National Grid Policy Pertaining to NY 3rd Party Applicant Directed Design (ADD) Process

National Grid Policy Pertaining to New York Third Party Applicant Directed Design (ADD) Process for Attachment to National Grid[1] Sole and Jointly Owned Facilities

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Third-Party Attachment Background: Attachment Agreement and BAU Application Process

Background

National Grid provides open and non-discriminatory access to its distribution and sub-transmission poles, ducts, and rights-of-way to Third Party Attachers ("Attacher(s)" or "Applicant(s)"). These Attachers are typically cable television providers and competitive local exchange carriers (including telecommunications companies and Internet Service Providers). Other Attachers may include private Attachers such as universities, hospitals, or other private businesses, including municipalities.

2004 Distribution Pole Order

Pursuant to the *Order Adopting Policy Statement on Pole Attachments* (The "*2024 Pole Order*", Issued and Effective August 6, 2004), "*Attachers shall notify Pole Owners of known upcoming significant projects in advance of submitting applications*." Additionally, "*Applications for pole attachment licenses shall be processed by the utility pole owner within five business days of receipt. All applications shall be reviewed promptly by the Pole Owners for completeness, in order to avoid miscommunications and delay.*"

Accordingly, National Grid will notify the Applicant within five (5) days of written notice, whether the Applicant will be required to utilize the ADD process.

National Grid may invoke the *2004 Pole Order* for an alternative Third-Party application process, which directs the Applicant to utilize approved external Design Engineer Contractors ("DEC") for Pre-Construction Survey and Engineering Design and for Make Ready work. National Grid has made its Asset Management systems, Workflow Management systems and Construction Standards available to these Contractors to be able to utilize existing records and standards to meet the necessary requirements to be recognized as an approved DEC. Additional details and requirements for DEC's are described in *ADD DEC Deliverables* below.

Attachment Agreement

Prior to submission of applications for attachment, a prospective Attacher intending to submit an application for attachment is required to execute an attachment agreement with National Grid. National Grid's Third Party Attachment's shall be the initial contact with the Applicant and can be reached via the TPL Mailbox at ThirdParty@nationalgrid.com The TAG team is responsible for administration of third party applications, including management of the application workflow, invoicing of applicable fees, and ultimately issuance of the license authorizing attachment to National Grid assets.

Business as Usual ("BAU") Application Process

Under the typical "Business as Usual" ("BAU") application process (following execution of an attachment agreement) an Applicant applies for attachment by submitting an application directly to National Grid's

TAG team. Once the application is received and processed, the TAG team will then assign the field survey and design to an approved National Grid design firm based on availability of survey and design resources. Under the BAU process, a Make Ready ("MR") package including the Construction Sketch and Exhibit 5 ("E5") detailing necessary electric and communication MR is provided only once the design is completed and approved by National Grid design. Should an Applicant wish to rework / redesign after receiving the final design, the application would be sent back to TAG requesting the rework / redesign.

Requests for Rework / Redesigned Applications

Requests for rework / redesign are treated as new application requests and cannot be prioritized. This is necessary to ensure applications are progressed in the order received, and new applications are not delayed by Applicant requested rework / redesign.

ADD Definition and Differences from BAU Process

ADD Definition

Applicant Directed Design ("ADD") is an alternative Third Party application process within National Grid, where an Applicant contracts with an approved external Design Engineer Contractor ("DEC") for Pre-Construction Survey and Engineering Design.

Differences from BAU Process

The ADD process differs from the BAU process as under ADD, the Attacher selects and signs a contract with a National Grid approved Design Engineering Contractor ("DEC" or "contractor") of their choosing from the approved contractor list (available on the National Grid Third Party Attachments website or from the TAG team). Under ADD the Applicant instead submits their application directly to their chosen DEC (instead of submitting to National Grid TAG). Additionally, this relationship allows the Applicant access to their chosen DEC throughout the survey and design process, allowing for Applicant to review, refine and adjust the design as it is developed (prior to a formal application submission to National Grid). Once the Applicant and design firm agree upon a preliminary design, the application is formally submitted to National Grid TAG by the ADD DEC on behalf of the Applicant.

Establishment of ADD Relationship

Establishment of an ADD relationship may be initiated voluntarily by the Applicant or required by National Grid under certain circumstances, described in the sections below.

Applicant Changing ADD DEC's or Electing to Submit Applications as BAU

National Grid internal Distribution Design has the final authority on whether an application is assigned as ADD or BAU. If an Attacher has chosen to submit applications via an ADD DEC, it is preferred the Attacher maintain this ADD relationship for all submitted applications. However, an Attacher may elect to change their hired DEC if desired. It is the responsibility of the Attacher to notify National Grid TAG of the change in ADD DEC.

In certain circumstances, an Attacher with an established ADD relationship may desire to submit an application as BAU. Should an Attacher with an ADD relationship desire to submit an application as BAU, the Attacher shall first obtain approval from National Grid TAG. Approval is required to prevent undue burdens on design resources and to eliminate confusion that may arise from an Attacher alternating submission of applications between ADD and BAU. Failure to notify National Grid TAG of a change in ADD DEC, or submission of applications from ADD to BAU (or vice versa) may result in delays to the application process.

National Grid Determination of ADD Requirement

National Grid, at its discretion may require an Applicant to leverage ADD should an Applicants' upcoming build, ongoing volume of applications or specific nature of applications exceed National Grid's capacity to process applications via the BAU (Business as Usual) process. In this circumstance, an Applicant will be notified of this mandatory ADD requirement by National Grid TAG and will be required to select an ADD DEC from the approved contractor list.

Benefits of ADD

- Applicants may select any National Grid approved ADD DEC.
- National Grid receives the design complete application directly from your ADD DEC, streamlining application inquiries prior to National Grid approval/final design/MR release.
- Applicants may negotiate design costs with their chosen ADD DEC, providing an opportunity to manage and forecast ADD DEC costs.

ADD Stakeholder Deliverables

Applicant Deliverables

Applicants are required to comply with all terms and conditions defined within the executed attachment agreement. While attaching to National Grid sole and jointly owned assets, attachments shall be placed and maintained in compliance with all applicable codes and standards, and permits including (but not limited to) NESC, NEC, OSHA guidelines and National Grid's construction standards.

Prior to submission of applications for attachment, a prospective Attacher intending to submit an application for attachment is required to execute an attachment agreement with National Grid and applicable joint owners.

Applications submitted to National Grid TAG by an Attacher (whether through the ADD or BAU process) shall be limited to 125 poles and a single municipality (tax district) per application.

To ensure timely progression of submitted applications, Applicants, in collaboration with their chosen DEC shall verify that all applications submitted to National Grid TAG include:

- Completed Exhibit 5 with description of all required Make Ready for electric and communications (including facilities and/or pole replacement, mid span pole placement, etc.).
- Creation of a Work Request (WR) within the National Grid workflow management system (STORMS) including accounting as provided by National Grid for each application. WR numbers are to be included in the GIS pole editor.
- Final E5 and applicable sketches uploaded in STORMS.
- Application received dates must be entered into the Remarks section in STORMS.
- The Licensee Information, Attachment Information, B2 and B3 tabs should be completed appropriately.
- Proof of coapplication submission, including the coapplicant number, reconciliation with all joint pole owners and acceptance of engineering make ready design.
- Completed GIS construction design sketches for preparation of Make Ready estimate.
- Updates for pole editors in National Grid's GIS System with proper attachment codes.
- Proof the Applicant has obtained any required permits (FAA, Railroad, Highway/DOT,Environmental, DigSafe, etc.).
- Environmental checklists and required documents.
- Pole loading pre-screening, and pole loading analysis when/where required.
- Any required signed easements and/or land use agreements in accordance with National Grid requirements.

While not exclusive to the ADD process, National Grid TAG and Joint Pole Owners strongly encourage Third Party Applicants to submit matching applications to all joint owners, which include corresponding joint owner Telephone Company attachment applications with National Grid attachment applications, pole for pole, and within a single tax district / municipality. This practice greatly improves the efficiency of the reconciliation and licensing process for all pole owners and Attachers.

Should an attacher elect to change their chosen ADD DEC, it is the responsibility of the Attacher to notify National Grid TAG of the change in ADD DEC. Should an Attacher with an ADD relationship desire to submit an application as BAU, the Attacher shall first obtain approval from National Grid TAG.

ADD DEC Deliverables

The ADD DEC is required to follow the standard design process and procedures specified by National Grid Internal Distribution Design. For additional information pertaining to onboarding, training, and National Grid design standards, policies, and procedures, prospective and current DEC's shall contact National Grid Distribution Design.

The DEC shall submit all completed Design Work documents and Make-Ready scope submittals to all affected joint pole owner(s) for their review, comment, and approval. Note that Make-Ready designs will not become final until reviewed and approved by the affected joint pole owner(s).

Additionally, as-built work is occasionally encountered. The DEC should provide a standard hourly rate to

perform such work as part of their proposal to the Attacher.

Proof of Reconciliation with all Joint Pole Owners and Acceptance of Engineering Make Ready Design shall be provided by DEC. The DEC shall provide contemporaneous written documentation from the joint owner of the agreed upon design and make ready work.

The DEC is responsible for the application of the appropriate Joint Pole Owner agreement with respect to this work. As such the "need" and appropriate cost provisions, "net loss", forestry, and other provisions of the agreement that follow shall be properly reflected in the review, revision, and eventual acceptance of the Joint Pole Proposal (JPP).

ADD DEC Reporting Requirements

Applicants' DEC shall maintain and provide a report of the status of each application including the National Grid WR number (if available). Other information for periodic reporting may be required as specified by National Grid. This report will be reviewed with the National Grid Distribution Design, National Grid TAG, or other entities as needed. Upon request by National Grid, requested reports / data should also be available for export and public use when requested by regulatory or other governmental agencies. The National Grid approved DEC shall field review the identified location(s) and document through detailed field notes, photographs, and contemporaneous, repeatable measurements of the existing conditions. Special consideration will be given to the methodology of documenting the existing conditions. Approved DEC's shall detail their proposed methodology for documenting field conditions and measurements obtained. Appropriate, accurate systems, such as Osmose Digital Measurement Technology (available in O- Calc Software) is an example of a system suitable for this purpose. Other proposed methodologies that achieve similar results will be considered.

National Grid ADD Deliverables

National Grid TAG shall maintain and make available (via the National Grid Third Party Attachments external website and on demand) the current list of approved Design Engineering Contractors.

Should National Grid mandating an Applicant to leverage ADD, National Grid shall timely notify the Applicant within five (5) business days of written notice of the mandatory ADD requirement and the reason for the requirement.

While not exclusive to the ADD process, the National Grid TAG team is responsible for administration of third party applications, including management of the application workflow, invoicing of applicable fees, and ultimately issuance of the license authorizing attachment to National Grid assets.

Joint Owner ADD Deliverables

No additional deliverables or requirements are expected of joint owners necessitated by the ADD process. Required Joint Pole Proposals (JPP's) shall be forwarded to the appropriate National Grid Representative according to the current and standard practice.

Additional Considerations Associated with ADD

Post-Construction Inspection Mandate

Pursuant to the *Order Adopting Modifications to the 2004 Policy Statement on Pole Attachments and Related Proceeding* (The "*2024 Pole Order*", Issued and Effective July 22, 2024), "Effective 60 days after the issuance of this Order, mandatory post-construction inspections shall be conducted on all attachments for which an Attacher applies after that date."

Upon completion of a conducted inspection (Post-Construction or Special Inspection) where non-conforming attachments are identified that cannot be resolved without additional design and make ready, Applicants with a contracted ADD DEC have the option to coordinate with their contracted DEC to identify remediation for found non-conforming attachments, including rework / redesign, or creation of an Incremental Make Ready WR as needed. For completed inspections where non-conforming attachments are identified but do not require additional design or MR to remediate (i.e., adjustment of attachment height), the Applicant shall remediate the identified non-conforming attachments and notify National Grid TAG or a designated external engineering firm upon remediation of said non-conforming attachments. Additional information on Incremental Make Ready can be found below.

Incremental Make Ready

Incremental Make Ready (IMR) is defined as Make Ready (electric and/or communications) necessitated to address an existing non-conforming attachment or attachments (an attachment that does not meet NESC, National Grid or other applicable standards). Similar to a standard application for attachment, an IMR requires an Applicant to submit an application for the poles / facilities where existing non-conforming attachments exist. Following creation of an IMR WR, the application will be designed and a MR package provided to the Applicant for completion of MR necessary to remediate all existing non-conforming attachments and bring them into compliance. Note that additional poles / facilities may need to be included in the application to remediate non-conforming attachments on adjacent poles / facilities.

Applicants with a contracted ADD DEC have the option to submit IMR applications directly to their contracted DEC. Should an Applicant elect not to leverage their ADD DEC for IMR, National Grid TAG reserves the right to assign IMR to a design firm of National Grid's choice.

Please note that in accordance with attachment agreements, an Attachers attachments shall be placed and maintained in compliance with all applicable codes and standards, including (but not limited to) NESC, NEC, OSHA guidelines and National Grid's construction standards. Failure of an Applicant to correct any found non-conforming attachments in a timely manner shall be considered a breach of the terms and conditions of the attachment agreement, subject to repercussions defined within the attachment agreement, including suspension of applications or termination of the attachment agreement.

NJUNS and Communications Make Ready

NJUNS, the National Joint Utilities Notification System (https://web.njuns.com/) is an external system intended to facilitate communication among pole owners and attachers associated with work coordination on utility poles. The NJUNS system is often used to notify pole owners and attachers of necessary transfers, relocates or other work on utility poles. Double wood transfers are to be supported in

accordance with NYS regulations.

Communications or "Comm" Make Ready refers to relocation of existing communications cables in the communications space, necessitated by an incoming attachment or to resolve an existing non-conforming attachment. It is the responsibility of the incoming Attacher to facilitate and coordinate all Comm Make Ready necessitated by their incoming attachment. As attaching at designed height and ensuring existing attachers are also attached at designed heights are reviewed as part of the Post-Construction and Special Inspection process, failure of an Attacher to facilitate necessary Comm Make Ready will result in failed inspections.

While not a requirement of the ADD process, some ADD DEC's may offer additional services to Attachers, including creation of NJUNS tickets for Comm Make Ready or transfers necessitated by double wood or other conditions. Please consult with prospective ADD DEC's for additional services they may offer relating to NJUNS.

Glossary

Applicant: Those entities, typically telecommunications companies, Internet Service Providers, or Private Attachers that request through the Third Party Application process access to place attachments on National Grid's infrastructure or rights-of-way. An Applicant is required to have an executed pole attachment agreement prior to applying for attachment.

***Application*:** The standardized formal process by which Applicants seek access to National Grid's infrastructure or rights-of-way. An Applicant is required to have an executed pole attachment agreement prior to applying for attachment.

***Attachers*:** Third Parties other than National Grid (*e.g.,* CLEC, CATV, Private Attachers, etc.) who have legal access and may attach wires, cables, and other equipment on National Grid's infrastructure or rights-of-way after receiving a license to attach.

Business as Usual (BAU): Refers to the standard third party application process whereas an Attacher applies for attachment directly to National Grid's TAG team. Once received, the TAG team will assign the survey and design to an approved National Grid design firm based on availability.

Competitive Local Exchange Carrier (CLEC): Companies registered with the NYS Department of Public Service as Active Telecommunications Companies in New York State to provide telecommunications and Internet Service.

Construction Sketch: A visual representation created in GIS by National Grid Distribution Design or a DEC depicting infrastructure and Make Ready necessitated by an incoming attachment.

Design Engineering Contractor ("DEC"): An external Design Contractor or Engineering Firm authorized by National Grid to design third party attachments on National Grid sole and jointly

owned assets and facilities. Please see our Approved Contractor listing on our website https://www.nationalgridus.com/New-York-Third-Party-Attachments/Upstate-NY/Contractor-List.

Design, Final: An iteration of an engineering design for attachment that has been reviewed and approved by National Grid Distribution Design.

Design, Preliminary: An initial iteration of an engineering design for attachment prior to review and approval by National Grid Distribution Design. Within the ADD process, a preliminary design often refers to the iteration of the design created by a DEC and approved by the Applicant prior to formal submission to National Grid TAG.

Distribution Design: Refers to National Grid's internal distribution design department, responsible for reviewing and approving designs for third party attachment to National Grid sole and jointly owned utility poles.

Exhibit 5 ("E5"or "Ex5"): An Excel document that describes on a pole-by-pole basis, Electric and Communications Make Ready, and attachment heights for all current and future attachments necessitated by an Applicant's application for attachment. The E5 is provided to the Applicant in tandem with the Construction Sketch as part of a Make Ready Package.

GIS: Geographic Information System (aka "Smallworld GIS") utilized by National Grid for design and documentation of National Grid assets.

Incremental Make Ready (IMR): Incremental Make Ready (IMR) is defined as Make Ready (electric and/or communications) necessitated to address an existing non-conforming attachment or attachments.

Internet Service Provider (ISP): A company that provides internet service.

Joint Pole Proposal (JPP): The process and notification by which National Grid and joint pole owner(s) communicate on pole replacement, maintenance, and billing.

Make Ready (MR): Physical work, replacements, adjustments or relocation of facilities and assets necessitated by an incoming attachment. Make Ready work is further described by the space on the pole where the Make Ready is required, including Electric Make Ready, Telephone ("Tel") Make Ready or Communications ("Comm") Make Ready in the Electric, Tel and Comm spaces, respectively.

NJUNS: National Joint Utilities Notification System (https://web.njuns.com/) is an external system intended to facilitate communication among pole owners and attachers associated with work coordination on utility poles.

Non-Conforming Attachment: An existing attachment that does not meet NESC, National Grid, or other applicable standards. Sometimes referred to a/an "violation(s)".

Rework / Redesign: Rework / redesign refer to changes to a design, either initiated voluntarily by an

Applicant or necessitated by changing field conditions, the latter occurring when the current iteration of a design is no longer valid. Requests for rework / redesign are treated as new application requests and cannot be prioritized. This is necessary to ensure applications are progressed in the order received, and new applications are not delayed by Applicant requested rework / redesign.

STORMS: The work management system utilized by National Grid for tracking applications from intake to licensing. National Grid also utilizes STORMs for materials and cost estimates and determination of budget for distribution line construction.

Survey**:** Site visit that includes a physical and technical evaluation of each unit (e.g., pole, manhole, etc.)to which the Applicant requests access.

TAG (Third-Party Attachments Group)**:** Department within National Grid that provides the overall administration telecommunications attachments.

Third Party: Parties other than the joint owners (*i.e.,* National Grid and the respective incumbent telephone company); typically attaching or seeking to attach to National Grid infrastructure.

Violations: See "Non-Conforming Attachments".

Work Management**:** The business systems used by National Grid to plan, schedule and producework for construction (e.g., STORMS, GIS, etc.).

WR# (Work Request Number)**:** Unique number generated in STORMS used to distinguish unique applications.