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EVERSOURCE	TD038 Revision 3 Administration of Third Party Attachments to Eversource CT Poles		
TD PROCEDURE			
Issue Date: 03/21/2024	**Effective Date:** 03/21/2024	**Owner Department**: Single Pole Administration **Subject Matter Expert:** [redacted]	**Applicability:** CT

All changes to TD procedures are controlled by TD 003 "Standard Development, Review and Approval Process

This procedure replaces and supersedes the following procedures (in whole or in part), as described in Section 3 "Summary of Changes":

TD 038 Rev. 2 "Administration of Third-Party Attachments to CL&P Poles" effective 10/19/19.

TD 038 Rev. 3 "Administration of Third-Party Attachments to CL&P Poles" effective 03/21/24.

Roll Out Instructions:
Prior to initial use of this procedure, each individual using this procedure is required to attend training on this procedure delivered during Bi-Monthly Safety Meeting or similar.

Approvals:

Approval Signature: [redacted]

Director, Distribution Engineering

Procedure applicable only to states for which an approval signature appears above.

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1. INTRODUCTION

1.1 Objective

To govern the third-party attachment pole management process which would assist in ensuring standardization of processes and regulatory compliance.

1.2 Applicability

This guideline pertains to Eversource Connecticut Electric.

This procedure addresses:

- Requirements for Third Party Attachers.
- Establishing the sequence of events associated with issuing a license from time of application through final approval of installation.

1.3 References

Unless otherwise specified:

- All 3PA license applications are submitted and processed through the Alden ONE software system.

Procedures are available in the:

- Distribution Engineering Standards Bookshelf
- AldenOne - Training and Help section.

Development References
Documents used to develop this procedure and the process it controls:

- TD 003 “Writing, Revising, and Publishing Transmission & Distribution Procedures”

Supporting References
Documents that support performance of activities directed by this procedure:

- Public Utilities Regulatory Authority (PURA) -Docket No. 09-12-05: ADMINISTRATION OF THIRD-PARTY ATTACHMENTS TO EVERSOURCE CT POLES
  http://www.dpuc.state.ct.us/dockhist.nsf/8e6fc37a54110e3e852576190052b64d/08d20a020e13c584852577b6005de25b?OpenDocument
- PURA Docket No. 11-03-07: THE APPOINTMENT OF A THIRD-PARTY STATEWIDE UTILITY TELEPHONE POLE ADMINISTRATOR FOR THE STATE OF CONNECTICUT
  http://www.dpuc.state.ct.us/DOCKCURR.NSF/f7de85eded62752a8525655d005653b8/07734794316deaaf85257c710073b194?OpenDocument&Highlight=0,11-03-07,OCC
- DOCKET NO. 19-01-52 PURA INVESTIGATION OF DEVELOPMENTS IN THE THIRD PARTY POLE ATTACHMENT PROCESS
  https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/1181de3c7f8c8fc6852586db0066ef94/$FILE/190152-051921.pdf

- DOCKET NO. 19-01-52RE01 PURA INVESTIGATION OF DEVELOPMENTS IN THE THIRD-PARTY POLE ATTACHMENT PROCESS - MAKE-READY https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/4d4b047910a0304d8525883f0055a9cb?OpenDocument

- DOCKET NO. 18-04-20RE01 - APPLICATION OF NETSPEED, LLC FOR APPROVAL OF INSTALLATION OF FACILITIES UNDER AND OVER CERTAIN PUBLIC RIGHTS-OF-WAY – POLE ATTACHMENT DISPUTE https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/6bafef804067ddc9852584a30061c524/$FILE/180420Re01-103019.pdf

- DOCKET NO. 08-06-19RE01 - DPUC INVESTIGATION INTO THE DEPLOYMENT OF DISTRIBUTED ANTENNA SYSTEM (DAS) IN THE PUBLIC RIGHTS OF WAY IN CONNECTICUT – CPCN REQUIREMENT https://www.dpuc.state.ct.us/dockhistpre1900.nsf/8e6fc37a54110e3e852576190052b64d/823a099b290e8c9b852582cd006648ea?OpenDocument

- DOCKET NO. 99-03-25RE01 - **ERROR! REFERENCE SOURCE NOT FOUND.** https://www.dpuc.state.ct.us/dockhistpre1900.nsf/8e6fc37a54110e3e852576190052b64d/94b875d4b234b230852582b8005eabf6?OpenDocument

- Accounting Policy Statement 5 – Authorization and Approval

  TD870, "Design and Construction Audits" – Field verification of Make Ready work complies with Eversource standards.

Supporting Programs and Databases
Programs and databases that support performance of activities directed by this procedure:

- Alden ONE
- JRM (Joint Use Relationship Manager)
- Maximo
- Distribution System Engineering Manual (DSEM)
- Over Head Distribution Standards

1.4 Discussion

Background

Third Party Program Administrator Function

The Third-Party Program Administrator acts as the Company liaison in dealings with the joint pole owners and the Third Party Attachers (3PA's) for attachments in Connecticut.

The Administrator functions include but are not limited to:

- Receiving and processing new agreements between the 3PA's and the Company.
- Receiving and processing new license applications between the 3PA's and the Company.
- Receiving correspondence and drawings from the 3PA's and forwarding to appropriate personnel within the Company for review/design.
- Receiving, processing, and forwarding of Make Ready cost estimates to the 3PA's.
- Precipitating appropriate action and coordinating subsequent activities between the Company and the 3PA's and between departments within the Company.
- Resolving policy issues with the 3PA's.

Reimbursements

All Make-Ready work that is reimbursable shall be accounted for by using Maximo work order system to receive the reimbursable dollar amount.

Agreements with 3PA's

Eversource CT will not approve any license unless a duly signed agreement has been executed between the Company and the 3PA.

3PA Licensing Timetable

Eversource CT must adhere to the following regulatory required schedule:

The PURA mandated Licensing Timetable was revised in Docket 19-01-52RE01.

- The timetable for the Engineering Phase and the Make Ready Phase was adjusted per Docket 19-01-52RE01. The thresholds depend on the number of poles applied for by attacher in a rolling 30-day period.
- See steps 2.1.7 and 2.1.10 for additional information on the how the thresholds are calculated.

2. INSTRUCTIONS

2.1 Processing of Licenses

Third Party Attacher

2.1.1 The Third Party Attacher submits a license application via the Alden ONE system which creates a unique application number.

2.1.2 The Third Party Attacher license application is submitted once all pertinent information is provided.

Single Pole Administrator

2.1.3 Acknowledges receipt of license in Alden ONE and reviews application for accuracy. Upon completion, an automatic email is sent to the 3PA.

a. Await payment from 3PA.

2.1.4 Collection of engineering field survey and administration fees.

a. Acknowledge payment received in Alden ONE generating an automatic email to the 3PA.

b. Post check details in Alden ONE under the Notes tab including check number, check date and issuer.

c. Note check with conversation number and 3PA's company account number.

d. Add check details to the 3PA Check Registry.

2.1.5 The license is sent to survey after passing review and will split into two engineering surveys.

a. Power Survey (Engineering survey for Eversource Construction Engineering)

b. Telecom Survey (Engineering Survey for Joint Owner)

Supervisor – Field Engineering

2.1.6 Supervisor – Field Engineering or Contracting Consulting Firm Manager delegates work to field engineer.

Field Engineer

2.1.7 Conducts survey within PURA mandated time frames revised in Docket 19-01-52RE01(see Table 6 below). The PURA Docket further explains that the utility is to negotiate in good faith the timing of all requests for attachment larger than the lesser of 3000 poles or 5 percent of the utility's poles in a state. "Upon survey completion, Make Ready work is determined. Engineering Results

a. Make Ready Work Required

1) Determine if Make Ready work is billable or non-billable.

2) Add the following to the Alden ONE application: appropriate make ready work, a note, work request and the work order. Re-assign survey back to Single Pole Administrator and complete the Power Survey.

3) The Power Survey transitions into a SPA Review. (Joint Owner follows the same process)

b. Make Ready Work Not Required

1) No Make Ready work is required.

2) Add a note, re-assign survey back to Single Pole Administrator and complete the Power Survey.

3) The Power Survey will go into a SPA review. (Joint Owner follows the same process).

Table 6. Engineering Phase Timelines

	Days
Review Application for Completeness	10
Engineering Phase and Application Review on Merits	
less than 300 poles	45
300 – 3,000 poles	+15
More than 3,000 poles	N/A
Make-Ready Development	14

Single Pole Administrator

2.1.8 The License transitions into a "Review" Status

a. Eversource SPA has one calendar day to review both Power and Telecom Surveys for Make Ready concurrence.

b. If there are Make Ready discrepancies, an e-mail is sent to both the Joint Owner and Eversource Field Engineers to review.

c. If the Make Ready is in concurrence, the Eversource SPA completes the review for both Power and Telecom Survey.

2.1.9 The License transitions into a "Survey Complete" status

a. If Make Ready work is billable, the license transitions into an "Awaiting MR Payment" status until payment is received. Once payment is received, the license transitions into a "Make Ready" status.

1) The license will create a Make Ready child conversation for each attacher and pole owners.

b. If Make Ready work is non-billable, the license transitions into a "Make Ready" status.

1) The license will create a Make Ready child conversation for each attacher and electric company.

c. If no Make Ready work is required, the license is released to the proposed attacher and transitions into a "Ready to Attach" status.

Construction

2.1.10 Make Ready

a. The PURA mandated time frame to complete Make Ready work was adjusted in PURA Docket 19-01-52RE01(See Table 7 below). The PURA Docket further explains that the utility is to negotiate in good faith the timing of all requests for attachment larger than the lesser of 3000 poles or 5 percent of the utility's poles in a state.

b. Upon completions of all Make Ready child conversations the license transitions into a "Ready to Attach" status. An automatic e-mail will be sent to the 3PA.

2.1.11 JRM is updated the same day as the license is released.

Table 7. FCC Make-Ready Timelines in Days

	Communications Gain			Municipal and Electric Gain		
No. of Attachment Requests	< 300	300-3,000	> 3,000	< 300	300-3,000	> 3,000
Initial Days for Make-Ready	30	45	TBD	90	135	TBD
Pole Owner Allowance	+15	+15	+15	+15	+15	+15
Existing Attacher Allowance for Complex	+60	+60	+60	n/a	n/a	n/a
Total Allowance	105	120	TBD +75	105	150	TBD + 15

2.2 Agreements

Single Pole Administrator

Will provide Eversource's pole attachment agreement and cover letter upon request for any new 3PA seeking to make attachments on utility poles within Eversource service territory. Once two original signed agreements and proof of insurance is obtained by the Single Pole Administrator, access to the Alden ONE system will be provided. The Vice President or Director of Engineering will sign both agreements and one copy will be filed with Eversource and the other mailed back to customer for their records.

Existing Third Party Pole Attacher – As of March 26, 2012, Eversource no longer accepts paper license application requests. The 3PA would need to register with Eversource's new web-based application, Alden ONE.

New Third Party Pole Attacher – Pursuant to the Connecticut General State Statute §16-247g, all intrastate telecommunications services must obtain a Certificate of Public Convenience and Necessity (CPCN) and submit their specific construction plan in the public rights of way to the Public Utility Regulatory Authority (PURA) for its review pursuant to Connecticut Agencies Regs §16-24. A one-time "Agreement Establishment Fee" of $650 dollars is collected from the new 3PA for the use of Alden ONE.

2.3 JRM

Single Pole Administrator

2.3.1 Third Party Attachment Removals –EVERSOURCEs Geospatial Information System (GIS) runs a weekly upload to the JRM system for pole attribute and mapping updates. A third-party attachment removals report is generated for any GIS pole removals that have attachment data. The data is reviewed and manual corrections/updates to the attachments and/or poles are done via the JRM system.

2.3.2 Error in GIS File – A weekly report is generated to identify any routing errors between GIS and JRM. The routing errors are based on pole street name changes or missing route data information which requires a manual correction in JRM.

3. SUMMARY OF CHANGES

Changes to TD procedures are controlled by TD 001 "Writing, Revising, and Publishing Transmission and Distribution Procedures."

Revision 0 – Effective Date 10/02/2013

- Original Issue

Revision 1 – Effective Date 08/09/2017

- Updated template and document title in support of company rebranding
- Updated Approver(s) to reflect current organization
- Changed Owner Department and Subject Matter Expert
- Updated job titles
- Updated the most current PURA docket for Single Pole Administration
- Eliminated pictures/attachments to have a more comprehensive procedure
- Eliminated Weekly Reports and Billing section

Revision 2 – Effective Date 10/19/2019

- Updated Approver(s) to reflect current organization
- Updated Web-based Joint Use Communication, Inventory and Management system from NOTIFY to Alden ONE throughout the document
- Updated "Frontier" to "Joint Owner" throughout the document
- Updated step 2.1.3 – added SPA reviews application for accuracy
- Removed step 2.1.5 – SPA reviewing pole data for accuracy
- Updated Attachments 1 & 2 with new Alden One system name

Revision 3 – Effective Date 03/21/2024

- Changed all references from STORMS to MAXIMO
- Removed references to LOTUS NOTES.
- Updated Approver(s) and Subject Matter Expert to reflect current organization
- Updated References by adding newer PURA dockets that relate to the Single Pole Administration
- Revised 3PA Licensing Timetable. See step 2.1.7 and step 2.1.10 with updated timing thresholds matching the PURA Docket 19.01.52 RE01 Final Decision
- Replaced Attachment 2 "Alden ONE Workflow" with revised version.

Attachment 1
Definitions
(Sheet 1 of 1)

3PA- Third Party Attacher

3PAA – Third Party Attachment Administrator

SPA – Single Pole Administrator

JRM- Joint Use Relationship Manager

DSEM – Distribution System Engineering Manual

NESC – National Electric Safety Code

PURA – Public Utility Regulatory Authority

Alden ONE- Web-based Joint Use Communication, Inventory and Management system

MAXIMO – Work Management Estimating System

CATVs – Cable Television Companies

TELECOMS – Telecommunications Companies

GIS – Geospatial Information System

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Attachment 2
Alden ONE Workflow
(Sheet 1 of 1)

