

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

1. **Make Ready Costs** – Make-Ready costs are generally allocated to the cost causer. The following statements clarify the position of the companies.
 - a) **Pole Replacement Required - Existing NESC Non-Compliant Pole – Replacement Required to Clear the Non Compliance** - When a pole replacement is driven by new licensee, but there are existing NESC ground clearance or separation compliance issues that require a pole replacement irrespective of the new licensee requirements, then the pole is replaced at the pole owner(s) expense and room is made on the new pole for the new licensee without cost. The pole owner taking lead for the replacement incurs the initial cost of installing the new pole and transferring their equipment to the new pole. If the pole is to be jointly owned, the installing owner bills the other joint owner for their share of the pole installation cost. The existing licensees do not share in the pole installation cost. All companies, including existing licensees, incur their own transfer cost. Generally these situations require one or both pole owners to increase the height of the pole.

If the pole replacement is due to one of the owner's need for increased, and the other joint owner does not require the increased height, then the new pole is not considered to be mutually beneficial and the owner solely benefitting from the increased pole height shall pay the other owner "pole life credit" for the remaining value of the replaced pole. All companies, including existing licensees, incur their own transfer cost. In all cases, the last party [electric or telephone] off the pole has the responsibility to remove the replaced pole. In these situations, room is made on the new pole for the new licensee without cost. AVANGRID in New York does not currently attempt to assess if an existing third party is responsible for the existing non-compliance. Such an assessment is difficult and potentially time consuming. Moreover, even if such assessments were made, and it was determined that the existing third party created the non-compliance, obtaining compensation from the offending third party would be challenging. Hence, in order to provide timely make-ready, the pole owner(s) absorb the pole replacement cost.

- b) **Pole Replacement Required - Existing NESC Non-Compliant Pole – Replacement Required for New Licensee** - When a pole replacement is driven by a new licensee, but there are existing NESC ground clearance or separation compliance issues that also need to be addressed, and the non-compliance issues may be corrected without a pole replacement, then the pole replacement is determined not to be required but for the new licensee's requirements. In order to expedite the make-ready in these situations, the pole is replaced at the pole owners' expense. Room is made on the new pole for the new licensee without cost (subject to any alternate agreement with licensee). All companies, including existing licensees, incur their own transfer cost. In all cases, the last party [electric or telephone] off the pole has the responsibility to remove the replaced pole.

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

- c) **Pole Replacement Required - Existing NESC Compliant Pole** - When a pole replacement is driven by a new licensee and there are no existing NESC ground clearance or separation compliance issues, then the pole is replaced at the new licensee's expense and room is made on the new pole for the new licensee. All companies, including existing licensees, incur their own transfer cost. In all cases, the last party [electric or telephone] off the pole has the responsibility to remove the replaced pole.
- d) **Rearrangement Only - Existing NESC Non-Compliant Pole – Less Than NESC Minimum Approach Distance**: When a new licensee makes an attachment request and there are existing NESC ground clearance or separation compliance issues that could reasonably be expected to endanger life or property, then the pole owner(s) is responsible for the cost to rearrange facilities to clear the non-compliance and make room for the new licensee. All parties should work together to perform the most cost effective make-ready rearrangements on a collective basis. The following measurements will be considered Less Than Minimum Approach Distance: 35kv Primary with less than 36 inches to a communication facility; 5kv and 15kv Primary with less than 26 inches to a communication facility; 0 – 750 v Secondary with less than 13 inches to a communication facility.
- e) **Rearrangement Only - Existing NESC Non-Compliant Pole – Greater Than NESC Minimum Approach Distance**: When a new licensee makes an attachment request and there are existing NESC ground clearance or separation compliance issues that are not expected to endanger life or property, then the new licensee has an obligation to pass the design notification to the non-compliant stakeholder(s) already on the pole, thereby giving notice to rearrange the non-compliant facilities, clear the non-compliance and make room for the new licensee in a timely manner. Once compliant, any cost for electrical make ready required to make space for the new attacher shall be the responsibility of the new attacher, consistent with section 1(f) of this policy. The following measurements will be considered Greater Than Minimum Approach Distance: 35kv Primary with greater than 36 inches to a communication facility; 5kv and 15kv Primary with greater than 26 inches to a communication facility; 0 – 750 v Secondary with greater than 13 inches to a communication facility. All parties should work together to perform the most cost effective and timely make-ready rearrangements on a collective and timely basis. The licensee may coordinate a single vendor arrangement with the communication stakeholders to address the re-arrangements and clear the non-compliance timely and efficiently and settle up the cost with stakeholders upon agreements made.
- f) **Rearrangement Only - Existing NESC Compliant Pole**: When a new licensee makes an attachment request and there are no NESC ground clearance or separation compliance issues, rearrangement of existing facilities is performed to make room for the new licensee. The new licensee is responsible for the cost to rearrange existing electric facilities and provide notification to existing licensees to rearrange their communications facilities to make room for the new attachment if necessary. All parties should work together to perform the most cost effective make-ready rearrangements on a collective basis.

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

- g) Pole Replacement Required due to Room and Pole Condition:** When a new licensee makes an attachment request and there are no NESC ground clearance or separation compliance issues, but room needs to be made for the new licensee and the pole has been inspected previously and determined that replacement is required due to condition, the pole is replaced at the pole owners' expense and room is made on the new pole for the new licensee without cost.

AVANGRID Network NY Companies – NYSEG and RGE

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

AvanGrid – NYSEG/RGE Make-Ready Billable vs. Non Billable Quick Reference Who Pays Table							
Pole Replacements				Rearrangements			
NESC Non-Compliant Pole		NESC Compliant Pole		NESC Non-Compliant Pole		NESC Compliant Pole	
Scenario	Who Pays	Scenario	Who Pays	Scenario	Who Pays	Scenario	Who Pays
Room Required Irrespective of New Licensee	Pole Owner(s)	Room Required for New Licensee No Internal Replacement Identified	New Licensee	<u>Less Than Minimum Approach Distance</u> Clear The Non Compliance And Make Room For New Licensee	Pole Owner(s)	Make Room For New Licensee	New Licensee
		Room Required for New Licensee DLI Future Replacement Required	Pole Owner(s)				
Replacement may not be Required to Clear Non- Compliance. Replacement may be Required to Make Room for the New Licensee	Pole Owner(s)	Room Required for New Licensee DLI Immediate Replacement Required	Pole Owner(s)	<u>Greater Than Minimum Approach Distance</u> Clear The Non Compliance And Make Room For New Licensee	New Licensee to pass design notification and notify non-compliant CATV/ILEC /Municipality to clear violations in a timely manner. Once the pole is cleared of the non- compliance, the New Licensee is responsible for the cost to rearrange electric facilities to make space for new attachment.		

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

- 2) **Boxing of Poles** – Boxing is placing attachments on both sides of the pole. AVANGRID allows conditional boxing of poles in New York. Wholesale boxing is not allowed. Boxing can create access safety issues. The following statements clarify the position of the companies.
- a) **Existing NESC Non-Compliant Pole** - Allowing Boxing on an existing pole that is currently non-compliant with the NESC rules effecting electric and communication separation and clearance requirements is not allowed. The disallowance will be enforced even if the proposed new communication attachment would not, in and of itself, create an additional NESC non-compliance. The addition of a new communication attachment to a pole that does not meet electric and communication separation and clearance requirements increases the risks by exposing communication workers to the non-compliance, thus worsening the effects of the non-compliance and associated risks. Typically the existing non-compliance is inadequate separation between electric and communication facilities.
- b) **Existing NESC Compliant Pole – Delayed Make-Ready** - Temporary Boxing is allowed on a case-by-case basis when (a) make-ready will take longer than the PSC prescribed timeframes and (b) the pole is in compliance with NESC electric and communication separation and clearance requirements and (c) the new attachment will be in compliance with NESC rules effecting electric and communication separation and clearance requirements. Temporary Boxing is only allowed when a clear plan for unboxing the pole is economically feasible; like a pole replacement that facilitates placing all communication lines on the same side of the pole. Temporary Boxing should be recorded and removed within 30 days once the make-ready is performed. A post construction inspection will document compliance with these provisions for future reference. The ILEC joint pole owner may enforce more stringent rules. Temporary Boxing requires a pre-construction survey and a specific agreement where the poles and the plan for unboxing are identified.
- c) **Existing NESC Compliant Pole – Exceptionally Costly Make-Ready** -Permanent Boxing is occasionally allowed, on a case-by-case basis, to reduce the make-ready cost when (a) the cost is exceptionally large and (b) the pole is in compliance with NESC electric and communication separation and clearance requirements and (c) the new attachment will be in compliance with NESC rules effecting electric and communication separation and clearance requirements. The pole owners, existing and new attachers should work collectively to provide economical use of the pole and keep make-ready cost to a minimum for all attachers using standard attachment techniques. The pole owners will determine on a case-by-case basis if the make-ready costs are exceptionally large. AVANGRID will consider make-ready costs in excess of \$9500, on a per pole basis, to meet the exceptionally costly threshold, thus allowing permanent boxing. A pole with make-ready cost less than this threshold may be considered for boxing with the approval of an AVANGRID Engineering Supervisor. Permanent Boxing, to avoid make-ready, on multiple poles

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

in succession is not allowed. Boxing can create access safety issues. Therefore, boxing will only be considered if the pole can be safely accessed by bucket trucks, so that worker safety is not compromised.

3) Extension Arms These brackets are angled downward to maintain separation to electric conductors thus allowing an additional attachment at or near the same level as an existing communication attachment. AVANGRID allows conditional use of extension arms in New York. Wholesale use of extension arms is not allowed. When analyzing the electric to communications separation, all measurements are made vertically, not diagonally. The following statements clarify the position of the companies.

- a) **Existing NESC Non-Compliant Pole** -The use of a Temporary Extension Arm on an existing pole that is currently non-compliant with the NESC rules effecting electric and communication separation and clearance requirements is not allowed. The disallowance will be enforced even if the proposed new communication attachment would not, in and of itself, create an additional NESC non-compliance. The addition of a new communication attachment to a pole that does not meet electric and communication separation and clearance requirements increases the risks by exposing communication workers to the non-compliance, thus worsening the effects of the existing non-compliance and associated risks. Typically the existing non-compliance is inadequate separation between electric and communication facilities.
- b) **Existing NESC Compliant Pole – Delayed Make-Ready** - The use of a Temporary Extension Arm is allowed on a case-by-case basis when (a) make-ready will take longer than the PSC prescribed timeframes and (b) the pole is in compliance with NESC electric and communication separation and clearance requirements and (c) the new attachment will be in compliance with NESC rules effecting electric and communication separation and clearance requirements. The Temporary Extension Arm should be recorded and removed within 30 days once the make-ready is performed. A post construction inspection will document compliance with these provisions for future reference. The ILEC joint pole owner may enforce more stringent rules. Temporary Arms requires a pre-construction survey and a specific agreement where the poles and the plan for removing the arms are identified.

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

- c) **Existing NESC Compliant Pole – Exceptionally Costly Make-Ready** – Conditional use of a Permanent Extension Arm is allowed, on a case-by-case basis, to reduce the make-ready cost when (a) the cost is exceptionally large and (b) the pole is in compliance with NESC electric and communication separation and clearance requirements and (c) the new attachment will be in compliance with NESC rules effecting electric and communication separation and clearance requirements. The use of Permanent Extension Arms, to avoid make-ready, on multiple poles in succession is not allowed. The pole owners, existing and new attachers should work collectively to provide economical use of the pole and keep make-ready cost to a minimum for all attachers using standard attachment techniques. The pole owners will determine on a case-by-case basis if the make-ready costs are exceptionally large. AVANGRID will consider make-ready costs in excess of \$9500, on a per pole basis, to meet the exceptionally costly threshold, thus allowing permanent extension arms. A pole with make-ready cost less than this threshold may be considered for permanent extension arms with the approval of an AVANGRID Engineering Supervisor. The ILEC joint pole owner may enforce more stringent rules.

AvanGrid – NYSEG/RGE Communications Boxing and / or Extension Arms Quick Reference Table			
Temporary		Permanent	
Existing and New NESC Compliant Pole	Existing NESC Non-Compliant Pole	Existing and New NESC Compliant Pole	Existing NESC Non-Compliant Pole
Allowed on a Case-by-Case Basis and Only if Make-Ready will Take Longer than PSC Timeline	Not Allowed	Allowed Only if Make-Ready is Excessive (>\$9500 per Pole)	Not Allowed
Pre-Construction Survey and Specific Temporary Agreement and Removal Plan Required. Temporary Attachments Must be Made Permanent within 30 Days after Make-Ready is Completed		Allowed Only if Pole is Accessible to a Bucket Truck	

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

4) Service Drop Wires – AVANGRID allows abbreviated licensing for service drop poles in accordance with PSC rules in New York. Drop poles are poles placed between the distribution pole line and a customer’s building. The following statements clarify the position of the companies.

- a) **Permanent Service Drop Wires Placed on Main Line Poles** – The standard licensing procedure is required for drop wires attached to main line poles. Facilities placed on main-line distribution poles are considered an attachment requiring a license prior to attaching. The use of service drop wire attached with “J” hooks running down a main distribution line does not fall within the scope of the PSC rules affording abbreviated licensing of drop poles.
- b) **Temporary Service Drop Wires Placed on Main Line Poles - Delayed Make-Ready** Temporary service drop wires placed on main line poles is allowed when (a) make-ready will take longer than the PSC prescribed timeframes and (b) the pole is in compliance with NESC electric and communication separation and clearance requirements and (c) the new attachment will be in compliance with NESC rules effecting electric and communication separation and clearance requirements. The use of temporary service drop wire attached with “J” hooks running down a main distribution line does not fall within the scope of the PSC rules affording abbreviated licensing of drop poles. Temporary service drop wires should be recorded and removed within 30 days once the make-ready is performed. A post construction inspection will document compliance with these provisions for future reference. Temporary service drop wires require a pre-construction survey and a specific agreement where the poles and the plan for removing the drop wires are identified.
- c) **Permanent Service Drop Wires Placed on Service Drop Poles** - Only those drop wire facilities that are attached to poles between the main distribution line and a customer’s building are considered actual service drop pole attachments that do not require a license prior to attaching in order to meet the licensee's obligation to their customers. In those instances, licensees are still required to inform the pole owners of such attachments within 10 business days after they are made, in accordance with PSC rules. A license will still be required and will be issued after inspection. If the drop pole attachment does not conform to the standard specifications, correction and and/or additional make-ready will be required.

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

AvanGrid – NYSEG/RGE Communications Service Drop Wires Quick Reference Table							
Temporary				Permanent			
Main Line Pole		Service Drop Pole		Main Line Pole		Service Drop Pole	
Existing and New NESC Compliant Pole	Existing NESC Non-Compliant Pole	Existing and New NESC Compliant Pole	Existing NESC Non-Compliant Pole	Existing and New NESC Compliant Pole	Existing NESC Non-Compliant Pole	Existing and New NESC Compliant Pole	Existing NESC Non-Compliant Pole
Allowed When Make-Ready will Take Longer than PSC Timeline	Not Allowed	Typically Not Required	Not Allowed	Standard Licensing Required Prior to Attachment	Not Allowed	Attachment Prior to Licensing is Allowed. Attacher Must Submit Application within 10 Days of Attaching for Licensing	Not Allowed
A Pre-Construction Survey and a Specific Agreement and Removal Plan Required							

Policy Statements on Make-Ready

Costs /Boxing / Arms / Service Drop Poles

5. **Placement of Communications Facilities** – The following historical protocol will be used for the placement of communication cables from highest to lowest. Utilizing this historical protocol will help insure that communication cables meet NESC required ground clearances as well as providing for an orderly transfer of cables for future pole replacements, thus reducing “double wood” issues.

a. **Top**-Competitive Local Exchange Carrier – Typically Fiber Optic (CLEC)

b. **Middle** -Cable Television – Typically Coaxial Cable (CATV)

c. **Bottom**- Telephone – Typically Copper Cable (ILEC)