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Witness: David L. Gladey and Jeffrey Richard
Request from: Public Utilities Regulatory Authority

Question:

(MAKE READY) Application, Ex. CLP-REVREQ-4. Explain what "Priority" means under column "Non-Billable Reason" and explain how charges under this code satisfy the criteria for non-billable make ready work.

Response:

'Priority' is an internal Company work classification used to identify make-ready work requiring expedited completion due to safety, reliability, operational, or other urgent system considerations. The Priority designation reflects the need to perform the work on an accelerated basis and is distinct from other non-billable categories associated with specific pre-existing conditions, such as clearance violations, loading violations, or defective poles.

Costs classified under the 'Priority' non-billable reason satisfy the Company's criteria for non-billable make-ready because the underlying work was required to address conditions that the Company was obligated to correct independent of a third-party attachment request. As a result, the work would have been performed regardless of whether an attachment application was submitted and was not incurred solely to accommodate a new attachment. Accordingly, these costs are properly classified as non-billable make-ready costs.