



# AGENDA

- **Safety**
- **Damage Prevention**
- **Low Crossings**
- **General Topics**
- **Applications**
- **Requirements**
- **Wireless**
- **Announcements**



SAFETY



# SAFETY





# PIPELINE DAMAGE PREVENTION AND REPAIRING



What Is Considered Digging?

Prepare Your Work Area

White Line Area

Good Physical Address

Good Contact Information

# Call 811

- Allow for 48 Hour Response  
No Holidays or Weekends
- Positive Response
  1. Email
  2. Paint
  3. Fax
- No Response
- Ticket life
- Excavator Responsible for Marks



**Know what's below.  
Call before you dig.**

# Excavation

- Types
  1. Open Ditch
  2. Boring
  3. Hydro Excavation
- Tolerance Zone
  - Do's and Do not's
  - RRC
  - Coating Damages





## How to Recognize a Natural Gas Leak

- Sight: Fog, Mist, Dead Vegetation, and Bubbles
- Smell: Rotten Egg Smell aka Mercaptan
- Sound: Hissing, Blowing, or Whistling

## Why to Report a Damage

## Its' the Law

## **What to do and not do**

- **Do:**

1. Secure Area
2. Move upwind from Gas Leak
3. Call 911 for Fire Department
4. Call 811 for Dig Up Ticket
5. Alert Customers if Necessary

- **Do not:**

1. Leave the Scene
2. Backfill
3. Repair
4. Take Pictures or Use Phone

# Safe Digging

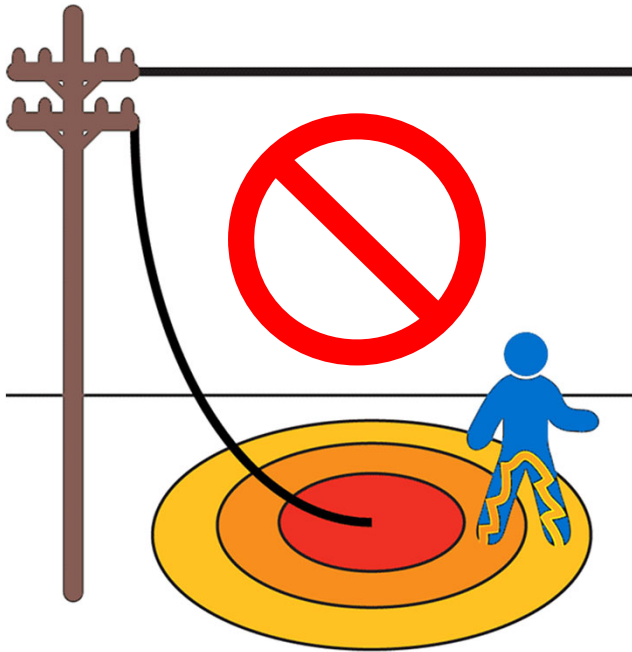
**8-1-1 Know What's Below, Call Before You Dig**



<https://www.thesun.co.uk/news/18982694/man-building-fence-nasty-surprise/>

# DOWNED POWER LINES

## SECURE THE AREA



- KEEP YOURSELF AND THE PUBLIC **AT LEAST 30 FEET AWAY** FROM FALLEN POWER LINES. FALLEN TRANSMISSION LINES FROM LARGE TOWERS REQUIRE 100 FEET OF CLEARANCE.
- STAY CLEAR OF ALL DOWNED LINES AND ANYTHING THEY ARE CONTACTING, INCLUDING NEARBY FENCES, TREES, CABLE OR PHONE LINES, AND THE GROUND.
- BE EXTREMELY CAUTIOUS WHEN USING WATER TO FIGHT FIRES NEAR DOWNED POWER LINES. IF YOU MUST USE WATER, USE ONLY A MIST OR SPRAY, DO NOT

Powerline & Car Safety

<https://youtu.be/J00FArjHIHc>

ATH

# Down Power Lines

## If Heavy Equipment Contacts a Power Line Know when to move and when to stay.

- If equipment comes into contact with power lines, but there is **no threat** of fire or power-line strikes, **stay put and remain inside** the equipment until the power company de-energizes the circuit.
- If fire or power-line strikes present **an immediate threat**, **jump** away from the equipment.
- **Keep both feet together** to avoid landing in power ripples with different voltage.
- **Do not walk, but shuffle**, away without removing either foot from the ground.
- Do not let the body touch the equipment and the ground at the same time to avoid electrocution.

<https://youtu.be/Ohlfv7ykR1E>



# RailRoad Commission

## Fines

1. Requesting Emergency Locate that is not One
2. Failure to notify 811 for Locate Request
3. Failure to refresh Marks or Locate Request
  - 14 Working Days
4. Failing to Report Pipeline Damage to R.R.C. within 30 Days.

<b>WHITE</b>	<b>White:</b> Pre-marking of the outer limits of the proposed excavation or marking the centerline and width of proposed lineal installations of buried facilities.
<b>PINK</b>	<b>Pink:</b> Temporary Survey Markings.
<b>RED</b>	<b>Red:</b> Electric power lines, cables or conduit, and lighting cables.
<b>YELLOW</b>	<b>Yellow:</b> Gas, oil, steam, petroleum, or gaseous materials.
<b>ORANGE</b>	<b>Orange:</b> Communication, alarm or signal lines, cables or conduits, and fiber.
<b>BLUE</b>	<b>Blue:</b> Potable water.
<b>PURPLE</b>	<b>Purple:</b> Slurry, irrigation and reclaimed water.
<b>GREEN</b>	<b>Green:</b> Sewers, drainage facilities or other drain lines.



- CPS Emergency Number: 210-353-HELP (4357)
- CPS Energy Locating Department: 210-353-3575
- [www.rrc.state.tx.us](http://www.rrc.state.tx.us)



<https://youtu.be/z-mliu5p6CE>



**LOW CROSSINGS**



# LIDAR DATA & LOW COMMUNICATION LINES ISSUES



- LiDAR (Light **D**etection **A**nd **R**anging) traditionally used to map out vegetation to identify areas needing trimming
- Identifying low hanging wires to prevent vehicular strikes
  - Safety
  - Reliability
- Currently targeting street crossings that go below NESC clearances (15.5 ft)
- Only where Truck traffic is possible
- Doesn't capture everything

# LOW CROSSINGS

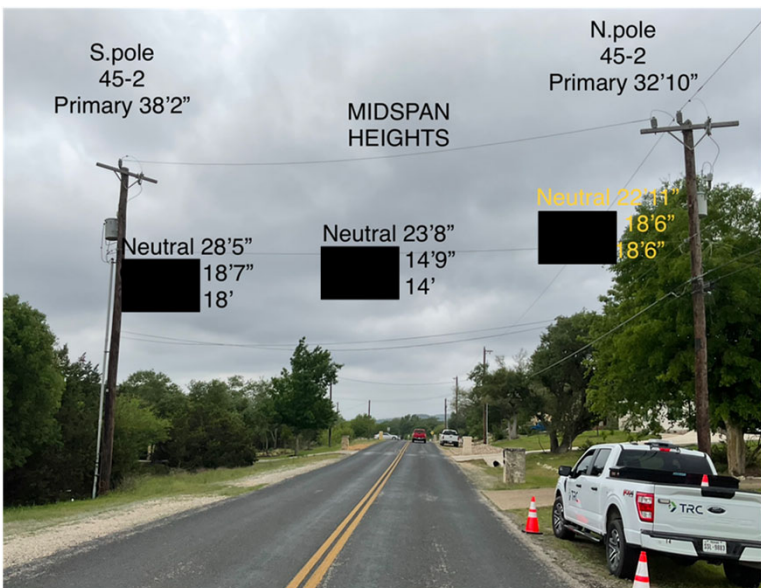
## NJUNS VIOLATION TICKETS



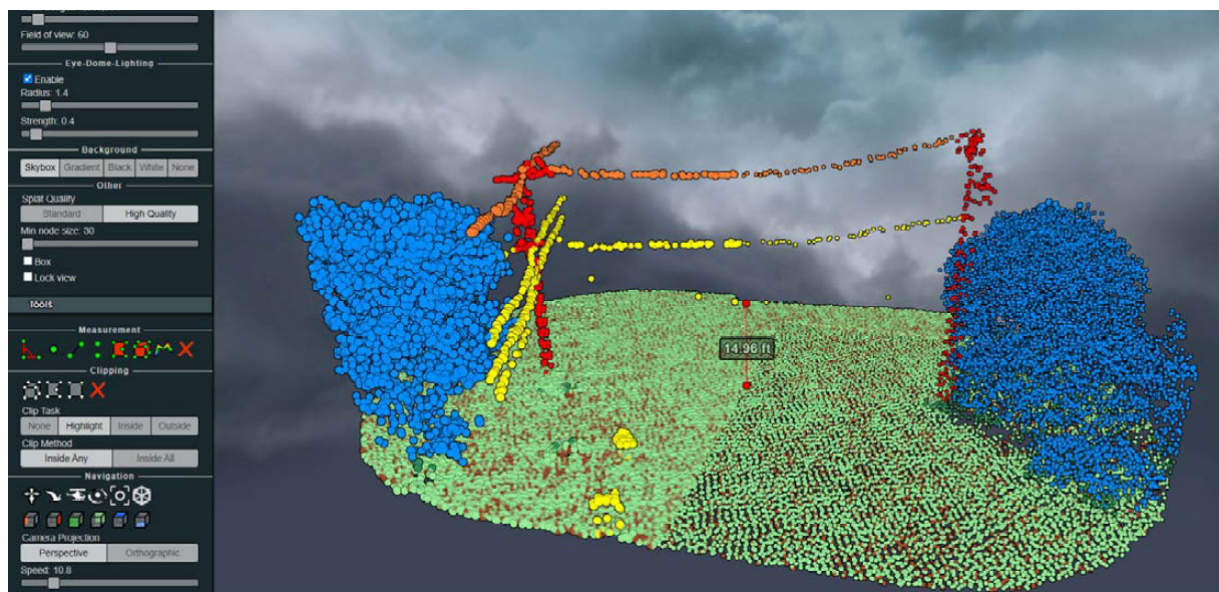
- Will be identified as violations (VIO) in NJUNS, requiring accelerated response times – emails outside of NJUNS are also sent as a friendly 'heads up'
- **Service drops that violate height requirements will be sent as violation tickets but will have a priority level of 3**
  - These pose a smaller risk of bringing down poles, but are still in danger of being snagged and can get wrapped in the primary
- 3 Methods of triggering:
  - LiDAR Data
  - Internal Reporting (Service Restoration etc.)
  - Community Reported

# LIDAR PROCESS

## IDENTIFYING CROSSINGS



Field Verification of Crossing



LiDAR 3D View of the Same Crossing

This location was identified as low with LiDAR data. Field verification confirmed low communications and recommended NJUNS tickets.

# LIDAR PROCESS

## ISSUE CORRECTIVE ACTION



Tickets Poles/Assets Steps Projects Members Run Reports Map Tools Help

Search [REDACTED]

Save and close Save Cancel Close Ticket Cancel Ticket History Reports Actions Ticket Map Add Poles

Ticket [REDACTED] Violation (VIO) - VIO:PT-Default

Ticket # [REDACTED] Creator TRCPA NTG Member [REDACTED] Priority 3  
Status Open Owner CPSE01 Start Date [REDACTED] Pole/Asset # [REDACTED]

Details Poles/Assets Associations Parties

Details

Work Requested Date [REDACTED]  
State Texas  
County Bexar  
Place San Antonio  
Contact Name Joshua Macias  
Contact Phone (210) 557-5116  
Contact Email jmacias@trccompanies.com  
Reference Id  
Misc Id  
# of Poles/Assets 1

Asset 1

House number [REDACTED]  
Street1 [REDACTED]  
Cross street [REDACTED]  
Latitude [REDACTED]  
Longitude [REDACTED]  
Zip code [REDACTED]  
Private property  
Pre existing

Remarks Full Screen  
Raise [REDACTED] to 24-1 on Pl [REDACTED]  
Raise [REDACTED] to 23-1 on Pl [REDACTED]

Steps

Create Edit Delete Excel Complete Actions 2 rows

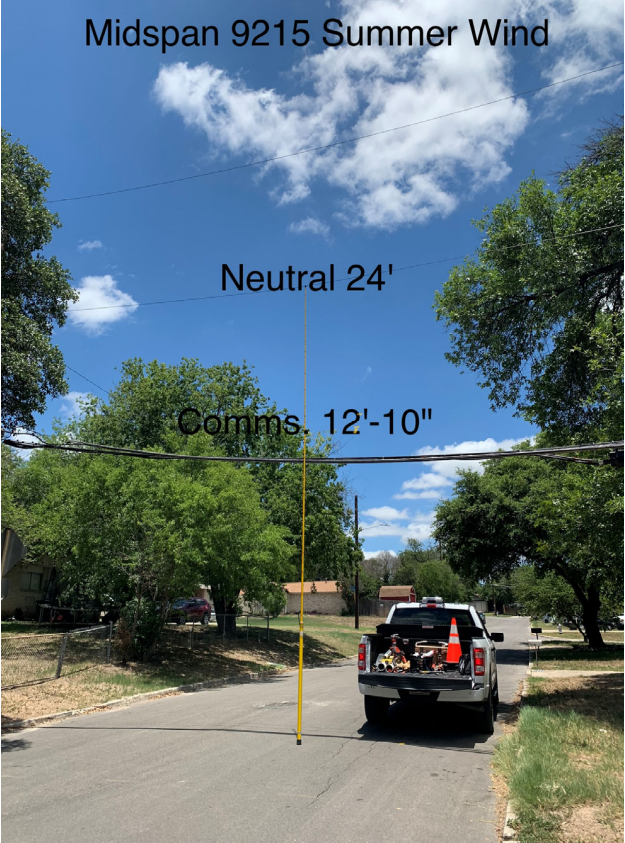
#	Updated On	Member	Job Type	Status	Interval	NTG Start	Response Request	Completed On	Field Completed On	# Reorder
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Move
2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Move

NJUNS VIO Ticket Issued

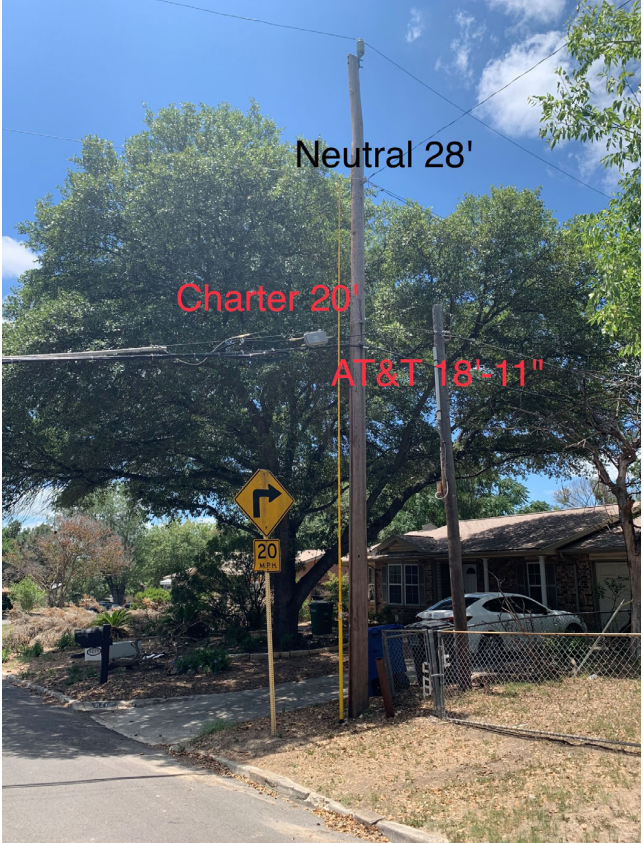
- In the top – Priority was assigned as 3
  - Communications lines with Messenger Wire are Priority 1, else **Priority 3**
- Under “Details” the attachment heights were called out

# LIDAR PROCESS

## VERIFY FIELD CONDITIONS



9215 Summer Wind Crossing



9215 Summer Wind at Pole

# LIDAR PROCESS

## ISSUE CORRECTIVE ACTION



- In the top – Priority was assigned as 1
  - Communications lines with Messenger Wire are Priority 1, else Priority 3
- Under “Details” the attachment heights were called out

Tickets Poles/Assets Steps Projects Members Run Reports Map Tools Help

Search: [REDACTED]

Save and close Save Cancel Close Ticket Cancel Ticket History Reports Actions Ticket Map Add Poles

Ticket: [REDACTED] - Violation (VIO) - VIO:PT-Default

Ticket # [REDACTED] Creator TRCPA NTG Member [REDACTED] Priority 1  
Status Open Owner CPSE01 Start Date [REDACTED] Pole/Asset # PL [REDACTED]

Details Poles/Assets Associations Parties

Details

Work Requested Date [REDACTED]  
State Texas  
County Bexar  
Place San Antonio  
Contact Name Joshua Macias  
Contact Phone (210) 557-5116  
Contact Email jmacias@trccompanies.com  
Reference Id  
Misc Id  
# of Poles/Assets 1

Asset 1

House number [REDACTED]  
Street1 [REDACTED]  
Cross street [REDACTED]  
Latitude [REDACTED]  
Longitude [REDACTED]  
Zip code [REDACTED]  
Private property   
Pre existing

Remarks

Raise [REDACTED] to 24-8 and Raise [REDACTED] to 23-8 on PL [REDACTED]

Steps

Create Edit Delete Excel Complete Actions

#	Updated On	Member	Job Type	Status	Interval	NTG Start	Response Request	Completed On	Field Completed On	# Reorder	
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Move
2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		Move

NJUNS VIO Ticket Issued



# LOW CROSSINGS

## 5 DAY CORRECTIVE ACTION

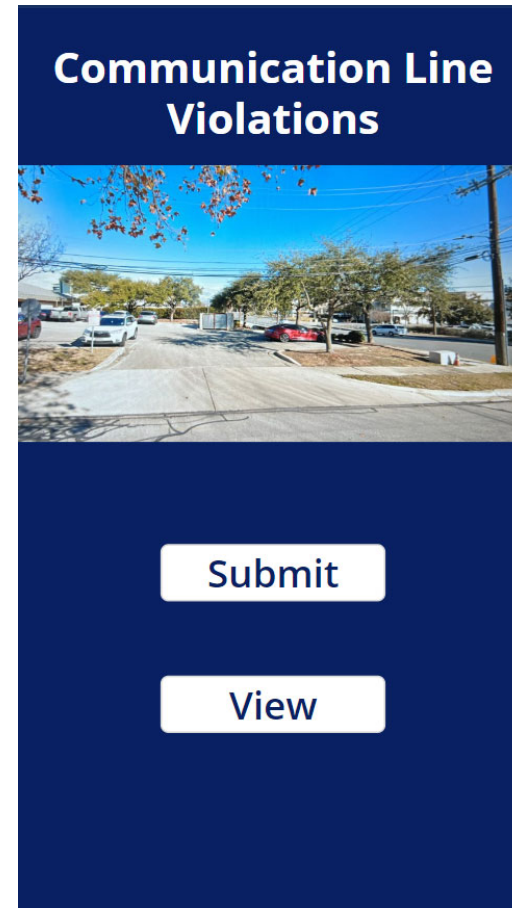


- NJUNS Violation ticket functions as Notice of Safety Violation
  - Process outlined in pole attachment standards
  - Violation shall be corrected by no later than five calendar days
- If the Violation has not been cured within five calendar days
  - CPS Energy may perform such work as it deems necessary without giving written notice to Attaching Entity
    - Attaching entity is responsible for all costs incurred by CPS Energy.
    - CPS Energy will impose a 10% surcharge on its costs of conducting any work or remedy of a Safety Violation
  - CPS Energy shall issue a Notice of Safety Violation Assessment Charge, provided in Appendix H for each Safety Violation(s) noted

# COMMUNICATIONS LINE VIOLATIONS

## POWER APP

- Gives internal personnel a reporting tool to communicate low lines and other hazardous situations related to telecommunications
  - Service Restoration
  - Inspectors



# COMMUNICATIONS LINE VIOLATIONS

## POWER APP



- Basic information is added to the application, Pole #s, nearest Address, additional comments, and the ability to load pictures or any other documents
- These are then sent for field verification and next steps

✕ Submit a Violation ✓

Pole 1 #  
Enter 1st pole number at crossing

Pole 2 #  
Enter 2nd pole number at crossing

Address  
Enter the address

Comment

Attachments  
Add a photo of the issue.  
📎 Attach file

# COMMUNICATION LINE VIOLATIONS

## REPORTED LOCATIONS



9760 FM 471 S



9760 FM 471 S Crossing

# COMMUNICATION LINE VIOLATIONS

## REPORTED LOCATIONS



Starcrest and Westmont



8423 Eastern Ave

# COMMUNITY CONCERNS



- [Customer Concern Example](#)
- Customer complaints to various business units that are redirected to the PAS team
- Sites are sent to contractors for Field Verification, follow up with customer is conducted



# GENERAL NOTES

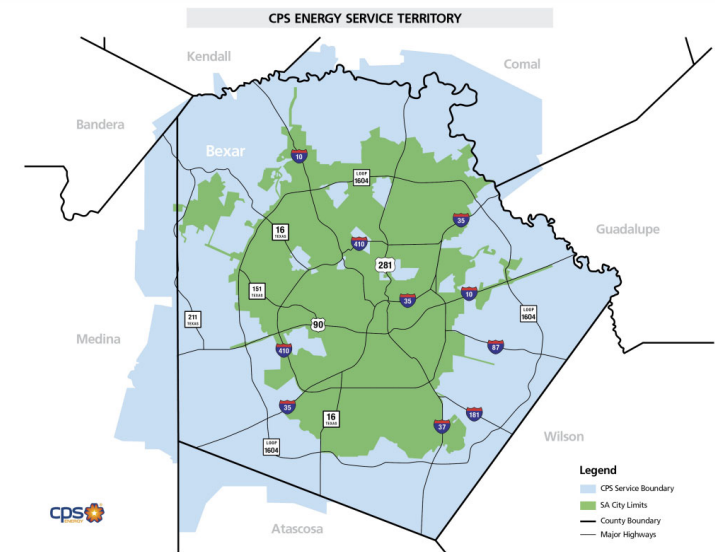


# PROACTIVE COMMUNICATION

## INCREASE IN APPLICATIONS / POLE COUNT



- Funding Programs – Texas Broadband Development Office
  - Boot
  - Boot II
  - Pole Replacement
  - IIJA BEAD
  - IIJA Digital Opportunity Program
- Other local level programs
- Please proactively communicate with the Pole Attachment Services Department regarding large scale deployments



Counties in CPS Energy Territory

- Atascosa
- Bexar
- Comal
- Guadalupe
- Kendall
- Medina



# REGISTRATION & ANNUAL REPORTING FORM A1



- Is **Required** to be completed annually by **September 1<sup>st</sup>** of every year
- The form can be found on the Pole Attachment page on the CPS Energy website



## Attaching Entity Registration & Annual Reporting Form

*To be completed annually by September 1st or as required due to contact information changes*  
 Submit form via email to [poleattach@cpsenergy.com](mailto:poleattach@cpsenergy.com) , Email Subject Line: Annual Registration & Reporting Form

Date Form Submitted to CPS Energy: \_\_\_\_\_

Attaching Entity General Information	
Attaching Entity Name	
Corporate Address	
Local Address	
Form Submitted by	
Telephone Number	
Email	
Does This Entity Hold a Certificate from the Public Utility Commission of Texas? <span style="float: right;">Y / N</span>	
If Yes, Indicate Certificate Number and Date Received	
Has This Entity Been Granted a Franchise, Licensee Agreement, Permit, or Ordinance by the City of San Antonio? <span style="float: right;">Y / N</span>	
If Yes, Indicate Certificate Number and Date Received	

A1 Registration & Annual Reporting Form

# APPROVED ENGINEERING FIRMS



- The PAS team periodically identifies firms that have not submitted applications & then will remove them from the Approved Engineering Firms list
  - This review will be conducted every 6 months
- It takes 90 days for individual credentials to expire
  - The firms removed had been inactive for much longer
- Firms will need to re-apply to become approved, going through the entire approval process as if it were the first time

**Engineering Firms that are collectively working on the applications & EMR design are to submit applications together**

# APPROVED ENGINEERING FIRMS



Engineering	Electrical Distribution Construction	One-Touch Transfer Construction	Vegetation Management
<p>Aeparmia ★                      AWE, LLC ★                      Binkley &amp; Barfield ★★★                      Black &amp; McDonald ★★★                      Byers Engineering ★                      Cobb Fendley ★★★                      DeBauche Comm. &amp; Cons. Serv.LLC ★                      ENTRUST ★★★                      LJA Telecom ★★★                      Merrick &amp; Company ★★★                      Mountain, LTD. ★★★                      Quanta Utility Eng. Services ★★★                      Surveying &amp; Mapping, LLC ★★★                      TDC2, LLC ★                      TechServ ★★★                      Telecom Staffing, LLC ★★★                      TexasPro Engineering ★★★                      TOP Engineers + ★★★                      Tower Engineering Prof., Inc. ★★★                      TRC, Inc. ★★★                      Utility Engineering ★★★</p>	<p>Chain Electric                      Pike Electric                      Greenstone                      Source Power</p>	<p>BComm Constructors, LLC                      Ervin Cable Construction, LLC                      Quest Utility Construction, Inc.                      S&amp;S Cable Communications                      Tero Technologies Inc.                      TEXSTAR Enterprises, Inc.                      TX Superior Communications, LLC                      JC Communications                      ADB Companies                      A2 Total Telecom Services LLC                      B Robinson Inc.                      CJ Hood Communications                      US Aerial                      HMI Utilities                      Global Optics</p>	<p>Asplundh Tree Expert                      Davey Tree Surgery                      McCoy Tree Surgery</p>

★ Option 1: Pole Loading Analysis (PLA) & Application submittal

★★ Option 2: Make ready engineering

★★★ Option 3: Pole Loading Analysis (PLA), Application submittal & Make ready engineering

# PAS GIS TRAINING CLASSES

## GENERAL TOPICS



- Future Proposed Trainings – Please submit the name & company to get on the list for the next available training (Feb 3<sup>rd</sup>-7<sup>th</sup>)
  - Date: Near future (working on scheduling)
    - Next class is @ capacity, continue to submit for future training sessions
  - Duration: 5 days Mon – Fri
  - Location: Virtual
- For more information, please email [poleattach@cpsenergy.com](mailto:poleattach@cpsenergy.com)
- The maximum class size is 6 & the minimum is 3
- **You will receive a set-up walkthrough from the GIS team that needs to be completed prior to the course starting**

# PAS GIS TRAINING CLASSES

## GENERAL TOPICS



- GIS training **DOES NOT** cover:
  - Pole Attachment Standards
  - Distribution Standards and Specifications
  - Pole Attachment Process
  - **Replace Design Training**
- GIS Training **DOES** cover basic GIS design training to submit EMR designs which include:
  - Transformers, Streetlights Etc.
  - Pole change outs (PCO)
  - Setting mid-span poles

CPS Energy led GIS training isn't a replacement for design training

# PAS GIS TRAINING CLASSES

## POLE APPLICATION PROCESS



Engineering Firms should:

- Make sure that all new &/or replacement employees as well as contractors are trained on
  - Pole Attachment Standards & pole attachment process
  - Electrical make ready designs to streamline the rejections
- Continue to train their employees on the importance of communication regarding worker safety zones & applicable clearances

**It's the engineering contractor's responsibility to learn how to fill out the application & understand CPS Energy standards**

# POLE ATTACHMENT APPLICATION PROCESSING



- RFQ for Pole Attachment Application Processing
- Contracts were finalized 10/31 with an effective date of 11/1
- The awarded contractors are: TRC, QUES, & ENTRUST



# APPLICATIONS





# COMMON APPLICATION ERRORS



- Application missing required information
  - CPS Energy Pole number (PL#) missing on application
  - Make ready not called for on the application
  - Missing required attachments at submittal of application
- Mistakes on Pole Loading Analysis
  - **All existing violations on pole are not fixed or creates a new violation**
  - Incorrect construction grades
  - Missing cables on pole
  - Incorrect cable tensions
  - Mid-span clearance issues
- The application review shot clock will reset with every application rejection
- Contractors should NOT change the attaching entities application name on rejections, only a REV designation should be added to the end of the application name
  - Example – Tag Number-Year-Application \*Number\_REV#

\*Needs to be a new revision number, otherwise it causes billing issues

# COMMON APPLICATION ERRORS



- Pole Loading Analysis (PLA) Report(s) should include coversheet stamped by a PE, or each individual PLA Report is to be stamped
- Pole information on PLA Reports should reflect that of application height information. Pole Capacity Utilization Percentage should also match on Application & more UTD PLA Reports
- Correct wire Sizes/Types, Equipment Sizes/Types, Tensions & Ownership need to be utilized
- Anchor(s)/Downguy(s) at appropriate Lead Lengths/Attachment Heights, as shown on the application. (If applicable)
- Pole Number, Class/Height, Species & Construction Grade, shown as it exists or is proposed on the application

PLA Analysis shall be valid for no longer than six (6) months from the time of Application Submission. After six (6) months, a new PLA analysis will be required

# WORK MANAGER PROCESS

## MAJOR TASKS

1000	Create Work Request	6000	Finalize and Lock Down Design
2125	Request Environmental Review	9100	Obtain ROW / Easement(s)
2130	Obtain Environmental Permit(s)	9200	Receive Customer Pre-Work Pay...
2280	Perform Field Survey / Obtain Data	11060	Submit Notice of Intent (NOI)
2305	Request Long Lead and/or Non-St...	11065	Underground Inspections
2310	Assign Designer / Supervisor	11100	Accept Work Request for Constru...
2360	Design Job	12271	Delay For Reason in Comments
2400	Request ROW / Easement From ...	12500	Schedule Work
2445	Obtain Permit(s)	12800	Send Scheduled Date to Customer
2450	Calculate Contribution Charges	16100	Perform Field Work
2460	Perform Supervisor Review of De...	16130	Submit Notice of Termination (NOT)
2605	Send Contribution Charges to Cus...	16500	Perform Initial Material Reconciliat...
2680	Indicate Official Revision	16900	Receive Customer Post-Work Pay...
5000	Perform Supervisor Approval	17000	Enter As-Builts
5100	Approve Work Request	18200	Close Work Request

- 2280 – Designer: Field work (locates, staked locations)
- 2360 – Designer: GIS Design
- 2460/2605 – Supervisor: Designer notifies supervisor by email that EMR is ready for review. Supervisor reviews the design & creates the CIAC invoice
- 2680 – Designer: if EMR project is completed (all permits attached, PE seal, etc.) designer indicates official revision in GIS & must send an email to supervisor that design is ready for final approval
- 5000/5100 – Supervisor: Final approval

EMR Designer is the owner of the Work Order from start to close out & responsible for pushing the project through the process

# WORK MANAGER PROCESS

## MAJOR TASKS



Attached Files

Remerge	Update	Refresh Date	Attachment File Name*	Description
		Nov 13, 2023	COSA_188645_20230831_extended.pdf	COSA PERMIT
		Oct 24, 2023	COSA_188645_20230831.pdf	COSA PERMIT
		Oct 24, 2023	WR#40761043 FINAL FOR CONSTRUCTION_PE Sealed.pdf	FINAL FOR CO
		Oct 06, 2023	40761043_2_202310061439_10-06-2023(14_39_35).pdf	DNU
		Jul 24, 2023	40761043_2_2023072410832_7_24_2023(08_32_28).pdf	DNU

Total items: 22

Attachments for Work Request

\*These are not the only attachments that would need to be attached; This is not a comprehensive list

- 2460 for Entrust- Zsofia Cassidy (CZ), TRC- Steven Chavez Martinez (CSTE), QUES- Brandon Perez (PBT1)
- Permit Attachments expected at task 2360\*
  - Design for Review (preliminary)
  - Design for Construction (final)
  - Dig TESS (number should also be on the design)
  - Gas Maps
  - SAWS/Water Maps
  - CPS Energy Environmental forms/approvals (design notes should be in red)
- Permit attachments expected before 5000 approval
  - TXDOT approval
  - City/County approval

# ASSOCIATED WORK REQUESTS

- All associated work requests should be submitted with the original application submission
- This extends to final approvals at task 5000/5100
- All associated work requests must be paid prior to sending to task 5000/5100
  - The 5000/5100 notification email should include the associated work requests



Failure to submit all associated work requests with the project can result in delays for the applicant company.

# DESIGNER RESPONSIBILITY



- **After task 5100 is completed, designer is responsible to progress job**
- **Task 6000 – Designer: Designer is responsible for:**
  - Finalizing the design
  - Coordinates the tree trimming if needed
  - Applies for any pending ROW permits
  - Re-stakes proposed pole locations
  - Prepares for construction
- **Ensure CIAC payment has been received prior to progressing the job to scheduling/construction**

# WORK MANAGER PROCESS



## MAJOR TASKS

1000	Create Work Request	6000	Finalize and Lock Down Design
2125	Request Environmental Review	9100	Obtain ROW / Easement(s)
2130	Obtain Environmental Permit(s)	9200	Receive Customer Pre-Work Pay...
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2605	Send Contribution Charges to Cus...	16500	Perform Initial Material Reconciliat...
2680	Indicate Official Revision	16900	Receive Customer Post-Work Pay...
5000	Perform Supervisor Approval	17000	Enter As-Builts
5100	Approve Work Request	18200	Close Work Request

\*NTP sent after EMR Post Inspection

- 6000 – Designer: Designer is responsible for:
  - Finalizing the design
  - Coordinates the tree trimming if needed
  - Applies for any pending ROW permits
  - Re-stakes proposed pole locations
  - Prepares for construction
- 9200 – Designer: receives notification when the CIAC has been paid
- 11100 – Designer: releases design to construction, emails scheduler
- 12500/12800/16100 – Scheduler/Construction
- **16500\* – Designer: Must Request NTP**
- **17000 – Designer: enters As-Builts & submits for verification**
- 18200: Work order is closed

# DESIGNER RESPONSIBILITY

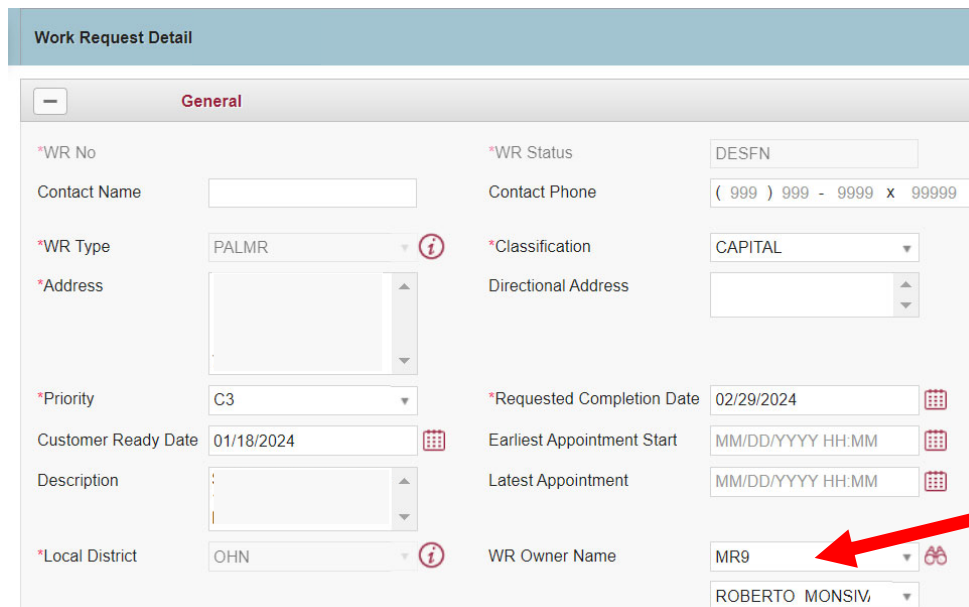


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- **Task 6000 – Designer: Designer is responsible for:**
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  - Coordinates the tree trimming if needed
  - Applies for any pending ROW permits
  - Re-stakes proposed pole locations
  - Prepares for construction
- **Ensure CIAC payment has been received prior to progressing the job to scheduling/construction**



# DESIGNER RESPONSIBILITY

- **The Designer is the owner of the Work Order & GIS from the creation through the As-Builts**
- Make sure that the designer's initials are indicated under Work Request Owner to ensure delivery of emails as tasks are completed



The screenshot shows a 'Work Request Detail' form with a 'General' tab. The form contains the following fields and values:

Field	Value
*WR No	
Contact Name	
*WR Status	DESFN
Contact Phone	( 999 ) 999 - 9999 x 99999
*WR Type	PALMR
*Classification	CAPITAL
*Address	
Directional Address	
*Priority	C3
*Requested Completion Date	02/29/2024
Customer Ready Date	01/18/2024
Earliest Appointment Start	MM/DD/YYYY HH:MM
Description	
Latest Appointment	MM/DD/YYYY HH:MM
*Local District	OHN
WR Owner Name	MR9 ROBERTO MONSIV

A red arrow points to the 'WR Owner Name' field, specifically to the 'MR9' dropdown selection.

# UPGRADE WORK REQUESTS

## POLE ATTACHMENT STANDARDS

- Upgrade work requests are strictly for poles identified as defective.
  - Sole Judgement of CPS Energy
- Commonly referred to as 'double red tagged poles
- Require CPS Energy PAS manager approval



Depending on severity, these poles may be handled as emergency pole replacements.

# UPGRADE WORK REQUESTS

## SUMMER 2024 REVIEW

- Specific scenario presented
  - 360° review- the applicant company not attaching in that direction
  - No telecommunications throughout the span in question
  - CPS Energy measured below the pole attachment standards
  - The applicant can otherwise attach without creating a clearance violation
  - Other violations not present



# UPGRADE WORK REQUESTS

## SUMMER 2024 REVIEW



- Drafted a tentative plan to address these scenarios in the short term
- Plan to incorporate this guidance into the next iteration of the pole attachment standards
- Open to any feedback or any clarity needed around the proposed guidance

# UPGRADE WORK REQUESTS



<b>CPS Energy Upgrade Matrix</b>		
	Is an upgrade necessary?	Does upgrade need to be completed before attaching?
THE LOWEST CPS ENERGY FACILITIES BETWEEN 18-22'	No	No
THE LOWEST CPS ENERGY FACILITIES BETWEEN 16.5-18'	Yes	No
LOWEST CPS ENERGY FACILITIES ARE BELOW 16.5'	Yes	Yes

Matrix for scenarios described on slide 26. Upgrade work requests require CPS Energy approval.

# PROCESS STANDARDS

- Attachers must inform CPS Energy/Contractors when attachment construction is completed
  - Notice is required to initiate post construction inspection
  - Final permit will not be received until passing post construction inspection
- Wireline routes should follow existing CPS Energy pole lines

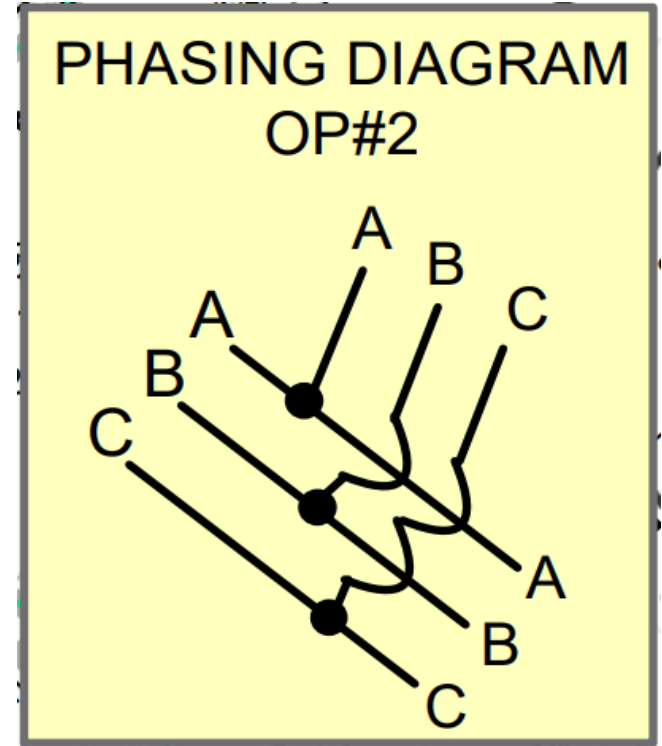
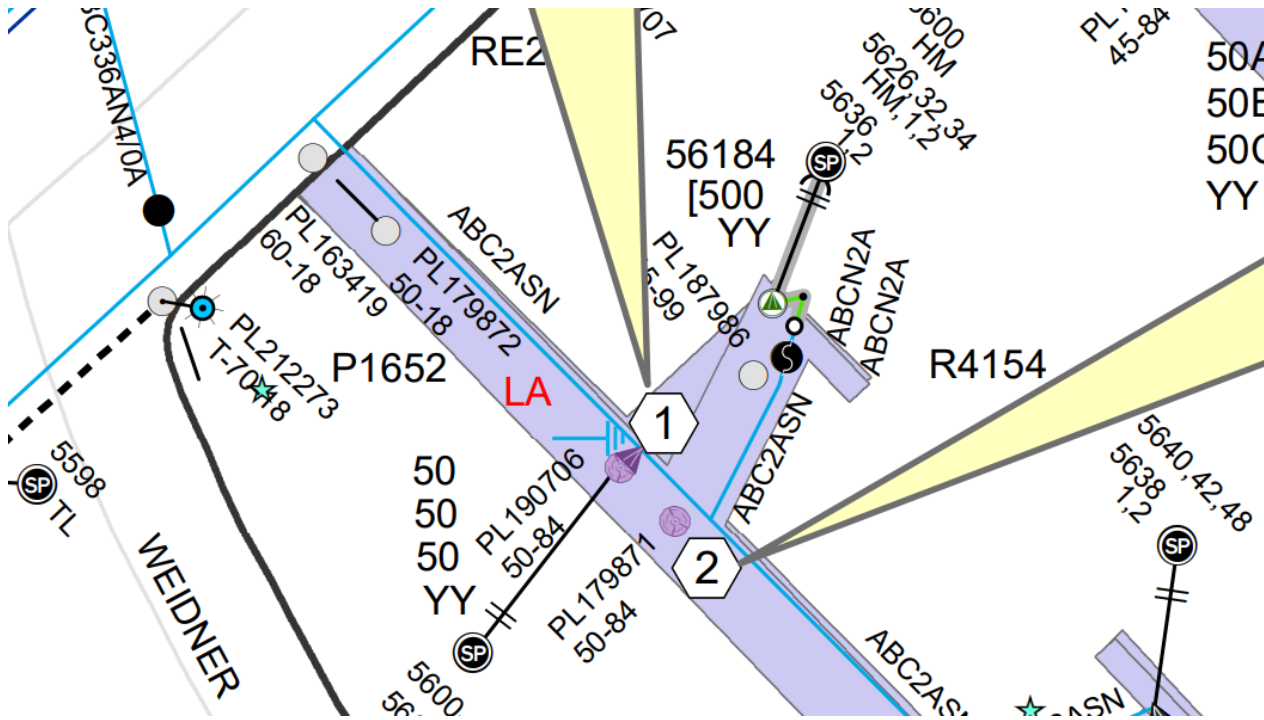


Pole line with communications attached



# APPLICATION CONSIDERATIONS

## PHASING DIAGRAMS







# APPLICATION CONSIDERATIONS

## PARKING LOTS

- NESC Rule 217.A.1.a- Protection of structures from vehicular damage
  - Appropriate physical protection shall be provided for supporting structures in established parking areas, in alleys, or next to driveways subject to vehicular traffic abrasion that would materially affect their strength. Physical protection is not required for supporting structures located outside of established parking areas, alleys, or driveways.



# APPLICATION CONSIDERATIONS

## PARKING LOTS

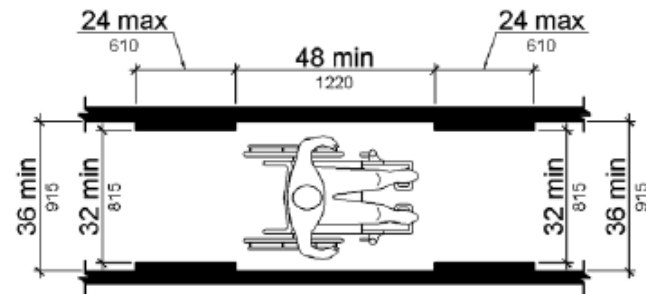


# APPLICATION CONSIDERATIONS

## ADA COMPLIANT POLE SETS

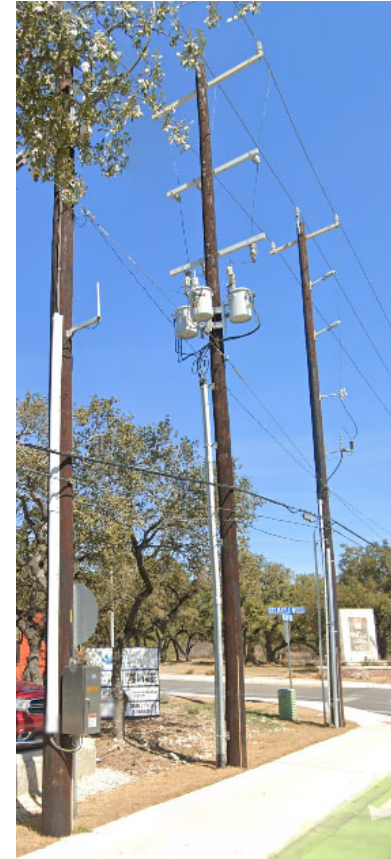
- A minimum width of 36" is required for sidewalks per the ADA
- Local Cities and Municipalities may have ordinances that exceed 36"
- New poles cannot be set to impede on these walkways

Figure 403.5.1 Clear Width of an Accessible Route



# PROCESS STANDARDS

- Attachers must inform CPS Energy/Contractors when attachment construction is completed
  - Notice is required to initiate post construction inspection
  - Final permit will not be received until passing post construction inspection
- Wireline routes should follow existing CPS Energy pole lines



Pole line with communications attached

# AS-BUILT CLEAN UP



- CPS Energy is running weekly reports for work requests in As-Built Status
  - Responsible designer shall review documents attached at task 16500 for As-Builts
  - After entering and completing the as-builts, send revision for as-built verification through GIS
  - In ARM, at Task 17000, add supervisor initials CZ or CSTE
    - "Completed on 12/05/2024 submitted to Entrust/TRC by SWAY"
  - If the applicable designer has left the approved engineering firm's company, it is that engineering firm's responsibility to submit
  - Supervisor that completes as-built verification shall notify designer that work request is closed

# BACK OFFICE AND FIELD INSPECTION WORK RELATED TO APPLICATIONS



- Invoices related to the application process can extend beyond **final permit**
- There is chargeable work that is done until final permit is issued
  - As-builts, post construction inspection, etc.
- Closed projects do not absolve of financial responsibility
- The CPS Energy contractors that review and approve applications work on behalf of CPS Energy
  - 45 calendar days following issuance of invoice
- CPS Energy will be meeting with attachers that have past due balances



# REQUIREMENTS





# COMMUNICATION FIBER PLACEMENT

- Attachers shall place their fiber on the same side of the pole as CPS Energy Fiber
  - Safety issues – Failure to do so causes a safety issue for CPS Energy Linemen that have to climb these poles
  - Attaching to the same side of the pole allows for a simpler and smoother transition when replacing poles
  - Reliability issue – longer outage times to restore power during emergencies



Communications don't follow existing power

- Wireline routes should follow existing CPS Energy pole lines

# TAGGING

- Attachers have tagging requirements for
  - Attachments
  - Banner Attachments
  - Overlashings
  - Wireless installations
- Minimum of 95% of attachments need to be tagged



Proper Tag

# NJUNS PROCESS & NEXT TO GO



- Attachers need to query NJUNS regularly to keep up with their Next to Go steps, PT tickets too
- Violation NTG steps will have a 5-day period to address
  - Safety driven initiative
- As was stated earlier, NJUNS registration is a requirement for **ALL** attaching entities



Regularly checking NTG reporting is important to staying clear of violations & holding up jobs for other entities

# NJUNS NOTIFICATIONS



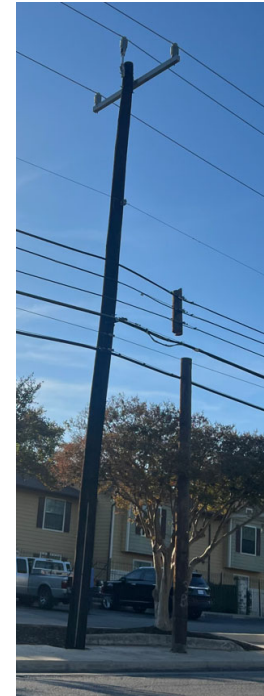
- CPS Energy utilizes different types of NJUNS notifications:
  - Pole Transfers (PT) tickets – **Excellent time to add tags if there aren't any**
  - Violation (VIO) tickets – 5 days to complete
  - New (New) tickets
- NJUNS training materials can be found on the training page & includes:
  - NJUNS User's guide
  - Training Videos
  - Best Practices
- **If any attaching entity needs assistance or additional training, please reach out to the Pole Attachment Services team**

The next web-based training can be found at the [NJUNS Training page](#), where you can subscribe to receive notifications

# COMMUNICATION TRANSFERS & SAFETY CONCERNS



- CPS Energy continues to stress the importance of communications transfers
- CPS Energy receives numerous complaints per year regarding double wood and braced poles
- These issues pose huge safety concerns for CPS Energy
- CPS Energy contractors will contact and coordinate the attaching entities to transfer their facilities as soon as possible
- If attachments are simple transfers, CPS Energy may use our approved construction contractors to transfer and pull the old poles



Stub Pole



**WIRELESS**



# WIRELESS ATTACHMENT REMOVALS



- It is the responsibility of the wireless attacher to submit a removal application notifying pole attachment services & customer engineering
- Pole attachment services will remove those attachments from the yearly attaching count
- Customer engineering oversee the work order to remove the service & meter to each site
- Wireless attacher wishing to upgrade their wireless equipment that will change the pre-certified wireless installation configuration, a new mock-up installation will be required to pre-certify the proposed wireless installation configuration

# WIRELESS ATTACHMENT MAKE READY

- It's the wireless providers responsibility to use the one-touch process to transfer all attaching entities on the old pole to the new so the old pole can be pulled
- If this is not done, pole attachment services will reject the permit as a gig







# ANNOUNCEMENTS

# POLE ATTACHMENT INVENTORY



- Kickoff meeting with attaching entities occurred on 11/26/2024
  - Cost sharing methodology
  - Attachment count methodology
  - Ramp up schedule
- Expectation is for the inventory to be completed over 18 months

# PAS INVOICES



- The 2025 pole attachment rental rate calculation has begun
- Rates will be posted on PAS Website as soon as they are finalized

# FUTURE DATES & GIS TRAINING



- Next Quarterly Dates:
  - March 6<sup>th</sup>, 2025
  - June 5<sup>th</sup>, 2025
  - September 4<sup>th</sup>, 2025
  - December 4<sup>th</sup>, 2025
- Contact [poleattach@cpsenergy.com](mailto:poleattach@cpsenergy.com) to get on the list for GIS training



THANK YOU