

POLE ATTACHMENT SERVICES QUARTERLY WORKSHOP

PRESENTED BY:

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07 DECEMBER 2023

AGENDA

CDS TO SERVICE OF THE PROPERTY OF THE PROPERTY

CPS ENERGY QUARTERLY PAS WORKSHOP

- SAFETY
- GENERAL TOPICS
- APPLICATIONS
- REQUIREMENTS
- WIRELESS
- PROJECTS
- ANNOUNCEMENTS

PAS SAFETY MESSAGE

SAFETY



- Safety Message
 - Holiday Safety
 - Don't overload circuits, extension cords, or electrical sockets
 - Never leave cooking or baking unattended
 - Keep holiday plants away from pets
 - Check your smoke detector battery
 - Celebrate small and don't drink and drive
 - Choose a fire-resistant artificial tree and be sure to water a natural tree daily
 - Fireworks



GENERAL TOPICS

PAS WEBPAGE



CPS Energy Pole Attachment Program

CPS Energy's distribution system can facilitate the delivery of the variety of communication services offered today.

With a streamlined pole attachment process, we're dedicated to partnering with companies to assist with speed-to-market processes for future technologies.

CPS Energy's Pole Attachment Services Office is the single point of contact for all who wish to attach infrastructure to our distribution poles.

The Pole Attachment Services Office is responsible for:

- Registration
- · Attachment agreements
- · Applications for new pole attachments or removals
- · Surveys of existing attachments
- · Billing and collections for all the above services

For questions or more information on the pole attachment process, SEND US AN EMAIL

CPS Energy has released the revised Pole Attachment Standards Version 6.0 (the "Standards") and the Joint Trench Agreement Friday, August 12, 2022, which include the integration of more detailed procedures for the underground relocation projects. CPS Energy continues to work with stakeholders to ensure the adoption of best practices in the Standards to further streamline our processes and operations for the benefit of all attaching entities. Thank you for your consideration and patience.

Upcoming Meetings/Workshop

- Previous Presentations
- Pole Attachment Standards
- Rate Calculations
- Template Agreements
- Approved Contractors
- Forms

Subscribe to receive email updates:

If you would like to receive emails regarding CPS Energy's Pole Attachment Program, please click on the button below to register your contact information.

Register Contact Info Here

Upcoming Meetings/Workshops

Pole Attachment Standards

- Pole Attachment Standards V6.0 Effective August 12 2022
- Loint-Trench Δareement Effective Δugust 12 2022

Helpful Links

- Certificate of Authority (City of San Antonio)
- NJUNS

REGISTRATION & ANNUAL REPORTING FORM A1



- Is Required to be completed annually by September 1st of every year
- If your organization didn't submit the form, you will be contacted
- The form can be found on the Pole Attachment page on the CPS Energy website

To be completed annually by September 1st or as required due to contact informal Submit form via email to poleattach@cpsenergy.com, Email Subject Line: Annual Registration Date Form Submitted to CPS Energy: Attaching Entity General Information Attaching Entity Name Corporate Address Local Address Form Submitted by Telephone Number Email	
Attaching Entity General Information Attaching Entity Name Corporate Address Local Address Form Submitted by Telephone Number	
Attaching Entity Name Corporate Address Local Address Form Submitted by Telephone Number	-
Corporate Address Local Address Form Submitted by Telephone Number	
Local Address Form Submitted by Telephone Number	
Form Submitted by Telephone Number	
Telephone Number	
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Elliali	
<u> </u>	
Does This Entity Hold a Certificate from the Public Utility Commission of Texas?	? Y / N
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?	Y / N
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 and then will remove them from the Approved Engineering Firms list
 - The list was updated (11/30) to reflect firms that were added and removed
- It takes 90 days for individual credentials to expire
 - o 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

1. AWE, LLC * 2. Binkley & Barfield *** 3. Black & McDonald ★★★ 4. Cobb Fendley ★★★ 5. Davey Resource Group ★★★ 6. DeBauche Comm. & Cons. Serv., LLC ★ 7. ENTRUST ★★★ 8. LJA Telecom ★★★ 9. Merrick & Company ★★★ 10. Mountain, LTD. ★★★ Quanta Utility Eng. Services ★★★ 12. Surveying & Mapping, LLC ★★★ 13. TDC2, LLC ★ 14. Telecom Staffing, LLC ★★★ TOP Engineers + ★★★ 16. Tower Engineering Prof., Inc. ★★★ 17. TRC, Inc. ★★★

Electrical Distribution Construction

Chain Electric Pike Electric Greenstone

One-Touch Transfer Construction

BComm Constructors, LLC
Ervin Cable Construction, LLC
Quest Utility Construction, Inc.
S&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

Vegetation Management

Asplundh Tree Expert Davey Tree Surgery McCoy Tree Surgery

- ★ 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
 - Date: January 22nd 26th (Full)
 - Following class to be tentatively scheduled for February
 - Duration: 5 days Mon Fri
 - Location: Virtual
- For more information, please email <u>poleattach@cpsenergy.com</u>
- The maximum class size is 6 & the minimum is 3

PAS GIS TRAINING CLASSES

GENERAL TOPICS



- GIS training DOES NOT cover:
 - Pole Attachment Standards
 - Pole Attachment Process
 - Replace Design Training
- GIS Training DOES cover basic GIS design training to submit EMR designs which include:
 - Moving neutrals
 - Pole change outs (PCO)
 - Raising drip loops

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



APPLICATIONS

COMMON APPLICATION REJECTIONS



- 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 new creates a new violation
- Incorrect construction grades
- Missing cables on pole & Incorrect cable tensions
- Mid-Span clearance issues
- Contractors should NOT change the attaching entities application name

21 Day application review will reset with every application rejection

UPGRADE JOBS

- There are two situations currently approved for upgrade jobs
 - Low neutral below NESC minimum clearances
 - Below 22' is not an automatic qualifier for an upgrade job
 - Double red tagged poles
 - The tags must be from different years



Recently Replaced Pole

CPS ENERGY ONE-TOUCH



- CPS Energy is not required or obligated to use the one-touch process when completing overhead construction
- One touch is only applicable for simple transfers
- Must be completed by an approved One touch contractor
- Applicant utilizing One touch transfer must follow the notification process described in the Pole Attachment Standards
 - o 21 day notice required through NJUNS; CPSE01 must be copied member
 - 3rd party attacher can accept or decline the One touch transfer if critical pole existing attacher notifies applicant & has accelerated make ready timeframes
 - 15 day notice of completion- One Touch is complete & ready to inspect



- Level 1: Initial Request for Complex Transfer (Days 0 to 30)
 - Requesting attaching entity required to provide notice to owner of existing Attachment utilizing NJUNS
 - CPS Energy should be copied member
 - The transfer shall be completed within 30 days of notice

It is the responsibility of the Attaching Entity requesting the Complex Transfer to negotiate a private process with the owning Attaching Entity for the Complex Transfer



- Level 2: Initial Escalation Process (Days 31 to 60)
 - Attaching Entity shall send a certified letter to the noncompliant Attaching Entity notice that Attachment in question being designated by CPS Energy as non-compliant after 30 days
 - Requesting company shall send copy of escalation letter to CPS Energy

Requesting Attaching Entity is required to continue to negotiate with the non-compliant Attaching Entity during the 30 day period



- Level 3: CPS Energy Finding of Non-Compliant Attachment (Days 61 to 90)
 - Requesting Attaching Entity shall notify CPS Energy in writing of efforts to negotiate & request CPS Energy to make a finding of Non-compliant Attachment
 - Request shall explain why the non-compliant Attaching entity is acting in bad faith
 - CPS Energy shall evaluate within 10 days



- Level 3: CPS Energy Finding of Non-Compliant Attachment (Days 61 to 90)
 - If the request is credible, CPS Energy shall:
 - Notify non-compliant Attaching Entity by certified mail that CPS Energy has determined the Attachment as a "noncompliant Attachment"
 - Non-compliant Attaching Entity will be accruing penalties as provided in Appendix H until Attachment is transferred
 - CPS Energy shall suspend processing of Attaching Entity's Applications 5 days after receipt of letter



- Level 3: CPS Energy Finding of Non-Compliant Attachment (Days 61 to 90)
 - Non-complaint Attaching Entity has 15 days to transfer & notify CPS Energy in writing
 - Should non-complaint Attaching Entity not transfer within 20 days that company shall be further subject to penalties
 - If complex transfer is completed, non-compliant company shall notify CPS Energy so that processing of applications can be reinstated

The requesting Attaching entity is required to continue to negotiate during this period



- Level 4: Transfer or Removal of Unauthorized Attachments (Days 91+)
 - The requesting Attaching Entity shall notify CPS Energy in writing of the failed attempt of unsuccessful transfer
 - CPS Energy shall transfer or remove non-compliant Attachment
 - CPS Energy shall re-instate processing of non-compliant Attaching Entity within 24 hours after receiving payment for field work & all outstanding penalties

SERVICE DROPS



Removed Service Drops



- Service Drops the submission of an application is not required to install a service drop on a pole on which the attaching entity has an authorized attachment
- Any communication line from pole to pole is a pole attachment & requires an application
- Attaching entity must provide notice of such service drops in the annual reporting form
- These issues pose safety concerns

PROCESS STANDARDS





Pole with comms wires attached

- Attachers must inform CPS Energy/Contractors when fiber 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

AS-BUILT CLEAN UP



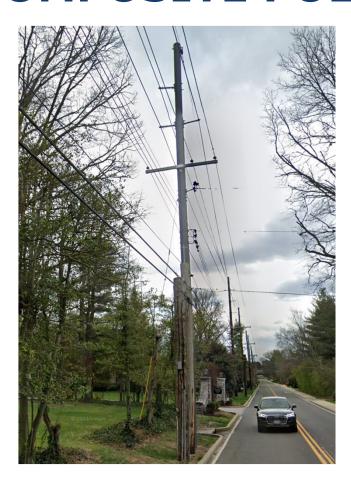
- CPS Energy is running weekly reports for work requests in As-Built Status
 - 1. Responsible designer shall review documents attached at task 16500 for As-Builts
 - After entering and completing the as-builts, send revision for as-built verification through GIS
 - 3. In ARM, at Task 17000, add supervisor initials CZ or TDEL
 - "Completed on 12/07/2023 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 completed task 18200 shall notify designer that work request is closed



REQUIREMENTS

COMPOSITE POLES





Composite Pole

- 284 composite poles have been purchased & delivered
- 103 further composite poles are anticipated to be purchased

COMPOSITE POLES

CDS TO SERVICE OF THE PROPERTY OF THE PROPERTY

- Drilling is not an option to attach
 - This includes messengered lines or risers
- Banding or steel clamps is required to attach to composite poles



Banding kit for telecom standoff riser

Mounting block on banding kit for telecom attachment



Drilling for 3rd Party Attachments is Prohibited

COMMUNICATION TRANSFERS & SAFETY CONCERNS





418 E. Southcross Blvd

- CPS Energy continues to stress the importance of communication transfers
- CPS Energy receives numerous reports per year regarding double wood & braced poles
- These issues pose safety concerns as well as public concerns

COMMUNICATION TRANSFERS



CIVIC IMPROVEMENT & TXDOT PROJECTS

- Attaching entities must follow all Pole Attachment Standards & processes for any civic improvement or TXDOT project
- An affected Attaching Entity that elects to transfer its Existing
 Attachments, Wireless Installations, or Banner Attachments to the CPS Energy replacement
 Poles &/or Streetlight Poles, shall complete such transfer at no cost to CPS Energy
 & in accordance with all Applicable Engineering Standards
- Affected Attaching Entities seeking to transfer their existing facilities to CPS Energy replacement
 Poles or Streetlight Poles in response to a Civic Project shall be solely responsible for
 coordinating with the Civic Project's manager in order to determine whether any of Attaching
 Entity's transfer costs are reimbursable from the Civic Authority, & for entering into any
 necessary agreements with the Civic Authority concerning such cost reimbursements

TXDOT RIGHT OF WAY UPDATES



OVERHEAD ELECTRIC & COMMUNICATIONS LINES

- TXDOT has updated many of their regulations
- Biggest change for Pole Attachments is that the minimum height along any TXDOT right of way is 18'
 - Applies to crossings above highways as well as cables that run longitudinal to the road
- Right of Way regulations can be found in the <u>TX Administration Code</u>
- Each firm needs to register under their own organization's credentials for their RULIS account

To see these regulations & more, visit the TXDOT website

TAGGING





Proper Tag

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

TAGGING





No Tags visible

- If less than 95% are tagged, the attacher & CPS Energy will meet & start a tagging program
- Tags are beneficial to everyone & facilitates properly identifying NTG steps for NJUNS
- Properly tagged lines results in less wasted time & less mistakes

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 NJUNS steps
 - 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 3 types of NJUNS notifications:
 - Simple Transfer Notification Process
 - Complex Transfer Notification Process
 - Violation (VIO) tickets
- NJUNS training materials can be found on the training page & includes:
 - NJUNS User's guide
 - Training Videos
 - Best Practices

The next web-based training is 14 December & can be found at the NJUNS Training page



WIRELESS

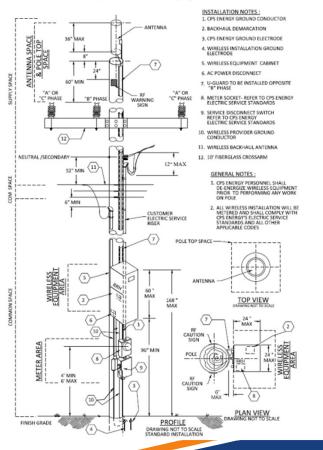
SMALL CELL REFRESHER

REQUIREMENTS

- Require radio equipment to be enclosed in shroud cabinet on pole or ground cabinet in ROW
- Require pole mounted cabinet to be flush with pole
- Require antenna to be embedded in cylinder enclosure or shroud cabinet
- Limit pole mounted cabinet to 5' in height & ground cabinet to 42"x42"x42" consistent with Chapter 284
- Require all pole mounted equipment to be the same color as pole



I4: CPS Energy Wireless Antenna Installation – Pole Top Space (Round-Sectored) Pole Mounted Equipment Cabinet



SMALL CELL REFRESHER

SAFETY



- Only approved electrical distribution construction contractors in the electrical space
- Pole top antenna 5' clearance from electrical primary
- No backup batteries permitted
- All wires must be protected by conduit or U-Guard
- All small cell equipment must be properly grounded
- All wireless antennas must have appropriate warning signs
- All small cell equipment will be de-energized prior to CPSE performing any work on pole
- Poles not accessible by bucket truck will not be available for small cell installation
- Ground cabinets must be 25' from pole
- Micro network nodes minimum clearance of 15" to 72" from pole

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 will do the work order to remove the service
 & meter to each site

WIRELESS ATTACHMENT POLE REMOVAL





- 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



PROJECTS

JOINT TRENCHING AGREEMENT



- CPS Energy has posted the proposed Joint Trenching Agreement as of November 6th, 2023
 - All current Joint Trenchers were notified
 - Was posted for comment
 - Comments are due December 8th, 2023 (tomorrow)
 - Can be found on the Joint Trenching page <u>here</u>
- Once finalized, we will provide updates at the next quarterly

POLE ATTACHMENT STANDARDS



- The PAS Team is currently working through the Pole Attachment Standards & marking lines for updates & clarifications
- The team is also reviewing all appendix documents
- New forms to be created following the Joint Trenching Agreement's official release
- Once done, the updated standards will be posted for comment on the Pole Attachment Services web page

LIDAR DATA & LOW COMMUNICATION LINES ISSUES



- LiDAR (Light Detection And Ranging) traditionally used to map out vegetation to identify areas needing trimming
- Identifying low hanging wires to prevent vehicular strikes
 - Safety
 - Reliability
- Will be identified as violations (VIO) in NJUNS, requiring accelerated response times

OUTAGES AS A RESULT OF LOW COMMUNICATIONS LINES







Cumberland Street

LiDAR 3D View

LiDAR Data showed a clearance of 14'-4" over the roadway, outage affected over 3,000 customers

POLE ATTACHMENT INVENTORY

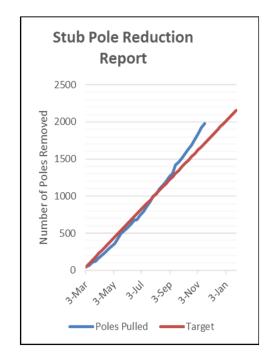


- Currently in contract negotiations
- Inventory to begin early 2024
- Expectation is for the inventory to be completed over 18 months
- Inventory is to account for pole attachments only, other facilities will not be inventoried

IDLE POLE PROJECT



- Pole Attachment Services (PAS) uses the previous pole inventory to remove Idle Poles to improve the aesthetics within the community
- The PAS team coordinates the removal of Idle Poles to reach the target of 2160 poles per fiscal year
- PAS team keeps track of the Idle Pole removals to ensure we are able to achieve our goal & report to management on a weekly basis





Idle Pole

ANNOUNCEMENTS



- Next Quarterly Dates:
 - o 07 March 2024
 - o 06 June 2024
 - o 05 September 2024
 - o 05 December 2024
- Invoices for 2023 will be going out at the beginning of the year
- Contact <u>poleattach@cpsenergy.com</u> to get on the list for GIS training



Thank You