

FILE



# Public Utilities Commission

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## Confidential Release

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**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. 20-1645-EL-ATA

**APPLICATION FOR REHEARING OF  
THE OHIO CABLE TELECOMMUNICATIONS ASSOCIATION**

The Ohio Cable Telecommunications Association (“OCTA”) respectfully requests rehearing of the decision of the Public Utilities Commission of Ohio (“Commission”) to approve automatically on December 29, 2020, the pole attachment rate of \$10.45, as contained in the amended application filed on December 23, 2020, by The Toledo Edison Company (“TE”). The OCTA requests that the Commission reverse its decision, and requests that the estimated number of non-unitized poles used for the pole attachment rate calculation be revised and the pole attachment rate be revised. The Commission’s decision was unlawful and unreasonable for the following reasons:

**Assignment of Error 1:** It was unjust and unreasonable for the Commission to automatically approve a pole attachment rate of \$10.45 based on inputs used to calculate an estimate of the number of non-unitized poles that do not match the company’s records and cannot be verified.

**Assignment of Error 2:** It was unjust and unreasonable for the Commission to automatically approve a pole attachment rate of \$10.45 based on a revised number of poles without evidence in the record to demonstrate that the revised number of poles is just and reasonable.

Respectfully submitted,

/s/ Gretchen L. Petrucci  
Gretchen L. Petrucci (0046608)  
Vorys, Sater, Seymour and Pease LLP  
52 E. Gay Street  
Columbus, OH 43215  
614-464-5407  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

*Attorneys for the Ohio Cable Telecommunications Association*

**MEMORANDUM IN SUPPORT****I. Introduction**

The pole attachment rate approved in this matter was based on a pole count in TE's amended application that 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. However, the record and TE's own data do not substantiate the estimated non-unitized poles used in the amended application. For this reason, the estimated number of non-unitized poles used for the pole attachment rate calculation should be revised consistent with TE's data and, using that number, a revised pole attachment rate should be approved as reflected in Confidential Attachment A.

**II. Argument**

**Assignment of Error 1:** It was unjust and unreasonable for the Commission to automatically approve a pole attachment rate of \$10.45 based on inputs used to calculate an estimate of the number of non-unitized poles that do not match the company's records and cannot be verified.

**Assignment of Error 2:** It was unjust and unreasonable for the Commission to automatically approve a pole attachment rate of \$10.45 based on a revised number of poles without evidence in the record to demonstrate that the revised number of poles is just and reasonable.

TE filed an amended application in this matter on December 23, 2020. In its amendment, TE changed only the number of its poles for 2019 from 220,203 to 221,541 – an increase of 1,338 poles.<sup>1</sup> TE 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.”<sup>2</sup> No further information was presented with the filing.

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<sup>1</sup> Compare lines 17 of Exhibit C in the October 30, 2020 Application with the December 23, 2020 Amended Application.

<sup>2</sup> See footnote on Exhibit C of the December 23, 2020 Amended Application.

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.

In confidential discovery responses served at the time of the amended application, TE identified the inputs used for calculating the estimate for the number of poles associated with non-unitized plant balances in FERC account 364, based on historical average costs per pole. TE also served relevant company records and data.

Importantly, the OCTA does not take issue with TE's methodology (formula) for calculating the non-unitized pole estimate and the OCTA agrees that the resulting estimate should be added to the number of poles listed in TE's original application to ultimately calculate the pole attachment rate. The OCTA, however, was not able to verify the value that TE actually used for one input. The input was not identified in the amended application filing and TE provided no further explanation even though, as the applicant, it has the burden of proof. TE's confidential discovery responses (served concurrent with the amended application) list a different value than what TE used, and no explanation was presented. Therefore, validation of the input used could not be made. Rather, TE's records reflect that another value should have been input into the estimate calculation and, if done, a lower pole attachment rate would result.

Further details regarding the input and the company's records are contained in the Confidential Attachment A to this Application for Rehearing.

The OCTA does not take a position in this pleading on the confidentiality of the values used in calculating the estimated non-unitized poles or the confidentiality of TE's records. In accordance with the protective agreement that the OCTA and TE executed for this proceeding and until the Commission rules otherwise, the OCTA submits further detail under seal to demonstrate

the inconsistency between TE's own records and the value it used in calculating the estimate for the number of non-unitized poles.

**III. Conclusion**

Neither the record nor TE's own data as served in discovery supports the revised pole attachment rate. It was, therefore, an error for the Commission to automatically approve TE's revised pole attachment rate of \$10.45. As identified in the Confidential Attachment A, the estimated number of non-unitized poles used for the pole attachment rate calculation should be revised based on the data in TE's records and, using that number, a revised pole attachment rate should be approved.

Respectfully submitted,

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci (0046608)

Vorys, Sater, Seymour and Pease LLP

52 E. Gay Street

Columbus, OH 43215

614-464-5407

[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)

*Counsel for the Ohio Cable Telecommunications Association*

**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.

The Toledo Edison Company

[edanford@firstenergycorp.com](mailto:edanford@firstenergycorp.com)

Staff of the Public Utilities Commission of Ohio

[John.jones@ohioattorneygeneral.gov](mailto:John.jones@ohioattorneygeneral.gov)

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci

**CONFIDENTIAL ATTACHMENT A**

**Formula:** Estimate = (column d × column g) ÷ (column b ÷ column a)

**The Toledo Edison Company**

<b>Column</b>	<b>(a)</b>	<b>(b)</b>	<b>(c) = (b)/(a)</b>	<b>(d)</b>	<b>(e) = (d)*(g)</b>	<b>(f) = (e)/(c)</b>	<b>(g)</b>
<b>Description of column</b>	2019 Poles	2019 dollars	Average \$/pole	Non-unitized Acct. 364 \$	Estimated Non-unitized Acct. 364 \$ (Appurtenance Adj.)	Estimated No. of Non-unitized Poles	Appur. Factor % (rounded)
Values used by CEI [1]	1,741	\$4,981,441.44	\$2,861.25	\$4,520,947	\$3,828,535	1,338	84.7%
Values in CEI records	1,741	\$3,367,639.51 [2]	\$1,934.31	\$4,520,947 [3]	\$3,828,535	1,979	84.7%

[1] See OCTA TE Set 1-RPD-004 Attachment F Confidential

[2] See OCTA TE Set 1 RPD-003 Attachment D Confidential

[3] See OCTA TE Set 1-INT-1-3 Attachment A Confidential

**CASE NO. 20-1645-EL-ATA: CONFIDENTIAL**

**OCTA TE Set 1**

Case No. 20-1645-EL-ATA

In the Matter of the Application of  
The Toledo Edison Company  
for Approval of a Tariff Change

RESPONSES TO REQUEST

**OCTA TE Set 1**    Regarding the FERC Form 1 used in TE's proposed pole rate calculation, identify all of TE's  
**INT-003**        investments as reflected in Account 364 (poles, towers, and fixtures).

**Response:**    Objection. The request is overbroad, unduly burdensome, seeks irrelevant information and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the request is vague and ambiguous and incapable of being answered as drafted. Subject to and without waiving the foregoing objections, see "OCTA TE Set 1 INT 1-3 Attachment A – CONFIDENTIAL".

**CASE NO. 20-1645-EL-ATA: CONFIDENTIAL**



**OCTA TE Set 1 INT 1-3 Attachment A  
CONFIDENTIAL**

<b>Company</b>	<b>Utility Account</b>	<b>Retirement Unit</b>	<b>Month</b>	<b>Cost</b>
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	Dec-19	19,700,892
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Unitized	Dec-19	4,520,947
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Pole Banding Wrap	Dec-19	2,832,850
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	Dec-19	385,554
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	Dec-19	164,867,968
			<b>Total</b>	<b>192,308,212</b>

Source: PowerPlant  
Report: Asset 1037 (cost only)

Case No. 20-1645-EL-ATA

In the Matter of the Application of  
The Toledo Edison Company  
for Approval of a Tariff Change

RESPONSES TO REQUEST

**OCTA TE Set 1** The OCTA requests that TE produce true and accurate copies of the following documents:  
**RPD-003**

All data requests received from the PUCO Staff related to this proceeding and TE's responses thereto.

**Response:** Please see the following attachments:

OCTA TE Set 1-RPD-003 - Attachment A – CONFIDENTIAL  
OCTA TE Set 1-RPD-003 - Attachment B – CONFIDENTIAL  
OCTA TE Set 1-RPD-003 - Attachment C – CONFIDENTIAL  
OCTA TE Set 1-RPD-003 - Attachment D – CONFIDENTIAL

**CASE NO. 20-1645-EL-ATA: CONFIDENTIAL**

TE - Appurtenance Factor 12/2019

description	description	description	compute_0004	start_month	act_cost	364 not included
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1948	12/1/2019 0:00	149.82	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1951	12/1/2019 0:00	323.61	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1952	12/1/2019 0:00	461.31	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1953	12/1/2019 0:00	154.50	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1954	12/1/2019 0:00	1,653.48	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1955	12/1/2019 0:00	2,085.58	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1956	12/1/2019 0:00	3,753.62	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1957	12/1/2019 0:00	3,264.91	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1958	12/1/2019 0:00	1,189.54	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1964	12/1/2019 0:00	395.04	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1965	12/1/2019 0:00	6,171.14	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1966	12/1/2019 0:00	8,116.10	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1967	12/1/2019 0:00	6,460.32	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1968	12/1/2019 0:00	4,553.47	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1969	12/1/2019 0:00	2,206.18	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1970	12/1/2019 0:00	19,692.69	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1971	12/1/2019 0:00	22,459.70	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1972	12/1/2019 0:00	38,393.97	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1973	12/1/2019 0:00	38,670.62	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1974	12/1/2019 0:00	43,979.64	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1975	12/1/2019 0:00	33,025.56	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1976	12/1/2019 0:00	29,024.80	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1977	12/1/2019 0:00	45,758.41	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1978	12/1/2019 0:00	51,498.32	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1979	12/1/2019 0:00	63,593.69	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1980	12/1/2019 0:00	79,437.30	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1981	12/1/2019 0:00	63,984.06	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1982	12/1/2019 0:00	88,548.68	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1983	12/1/2019 0:00	82,155.92	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1984	12/1/2019 0:00	62,450.86	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1985	12/1/2019 0:00	88,646.94	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1986	12/1/2019 0:00	85,211.11	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1987	12/1/2019 0:00	133,563.91	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1988	12/1/2019 0:00	91,729.46	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1989	12/1/2019 0:00	80,737.64	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1990	12/1/2019 0:00	99,294.27	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1991	12/1/2019 0:00	86,977.98	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1992	12/1/2019 0:00	87,240.70	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1993	12/1/2019 0:00	112,571.80	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1994	12/1/2019 0:00	99,865.27	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1995	12/1/2019 0:00	99,280.37	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1996	12/1/2019 0:00	145,367.88	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1997	12/1/2019 0:00	147,028.47	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1998	12/1/2019 0:00	113,920.99	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	1999	12/1/2019 0:00	137,118.24	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2000	12/1/2019 0:00	216,005.09	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2001	12/1/2019 0:00	213,407.45	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2002	12/1/2019 0:00	213,188.82	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2003	12/1/2019 0:00	521,302.44	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2004	12/1/2019 0:00	260,053.18	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2005	12/1/2019 0:00	192,564.22	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2006	12/1/2019 0:00	416,124.91	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2007	12/1/2019 0:00	738,151.52	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2008	12/1/2019 0:00	1,243,596.62	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2009	12/1/2019 0:00	1,266,362.99	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2010	12/1/2019 0:00	868,031.40	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2011	12/1/2019 0:00	1,014,994.22	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2012	12/1/2019 0:00	2,825,157.22	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2013	12/1/2019 0:00	1,069,770.49	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2014	12/1/2019 0:00	1,270,294.41	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2015	12/1/2019 0:00	887,063.96	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2016	12/1/2019 0:00	1,035,000.87	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2017	12/1/2019 0:00	1,098,273.25	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2018	12/1/2019 0:00	1,066,253.37	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Crossarm	2019	12/1/2019 0:00	873128.1	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2003	12/1/2019 0:00		3946.96
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2007	12/1/2019 0:00		-134011.43
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2008	12/1/2019 0:00		118201.39
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2009	12/1/2019 0:00		8403.83
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2010	12/1/2019 0:00		6850.72
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2011	12/1/2019 0:00		-9467.1
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2012	12/1/2019 0:00		-14371.03
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2013	12/1/2019 0:00		18913.96
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2014	12/1/2019 0:00		1325.93
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2015	12/1/2019 0:00		5025.31
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2016	12/1/2019 0:00		10458.37
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2017	12/1/2019 0:00		-47025.64
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2018	12/1/2019 0:00		437,699.01
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Non-Utilized	2019	12/1/2019 0:00		4,114,996.89
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Pole Banding Wrap	2008	12/1/2019 0:00	97,808.59	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Pole Banding Wrap	2009	12/1/2019 0:00	111,445.51	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Pole Banding Wrap	2011	12/1/2019 0:00	135,433.61	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Pole Banding Wrap	2012	12/1/2019 0:00	123,294.02	

TE - Appurtenance Factor 12/2019

TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Pole Banding Wrap	2014	12/1/2019 0:00	326,589.07	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Pole Banding Wrap	2015	12/1/2019 0:00	167,980.30	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Pole Banding Wrap	2016	12/1/2019 0:00	746,834.69	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Pole Banding Wrap	2017	12/1/2019 0:00	665,756.82	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Pole Banding Wrap	2018	12/1/2019 0:00	457,707.13	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1922	12/1/2019 0:00		1082.25
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1927	12/1/2019 0:00		3321.72
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1932	12/1/2019 0:00		118
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1937	12/1/2019 0:00		2345.44
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1942	12/1/2019 0:00		3382.54
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1945	12/1/2019 0:00		1424.89
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1947	12/1/2019 0:00		16890
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1948	12/1/2019 0:00		13833.03
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1951	12/1/2019 0:00		3352
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1952	12/1/2019 0:00		929
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1953	12/1/2019 0:00		772
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1954	12/1/2019 0:00		2006
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1955	12/1/2019 0:00		111
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1956	12/1/2019 0:00		1580
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1957	12/1/2019 0:00		505
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1958	12/1/2019 0:00		184
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1959	12/1/2019 0:00		133.42
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1960	12/1/2019 0:00		359.62
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1961	12/1/2019 0:00		189.63
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1962	12/1/2019 0:00		674.6
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1965	12/1/2019 0:00		3329.27
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1966	12/1/2019 0:00		1526.65
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1967	12/1/2019 0:00		7808.28
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1968	12/1/2019 0:00		29010.17
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1969	12/1/2019 0:00		51276.15
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1970	12/1/2019 0:00		8809.04
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1971	12/1/2019 0:00		28546.39
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1972	12/1/2019 0:00		21764.39
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1973	12/1/2019 0:00		84384.83
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1974	12/1/2019 0:00		50257.49
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1975	12/1/2019 0:00		3301.02
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1976	12/1/2019 0:00		2080.08
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1977	12/1/2019 0:00		694.08
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1978	12/1/2019 0:00		4263.05
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1979	12/1/2019 0:00		491.97
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1980	12/1/2019 0:00		944.98
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1981	12/1/2019 0:00		5291.82
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1982	12/1/2019 0:00		315.8
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1983	12/1/2019 0:00		1326.79
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1984	12/1/2019 0:00		632.48
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1986	12/1/2019 0:00		1268.42
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1987	12/1/2019 0:00		2170.95
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1988	12/1/2019 0:00		1530.47
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1991	12/1/2019 0:00		1267.37
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1992	12/1/2019 0:00		611
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1993	12/1/2019 0:00		481.83
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1996	12/1/2019 0:00		16,955.18
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	1997	12/1/2019 0:00		618.70
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Steel Pole Fully Dressed	2001	12/1/2019 0:00		1,401.41
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1948	12/1/2019 0:00	20,890.16	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1951	12/1/2019 0:00	6,249.11	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1952	12/1/2019 0:00	16,752.07	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1953	12/1/2019 0:00	100,183.87	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1954	12/1/2019 0:00	115,603.97	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1955	12/1/2019 0:00	161,483.13	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1956	12/1/2019 0:00	310,218.16	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1957	12/1/2019 0:00	414,745.86	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1958	12/1/2019 0:00	368,159.32	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1959	12/1/2019 0:00	264,801.28	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1960	12/1/2019 0:00	338,293.73	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1961	12/1/2019 0:00	551,297.43	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1962	12/1/2019 0:00	644,427.76	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1963	12/1/2019 0:00	621,748.42	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1964	12/1/2019 0:00	530,385.20	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1965	12/1/2019 0:00	491,679.71	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1966	12/1/2019 0:00	29,783.13	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1967	12/1/2019 0:00	469,537.91	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1968	12/1/2019 0:00	1,006,095.71	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1969	12/1/2019 0:00	1,086,287.22	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1970	12/1/2019 0:00	878,750.94	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1971	12/1/2019 0:00	1,255,217.45	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1972	12/1/2019 0:00	1,983,084.71	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1973	12/1/2019 0:00	1,888,104.12	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1974	12/1/2019 0:00	2,041,780.70	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1975	12/1/2019 0:00	1,688,732.85	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1976	12/1/2019 0:00	1,762,257.29	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1977	12/1/2019 0:00	1,875,341.18	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1978	12/1/2019 0:00	1,936,827.83	
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1979	12/1/2019 0:00	2,634,928.08	

**TE - Appurtenance Factor 12/2019**

TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1980	12/1/2019 0:00	2,276,656.83		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1981	12/1/2019 0:00	2,649,842.09		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1982	12/1/2019 0:00	2,458,237.23		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1983	12/1/2019 0:00	2,692,150.52		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1984	12/1/2019 0:00	2,548,501.82		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1985	12/1/2019 0:00	2,254,817.50		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1986	12/1/2019 0:00	2,596,796.41		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1987	12/1/2019 0:00	2,750,364.74		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1988	12/1/2019 0:00	2,404,906.51		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1989	12/1/2019 0:00	2,995,927.06		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1990	12/1/2019 0:00	2,050,188.68		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1991	12/1/2019 0:00	1,781,884.66		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1992	12/1/2019 0:00	3,569,874.01		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1993	12/1/2019 0:00	1,961,985.04		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1994	12/1/2019 0:00	1,942,936.66		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1995	12/1/2019 0:00	1,584,106.59		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1996	12/1/2019 0:00	1,988,188.32		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1997	12/1/2019 0:00	2,834,727.87		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1998	12/1/2019 0:00	2,446,403.72		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	1999	12/1/2019 0:00	4,037,138.66		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2000	12/1/2019 0:00	3,025,983.93		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2001	12/1/2019 0:00	3,651,039.57		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2002	12/1/2019 0:00	3,143,564.22		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2003	12/1/2019 0:00	5,598,050.24		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2004	12/1/2019 0:00	3,281,430.00		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2005	12/1/2019 0:00	3,893,050.44		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2006	12/1/2019 0:00	4,258,612.06		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2007	12/1/2019 0:00	5,827,941.25		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2008	12/1/2019 0:00	4,655,065.91		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2009	12/1/2019 0:00	7,396,238.91		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2010	12/1/2019 0:00	5,195,818.72		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2011	12/1/2019 0:00	4,777,131.29		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2012	12/1/2019 0:00	6,235,522.73		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2013	12/1/2019 0:00	4,097,719.16		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2014	12/1/2019 0:00	4,197,028.05		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2015	12/1/2019 0:00	3,792,359.21		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2016	12/1/2019 0:00	4,080,159.09		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2017	12/1/2019 0:00	4,956,591.44		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2018	12/1/2019 0:00	4,117,739.54		
TOLEDO EDISON	36400 - Poles, Towers And Fixtures	Wood Pole	2019	12/1/2019 0:00	3,367,639.51		
					<b>187,401,710.63</b>	<b>4,906,501.37</b>	<b>192,308,212.00</b>

Pole Appurtenance Total 22,533,742.14

Non-Appurtenance Total 164,867,968.49

**Appurtenance Factor 0.879757009**

Case No. 20-1645-EL-ATA

In the Matter of the Application of  
The Toledo Edison Company  
for Approval of a Tariff Change

RESPONSES TO REQUEST

**OCTA TE Set 1** The OCTA requests that TE produce true and accurate copies of the following documents:  
**RPD-004**

All informal data requests received from the PUCO Staff related to this proceeding and TE's responses thereto.

**Response:** Please see the following attachments:

OCTA TE Set 1-RPD-004 - Attachment A – CONFIDENTIAL  
OCTA TE Set 1-RPD-004 - Attachment B – CONFIDENTIAL  
OCTA TE Set 1-RPD-004 - Attachment C – CONFIDENTIAL  
OCTA TE Set 1-RPD-004 - Attachment D – CONFIDENTIAL  
OCTA TE Set 1-RPD-004 - Attachment E – CONFIDENTIAL  
OCTA TE Set 1-RPD-004 - Attachment F – CONFIDENTIAL

**CASE NO. 20-1645-EL-ATA: CONFIDENTIAL**

**OCTA TE Set 1-RPD-004 - Attachment F - CONFIDENTIAL**

		Non-Unitized 364 \$	Appurtenance Factor	Estimated Pole \$ Non-Unitized	Average \$/Pole	Estimated Non-Unitized Poles
OE	Non-Unitized	15,335,496	0.861912708	13,217,859	2,442.52	5,412
TE	Non-Unitized	4,520,947	0.846843556	3,828,535	2,861.25	1,338
CE	Non-Unitized	17,742,935	0.784544512	13,920,123	3,668.15	3,795

	2019 Poles	2019 Dollars	Average \$/Pole
OE	5,715	13,958,990.28	\$2,442.52
TE	1,741	4,981,441.44	\$2,861.25
CE	4,093	15,013,723.19	\$3,668.15
	<u>11,549</u>	<u>33,954,154.91</u>	

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

**Commission of Ohio Docketing Information System on**

**1/28/2021 4:34:14 PM**

**in**

**Case No(s). 20-2000-XX-XXX**

**Summary: App for Rehearing Confidential Version of Application for Rehearing 20-1645-EL-ATA electronically filed by Mrs. Gretchen L. Petrucci on behalf of Ohio Cable Telecommunications Association**