the current version of the rule, and not any changes to the FCC's rule that may be adopted in the future. Further, should the Commission incorporate FCC Rule 1.1411(j) by reference, it is important that it also incorporate by reference FCC Rule 1.1412 (regarding contractors for OTMR, with the

exception noted *infra*), as well as the FCC's definitions of "simple" and "complex" make-ready at 47 C.F.R. § 1.1402(p)&(q).

VI. The Commission Should Reject Crown Castle's Proposed Rule Regarding Pole-by-Pole Estimates and Invoices.

Crown Castle contends that it is frequently provided with "make-ready estimates that provide no level of detail upon which to determine if the costs are reasonable." Crown Castle Initial Comments at 8. To address this concern, Crown recommends that the Commission incorporate the following language into existing Rule 4901:1-3-03(B)(2):

> *Estimate*. Where a new attacher's request for access is not denied, a utility shall present to a new attacher a detailed, itemized estimate, on a pole-by-pole basis where requested, of charges to perform all necessary make-ready within 14 days of providing the response required by paragraph (c) of this section, or in the case where a new attacher has performed a survey, within 14 days of receipt by the utility of such survey. Where a pole-by-pole estimate is requested and the utility incurs fixed costs that are not reasonably calculable on a pole-by-pole basis, the utility present charges on a per-job basis rather than present a pole-by-pole estimate for those fixed cost charges. The utility shall provide documentation that is sufficient to determine the basis of all estimated charges, including any projected material, labor, and other related costs that form the basis of its estimate.

Crown Castle Initial Comments at 8-9.

The Commission should reject Crown Castle's proposed rule (which mirrors FCC Rule 1.1411(d)). The proposed rule is unnecessary. Existing Rule 4901:1-3-03(B)(2)(c) provides that:

> (c) Upon receipt of a written dispute or request for additional information regarding the scope of work or allocation of costs of the work from the attaching entity, the twenty-one day period to accept a valid estimate and make payment will be held in abeyance pending resolution of the dispute or inquiry to the public utility.

The Commission's existing rules thus already provide attaching entities with the ability to request additional information regarding estimates if they do not receive the level of detail they believe

necessary. AEP and Duke would not oppose a clarification to existing Rule 4901:1-3-03(B)(2)(c) stating that make-ready estimates must be "reasonably detailed."

However, the Commission should not go so far as to require pole-by-pole estimates. First, with respect to a project of any size, the administrative burden associated with generating any such break down is time consuming and cost prohibitive. A rule that requires pole-by-pole estimates will increase both the administrative costs of creating estimates and the actual cost estimates themselves. Second, the option to present "fixed costs" on a "per job" basis is unavailing because it still requires a disaggregation of job components that is inconsistent with the manner in which electric utility construction project work orders are calculated. These are the same systems the utilities are using to provide cost estimates to their electric service customers. The Commission should not require electric utilities to implement make-ready estimate tools for attaching entities that are different from (and provide a greater level of detail than) those they already use for their core electric service construction.

VII. The Commission Should Reject Crown Castle's Request to Apply the Draft Presumptions Regarding ILECs to All Attaching Entities.

In its initial comments, Crown Castle argues:

> Staff has recommended a revision to Rule 4901:1-3-05 that, in a formal complaint by an incumbent local exchange carrier ("ILEC") challenging pole attachment or conduit occupancy rates, terms, and conditions under a joint use agreement, establishes a rebuttable presumption that such ILEC should be treated as a non-utility attaching entity.…Crown Castle…believes such protection should also be extended to other attaching entities…Extending the presumption of nonutility status to ILEC attachers but not other attaching entities could ultimately bring about a competitive advantage for ILEC attachers over other attaching entities.

Crown Castle Initial Comments at 11. As an initial matter, and as set forth above at section I and in the initial comments filed by Duke and AEP, the Commission should not adopt the presumptions

at all. Beyond that, though, AEP and Duke are unclear as to exactly what Crown Castle is trying to accomplish. To the extent Crown Castle is seeking a presumption that their heavy, large, strand mounted wireless equipment (such as the equipment shown above at p. 2 *supra*) is similarly situated to and should be treated the same from a rate perspective as one cable attached to a thru-bolt, such a presumption would clearly be at odds with the facts. *See NLRB v. Baptist Hosp., Inc.*, 442 U.S. 773, 787 (1979) ("It is, of course, settled law that a presumption adopted and applied by [a regulatory agency] must rest on a sound factual connection between the proved and inferred facts.").

VIII. The Commission Should Reject OCTA's Proposal Regarding Service Drops, as That Issue is Already Adequately Addressed by Applicable Tariffs.

The OCTA proposes to add the following definition of "customer service drop" to existing Rule 4901:1-3-01: "Customer service drop" means a pole attachment that extends from a pole directly to a customer's premises." OCTA Initial Comments at 3. OCTA also proposes that "the rules make clear that a customer service drop is an attachment for rental rate purposes (when it is attached directly to a drop pole (i.e., by a j-hook)), but the public utility may not require an application for customer service drops." *Id.* at 3, 5. While AEP and Duke do not have strong objections in principal to the OCTA's proposed rules, there are variations in the way individual electric utilities' tariffs (including Duke's and AEP's) address this issue, and those tariffs have previously been approved by the Commission. This issue has been adequately addressed by the electric utilities' individual tariffs in the past, and should continue to be governed by such tariffs going forward.

IX. AEP and Duke Do Not Oppose the Commission's Adoption of Rules Similar to FCC Rule 1.1412 Regarding Contractors, with the Modification that Attaching Entities May Suggest the Addition of Contractors to a Utility's List, but a Utility is Not Required to Accept such Additions.

In their initial comments, both the OCTA and OTA suggest that the Commission adopt contractor rules similar to FCC Rule 1.1412. *See* OCTA Initial Comments at 8-10; *see* OTA Initial Comments at 6-7. AEP and Duke do not oppose the Commission's adoption of contractor rules that are consistent with FCC Rule 1.1412, but suggest that the Commission vary its rule from Rule 1.1412 in one key respect. FCC Rules 1.1412(a) and (b) provide that "new and existing attachers may request the addition to [a utility's] list of any contractor that meets the minimum qualifications in paragraphs (c))(1) through (5) of this section **and the utility may not unreasonably withhold its consent**." (emphasis added). 47 C.F.R. § 1.1412(a)&(b).

AEP and Duke suggest that the Commission's rule should instead state that attaching entities may request the addition to a public utility's list of any contractor that meets the minimum qualifications adopted by the Commission, and the utility may add such contractors to its list in its sole reasonable discretion. AEP and Duke suggest the foregoing variance from the FCC's rule because it could otherwise result in an electric utility being required to maintain an unnecessarily large number of approved contractors. In practice, where a utility already has a sufficient number of approved contractors on its list that can perform work consistently, accurately and in accordance with applicable laws, codes, and utility standards, it is not beneficial for the utility or attaching entities for the utility to fatten the list at the request of attaching entities, where such additional contractors are untested and unfamiliar with the utility's standards. Allowing every attaching entity to insist on the addition of "their" contractor to a utility's list regardless of whether there are

already a sufficient number of contractors on the utility's approved list dilutes the purpose of the approved contractor rule, which is to preserve utility control over **who** works on its system.

CONCLUSION

AEP and Duke respectfully request that the Commission adopt revisions to O.A.C. 4901:1-03 consistent with AEP and Duke's comments *supra* and their initial comments filed in this docket on August 15, 2019. AEP and Duke appreciate the Commission's attention to these important issues and look forward to working with the Commission further to ensure that the Commission's pole attachment rules fairly balance the interests of attaching entities with the important concerns of electric utility pole owners and their electric customers, as well as the public at large.

Respectfully submitted this 9th day of September, 2019.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was electronically filed through the Docketing Information System of the Public Utilities Commission of Ohio on this 9th day of September, 2019. In accordance with Ohio Adm. Code 4901-1-05, the PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

Respectfully submitted,

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Summary: Comments - Reply Comments of Duke Energy Ohio, Inc. and the Ohio Power Company electronically filed by Tanner Wolffram on behalf of Ohio Power Company