

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Verizon Pennsylvania LLC and Verizon North LLC

v.

**Metropolitan Edison Company, Pennsylvania Electric Company, and
Pennsylvania Power Company
Docket No. C-2020-3019347**

**Rebuttal Testimony
of
Thomas R. Pryatel, P.E.**

List of Topics Addressed

**Feasibility of FirstEnergy Removing Its Attachments from Verizon's Poles and
Constructing Duplicate Facilities**

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Q. Please describe your professional experience.

A. I have spent nearly 32 years with FirstEnergy Corp. and its predecessor companies and subsidiaries. Prior to my current position, I served as Manager of Engineering for the Ohio Edison Company (“Ohio Edison”) and Penn Power. As Manager of Engineering, I had responsibility for the design of the distribution system, new business and public works projects, reliability, system planning and protection, execution of inspection and maintenance programs, project management and maintenance of system records. I have also previously held the positions of Manager, Energy Delivery Asset Strategy for FirstEnergy Utilities and General Supervisor, Reliability and Asset Strategy for Ohio Edison.

Q. Have you previously testified as a witness before the Pennsylvania Public Utility Commission (“Commission”)?

A. No.

Q. What is the purpose your rebuttal testimony?

A. I will respond to certain allegations in the direct testimony and exhibits submitted by Stephen C. Mills and Dr. Timothy J. Tardiff on behalf of Verizon Pennsylvania LLC and Verizon North LLC (collectively, “Verizon”). Specifically, on behalf of the Companies, I will explain that it is not feasible for FirstEnergy to remove its facilities from Verizon’s poles and construct duplicate facilities, which further demonstrates that FirstEnergy does not have superior bargaining power over Verizon as alleged by Mr. Mills and Dr. Tardiff.

1 **Q. Are you sponsoring any exhibits with your rebuttal testimony?**

2 A. No.

3

4 **II. IT IS NOT FEASIBLE FOR FIRSTENERGY TO REMOVE ITS**
5 **ATTACHMENTS FROM VERIZON'S POLES AND TO CONSTRUCT**
6 **DUPLICATE FACILITIES**

7 **Q. Would it be feasible for FirstEnergy's attachments to be removed from Verizon's**
8 **poles and for FirstEnergy to construct duplicate facilities to house those**
9 **attachments?**

10 A. Absolutely not. FirstEnergy and Verizon share many distribution poles to access their
11 respective customers. I have been advised by counsel that FirstEnergy is required by law
12 to provide electric service in all of the areas that it serves under the Pennsylvania Public
13 Utility Code. Accordingly, if all of FirstEnergy's attachments were removed from
14 Verizon's poles, FirstEnergy would instantly need to find an alternative means to provide
15 electricity to its customers.

16 The only possible alternatives would be to construct either additional pole lines or
17 underground facilities paralleling and duplicating Verizon's pole lines. In either case, the
18 Companies would need to remove their facilities from Verizon's pole lines and transfer
19 them to the newly-constructed duplicate pole lines or underground facilities.

20 Neither of these duplicate distribution system possibilities would likely be
21 deemed by the Commission or other state and local officials in Pennsylvania to be a
22 reasonable and prudent expenditure of ratepayer money. The Commission permits the

1 construction of dual pole lines only in certain limited circumstances where it is
2 impractical or impossible to share distribution poles. Examples include:

3 a. Areas where there are limits on pole heights near airports and airfields in
4 accordance with Federal Aviation Administration regulations which prevent or
5 minimize adverse impacts to the navigable airspace.

6 b. Areas where there are limits on pole heights located under transmission line
7 crossings or transmission line underbuild which are required to maintain National
8 Electrical Safety Code (“NESC”) vertical clearances between the transmission
9 and distribution conductors.

10 c. Dual pole lines may be constructed to accommodate area load demographics.
11 Generally, urban areas will have dual pole lines when multiple circuits are
12 necessary to serve the electrical demand.

13 d. Dual pole lines may be constructed on the opposite side of the road to serve new
14 load growth or a specific new bulk load where it is more economical or less
15 intrusive to construct a brand new pole line rather than modify and upgrade an
16 existing pole line. Attachers like Verizon may or may not transfer to the new pole
17 line at a later date at their discretion.

18 It is unlikely that these situations exist with respect to many of the Verizon-owned poles
19 to which FirstEnergy’s facilities are attached, if any.

20
21 **Q. Why do state and local officials generally disfavor duplicate facilities?**

22 A. State and local officials generally oppose the presence of duplicate overhead pole lines as
23 well as the disruption caused by the construction of redundant underground facilities for
24 both aesthetic and safety reasons.

1 I have been advised by counsel that the Commission generally opposes electric
2 utilities installing duplicate facilities due to the unnecessary cost and negative aesthetic
3 impact associated with them. I understand that counsel will address this further in
4 FirstEnergy's briefs.

5

6 **III. CONCLUSION**

7 **Q. Does this conclude your rebuttal testimony?**

8 **A. Yes, it does.**