

Attachment 3

May 27, 2010
Rev.7

National Grid¹ Electric Distribution Pole Overlash Policy and Operating Procedure

This Policy and Operating Procedure details uniform practices for overlashing Third Party aerial attachments to National Grid's Electric Distribution Poles. National Grid reserves the right to revise this Policy and Operating Procedure.

Definitions

- Licensee - The party currently licensed or authorized to physically attach to the National Grid distribution pole. This may be a Licensed Attacher or Joint Pole Owner.
- Overlasher - The party proposing to overlash to the Licensee's existing cable or messenger. A Licensee overlashing its own cable is also the Overlasher for purposes of this Policy.
- Pole Owner - A party that owns an interest in a pole or anchor supporting the attachment that is to be overlash.

Guidelines

a.) Standards

- i. The Licensee and Overlasher shall install and maintain their facilities in compliance with relevant codes, standards, and engineering, safety and reliability practices ("Standards"). Such Standards include National Grid's Electrical Overhead Standards, Telcordia Blue Book – Manual of Construction Procedures, the National Electric Safety Code (NESC) and OSHA requirements.

b.) Pole Loading Analysis:

Prior to overlashing, the Licensee shall perform a strand tension analysis and may be required to perform a pole loading analysis as follows:

- i. A strand tension analysis shall be conducted by the Licensee to assure the facilities and those overlash are in compliance with the NESC. For existing licensed attachments with a pre-existing NESC Heavy loading design case calculated span tension of no more than 1,750 lbs., the Licensee will be allowed to presume that the allowable loading will not be exceeded for any pole, guy, anchor or other structural component supporting the overlash attachment where the overlash does not increase the NESC Heavy loading design case calculated span tension by more than 20%. For existing licensed attachments with a pre-existing NESC Heavy loading design case calculated span tension of less than 1,000 lbs., the Licensee will be allowed to presume that the allowable loading will not be exceeded for any pole, guy, anchor or other structural component supporting the overlash attachment where the overlash does not increase the NESC Heavy loading design case calculated span tension by more than 40%. The Licensee shall identify those spans that fail to meet either of the above criteria and perform a pole loading analysis for any poles supporting those spans.

¹ Niagara Mohawk Power Corporation, d.b.a. National Grid.

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- ii. In the event the strand tension analysis in item (i) above reveals loading greater than allowable, the Licensee shall conduct a pole loading analysis through a Professional Engineering firm or under the review of an in-house Licensed Professional Engineer that shall assure that the poles, guys, anchors or other structural components supporting the overlashed attachment will be in compliance with relevant Standards and that allowable loading under the NESC will not be exceeded. Where a large number of poles in an area support similar facilities, the Licensee may perform a pole loading analysis for a "worst case" pole to represent a group of poles and verify that each pole in the represented group is at least as strong as the "worst case pole". A "worst case pole" shall be a pole supporting the maximum spans and line angle in the represented group.
- iii. All pole loading analyses shall be performed in compliance with Attachment 4 – "National Grid Distribution Pole Third Party Pole Loading Analysis Criteria".
- iv. A copy of the strand tension analysis and pole loading analysis (if applicable) shall be submitted to the Pole Owner(s) with the Licensee overlashing notice. The analysis shall clearly identify any poles that exceed allowable loading.

c.) Licensee pre-construction survey:

- i. Prior to overlashing, a field survey of the existing Licensee attachments and support strand shall be conducted by the Licensee to assure the existing facilities are in compliance with the Standards. The field survey shall confirm required clearances exist and identify any locations that require pole owner review and make-ready work assessment.
- ii. In the event the field survey confirms the Licensee's attachments are in conformance with the Standards (e.g., required clearances exist), and no poles are identified for Pole Owner review, no National Grid field survey will be required.
- iii. In the event adequate clearance does not exist or existing facilities are in non-compliance with Standards, Licensee shall identify such locations and conditions to the Pole Owner(s) for make-ready assessment.

d.) National Grid pre-construction survey:

- i. National Grid will conduct a pre-construction survey of the poles identified by the Licensee as overloaded or in non-compliance with Standards. Poles reported by the Licensee as "in compliance" e.g., within allowable loading and in compliance with Standards will not be field surveyed by National Grid.
- ii. For poles identified as requiring Pole Owner review, National Grid will provide the Licensee within five (5) business days from the receipt of the Licensee's notice, a written proposal for pre-construction survey and estimating services to be performed on the identified poles. A cost proposal for make-ready work resulting from the survey will be provided to the Licensee within fourteen (14) calendar days. Survey and make-ready cost proposals will be developed using National Grid's prescribed rates in effect at that time.

e.) Licensee Notification of Overlashing Work:

- i. Prior to overlashing, the Licensee shall notify all Pole Owner(s) of overlashing projects as soon as the work dates are known. Notice of overlashing shall be received by the Pole Owner(s) not less than ten (10) business days prior to the start of work. Prior notice will help the Pole Owner(s), other attacher(s) and the Overlasher avoid conflicts in crews trying to access the

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pole's work space. Notices of such projects should be forwarded to the designated liaisons for each of the Pole Owners.

- ii. Licensees desiring to overlash or allow other parties to overlash to its pole attachments on NM distribution poles shall submit to the Licensor a detailed request of its intended overlashing route, including the following information:
 1. The company name, address, contact name, telephone number, and fax number of the entity that would be overlashing to the Licensee's pole attachments.
 2. A route map of the proposed overlashing route with span lengths.
 3. Existing Licensee Cable Information: cable diameter; cable weight, suspension strand diameter, suspension strand weight, cable tension.
 4. Overlashing Cable Information: cable diameter; cable weight, weight of overlashing equipment.
 5. If the overlashing Party is other than the Licensee that is attached to the distribution pole, then written acceptance for the overlashing Party to overlash to the Licensee's cable must be provided by the Licensee.

- iii. The Licensee's notice shall be a written representation that the proposed overlashing will comply with the applicable Standards. The overlashing notice shall affirm (i) the proposed overlashing will not result in the poles and anchors exceeding allowable capacities, and (ii) the Licensee has conducted a pre-construction survey and confirmed existing Licensee facilities are in compliance with the Standards, and (iii) the pole is safe and ready for the proposed overlashing. In the event the Licensee's field survey reveals adequate clearance does not exist or existing facilities are in non-compliance with Standards, the Licensee notice shall identify such locations and conditions and request Pole Owner(s) review and make-ready assessment. In addition, a copy of the strand tension analysis and pole loading analysis (if applicable) shall be submitted with the Licensee overlashing notice. All Pole Loading Analysis and Reporting shall be developed and performed under the direction of a professional engineer licensed by the state where such facility is located, all of which shall be subject to National Grid review and acceptance. The Applicant shall pay National Grid prior to National Grid's commencement of any reviews.

Please send Notification to the National Grid Telecommunications Attachments Group (TAG) at:

National Grid USA Service Company, Inc.
Telecommunications Attachments Group
1 Apollo Drive
Glens Falls, New York 12801

nmnytele@us.ngrid.com

Fax: 518.471.7718

For assistance call: 518.761.5850 or 315.428.5906

- iv. In the event emergency repairs are required to the Licensee's network and such emergency repairs involve overlashing, Licensee may proceed and provide notice as soon as practicable.

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f.) Commencement of Overlashing

- i. Upon compliance with the notice and submittal requirements detailed above, Licensee may proceed to overlash to those poles that the Licensee has identified as ready for overlash (e.g., no further review, field survey or make-ready work is required).
- ii. Licensee shall refrain from overlash to poles or facilities that been identified as requiring further review, field survey or make-ready work until such review and work has been completed.

g.) Completion of Overlashing:

- i. Within (14) calendar days of completing overlash activities, Licensee shall make written notification to National Grid of such work completion. National Grid may conduct at Licensee cost, an overlash “post construction inspection”. Licensee will be advised of National Grid’s decision to conduct a post-construction inspection and the associated inspection cost no later than (30) calendar days after receipt of Licensee’s notice of completion.

h.) Fees

- i. Overlashed facilities that are added to an existing licensed pole attachment will not be considered an additional and separate Attachment. National Grid will not charge annual Attachment fees for overlashed facilities to an existing Licensed attachment.
- ii. The Licensee will be responsible to pay National Grid in advance for any survey, reviews, inspections, and make-ready costs performed by National Grid, per National Grid’s posted Service Work Rate Sheet.

- End -