



CPS Energy

Annual Pole Attachment Rate and Attachment Connection Fee _ Revised

(Effective on January 1, 2020)

In compliance with the CPS Energy Pole Attachment Standards, this disclosure statement outlines the formula, inputs, and calculation used to derive the annual Attachment Rate and the annual Wireless Installation Rate and is based on data that ties to audited annual financial reports for Fiscal Year Ending (FYE) 2020¹.

CPS Energy calculates the annual Attachment Rate as provided by Section 54.204(c) of the Texas Utilities Code, which requires application of the pole attachment rate formula adopted by the Federal Communications Commission² under 47 U.S.C. § 224(e), where:

$$\text{Attachment Rate} = (\text{Space Factor}) \times (\text{Cost})$$

$$\text{Space Factor} = \frac{(\text{Space Occupied}) + ((2/3)(\text{Unusable Space}))}{(\text{Number of Attaching Entities}) \times (\text{Average Pole Height})}$$

and,

$$\text{Cost} = (0.4114) \times (\text{Net Cost of a Bare Pole}) \times (\text{Carrying Charge Rate}) = \underline{\underline{\$14.52 \text{ per 1.0 foot of Space}}}$$

Direct Inputs:

Space Occupied		1.0 Foot	
Number of Attaching Entities		2.78	<i>Per PUCT Order in Docket #36633</i>
Total Investment FYE 2020	A/C 364 Poles, Towers, & Fixtures	\$ 584,656,337.88	<i>See footnote 4</i>
Total Investment FYE 2020	A/C 365 OH Conductors & Devices	\$ 374,849,557.76	<i>See footnote 4</i>
Total Investment FYE 2020	A/C 369 Services	\$ 360,071,599.98	<i>See footnote 4</i>
Total Investment FYE 2020	Total Electric Plant In-Service (Gross)	\$ 11,233,423,469.98	<i>See footnote 4</i>
Total Investment FYE 2020	Total Gas Plant In-Service (Gross)	\$ 1,022,248,161.71	<i>See footnote 4</i>
Total Investment FYE 2020	Total Common Plant In-Service (Gross)	\$ 1,051,407,016.81	<i>See footnote 4</i>
Total Depreciation FYE 2020	A/C 364 Poles, Towers, & Fixtures	\$ 213,902,100.03	<i>See footnote 4</i>
Total Depreciation FYE 2020	A/C 365 OH Conductors & Devices	\$ 147,998,403.82	<i>See footnote 4</i>
Total Depreciation FYE 2020	A/C 369 Services	\$ 230,274,952.88	<i>See footnote 4</i>
Total Depreciation FYE 2020	Total Electric Plant In-Service (Accum)	\$ 5,132,298,591.63	<i>See footnote 4</i>
Total Depreciation FYE 2020	Total Gas Plant In-Service (Accum)	\$ 395,345,649.57	<i>See footnote 4</i>
Total Depreciation FYE 2020	Total Common Plant In-Service (Accum)	\$ 334,323,218.29	<i>See footnote 4</i>
Total Expense FYE 2020	A/C 408 Payroll & Other Taxes <i>(Electric Only)</i>	\$ 7,004,675.87	<i>See footnote 5</i>
Total Expense FYE 2020	A/C 593 Maintenance of OH Lines	\$ 35,227,614.54	<i>See footnote 5</i>
Total Expense FYE 2020	A/C 920-932 Total Admin & General <i>(Electric Plant Only)</i>	\$ 128,774,354.55	<i>See footnote 5</i>
Depreciation Rate		4.30%	<i>CPS Energy Depreciation Study</i>
Cost of Capital ³		10.25% (1/1/2020 – 6/30/2020)	<i>FCC Authorized Rate of Return</i>
		10.00% (7/1/2020 – 12/31/2020)	
Total Number of Poles (A/C 364)		324,196	<i>CPS Energy Capital Asset Records and Pole Inventory</i>

¹ CPS Energy's FYE 2019 covers the period February 1, 2019 to January 31, 2020.

² Federal Communications Commission Order 15-151, effective March 4, 2016.

³ Per FCC Order 16-33, dated 5/25/2016. In this Order, the FCC reduces the default authorized Rate of Return (ROR) by 25 basis points beginning on July 1, 2016 and each July 1, thereafter until the ROR is 9.75%. CPS Energy uses the FCC default ROR since state law does not prescribe a ROR for CPS Energy.

⁴ Based on Capital Asset Classes by FERC report that tie to Audited Annual Financial Reports.

⁵ Based on Operating and Maintenance by FERC report that tie to Audited Annual Financial Reports.



Derived Inputs:

Average Height of Pole 44.70 Feet *Calculated from Pole Records*

Unusable Space

Defined as: 18.0' + (10% of Average Pole Height) + 2.0'

Per PUCT Order in Docket #36633

Unusable Space = 18.0 + (0.1 x 44.70) + 2.0 = 24.47'

Net Cost of a Bare Pole

Total Investment FYE 2020	A/C 364 Poles, Towers, & Fixtures	\$ 584,656,337.88	
Total Depreciation FYE 2020	A/C 364 Poles, Towers, & Fixtures	(\$213,902,100.03)	
	Net Investment in Poles	\$ 370,754,237.85	
	Less (15%)	(\$55,613,135.68)	<i>Per FCC Instructions</i>
	Less (FCC 17-154 Adjustment)	(\$62,864.58)	<i>Per FCC Instructions</i>
	Total Cost in Bare Poles:	\$ 315,078,237.59	
	Total Number of CPS Energy Poles	324,196	
	Net Cost of a Bare Pole:	\$ 971.88	

Net Electric Plant In-Service

Total Investment FYE 2020	Total Electric Plant In-Service (Gross)	\$ 11,233,423,469.98	91.66%
Total Investment FYE 2020	Total Gas Plant In-Service (Gross)	\$ 1,022,248,161.71	8.34%
		\$12,255,671,631.69	100.0%
Total Investment FYE 2020	Total Common Plant In-Service (Gross)	\$ 1,051,407,016.81	
	Electric Ratio	91.66%	
	Total Common Plant Allocated to Electric	\$ 963,708,935.27	
	Total Plant-In-Service Electric (Gross)	\$ 12,197,132,405.25	
Total Depreciation FYE 2020	Total Electric Plant In-Service (Accum)	\$ 5,132,298,591.63	92.85%
Total Depreciation FYE 2020	Total Gas Plant In-Service (Accum)	\$ 395,345,649.57	7.15%
		\$ 5,527,644,241.20	100.0%
Total Depreciation FYE 2020	Total Common Plant In-Service (Accum)	\$ 334,323,218.29	
	Electric Ratio	92.85%	
	Total Common Plant Allocated to Electric	\$ 310,411,905.60	
	Accumulated Depreciation of Total Plant In-Service (Electric)	\$ 5,442,710,497.23	
	Total Plant-In-Service Electric (Gross)	\$ 12,197,132,405.25	
	Accumulated Depreciation of Total Plant In-Service (Electric)	(\$5,442,710,497.23)	
	Net Electric Plant In-Service:	\$ 6,754,421,908.02	



Derived Inputs (Continued):

Carrying Charge Rate

Defined as: Administration Expense + Maintenance Expense + Depreciation Expense + Taxes + Cost of Capital
Per PUCT Order in Docket #36633

$$\begin{aligned} \text{Administration Expense} &= \frac{\text{A/C 920-932 Total Admin \& General (Electric Plant Only)}}{\text{Net Electric Plant In-Service}} \\ &= \frac{\$ 128,774,354.55}{\$ 6,754,421,908.02} = \underline{1.9065\%} \end{aligned}$$

$$\begin{aligned} \text{Maintenance Expense} &= \frac{\text{A/C 593 Maintenance of OH Lines + FCC 17-154}}{\text{(Total Investment in A/C 364, 365, 369) - (Total Accum Depr A/C 364, 365, 369)}} \\ &= \frac{\$ 35,277,614.54 + (-897,003.04)}{(\$1,319,577,495.62 - \$ 592,175,456.73)} = \underline{4.7196\%} \end{aligned}$$

$$\begin{aligned} \text{Depreciation Expense} &= \text{Depreciation Rate} \times [(\text{Total Investment A/C 364}) / (\text{Net Investment in Poles})] \\ &= 0.0430 \times (\$ 584,656,337.88 / (\$ 584,656,337.88 - \$213,902,100.03)) = \underline{6.7808\%} \end{aligned}$$

$$\begin{aligned} \text{Taxes} &= \frac{\text{A/C 408 Payroll \& Other Taxes (Electric Only)}}{\text{Net Electric Plant In-Service}} \\ &= \frac{\$ 7,004,675.87}{(\$12,197,132,405.25 - \$5,442,710,497.23)} = \underline{0.1037\%} \end{aligned}$$

$$\text{Cost of Capital} = \underline{10.1243\%} \quad (\text{Blended Rate---See Footnote 3})$$

$$\begin{aligned} \text{Carrying Charge Rate} &= \text{Administration Expense} + \text{Maintenance Expense} + \text{Depreciation Expense} + \text{Taxes} + \text{Cost of Capital} \\ &= 1.9065\% + 4.7196\% + 6.7808\% + 0.1037\% + 10.1243\% \\ &= \underline{23.6349\%} \end{aligned}$$



Rate Calculation:

Attachment Rate = (Space Factor) x (Cost)

Space Factor = $\frac{(\text{Space Occupied}) + ((2/3)(\text{Unusable Space}))}{(\text{Number of Attaching Entities})}$
(Average Pole Height)

and,

Cost = (0.4114) x (Net Cost of a Bare Pole) x (Carrying Charge Rate)

Therefore, using both the direct and derived inputs from above:

Space Factor = $\frac{(1.0) + ((2/3)(24.47))}{(44.7)}$ = 0.1536

and,

Cost = (0.4114) x (\$971.88) x (23.6349%) = \$94.5000

Resulting in:

Attachment Rate = (0.1536) x (\$94.5000) = \$14.52 per 1.0 foot of Attachment Space