

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Edison Company for Approval of a Tariff)	Case No. 20-1643-EL-ATA
Change)	

**MOTION FOR LEAVE TO FILE AN
APPLICATION FOR REHEARING OF
THE OHIO CABLE TELECOMMUNICATIONS ASSOCIATION**

The Ohio Cable Telecommunications Association (“OCTA”) respectfully requests leave to file an application for rehearing in this proceeding. The pole attachment rate approved in this matter was based on a pole count in an amended application that was filed after the objection deadline and shortly before the automatic approval date. The amended application included an estimate for poles associated with non-unitized investment in FERC Account 364. The OCTA agrees that the pole count should include non-unitized poles. Ohio Edison Company (“OE”), however, followed the same approach to estimating the number of non-unitized poles as was done by its other Ohio affiliates in their pole attachment proceedings and there were errors in the approach.¹ Moreover, the record does not substantiate the estimated non-unitized poles used in the amended application. Contemporaneous to the filing of this motion for leave to file an application for rehearing, the OCTA is filing a motion for leave to intervene and an application for rehearing showing that the approach should be reviewed and the pole attachment rate should be revised.

The reasons supporting this motion for leave to file an application for rehearing are set forth in the accompanying Memorandum in Support.

¹ See the OCTA’s applications for rehearing filed this same date in *In the Matter of the Application of The Cleveland Electric Illuminating Company to Update its Pole Attachment Rate*, Case No. 20-1644-EL-ATA, and *In the Matter of the Application of The Toledo Edison Company to Update its Pole Attachment Rate*, Case No. 20-1645-EL-ATA.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

OE filed an amended application in this matter on December 23, 2020. In its amendment, OE changed only the number of its poles for 2019.² OE explained in a footnote that the revised number of poles “[i]ncludes an estimate for the number of poles associated with non-unitized plant balances in FERC account 364, based on historical average costs per pole.”³ No further information was presented with the amended application.

On December 28, 2020, Staff described in its Review and Recommendation the company’s methodology for calculating the estimated non-unitized poles as follows: the non-unitized pole investment in Account 364 divided by the actual, average cost of a pole placed in 2019. OE used the same methodology and approach to the inputs as was used to calculate an estimate of non-unitized poles for its Ohio affiliates.⁴ Through pleadings filed this same date, the OCTA has shown that there were errors in the approach used in the other cases, and the OCTA seeks leave to file an application for rehearing in order to correct the approach in this proceeding too. The OCTA and its members seek to ensure that OE’s pole attachment rate fully complies with the Commission’s adopted administrative rules in Ohio Adm.Code Chapter 4901:1-3 and is just and reasonable.

WHEREFORE, for the foregoing reasons, the OCTA respectfully requests that the Commission grant this motion for leave to file an application for rehearing and that the Commission grant rehearing, review and revise the estimated number of non-unitized poles used

² Compare lines 17 of Exhibit C in OE’s October 30, 2020 Application with its December 23, 2020 Amended Application.

³ See footnote on Exhibit C of the December 23, 2020 Amended Application.

⁴ See *In the Matter of the Application of The Cleveland Electric Illuminating Company to Update its Pole Attachment Rate*, Case No. 20-1644-EL-ATA, and *In the Matter of the Application of The Toledo Edison Company to Update its Pole Attachment Rate*, Case No. 20-1645-EL-ATA.

for the OE pole attachment rate calculation and, using that number, approve a revised pole attachment rate for OE.

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 28th day of January 2021 upon the persons listed below.

Ohio Edison Company

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Staff of the Public Utilities Commission of Ohio

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/s/ Gretchen L. Petrucci

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Summary: Motion Motion for Leave to File an Application for Rehearing electronically filed by Mrs. Gretchen L. Petrucci on behalf of Ohio Cable Telecommunications Association