

March 29, 2021

Executive Secretary Connie Graley
Public Service Commission of West Virginia
P. O. Box 812
201 Brooks Street
Charleston WV 25323

RE: **Case No. PUR-21-0032-E-IMM**

Dear Executive Secretary Graley:

The Utilities Technology Council (UTC) is excited to extend its strong support of Appalachian Power's (APCo) proposal to facilitate broadband deployment in unserved parts of West Virginia. In a time when millions of Americans are working and learning from home due to the coronavirus pandemic, APCo's program is precisely the kind of effort our nation needs to connect more Americans to the Internet. UTC has worked closely with APCo to learn more about this effort, and we urge this Commission to approve of their proposal.

By way of introduction, UTC is the national trade association for the broadband, telecom and information and communications technology interests of electric, water, and natural gas utilities of all ownership types.¹ Based in Arlington, Virginia, UTC's mission is to shape the future of utility mission-critical technologies by driving innovation, fostering collaboration, and influencing public policy. UTC has held dozens of workshops and conferences on the importance of utility broadband efforts.² In addition, UTC several years ago established a Utilities Broadband Committee to share information and discuss business, regulatory, and legal issues that could promote utility broadband efforts.

There is a growing recognition within the electricity industry that utilities can play key roles in facilitating broadband deployment, either through directly providing broadband to their customers or through middle-mile projects such as the one being proposed here by APCo. Moreover, utility investments in broadband will also assist in bringing new and innovative energy technologies to market, such as renewable and distributed energy resources.

Appalachian Power is proposing to provide middle-mile broadband services in parts of West Virginia that are currently unserved by traditional telecommunications providers.³ Policymakers in Washington and throughout the country have recognized that electric utilities of

¹ See www.utc.org.

² See <https://utc.org/utility-broadband-deployment/>

³ *Application for Approval of a Written Plan for a Middle-Mile Broadband Infrastructure Expansion Project and Associated Cost Recovery, pursuant to PJ' VU. Code § 24-2- 1 p(f)*, Case No. PUR-21-0032-E-IMM (filed Jan. 20, 2021), available at <http://www.psc.state.wv.us/scripts/WebDocket/ViewDocument.cfm?CaseActivityID=559457&NotType=%27WebDocket%27>.

all kinds are key players in bringing broadband services to unserved and underserved areas. In particular, the APCo project would facilitate broadband connectivity in Logan and Mingo counties. APCo is seeking approval to recover costs from ratepayers associated with the estimated \$61.3 million program with 430 miles of middle-mile fiber optic infrastructure needed to expand high-speed broadband access.⁴

This is exactly the kind of program West Virginia legislators envisioned when the General Assembly in 2019 and 2020 passed laws encouraging utilities like APCo to consider whether and how their infrastructure could be used to support middle-mile broadband deployment. As utilities invest in new grid-modernization technologies, these investments can also be used to bring robust, reliable and affordable broadband services to unserved and underserved areas.⁵ Indeed, the Virginia State Corporation Commission has approved a similar pilot program proposed by APCo.⁶

Like electricity in the 1900s, access to broadband is becoming an essential service for the new millennium. No West Virginia customers should be left behind simply because of where they live. UTC is proud to support APCo's proposal and urges this Commission to approve it.

Sincerely,

Sheryl Osiene-Riggs
President and CEO
Utilities Technology Council

⁴ "AEP seeks commission approval of broadband infrastructure expansion project in Mingo, Logan counties," Williamson Daily News (Jan 27, 2021) available at https://www.williamsondailynews.com/news/aep-seeks-commission-approval-of-broadband-infrastructure-expansion-project-in-mingo-logan-counties/article_27f51101-bc4b-5fc5-bdeb-325776f27f77.html

⁵ See "Utilities Empower Broadband Deployment—A UTC Whitepaper" available at https://utc.org/wp-content/uploads/2021/01/BB_utilities_historical_piece_FINAL.pdf

⁶ See "Virginia SCC Approves Appalachian Power's Broadband Pilot Program," American Electric Power (May 14, 2020) available at <https://www.appalachianpower.com/info/news/viewRelease.aspx?releaseID=5556#:~:text=5%2F14%2F2020-Virginia%20SCC%20approves%20Appalachian%20Power's%20broadband%20pilot%20program,the%20Virginia%20State%20Corporation%20Commission.>