nationalgrid

Alexandra E. Blackmore
Senior Attorney

May 12, 2006

VIA HAND DELIVERY & ELECTRONIC MAIL

Ms. Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: DM 05-172; Responses of Granite State Electric Company d/b/a National Grid to Staff's Fourth Set of Data Requests

Dear Ms. Howland:

I am enclosing for filing the responses of Granite State Electric Company d/b/a National Grid to Staff's fourth set of data requests in the above-captioned proceeding. I have also submitted these responses electronically to the email list in this proceeding.

Please feel free to contact me at (508) 389-3243 with any questions.

Very truly yours,

Alexandra E. Blackmore

Alexandra E. Blackmore

enclosures

cc: F. Anne Ross, Esq.
Suzanne Amidon, Esq.
Donald Pfundstein, Esq.
Service List (via electronic mail)

25 Research Drive, Westborough, MA 01582
T: 508.389.3243 ■ F: 508.389.2463 ■ alexandra.blackmore@us.ngrid.com ■ www.nationalgrid.com

Staff 4-1

Request:

Please supply a copy of the ***Blue Book – Manual of Construction Practices*** (by Telcordia Technologies, Inc.) or copies of the relevant pages thereof concerning pole attachments in the communication space.

Response:

Vz only.

Prepared by or under the supervision of:

Staff 4-2

Request:

Please supply copies of any other construction standards (besides the Blue Book standards) that govern the use of the communication space on a pole.

Response:

Vz only.

Prepared by or under the supervision of:

Staff 4-3

Request:

Electrics: Please provide a copy of the construction standards that govern the use of electric space on a pole.

Response:

Please see a copy of the National Grid Overhead Distribution Construction Standards which has been provided to Staff along with this response. At a minimum, for installations not covered by National Grid's standards, National Grid requires that all attached facilities, regardless of owner, comply with the National Electrical Safety Code.

Prepared by or under the supervision of: G. Paul Anundson

Staff 4-4

Request:

To Electrics, Verizon, municipalities & NHDOT:

Please describe the process by which a municipality or the State of New Hampshire Department of Transportation (NHDOT) obtains the right to attach to utility poles and/or occupy conduit space in order to build an intra-government network for government use only. For example, is a Pole Attachment or Conduit Occupancy Agreement typically executed with the owner or joint owners of the poles and conduit? Are such agreements ever executed by municipalities or the NHDOT? If so, when?

Does the municipality or NHDOT typically apply for a license and pay related fees, such as engineering survey fees, make-ready costs, and prevailing pole attachment and/or conduit occupancy fees? Would a municipality or NHDOT ever apply for a license or pay such fees? Please identify any such instances.

Please explain your answers fully and provide the basis for the process typically undertaken, including, where appropriate, a citation to the rule, tariff, ordinance or statute that supports your assertion.

Response:

As a condition to permitting utility poles in the public way, municipalities frequently reserve a right to attach a fire alarm or police signal wire on those poles. These attachments are made by the municipalities without any further agreement by the pole owners and generally without the pole owners being informed when or where these attachments are being made.

Before allowing a municipality or the State of New Hampshire Department of Transportation to attach to utility poles to build an intra-government network for other government uses, National Grid requires the municipality or the State of New Hampshire Department of Transportation to execute a license agreement with National Grid covering use of National Grid's poles. This agreement requires that the municipality or the State of New Hampshire Department of Transportation apply for a license, pay for the costs of engineering surveys and make-ready work, and pay fees for the use of the poles.

Pole attachments for the purpose of building an intra-government network for other government uses have been made by the towns of Pelham and Salem and are covered by license agreements.

Prepared by or under the supervision of: G. Paul Anundson

Staff 4-5

Request:

To Electrics, Verizon, municipalities & NHDOT:

Please describe the process by which a municipality or the State of New Hampshire Department of Transportation obtains the right to attach to utility poles and/or occupy conduit space in order to offer competitive services for use by the general public. For example, is a Pole Attachment or Conduit Occupancy Agreement typically executed with the owner or joint owners of the poles and conduit? Are such agreements ever executed by municipalities or the NHDOT? If so, when?

Does the municipality or NHDOT typically apply for a license and pay related fees, such as engineering survey fees, make-ready costs and prevailing pole attachment and/or conduit occupancy fees? Would a municipality or NHDOT ever apply for a license or pay such fees? Please identify any such instances.

Please explain your answers fully and provide the basis for the process typically undertaken, including, where appropriate, a citation to the rule, tariff, ordinance or statute that supports your assertion.

Response:

Before allowing a municipality or the State of New Hampshire Department of Transportation to attach to utility poles for the purpose of offering competitive services to the general public, National Grid would require the municipality or the State of New Hampshire Department of Transportation to execute a license agreement with National Grid covering use of National Grid's poles. To date, National Grid is unaware of any pole attachments made or requested by any New Hampshire municipality or by the State of New Hampshire Department of Transportation for the purpose of offering competitive services to the general public.

The agreement mentioned above would require that the municipality or the State of New Hampshire Department of Transportation apply for a license, pay for the costs of engineering surveys and make-ready work, and pay fees for the use of the poles.

Prepared by or under the supervision of: G. Paul Anundson

Staff 4-6

Request:

Electrics, Verizon, municipalities & NHDOT: Please provide procedures and actual practices for municipalities' or their subcontractors' placement, replacement, maintenance and repair of municipal communication equipment in reserved space on the poles.

Response:

Procedures and actual practices for municipalities' or their subcontractors' placement, replacement, maintenance and repair of municipal communication equipment on poles is under the control of municipalities, not National Grid, and National Grid does not have the information to answer this question.

Prepared by or under the supervision of: G. Paul Anundson

Staff 4-7

Request:

Electrics & VZ: Please provide a sample of all joint ownership agreements or IOPs that recognize reserved municipal space on poles.

Response:

National Grid's joint ownership agreement with Verizon provides that, "a reasonable amount of space shall, if so desired by municipal authorities or deemed desirable by the parties hereto, be reserved for the municipal fire alarm and police signal wires or cables, owned by the municipality and used exclusively for municipal purposes." *Joint Ownership Agreement dated October 1, 1980 at Article 7.* A copy of this agreement has already been supplied as part of National Grid's response to Staff 1-22.

Prepared by or under the supervision of: G. Paul Anundson

Staff 4-8

Request:

Electrics & VZ: Please provide the procedure, policy, joint ownership agreement or IOP that permits Verizon to reserve a specific space on each pole.

Response:

Allocation of space between National Grid and Verizon on jointly owned poles is covered in the Intercompany Operating Procedures (IOPs) at IOP A, section 2. Copies of the IOPs have already been supplied as part of National Grid's response to Staff 1-22.

Prepared by or under the supervision of: G. Paul Anundson

Staff 4-9

Request:

Electrics & VZ: Please provide the procedure and actual practice for assessing make-ready costs on poles when municipalities attach their communication equipment.

Response:

When a Municipal requests space on a pole for an attachment, it is National Grid's practice to send a qualified representative to the location/locations to assess the pole to determine whether or not make-ready work is necessary to accommodate the attachment. If make-ready work is required, a work request will be written and sent to the Scheduler for scheduling. The cost for the make-ready work is generated in the work request.

Prepared by or under the supervision of: David C. Way

Staff 4-10

Request:

Electrics & VZ: Referencing your response to Staff 3-15, please identify all municipalities currently using space reserved for municipal purposes on poles for which you have sole or joint ownership or a joint use interest, for copper wire or other communications, including safety and emergency communications among municipality offices, police, fire and others.

Response:

National Grid is generally not informed by municipalities when they attach fire alarm and police signal wires to poles and does not maintain records of municipal attachments.

National Grid currently has municipal attachments on poles in the following communities:

Lebanon, Hanover, Salem, Windham, Pelham, Derry

Prepared by or under the supervision of: G. Paul Anundson and David C. Way

Staff 4-11

Request:

Electrics & VZ: Please provide the policies and actual practices relating to any restrictions on the type of facilities or communication equipment that may be attached to poles by municipalities in the communication space.

Response:

When municipalities grant licenses for poles in public ways, they generally reserve the right to attach fire alarm and/or police signal wires without payment to National Grid as a condition of the pole license. Municipal communications equipment and wires for other purposes, including networks for municipal use and for the provision of services to the public, have been allowed as licensed attachments with associated fees.

Prepared by or under the supervision of: G. Paul Anundson

Staff 4-12

Request:

Electrics & VZ: Please provide the practice by which space on the poles reserved for municipal purposes is included, or excluded, for the rate base calculation.

Response:

All pole costs are included in the rate base calculation. No costs are excluded from the rate base calculation as being associated with municipal use of space on poles for fire alarm and/or police signal wires. To the extent that municipalities or any other licensees pay fees for use of poles for other purposes, such fees are treated as non-electric revenues and offset rates paid by National Grid's electric customers.

Prepared by or under the supervision of: G. Paul Anundson

Staff 4-13

Request:

Electrics & VZ: Please provide your policy regarding licensees on poles who have over lashed new facilities to their own facilities or the facilities of others already installed on the poles.

Response:

Licensees may overlash additional cables to their own messenger cables. Within limits defined in the license agreements, licensees may install this type of overlash without further authorization by National Grid. Beyond the defined limits, licensees may install this type of overlash after a review by National Grid to assure that the pole will support the additional loads of the larger cable bundle.

Within the same mechanical limits and/or review, licensees may allow others to overlash additional cables to the licensee's messenger cables. National Grid requires that these additional overlashed parties execute an aerial license agreement with National Grid.

Prepared by or under the supervision of: G. Paul Anundson

Staff 4-14

Request:

Electrics & VZ: Referencing your response to Staff 1-29, please provide the process and actions you follow for applying for a license for a new pole or a location for a pole from a municipality (for municipal rights of way) or the state (for state rights of way), pursuant to RSA 231:159-182, inclusive.

Response:

Pole licensing is handled similarly across all municipalities. In each municipality, the custodial pole owner applies to the municipal government and obtains a license on behalf of both pole owners. The agency of the municipal government issuing the pole license varies between towns, but is generally the board of selectmen or department of public works. The exact form of the license issued by the municipal government varies between towns. National Grid is currently working with the New Hampshire Municipal Association to develop a standardized form of pole license.

Prepared by or under the supervision of: David C. Way

Staff 4-15

Request:

Electrics & VZ: Please provide samples (both presently used and historically used) of petitions to municipalities for pole licenses, including global and individual poles license petitions.

Response:

Please see attachments 4-15(a), 4-15(b) and 4-15(c). Attachment 4-14(a) is used for Lebanon. Attachment 4-15(b) is used for Salem. Attachment 4-15(c) is a general petition used for all other municipalities in our service territory.

Prepared by or under the supervision of: David C. Way

PETITION FOR LICENSE

To the City Manager of the City of Lebanon, New Hampshire.

Pursuant to RSA 231:161, **National Grid** , with a mailing address of **407 Miracle Mile, Lebanon** & **Verizon**, with a mailing address of **900 Elm St., Suite 1401D, Manchester**, request(s) that a license to erect, install and thereafter maintain the following described poles, structures, and/or conduits together with wires, cables, and associated sustaining, strengthening and protecting fixtures, be granted across and/or under the following public right(s)-of-ways in said municipality:

A. Equipment Description

_____Pole, being numbered_____, and as shown on plan marked _____ , dated _____, attached to and made a part hereof.

___ Underground conduit, being described as _____ and as shown on plan marked _____, dated _____, attached to and made a part hereof.

Anticipated attached equipment: The above-described pole(s) or conduit shall support the equipment of the following named providers: **National Grid, Verizon**

B. Location Description

The equipment shall be located in the right(s)-of-way of the City highway described or named as _____, and more precisely located by the following method:

_____ GPS coordinates and location, with reference to the NH Plane Coordinate system:

_____ Attached location plan or land survey; or

_____ Plan as approved by the City of Lebanon Planning Board, which plan is recorded in the Grafton Registry of Deeds at Book _____ and Page_____

C. Nearest Licensed Structure

The above-described equipment installation will commence at an existing licensed utility structure described by the following location and license information: ____, and will terminate at an existing licensed utility structure described by the following location and license information:_ _____.

****

Petitioner:

By:_____
Duly Authorized

Petitioner:

By:_____
Duly Authorized

PETITION AND POLE LICENSE

Attachment 4-15(b)

JOINT PETITION

Salem, New Hampshire Date: _____.

To the Senior Engineer
City/Town __Salem__, New Hampshire_____.

NATIONAL GRID USA and VERIZON NEW ENGLAND COMPANY desire a license to erect and maintain poles and structures, with wires, cables, conduits and devices thereon, together with sustaining, strengthening and protecting fixtures along, across and under the following highways in said municipality:

.

.

NATIONAL GRID USA

BY: _____

SOLE EQUIPMENT LICENSE

Upon petition of the NATIONAL GRID USA dated_____,
it appearing that the public good so requires, it is hereby

ORDERED

_____That said petitioners be and hereby are granted a license to erect and maintain poles and structures, with wires, cables, conduits and devices thereon, together with sustaining, strengthening and protecting fixtures, in highways covered by said petition.

The maximum and minimum length of poles shall be 50 feet and 20 feet respectively; the maximum and minimum height of structures shall be 40 feet and 15 feet respectively. The approximate location of the poles and structures is designated or defined as shown on plan marked "NATIONAL GRID USA" and Verizon New England Inc." No._____ Dated_____ attached to and made a part of this order. All wires and cables except those leading down the poles and structures and those leading to fixtures attached thereto shall be placed at a height of not less than 18 feet above the surface of the highway.

By_____
Senior Engineer

of the City/Town of Salem, New Hampshire
Recorded in the _____ record of the City/Town of
_____, New Hampshire Book ____, Page

Dated_____ Attest

City/Town Clerk

PETITION AND POLE LICENSE

JOINTLY OWNED PETITION

To the Board of Selectmen;
City / Town _____, New Hampshire;

GRANITE STATE ELECTRIC COMPANY & VERIZON desires a license to erect and maintain poles and structures with wires, cables, conduits and devices thereon, together with sustaining, strengthening and protecting fixtures along, across and under the following highways in said municipality:

_____.

Granite State Electric Co. **Verizon**

By_____ By_____

Jointly Owned Pole License

Upon petition of the **Granite State Electric Co. and Verizon Co.**
Dated _____ It appearing that the public good so requires, it hereby

ORDERED Dated _____

That said petitioner be and hereby are granted a license to erect and maintain poles and structures, with wires, cables, conduits and devices thereon, together with sustaining, strengthening and protecting fixtures, in highways covered in said petition.

The maximum and minimum length of poles shall be 50 feet and 20 feet respectively; the maximum and minimum height of structures shall be 45 feet and 15 feet respectively. The approximate location of the poles and structures is designated or defined as shown on plan marked **Granite State Electric Company** NO. _____ Dated _____ attached to and made a part of this order. All wires and cables except those leading down the poles and structures and those leading to fixtures attached thereto shall be placed at a height of not less than 18 feet above the surface of the highway.

_____ by vote of the selectmen

_____ Town of _____, NH

_____ Attest _____
Selectman, / Town Manager Town Clerk

of the Town of _____, New Hampshire

Recorded in the _____records of the City / Town of _____, New Hampshire
Book_____ Page_____.
Date_____ Attest _____
Town Clerk

Staff 4-16

Request:

Municipals: Are you aware of any unlicensed utility poles in your jurisdictions? If so, please provide an approximate number by town to the extent you are able.

Response:

Municipalities only.

Prepared by or under the supervision of:

Staff 4-17

Request:

Municipals: Do you perceive unlicensed poles as a problem in your jurisdictions? If so, please explain why.

Response:

Municipalities only.

Prepared by or under the supervision of:

Staff 4-18

Request:

Electrics & VZ: Are you aware of any unlicensed poles in the right-of-way in the towns in your franchise areas? To the extent you are able, please quantify by town.

Response:

No.

Prepared by or under the supervision of: G. Paul Anundson

Staff 4-19

Request:

Electrics & VZ: How does your company efficiently budget and manage utility relocations for municipal road projects. Does the process change in cases when those projects are initiated with short or no advance notice? If so, please explain how the process is different.

Response:

National Grid budgets for utility relocations for municipal road projects on an annual basis under the category of new business/public requirements. These projects are managed by the Division Operations Planning group. All projects are entered into the division construction schedule. They are ranked according to customer need date and by the ready for construction need date. Meetings are held regularly to discuss and update the division construction schedule. If a project arises with a shorter lead time we react to the need and work it into the schedule as an unplanned project and reallocate the budget dollars.

Prepared by or under the supervision of: David C. Way

Staff 4-20

Request:

Municipalities: Do you follow the New Hampshire Department of Transportation's ***Utility Relocation Process – Scheduling Guidelines*** (see Attachment NHDOT Utility Relocation Process (Scheduling Guidelines) to Verizon NH's response to Staff 1-37) on the administration of public works projects when undertaking a public works project in your municipality? If not, why not? Please provide a copy of the administrative guidelines that you follow.

Response:

Municipalities only.

Prepared by or under the supervision of:

Staff 4-21

Request:

Electrics, Verizon, municipalities & NHDOT: What do you recommend to improve municipal road project coordination?

Response:

National Grid is satisfied with road project coordination with the municipals.

Prepared by or under the supervision of: David C. Way

Staff 4-22

Request:

Electrics & VZ: Provide procedures and actual practices for notifying and/or seeking permission from municipalities for emergency and routine maintenance in the right-of-way, organized by municipality.

Response:

National Grid does not routinely seek permission from municipalities to work on our facilities that are in the right-of-way. However, this does occur during the spring season when the roads are posted with weight limits.

Prepared by or under the supervision of: David C. Way

Staff 4-23

Request:

Electrics & VZ: Please provide procedures and actual practices for communication with municipalities that use the communication space on poles.

Response:

National Grid does not have a formal process for communicating with municipals. The practice would typically be to e-mail or call, via telephone, the municipality when communication is required.

Prepared by or under the supervision of: David C. Way

4-24

Request:

Electrics, Verizon, municipalities & NHDOT: In the event that a public works project, either municipal or state, calls for utilities to temporarily relocate their facilities before moving them to their final location at a later date in the project, should the utilities be compensated for the temporary relocation work? If your answer is no, please explain why and provide the basis for your rationale, including a citation to any rule, tariff, ordinance or statute that supports your assertion.

Response:

Yes.

Prepared by or under the supervision of: G. Paul Anundson