

that pre-allocate capacity for certain uses could result in insufficient capacity for a utility's own use. Sufficient facilities and infrastructure capacity are paramount to utilities and should not be compromised by the imposition of FCC regulations.

69. NESC, NEC, OSHA, and other safety laws, regulations and standards (including the utility's own internal standards), in conjunction with pole and other infrastructure lease agreements and market forces, provide the best guidance on what is a fair and reasonable allocation of capacity. Finally, because each attachment will depend on the circumstances surrounding the particular infrastructure, a general requirement of fairness and reasonableness is all that is necessary in ensuring nondiscriminatory access. Specific regulations regarding this issue will simply complicate matters for the parties negotiating an attachment agreement.

III. The Infrastructure Owners Strongly Oppose the Promulgation of Burdensome Regulations To Ensure Compliance with the Written Notification Requirement of Section 224(h)

70. The Infrastructure Owners are concerned that the Commission, in promulgating regulations under Section 224(h), will unnecessarily impose significant notification burdens on owners of poles, ducts, conduits or rights-of-way. Consequently, the Infrastructure Owners urge the Commission to proceed

cautiously in dealing with the written notification requirement.^{15/} The Infrastructure Owners oppose the promulgation of specific written notification requirements, believing that the details of compliance should be left to the agreement of the parties. In those situations in which owners and attaching entities mutually agree to written notification, for example, the Commission should not impose additional notification requirements on the owners. If the parties have not agreed to written notification procedures, the Commission should require no more than a 10-day notification period so that owners are able to adequately meet the needs and demands of their customers -- the general public.

71. Also, the Commission should clarify that the written notification requirement does not apply (1) to routine maintenance, (2) to the installation of temporary facilities, (3) during emergency situations, where no intent to make modifications or alterations to the infrastructure was formulated

^{15/} The Infrastructure Owners also request clarification from the Commission that notice of modification or alteration does not necessarily ensure that attaching entities will actually be allowed greater access to a particular pole, duct, conduit, or right-of-way. The Infrastructure Owners anticipate that notice typically would be sent out before the feasibility of enhanced access is actually considered. As set forth in detail above, there are numerous capacity, reliability, safety and engineering issues associated with access. In this regard, electric utilities in some instances will be forced to deny access to parties already present on the pole, or in the duct, conduit, or right-of-way, even after the entity has affirmatively responded to written notification. Section 224(h) should thus be read in conjunction with the access denial provisions of Section 224(f)(2).

in advance, (4) in fulfilling specific customer service requests, and (5) in the event of an uncooperative attaching entity. Finally, the Commission should promulgate cost-sharing regulations that conform exactly to the 1996 Act, i.e., attaching entities should bear a proportionate share of costs incurred by the owner in making such pole, duct, conduit, or right-of-way accessible.

A. The Commission Should Not Impose Specific Written Notification Requirements on Owners

72. The Infrastructure Owners urge the Commission to adopt flexible written notification guidelines in accordance with Section 224(h). Many electric utilities, for example, already notify (or attempt to notify) attaching entities regarding their intention to modify or alter poles, ducts, conduits, or rights-of-way. This voluntary notification practice has been successful, notwithstanding the lack of specific Commission regulations. Detailed requirements beyond the simple approach established in the statute will interfere with the current contractual obligations between utilities and licensees of infrastructure space. The Infrastructure Owners urge the Commission to leave in place the written notification provisions mutually arranged between utilities and attaching entities.

73. Moreover, most owners will continue to include notice provisions in any new or future attachment agreements. Consequently, the Infrastructure Owners urge the Commission to

adopt general notification guidelines while still allowing owners and attaching entities to reach their own mutually beneficial arrangements on specific notification standards. Section 224(h) simply requires written notification. Provided written notification occurs to the satisfaction of both the owner and the attaching entity, the Commission should not intervene.

74. In addition to urging the Commission to adopt a "performance-oriented" approach to the written notification requirement of Section 224(h), the Infrastructure Owners seek a clarification that the requirement applies only to those situations in which the owner actually "intends to modify or alter" a pole, duct, conduit, or right-of-way. Section 224(h) therefore does not apply in all circumstances. Section 224(h) clearly requires "intent," and if an infrastructure owner has not planned in advance to modify or alter a pole, duct, conduit or right-of-way, the owner should not be required to provide written notification to attaching entities with respect to any work done on the facility. This reading of Section 224(h) is consistent with the primary obligation of electric utilities: to meet the needs of their residential and business customers, including hospitals, police and fire departments, governments, schools and traffic-control agencies. The needs of these customers cannot be considered secondary to written notification requirements. To improperly extend the scope of Section 224(h) to all situations in which an owner modifies or alters a pole, duct, conduit or

right-of-way is beyond the literal reading of the law and will place extraordinary burdens on the Infrastructure Owners and other owners facilities subject to regulation under Section 224(h).

75. Notice requirements should thus be a function of the nature and urgency of the modification or alteration and should not apply to those situations in which the owner did not intend a modification or alteration to occur. For example, no notice should be required in cases of routine maintenance -- utilities cannot be expected to provide notification regarding maintenance crew work where there is no advance intention to modify or alter the pole, duct, conduit, or right-of-way. Moreover, utilities should not be obligated to provide notice in fulfilling specific electric customer service requests -- such requests typically are unanticipated and, in responding to such requests, a utility does not generally intend to modify or alter a pole, duct, conduit, or right-of way.^{16/}

76. Finally, the Commission must clarify that the written notification requirement does not apply in the event of extreme weather conditions, storm restoration conditions, and other emergency situations. As noted above, Section 224(h) is limited

^{16/} In addition, the Infrastructure Owners typically are under strict public utility commission guidelines that do not allow them to unnecessarily delay responding to customer service requests. Written notification requirements, as contemplated herein, could be considered such an unnecessary delay.

to those situations in which an owner "intends" to modify its poles, ducts, conduits or rights-of-way. If an owner truly intends to do such work, it is appropriate for the owner to give notice to an attaching entity so that the entity has an opportunity to take advantage of access, without bearing the full costs of access. However, in an emergency situation, the owner does not "intend" to modify its poles, ducts, conduits or rights-of-way. Rather, the owner is responding to an emergency situation, a situation in which the public health, safety and welfare is of utmost priority. Where the electric utility is responding to a crisis situation, there is no premeditated intention. Clearly, it would be contrary to the public interest to require an owner to notify attaching entities of its modification or alteration work during emergency situations.

77. Section 224(h), if applied improperly, could cripple the electric utility industry. Everyday, utility poles are struck and often knocked down by vehicles. It is unthinkable that a pole owner would have to provide written notification to all attached parties before it could modify or alter the pole and restore it to a safe position. Clearly, this was not the intent of Congress in enacting Section 224(h). To avoid the unintended application of the written notification requirement to all situations in which work is performed on or in infrastructure, the Infrastructure Owners strongly urge the Commission to clarify

that the requirement does not apply to emergency situations, as described herein.

78. With respect to the timing of the written notice, the Infrastructure Owners urge the Commission to adopt no greater than a 10-day notification period. Owners, especially electric utility providers, should not be expected to unnecessarily delay work simply to accommodate an attaching entity. Any delay beyond 10 days would unduly interfere with the ongoing work of the electric utility to maintain and repair lines and provide prompt and timely service to customers. Notice should not become a contingency that causes additional costs to the utility or causes a delay in service to the customer. Ten days is an ample amount of time given the demands placed on utilities in meeting their public service obligations. Of course, infrastructure owners would be free to provide additional notification time in appropriate situations.

79. With regard to actual notification, owners should be allowed to notify attaching entities by mail, facsimile, or electronic mail. Owners can best decide how to notify attaching entities based on established practices and procedures and notification systems at their disposal. Owners should not be required to make any follow-up effort to contact attaching entities, nor should they be obligated to force attaching entities to respond to notifications. If, after receiving

notification, an attaching entity elects to share in the access, it must respond to the owner of the pole, duct, conduit, or right-of-way to coordinate work on the facility prior to the expiration of the 10-day notification period. If the attaching entity and owner cannot then reach mutually agreeable terms on the date, time and manner of access, the infrastructure owner should be under no further obligation to provide access.

80. The Commission should clarify that owners will not be required to accommodate the construction schedules of attaching entities in performing the owner's planned work on facilities. The notification requirement should not lead to unnecessary delays in modifying or altering poles, ducts, conduits, or rights-of-way. Owners should not be forced to delay modification or alteration schedules because an attaching party has failed to make a timely response. Proof of notification should not be required as it could also delay the ability of owners to perform needed modifications or alterations before a safety problem develops.

81. Finally, infrastructure owners should be permitted to use an outside contractor to coordinate the written notification requirements of Section 224(h), and the Commission should require attaching entities and other third parties to cooperate with such notification services. Attaching entities also should be expected to proportionally bear the full costs of such service,

since those costs are directly related to improving coordination efforts between owners of poles, ducts, conduits or rights-of-way and companies with attachments to these facilities.

82. Moreover, attaching entities should reimburse owners for meeting the written notification requirements even if such work is performed by the owner "in-house." Written notification, as required under Section 224(h), solely is for the benefit of attaching entities. Thus, owners should not be required to bear the costs of the notice. Section 224(h) imposes written notification requirements on owners of poles, ducts, conduits, or rights-of-way for the benefit of attaching entities. To require owners to bear the costs of such benefit is inequitable.

B. Owners Should Not Be Required To Provide Written Notification to Uncooperative Attaching Entities

83. The Infrastructure Owners are consistently plagued with the problem of unauthorized attachments to their property. For example, one Infrastructure Owner has reported that during any given pole inspection, roughly 10-15 percent of the poles used by telephone companies are unauthorized, and 20-25 percent of the poles used by cable companies are unauthorized. These unauthorized attachments may (1) represent an attempt by the attaching entity to avoid paying for the use of the pole, (2) represent an attempt to avoid addressing a safety code problem with the particular attachment, or (3) may be the result of poor recordkeeping. In any case, the owners are often not

aware of numerous attachments. Given the historical problems in the industry with unauthorized attachments and the difficulty in identifying attachment owners in general, in no case should an owner of a pole, duct, conduit, or right-of-way be penalized for failure to provide notice to an unauthorized attaching entity.

84. The Infrastructure Owners urge the Commission to recognize the serious problem of unauthorized attachments and to discourage telecommunications companies from attaching unauthorized facilities to poles, ducts, conduits, and rights-of-way. In addition, the Commission must not impose an obligation on owners to notify attaching entities that have not applied for or entered into an agreement to lease space with the infrastructure owner; such entities should not be entitled to written notification under Section 224(h). Owners should only notify attaching entities that are in full compliance with the applicable terms of a pole attachment or similar agreement. They should not be obligated to notify any attaching entity that is in material default of an attachment agreement.

85. In addition, the notification requirement should not be viewed solely as an obligation of the owner; rather, it should be a joint obligation of all attaching entities. The Commission should clearly specify that attaching entities must keep owners fully apprised of (1) changes or additions to attachments; (2) assignments of agreements or transfers of ownership; (3) new

mailing addresses; and (4) new contact persons. Concurrently, attaching entities should provide owners with insurance certificates and certificate renewals. The attaching entity should be solely responsible for keeping the infrastructure owner fully informed with respect to current information of this nature. It should not be the owner's responsibility to ensure that this information is up-to-date.

86. Finally, the Infrastructure Owners bring to the FCC's attention that they may be unaware of attachments on a pole-by-pole basis. Most attachment agreements contemplate the leasing of a route or a number of poles rather than the leasing of a particular pole. While electric utilities attempt to maintain attachment records through computer databases and paper reports, accurately tracking multiple attachments on thousands or millions of poles is problematic. Thus, it could be difficult for the Infrastructure Owners to accurately notify all attaching entities on a particular pole. To counter this problem, the Infrastructure Owners recommend that the Commission require all attaching entities to tag pole attachments and manhole covers so that the infrastructure owner is more readily aware of an attachment and can make the necessary written notification. Absent such a requirement, however, infrastructure owners should not be penalized for the failure to notify an attaching entity of planned access, but instead should provide written notification as set forth in the preceding paragraphs.

C. The Commission Should Allocate the Costs of Accessibility in Accordance with the Specific Language of Section 224(h)

87. Under Section 224(h), an attaching entity has an affirmative obligation to bear a proportionate share of accessibility in the event it adds to or modifies an existing attachment after receiving notice from the owner of the pole, duct, conduit, or right-of way.^{17/} Section 224(h) provides for notice first and foremost, but if any attaching entity chooses to add to or modify an existing attachment, the entity "shall bear a proportionate share of the costs incurred by the owner" ^{18/} The language of the statute is clear; there is no basis for the Commission to offset such costs. An attaching entity's decision to respond to the written notification is voluntary.^{19/} The attaching entity is not forced to make changes. Section 224(h) simply is a vehicle to ensure that attaching entities are apprised of opportunities to modify. Attaching entities who choose to avail themselves of the opportunity have an affirmative

^{17/} If an attaching entity requires access in a situation where the owner of a pole, duct, conduit, right-of-way does not intend to modify or alter the facility (and notification thus has not been sent), the attaching entity is responsible for all accessibility expenses as a make-ready cost.

^{18/} 47 U.S.C. § 224(h) (emphasis added).

^{19/} The Infrastructure Owners note that in certain circumstances, e.g., where the owner of a pole, duct, conduit or right-of-way is forced to relocate due to road widening, etc., the attaching entities may have an obligation to respond to the owner. The Infrastructure Owners believe that Section 224(h) does not apply in such a situation because the attaching entities do not have the option of responding; rather they must respond.

obligation under the statute to share in the costs of accessibility on a facility-by-facility basis.

88. Proportionate share is a very simple and understandable concept: to calculate the share, one takes the cost of accessing the pole, duct, conduit, or right-of-way space and divides that cost by the number of entities taking advantage of the access.^{20/} Keeping the calculation of proportionate share as simple as possible is to the benefit of the Commission and all interested parties; it also is well within the language of Section 224(h). This is not a case of artificial distinctions between usable and unusable space, or of which entity gets more benefit from the access. It is a question of all parties equally sharing in the costs of accessibility. Rather than an attaching entity bearing the full cost of access for a modification to its attachment or an owner bearing the entire costs of access to alter a pole, duct, conduit, or right-of-way, the parties share the cost fairly.

D. Under Section 224(h), the Commission Cannot Offset Revenues Nor Limit Owner Modifications

89. Section 224(h) does not make a distinction in the types of modifications the owner intends to make; rather, the section deals with pure access issues. The Commission's suggestions that

^{20/} While determining the proportionate share might be simple, much work needs to be done to determine the costs of accessing the utilities' facilities.

payments should be offset by revenues, and that owners should be limited in their ability to modify facilities are misplaced.^{21/} There is no basis for the Commission to enforce such restrictive regulations on owners when Section 224(h) does not force an attaching entity to request access. Participation is voluntary, and an attaching entity is only required to bear a proportionate share in the event it adds to or modifies its existing attachment after receiving notification. The Commission has mistaken the goal of Section 224(h) in proposing to limit owners as the Commission has done in the Interconnection NPRM.

90. Whether or not an owner ultimately derives any revenues from its modification to its pole, duct, conduit, or right-of-way has no bearing on the obligation of the attaching entity to proportionately share the cost of access. The Commission is attempting to broaden the scope of Section 224(h). Even if the Commission ruled that it had the authority to offset accessibility costs by revenues, the administrative details associated with such a determination are excessive. First, modifications do not necessarily mean additional revenue. Second, even if revenues are realized, it is virtually impossible to predict when and how much revenues are gained by the owners

^{21/} The Infrastructure Owners recognize that such issues may be appropriate in a discussion of the rules that are to be promulgated under Section 224(i). It is the Infrastructure Owners' understanding that the Commission will initiate a separate proceeding to prescribe regulations under Section 224(i). Interconnection NPRM at ¶ 221, n.301.

(especially if revenues are tied to one pole out of a million). Section 224(h) does not contemplate the promulgation of such regulations by the Commission.

CONCLUSION

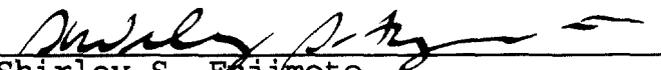
91. The Infrastructure Owners urge the Commission to adopt a fair, balanced and reasonable approach to the requirements of Sections 224(f) and 224(h) that is consistent with the overall deregulatory nature of the 1996 Act. Congress contemplated that, with the removal of barriers to entry accomplished by the 1996 Act, market forces would control. The Infrastructure Owners urge the Commission to let those market forces govern in the absence of a specific, demonstrated need for regulation.

92. To the extent the Commission adopts any regulations, the Infrastructure Owners urge the Commission to bear in mind its obligations to regulated entities and their customers. Just as the States must certify to the Commission, in preempting the Commission's jurisdiction over pole attachments, that in regulating they will take into account the interests of the subscribers of telecommunications services and the interests of the utility ratepayers and investors, the Commission likewise has an obligation to both. The Infrastructure Owners urge the Commission to recognize its dual obligations and to proceed accordingly.

WHEREFORE, THE PREMISES CONSIDERED, the Infrastructure Owners respectfully request that the Commission act upon the pole access and related issues raised in Paragraphs 220-225 of the Interconnection NPRM in a manner consistent with the views expressed herein.

Respectfully submitted,

**American Electric Power Service
Corporation
Baltimore Gas and Electric Company
Commonwealth Edison Company
Duke Power Company
Energy Services, Inc.
Florida Power & Light Company
Metropolitan Edison Pennsylvania
Electric Company
Montana Power Company
Northern States Power Company
Otter Tail Power Company
Pacific Gas & Electric Company
The Southern Company
Tampa Electric Company
Union Electric Company
Washington Water Power Company
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Dated: May 20, 1996

APPENDIX I

INFRASTRUCTURE OWNER COMPANY DESCRIPTIONS

American Electric Power Service Corporation, a wholly-owned subsidiary of American Electric Power Co., Inc., is an organization which provides administrative, engineering, financial, legal and other services to the operating companies of American Electric Power Co., Inc. American Electric Power Co., Inc. is a public utility holding company registered under the Public Utility Holding Company Act of 1935, and holds all of the issued and outstanding common stock of the following companies: Appalachian Power Company, Indiana Michigan Power Company, Kentucky Power Company, Ohio Power Company, Columbus Southern Power Company, Kingsport Power Company, and Wheeling Power Company.

Baltimore Gas and Electric Company is an investor-owned public utility that provides gas and electric service to more than 2.6 million residents in central Maryland, over a 2,300 square-mile area.

Commonwealth Edison Company ("ComEd") is an investor-owned public utility that supplies electricity to approximately 3.3 million retail customers in a service territory that includes roughly the northern one-third of Illinois and includes the city of Chicago and its suburbs. ComEd and its parent holding company, Unicom Corporation, are corporations organized and existing under the laws of the State of Illinois. ComEd is

subject to the jurisdiction of the Illinois Commerce Commission as a public utility. ComEd also provides wholesale requirements service to several municipalities located in its service area. With respect to that service, as well as to coordination agreements ComEd has with numerous other electric suppliers for the interstate transmission of energy, ComEd is subject to the jurisdiction of the Federal Energy Regulatory Commission ("FERC").

Duke Power Company ("DPC") supplies electricity to more than 1.7 million residential, commercial, and industrial customers in a 20,000 square-mile service area in North Carolina and South Carolina. DPC owns solely, or jointly, 1,772,732 electric distribution poles.

Entergy Services, Inc. is a subsidiary of Entergy Corporation, a public utility holding company organized pursuant to the provisions of the Public Utility Holding Company Act of 1935. Entergy Corporation owns all of the outstanding shares of common stock of the following five operating company subsidiaries: Entergy Arkansas, Inc. (formerly Arkansas Power & Light Company), Entergy Gulf States, Inc. (formerly Gulf States Utilities Company), Entergy Louisiana, Inc. (formerly Louisiana Power & Light Company), Entergy Mississippi, Inc. (formerly Mississippi Power & Light Company), and Entergy New Orleans, Inc. (formerly New Orleans Public Service, Inc.) (collectively, the "Entergy Operating Companies"). The Entergy Operating Companies engage in the manufacture, generation, transmission, distribution, and sale of electricity to more than 2.3 million

retail customers throughout 112,000 square miles of Arkansas, Louisiana, Texas, and Mississippi. Entergy Services, Inc. provides engineering, transmission, distribution planning, financial, human resource, tax, accounting, legal, and other services to the Entergy Operating Companies.

Florida Power & Light Company ("FPL") is the fourth largest investor-owned electric utility in the United States serving 3.5 million customers. FPL is a corporation organized and existing under the laws of the State of Florida and is a principle subsidiary of FPL Group, Inc. FPL is regulated by the Florida Public Service Commission. FPL's service territory covers 27,650 square miles in all or part of 35 Florida counties, most of the east coast of Florida, and the west coast of Florida south of the Tampa Bay area, including the municipalities of Miami, Ft. Lauderdale, West Palm Beach, Daytona Beach, and Sarasota.

Metropolitan Edison/Pennsylvania Electric Company is a wholly owned subsidiary of General Public Utilities Corporation ("GPU") and serves over 1.1 million customers in a 45-county area in Pennsylvania (and a small area in New York). Other subsidiaries of GPU include Jersey Central Power and Light, GPU Nuclear, GPU Service, GPU Generation (Genco), and Energy Initiatives, Inc.

Montana Power Company is an energy company headquartered in Butte, Montana. Its Utility Division operates electric and natural gas systems, serving 272,000 electric customers and 136,000 natural gas customers. Its electric system serves an area of 97,540 square miles, and its gas system serves an area of

70,500 square miles. The electric system consists of 6,911 miles of transmission line and 15,225 miles of distribution line.

Northern States Power Company ("NSP"), headquartered in Minneapolis, Minnesota, is a major utility company with growing domestic and overseas non-regulated energy ventures. NSP and its wholly-owned subsidiary, Northern States Power Company-Wisconsin, operate generation, transmission, and distribution facilities providing electricity to about 1.4 million customers in Minnesota, Wisconsin, North Dakota, South Dakota, and Michigan. The two companies also distribute natural gas to more than 400,000 customers in Minnesota, North Dakota, and Michigan, and provide a variety of energy-related services throughout their service areas.

Otter Tail Power Company is a small investor-owned, FERC-jurisdictional electric utility, serving 123,000 customers in a 50,000 square-mile service area. Otter Tail's service territory encompasses roughly the eastern half of North Dakota, the western one-third of Minnesota, and the northeastern corner of South Dakota. Otter Tail's retail load is predominately rural. Although Otter Tail serves approximately 437 communities, only one has a population greater than 15,000.

Pacific Gas & Electric Company is one of the largest investor-owned gas and electric utilities in the United States. It serves 4.3 million electric customers and 3.5 million gas customers in northern and central California. It maintains approximately 2 million solely- and jointly-owned wood distribution poles to provide its electric service.

The Southern Company is the parent firm of five electric utilities: Alabama Power, Georgia Power, Gulf Power, Mississippi Power, and Savannah Electric. Other subsidiaries include Southern Electric International, Southern Nuclear, Southern Development and Investment Group, Southern Communications Services, Inc., and Southern Company Services.

The Southern Company supplies energy to a 120,000-square mile U.S. service territory spanning most of Georgia and Alabama, southeastern Mississippi, and the panhandle region of Florida -- an area with a population of about 11 million. Through its Southern Electric International unit, The Southern Company also supplies electricity to customers in a number of other states and in Argentina, England, Chile, the Bahamas, Trinidad, and Tobago.

Tampa Electric Company ("TECO") is a tax-paying, investor-owned electric utility, incorporated in 1899. Its service area is relatively compact, comprised of about 2,000 square miles including almost all of Hillsborough County and parts of Pasco, Pinellas, and Polk Counties in the State of Florida. TECO has several generating plants and owns and operates approximately 313,000 distribution poles used to serve its approximately 500,000 customers. In addition, approximately 11,250 electric distribution poles are use-shared with the local exchange carrier pursuant to a joint use agreement.

Union Electric Company is headquartered in St. Louis. Union Electric supplies energy services to a diversified region in the heart of America -- 24,500 square miles that cover most of eastern Missouri and a small portion of Illinois. Its 6,190

employees provide dedicated service to 1.1 million electric customers and 121,000 gas customers.

Washington Water Power Company is an energy services company with operations in five western states. The company provides electric service to 291,000 customers in eastern Washington and northern Idaho, and provides natural gas service to 227,000 customers in parts of four states: Washington, Idaho, Oregon, and California.

Wisconsin Electric Power Company, a subsidiary of Wisconsin Energy Corp., provides electricity, natural gas, and/or steam service to about 2.3 million people in southeastern Wisconsin (including the Milwaukee area), the Appleton area, the Prairie du Chien area, and in northeastern Wisconsin and Michigan's Upper Peninsula.

Wisconsin Public Service Corporation is a public utility engaged in the production, transmission, distribution, and sale of electricity to approximately 340,100 customers, and in the purchase, distribution, and sale of natural gas to approximately 184,800 customers in northeastern Wisconsin and adjacent parts of upper Michigan. Cities that the company serves with retail electric energy or natural gas include Green Bay, Oshkosh, Sheboygan, Wausau, Stevens Point, Marinette, and Rhinelander in Wisconsin, and Menominee in Michigan. Wisconsin Public Service also sells electricity at wholesale rates to numerous utilities and cooperatives.