

December 20, 2022

Ms. Tanowa Troupe
Commission Secretary
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

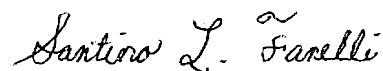
SUBJECT: Case Nos. 22-0935-EL-ATA
89-6008-EL-TRF

Dear Ms. Troupe:

Pursuant to the Commission's Entries dated February 25, 2015 and November 30, 2016 in Case No. 13-579-AU-ORD, and the Order dated September 7, 2016 in Case No. 15-975-EL-ATA (Orders), The Toledo Edison Company (TE) filed an application in the above referenced docket on October 21, 2022. TE is filing an amended application. A 60-day notice will be provided to affected attaching entities to inform them of the upcoming tariff adjustment.

The filing herein includes redline and clean pages from the Pole Attachment Tariff (Exhibit A and Exhibit B, respectively), along with workpapers supporting the proposed changes to update the annual rental fees based on 2020 FERC Form 1 data (Exhibit C). Please file the attached Pole Attachment Tariff pages on behalf of TE. Pursuant to the Orders, the proposed changes shall become effective February 19, 2023, unless otherwise ordered by the Commission. Please file one copy of the tariffs in Case Nos. 22-0935-EL-ATA and 89-6008-EL-TRF.

Sincerely,

A handwritten signature in cursive script that reads "Santino L. Fanelli".

Santino L. Fanelli
Director, Rates & Regulatory Affairs

**Application for Tariff Adjustment
pursuant to Section 4909.18 Revised Code**

In the Matter of the Application of)
The Toledo Edison Company) Case No. 22-0935-EL-ATA
Company for Approval of a Tariff Change)

1. APPLICANT RESPECTFULLY PROPOSES: (Check applicable proposals)

<input type="checkbox"/>	New Service	<input type="checkbox"/>	Change in Rule or Regulation
<input type="checkbox"/>	New Classification	<input checked="" type="checkbox"/>	Rate Change
<input type="checkbox"/>	Change in Classification	<input type="checkbox"/>	Correction of Error
<input type="checkbox"/>	Other, not involving increase in rates		
<input type="checkbox"/>	Various related and unrelated textual revision, without change in intent		

2. DESCRIPTION OF PROPOSAL:

At the request of Commission Staff, and as explained in Exhibit C-3, the Company is amending its annual update to Pole Attachment rates, which the Company filed on October 21, 2022.

3. **TARIFFS AFFECTED:** (If more than 2, use additional sheets) Only the Pole Attachment Tariff is affected.

4. Attached hereto and made a part hereof are: (Check applicable Exhibits)

<u> X </u>	Exhibit A - existing schedule sheets (to be superseded) if applicable
<u> X </u>	Exhibit B - proposed schedule sheets
<u> X </u>	Exhibit C - workpapers supporting the proposed changes to update the annual rental fees based on 2020 FERC Form 1 data consistent with Stipulation
<u> </u>	Exhibit C-2 - if a change of classification, rule or regulation is proposed, a statement explaining reason for change.

X Exhibit C-3 - statement explaining reason for any proposal not covered in Exhibits C-1 or C-2.

5. This application will not result in an increase in rate, joint rate, toll, classification, charge or rental.
6. Applicants respectfully request that the filing become effective after 60 days, pursuant to OAC 4901: 1-3-04(A).

Respectfully Submitted,

/s/ Kristen M. Fling

Kristen M. Fling (0099678)
Counsel of Record
FirstEnergy Service Company
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Akron, Ohio 44308
(330) 606-8087
kfling@firstenergycorp.com
Attorney for Ohio Edison Company,
The Cleveland Electric Illuminating
Company, and The Toledo Edison
Company

POLE ATTACHMENT TARIFF

APPLICABILITY:

This rate is available to any person or entity other than a public utility within the Company's service territory who shall contract for a specified number of pole attachments or contacts, subject to the specific conditions set forth in the General Rules and Regulations Concerning Pole Attachments. Attachments under this tariff shall be made pursuant to 4901:1-3, Ohio Administrative Code.

Overhead contact service shall consist of providing the opportunity to any person or entity other than a public utility to attach or contact, or to reserve the right to attach or contact, communication cable facilities to poles owned by the Company for the purpose of routing cables required for the transmission of information or signals.

Underground occupancy service shall consist of providing the opportunity to any person or entity other than a public utility to utilize the Company's trenches jointly for the purpose stated above.

RATE SCHEDULE:

OVERHEAD CONTACT SERVICE

ANNUAL NET RATE (per each pole contact or attachment):

~~\$10.45~~ \$9.08 per one foot of usable space

The Company will only file to adjust pole attachment rates once in a given calendar year period, unless otherwise required by law. The rates will become effective within sixty days unless otherwise ordered by the Commission.

UNDERGROUND OCCUPANCY SERVICE

ONE TIME CHARGE (underground trench occupancy):

- | | |
|---|----------|
| (1) Main line trench, per each foot jointly occupied, not to exceed | \$ 1.99 |
| (2) Service trench, if requested, per each service, not to exceed | \$136.00 |

The charge for underground occupancy service shall be made prior to the actual installation of cable facilities within Company trenches and shall cover the entire period of occupancy of the trench. Nonpayment of any such charge when due shall constitute a default. Upon default, the Company will install its cable and the customer will lose any right to joint occupancy in that particular trench.

INITIAL CHARGE:

A one-time application fee of \$5.00 will be made for each pole contact reserved during the term of the contact.

TERMS OF PAYMENT:

The annual rental amount is due and payable within a period of fourteen (14) days after the commencement of each rental year and shall be based on all contacts and attachments or pole space reserved at any time during the rental period. After thirty (30) days a service charge of one and one-half percent (1½%) per month on the unpaid balance for an annual rate of eighteen percent (18%) shall be assessed by the Company on overdue bills. Any and all other bills, including make ready work, are due and payable within twenty-one (21) days of receipt. The twenty-one day period to accept a valid estimate for make ready work and make payment will be held in abeyance pending resolution of any dispute or inquiry. After twenty-one (21) days, a service charge of one and one-half percent (1½%) per month on the unpaid balance for an annual rate of eighteen percent (18%) shall be assessed by the Company on overdue bills.

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	B	C	D	E	F
1		Case No. 22-0935-EL-ATA			EXHIBIT C
2					
3					
4		The Toledo Edison Company			
5		Annual Pole Cost Calculation (Year-End 2020)			
6					
7		Net Cost of a Bare Pole Calculation			Source
8					
9		Gross Distribution Plant	\$ 1,123,633,627		207, line 75(g)
10		Gross Pole Investment (Acct. 364)	\$ 198,485,467		207, line 64(g)
11		Distribution Plant Accumulated Depreciation	\$ 578,807,359		219, line 26(b)
12		Depreciation Reserve (Poles)	\$ 102,244,047		D10/D9*D11
13		Gross Plant Investment (Electric)	\$ 1,296,521,876		200, line 8(c)
14		Accumulated Deferred Taxes (Electric)(190, 281-3)	\$ 147,011,287		273, 8(k)+275, 2(k)+277, 9(k)-234, 8(c) + 278, 23(f)
15		Accumulated Deferred Taxes (Accts. 190, 281-3)(Poles)	\$ 22,506,064		D10/D13*D14
16		Net Pole Investment	\$ 73,735,357		D10-D12-D15
17		Appurtenances Factor	0.8768		Account 364 Continuing Property Records
18		Net Pole Investment Allocable to Attachments	\$ 64,650,053		D16*D17
19		Total Number of Poles (1)	222,315		TE Books, including estimate for non-unitized poles
20		Net Cost of a Bare Pole	\$ 290.80		D18/D19
21					
22		Carrying Charge Calculation			
23					
24		Total General and Administrative (2)	\$ 21,879,121		323, line 197(b) Less Note (2)
25		Gross Plant Investment (Electric)	\$ 1,296,521,876		D13
26		Depreciation Reserve (Electric)	\$ 668,187,522		200, line 22(c)
27		Accumulated Deferred Taxes (Electric)(190, 281-3)	\$ 147,011,287		D14
28		Administrative Carrying Charge	0.0455		D24/(D25-D26-D27)
29					
30		Account 593 (Maintenance of Overhead Lines)	\$ 10,180,417		322, line 149(b)
31		Investment in Accts. 364,365 & 369	\$ 516,329,622		207, lines 64(g)+65(g)+69(g)
32		Depreciation (Poles) related to Accts. 364, 365 & 369	\$ 265,972,269		D31/D9*D11
33		Accumulate Deferred Income Taxes for 364, 365 & 369	\$ 58,546,087		D31/D13*D14
34		Maintenance Carrying Charge	0.0531		D30/(D31-D32-D33)
35					
36		Gross Pole Investment (Acct. 364)	\$ 198,485,467		D10
37		Net Pole Investment	\$ 73,735,357		D16
38		Depreciation Rate for Gross Pole Investment	0.0378		Case No. 07-551-EL-AIR
39		Depreciation Carrying Charge	0.1018		D36/D37*D38
40					
41		Taxes (Accts. 408.1 + 409.1 + 410.1 + 411.4 - 411.1)	\$ 65,581,686		114, line 14(c)+15(c)+16(c)+17(c)+19(c)-18(c)
42		Gross Plant Investment (Total Plant)	\$ 1,296,521,876		D13
43		Depreciation Reserve (Total Plant)	\$ 668,187,522		D26
44		Accumulated Deferred Taxes (Electric)(190, 281-3)	\$ 147,011,287		D14
45		Taxes Carrying Charge	0.1363		D41/(D42-D43-D44)
46					
47		Rate of Return	0.0848		Latest ROR approved by PUCO
48		Return Carrying Charge	0.0848		
49					
50		Total Carrying Charges	0.4213		D28+D34+D39+D45+D48
51					
52		Attacher Responsibility Percentage			
53					
54		Space Occupied	1		FirstEnergy Joint Use Agreements
55		Usable Space	13.5		FCC Presumption
56		Attacher Responsibility Percentage	0.0741		D54/D55
57					
58		Annual Pole Cost Calculation			
59					
60		Attacher Responsibility Percentage	0.0741		D56
61		Net Cost of a Bare Pole	\$ 290.80		D20
62		Total Carrying Charges	0.4213		D50
63		Annual Cost Per Pole	\$ 9.08		D60*D61*D62
64					
65		NOTES			
66	(1)	Includes an estimate for the number of poles associated with non-unitized plant balances in FERC account 364, based on historical average costs per pole as of 12/31/2020, consistent with the PUCO Staff Report filed on October 14, 2021 in Case Nos. 20-1643-EL-ATA, 20-1644-EL-ATA and 20-1645-EL-ATA. See Workpaper 1.			
67					
68	(2)	Includes an adjustment to remove \$291,865 for expenses charged to FERC A&G O&M Accounts in 2020, associated with the Rider DCR Expanded Scope audit report in Case No. 20-1629-EL-RDR filed on 8/3/2021. See Workpaper 2.			
69					

Case Nos. 22-0933-EL-ATA, 22-0934-EL-ATA, 22-0935-EL-ATA
Non-Unitized Pole Counts

EXHIBIT C
WORKPAPER 1
PAGE 1 OF 2

		Non-Unitized 364 \$	Appurtenance Factor	Est. Pole \$ Non-Unitized	Average \$/Pole	Est. # Non- Unitized Poles
CE	Non-Unitized	\$ 7,721,809	0.7771	\$ 6,000,533	\$ 3,820	1,571
OE	Non-Unitized	\$ 13,395,198	0.8599	\$ 11,518,277	\$ 2,696	4,273
TE	Non-Unitized	\$ 4,210,188	0.8768	\$ 3,691,430	\$ 2,331	1,583

Source: OE/TE/CE Appurtenance Factor calculation files for 2020

Data as of 12.31.20

	2020 Poles	2020 Dollars	Average \$/Pole
CE	2,702	\$ 10,322,348	\$ 3,820
OE	4,731	\$ 12,753,190	\$ 2,696
TE	1,560	\$ 3,637,094	\$ 2,331
	<u>8,993</u>	<u>\$ 26,712,632</u>	

Source: PowerPlan CPR data for 2020 vintage poles using report 1124

CEI

Report Details				
	</			

OE

Report Details

		Company Total:	\$474,707,905.62244,796,651.68 229,911,253.94	
		Grand Total for Selected Assets:	576.356	\$474,707,905.62 4,796,651.68 229,911,253.94

TE

Report Details				
		Company Total:	\$169,999,597.46 128,409,364.10 \$41,590,233.36	
		Grand Total for Selected Assets:	220,732	\$169,999,597.46 128,409,364.10 \$41,590,233.36

* Source: Companies' records

	Unitized	Non- Unitized	Total
CEI	394,529	1,571	396,100
OE	576,356	4,273	580,629
TE	220,732	1,583	222,315

2020 A&G Expense Adjustment**Source: Rider DCR Expanded Scope Audit Report filed 8/3/2021 in Case No. 20-1629-EL-RDR**

	<u>CEI</u>	<u>OE</u>	<u>TE</u>	<u>Total</u>
(1) DCR Expanded Scope Expenses	\$ 346,280	\$ 392,076	\$ 261,644	\$ 1,000,000
(2) Adjustment: Re-allocate Costs to CEI, OE, TE	\$ 62,600	\$ 87,065	\$ 30,221	\$ 179,886
(3) Total	\$ 408,880	\$ 479,141	\$ 291,865	\$ 1,179,886

NOTES

- (1) Expenses charged to FERC A&G Accounts in 2020, associated with the Rider DCR Expanded Scope audit report filed 8/3/2021 in Case No. 20-1629-EL-RDR. See audit report, pages 17 and 27.
- (2) Expenses charged to FERC A&G Accounts for accounting adjustments to re-allocate costs of certain vendor payments to CEI, OE, and TE from non-Ohio affiliates. See Rider DCR Expanded Scope audit report filed 8/3/2021 in Case No. 20-1629-EL-RDR, page 28.

EXHIBIT C-3

At the request of Commission Staff, the Company is amending its annual pole attachment rate update, based on the 2020 FERC Form 1s, which the Company filed on October 21, 2022. The amendment removes the refund for the amount of Pole Attachment revenue from prior periods, including interest, associated with the Rider DCR Expanded Scope audit report filed on August 3, 2021, in Case No. 20-1629-EL-RDR. The refund and supporting details were included on Exhibit C, lines 65-73 and Exhibit C, workpaper 3 of the Company's October 21, 2022 filing.

With this amendment, Exhibit C includes supporting workpapers to incorporate adjustments to:

1. include in the Pole Attachment formula rate calculation the estimated number of non-unitized poles, consistent with the methodology used in Case Nos. 20-1643-EL-ATA, 20-1644-EL-ATA, and 20-1645-EL-ATA; and
2. remove from the Pole Attachment formula rate costs of payments identified in the Rider DCR Expanded Scope audit report filed on August 3, 2021, in Case No. 20-1629-EL-RDR.

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

Case No(s). 22-0935-EL-ATA, 89-6008-EL-TRF

Summary: Application - Update to their Pole Attachment Tariff electronically filed by
Karen A. Sweeney on behalf of The Toledo Edison Company and Fanelli, Santino
L. Mr.