

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF:

RULEMAKING TO CONSIDER ADOPTION OF
RULES TO IMPLEMENT RCW CH. 80.54,
RELATING TO ATTACHMENTS TO
TRANSMISSION FACILITIES

DOCKET NO.: U-140621

CENTURYLINK'S MAY 1, 2015
COMMENTS ON DRAFT RULES

1 CenturyLink hereby files its fourth set of comments in this docket in which the Washington
Utilities and Transportation Commission ("Commission") has opened a rulemaking to
consider the adoption of rules to implement RCW Chapter 80.54, relating to attachments to
transmission facilities. CenturyLink offers reply comments to some of the parties'
comments filed on April 17, 2015 and some additional comments.

I. CENTURYLINK RESPONSE TO OTHER PARTIES' APRIL 17 COMMENTS

2 ***Frontier.***

CenturyLink supports Frontier's comments concerning clarification of carrying charges in
480-54-020(3) to include very specific charges in accordance the FCC guidelines.

3 ***AT&T***

CenturyLink supports AT&T's recommendation that the rule be clarified regarding the use
of an alternate formula when the net cost of a bare pole is negative, as explained on pages 4
and 5 of the April 17 comments.

4 ***Avista.***

In 480-54-030(1), pole owners would be tasked with replacing existing poles with taller
poles. CenturyLink does not believe that the rules allow a wireless carrier to mandate the

placement of a 50 or 60-foot pole for its own convenience if in fact there is space available on a standard sized pole. However, CenturyLink does believe that a pole owner is required to place a new pole as a part of make-ready work if the existing pole is out of capacity and a new, taller pole would alleviate the capacity issue.

5 CenturyLink also notes that in response to the Commission’s Question No. 6, Avista is advocating for a rate formula that is based on old contractual rates, not the current FCC formula. CenturyLink opposes this, and opposes Avista’s recommendation to count the 40” of safety space as unusable space. The safety space is there purely for the benefit of the power company – that space is not required if there is no power on the pole. In addition to being for the benefit of the power company, the safety space is usable and used by the power company for various purposes, including street lights, etc. The 40” of safety space is properly considered usable space under the FCC formula.

6 ***Puget Sound Energy and PacificCorp.***

Concerning Commission Question No. 7, types of non-recurring costs an owner incurs in connection with attachments, CenturyLink reiterates its response in its April 17 comments. Additionally, CenturyLink believes that contract provisions between the parties should address non-recurring charges and include specific time frames for incurring additional costs. These additional items are best left governed by contract negotiations rather than by rule.

7 ***Puget Sound Energy.***

Puget Sound Energy’s Comments states that they believe new pole attachment rules will significantly increase the amount of staff they require and generate additional work (p. 21). CenturyLink does not see anything in these rules which would cause pole attachments to become more complicated or costly, as parties have been attaching to poles and sharing conduit and innerduct for many years.

8 ***Pacific Corp.***

Concerning 480-54-030(11), PacificCorp believes the number of overlashing notices should be limited. They recommend limiting the number of poles identified for overlashing in a 10-day period to 100. CenturyLink is not opposed to this limitation.

II. GENERAL COMMENTS

9 Question No. 1 addressed in the April 17 comments concerned the safety risks posed by attachments to poles on which both electric transmission lines and electric distribution lines are attached. CenturyLink reiterates its April 17 comments that all poles with power on them pose similar risks. 480-54-020(16) addresses transmission facilities which include distribution; therefore there is no basis to exclude distribution underbuild poles.

III. CONCLUSION

10 CenturyLink appreciates the continued work of the Commission Staff on this rulemaking, and encourages the Commission to make the modifications to the proposed rules as set forth in these comments.

Submitted this 1st day of May 2015.

CENTURYLINK

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