



Lori A. Cole
Manager - Regulatory & Tariffs

June 19, 2019

VIA ELECTRONIC FILING

Honorable Kathleen H. Burgess
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: 16-M-0330 – Petition of CTIA – The Wireless Association to Initiate a
Proceeding to Update and Clarify Wireless Pole Attachment Protections.

Dear Secretary Burgess:

New York State Electric & Gas Corporation (“NYSEG”) and Rochester Gas and Electric Corporation (“RG&E”), (together the “Companies”), are transmitting for filing in compliance with the New York State Public Service Commission’s (the “Commission”) Order Approving Petition In Part and Continuing Proceeding, issued and effective on March 14, 2019 (the “Order”), in the above-referenced proceeding. The tariff leaves and Statements will become effective August 1, 2019.

P.S.C. No. 119 – Electric, Schedule for Electric Service
POLE Statement No. 1 to NYSEG
Leaf No. 150, Revision 3

P.S.C. No. 19 – Electric, Schedule for Electric Service
POLE Statement No. 4 to RG&E
Leaf No. 86.1, Revision 4

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Purpose of Filing

The Companies are submitting tariff revisions and associated Short Form Environmental Assessment Forms in compliance with Ordering Clause No. 1 of the Order¹.

Overview

Pursuant to the Order, the Companies are filing a per-foot attachment rental rate using a calculation methodology previously approved and currently being used for wireline attachments in New York. The wireless Rental Rate per Pole Attachments will be set forth on Statements (i.e., the "POLE Statement") for the Companies. The calculations are shown on Attachment 1.

The Short Form Environmental Assessment Form is included as Attachment 2.

Newspaper Publication

In accordance with Ordering Clause No. 5 of the Order, newspaper publication in accordance with Public Service Law 66(12)(b) and 16 NYCRR 720-8.1 is waived.

Company Contacts

If there are any questions concerning this filing, please call Kathy Grande at (585)771-4514 or me at (585)484-6810.

Respectfully submitted,



Lori A. Cole

Enclosures

¹ The Companies requested and were granted an extension to June 19, 2019 to file tariff revisions in compliance with the Order.

New York State Electric and Gas Calculation of Pole Attachment Fee Pursuant to FCC Formula Based Upon Year Ended December 31, 2018 Financial Information

Data thru Year		2018	
Description		Amount	Source
a) Attachment Space Occupancy		1	Default minimum
b) Usable Space on an average NYSEG Pole		13.50	FCC Default
c) Unusable Space on an average NYSEG Pole		24.00	FCC Default
d) Average NYSEG Pole height		37.50	FCC Default
e) Net Pole Investment		281,565,102	From Calculation 1
f) Total Number of Poles		569,321	From Calculation 8
g) Cost per Pole		495	= e / f
h) Net Cost of Bare pole		420.38	= g * .85
i) Carrying Charge Rate		67.23%	From Calculation 3
k) Current Rate		12.14	
l) Rate of Return		6.80%	NY Rate Case 15-E-0283 Joint Proposal, Appendix B, Shedule A
m) Usage Factor		7.4%	= a/b
CATV / CLEC Rate Calculation			
Rate = Space Occupied / Usable Space * Net Cost of Bare Pole * Carrying Charge Rate			
Rate =		20.93	Represents 1 foot of occupied space

Net Pole Investment		Calculation 1	
Description		Amount	Source
a) Gross Pole Investment		646,498,942	2018 NYSEG fercform tab 204207 line 66 acct 364
b) Accumulated depreciation		297,112,620	2018 Powerplant Reserve Ledger (Request from Fixed Assets - Pineland) Acct 364
c) Accumulated deferred taxes		67,821,220	From Calculation 2
Net Pole Investment		281,565,102	= (a - b - c)

Accumulated deferred taxes (Poles)			Calculation 2
Description	Amount	Source	
a) Gross Pole Investment	646,498,942	2018 NYSEG fercform tab 204207 line 66 acct 364	
b) Total Gross Plant (Electric)	4,291,659,931	2018 NYSEG fercform tab 200201 line 8, col c Total Electric Plant in Service	
c) % Gross Pole Investment vs Gross Plant	15.06% = a / b		
d) Total Accumulated Deferred Income Taxes (Electric)			
(d1) ADIT (db acct)	231,095,161	2018 NYSEG fercform tab 234 line 8 Total Electric Acct 190	
(d2) ADIT Accel-Amortization liabilities	-	2018 NYSEG fercform tab 272273 line 8 Total Electric Acct 281	
(d3) ADIT Other Property liabilities	466,999,464	2018 NYSEG fercform tab 274275 line 2 col (k) Acct 282	
(d4) ADIT Other liabilities	214,313,932	2018 NYSEG fercform tab 276277 line 9 col (k) Acct 283 Total Electric	
e) Total deferred Taxes	450,218,235	- d1 + d2 + d3 + d4	
Accumulated deferred taxes (Pole)	67,821,220	= e * c	

Carrying Charge Rate			Calculation 3
Description	Amount	Source	
a) Administrative Rate	7.40%	From Calculation 4	
b) Maintenance Rate	38.13%	From Calculation 5	
c) Depreciation Rate	5.12%	From Calculation 6	
d) Taxes Rate	5.32%	From Calculation 7	
e) Return Rate	11.25%	FCC Default	
Carrying Charge Rate	67.23%	= a + b + c + d + e	

Administrative Carrying Charge			Calculation 4
Description	Amount	Source	
a) Total General & Administrative Expenses	130,754,243	2018 NYSEG fercform tab 320323 line 205 col (b)	
b) Gross Plant Investment (Electric)	4,291,659,931	2018 NYSEG fercform tab 200201 line 8 Total Utility Plant In Service	
c) Accumulated Depreciation (Electric)	2,074,807,086	2018 NYSEG fercform tab 200201 line 22 Total Electric Depreciation	
d) Accumulated Deferred Taxes (Electric)	450,218,235	From Calculation 2.(e)	
Administrative Carrying Charge	7.40%	= a / (b - c - d)	

Maintenance Carrying Charge			Calculation 5
Description	Amount	Source	
a) Maintenance of Overhead Lines Account 593	190,852,149	2018 NYSEG fercform tab 320323 line 156 col (b) Acct 593	
b) Investments in Overhead Line Acct 364, 365, 369			
- Investments in Pole Account 364	646,498,942	2018 NYSEG fercform tab 204207 line 66 col (g) Acct 364	
- Investments in Overhead Conductor Account 365	606,594,361	2018 NYSEG fercform tab 204207 line 67 col (g) Acct 365	
- Investments in Service Account 369	172,065,019	2018 NYSEG fercform tab 204207 line 71 col (g) Acct 369	
	<u>1,425,158,322</u>		
c) Depreciation of Investments in acct 364, 365, 369			
- Depr. Pole Investments in acct 364	297,112,620	2018 Powerplant Reserve Ledger (Request from Fixed Assets - Pineland) Acct 364	
- Depr. Overhead Conductor Investments in acct 365	310,571,577	2018 Powerplant Reserve Ledger (Request from Fixed Assets - Pineland) Acct 365	
- Depr. Service Investments in acct 369	167,479,265	2018 Powerplant Reserve Ledger (Request from Fixed Assets - Pineland) Acct 369	
	<u>775,163,461</u>		
d) Gross Plant (Electric)	4,291,659,931	2018 NYSEG fercform tab 200201 line 8 col (c)	
e) Total Acc.Def. Inc. Taxes (Electric)	450,218,235	From Calculation 2	
f) Accumulated Deferred Income Taxes related to account 364, 365, 369	149,506,782	= (b / d) * e	
Maintenance Carrying Charge	<u>38.13%</u>	= (a / (b - c - f))	

Depreciation Carrying Charge			Calculation 6
Description	Amount	Source	
a) Gross Pole Investment	646,498,942	2018 NYSEG fercform tab 204207 line 64 col (g) Acct 364	
b) Net Pole Investment	281,565,102	From Calculation 1	
c) Depreciation Rate for Pole	2.23%	PSC Case 15-E-0283, Appendix U, page 1 of 6 (JP)	
Depreciation Carrying Charge	<u>5.12%</u>	= (a / b) * c	

Taxes Carrying Charge			Calculation 7
Description	Amount	Source	
a) Account 408.1 Taxes other than Income Tax	120,512,908	2018 NYSEG fercform tab 114117 line 14 acct 408.1	
b) Account 409.1 Federal Income tax	(3,606,303)	2018 NYSEG fercform tab 114117 line 15 acct 409.1	
Account 409.1 Other Income Tax	(7,901,723)	2018 NYSEG fercform tab 114117 line 16 acct 409.1	
	(11,508,026)		
c) Account 410.1 Prov. Deferred Income Tax - db.	251,282,295	2018 NYSEG fercform tab 114117 line 17 acct 410.1	
d) Account 411.4 Investment Tax Credit	-	2018 NYSEG fercform tab 114117 line 19 acct 411.4	
e) Account 411.1 Prov. Deferred Income Tax - Cr.	214,504,234	2018 NYSEG fercform tab 114117 line 18 acct 411.1	
f) Subtotal (a + b + c + d - e)	145,782,943		
g) Gross Plant Investment (Total Plant)	5,936,417,105	2018 NYSEG fercform tab 200201 line 8 col b	
h) Accumulated Depreciation (Plant)	2,686,463,441	2018 NYSEG fercform tab 200201 line 22, col b	
i) Total defered Taxes (Total Plant)			
(i1) ADIT (Acc Def Inc Tax)	278,047,926	2018 NYSEG fercform tab 234 line 18 col c	
(i2) ADIT Accel-Amortization liabilities	-	2018 NYSEG fercform tab 272273 line 8 col c	
(i3) ADIT Other Property liabilities	535,285,515	2018 NYSEG fercform tab 274275 line 9 acct 282	
(i4) ADIT Other liabilities	254,026,399	2018 NYSEG fercform tab 276277 line 19 acct 283	
	511,263,988	- i1 + i2 + i3 + i4	
j) Net Utility Plant in Service	2,738,689,676	g - h - i	
Taxes Carrying Charge	<u>5.32%</u>	f / j	

Determination of Total Number of NYSEG Equivalent Poles			Calculation 8
Description			
a) Total Distribution Poles	816,673		
b) Sole Owned Poles	334,882		
c) Joint Owned poles 33% Ownership	37,981		
d) Joint Owned poles 50% Ownership	443,810		
e) Percent Sole Owned (B / A)	41.01%		
f) Percent Joint Owned (C +D)/ A	58.99%		
g) No. of NYSEG Equivalent Poles	569,321		

Rochester Gas and Electric Calculation of Pole Attachment Fee Pursuant to FCC Formula Based Upon Year Ended December 31, 2018 Financial Information

Data thru Year		2018	
Description	Amount		Source
a) Attachment Space Occupancy	1	Default minimum	
b) Usable Space on an average RGE Pole	13.50	FCC Default	
c) Unusable Space on an average RGE Pole	24.00	FCC Default	
d) Average RGE Pole height	37.50	FCC Default	
e) Net Pole Investment	100,845,016	From Calculation 1	
f) Total Number of Poles	151,539	From Calculation 8	
g) Cost per Pole	665	= e / f	
h) Net Cost of Bare pole	565.65	= g * .85	
i) Carrying Charge Rate	44.60%	From Calculation 3	
k) Current Rate	11.98		
l) Rate of Return	7.50%	NY Rate Case 15-E-0285 Joint Proposal, Appendix D, Shedule A	
m) Usage Factor	7.4%	= a/b	
CATV / CLEC Rate Calculation			
Rate = Space Occupied / Usable Space * Net Cost of Bare Pole * Carrying Charge Rate			
Rate =	18.69	Represents 1 foot of occupied space	

Net Pole Investment		Calculation 1	
Description	Amount		Source
a) Gross Pole Investment	167,247,387	2018 RGE fercform tab 204207 line 66 acct 364	
b) Accumulated depreciation	44,656,148	2018 Powerplant Reserve Ledger (Request from Fixed Assets - Pineland) Acct 364	
c) Accumulated deferred taxes	21,746,223	From Calculation 2	
Net Pole Investment	100,845,016	= (a - b - c)	

Accumulated deferred taxes (Poles)			Calculation 2
Description	Amount	Source	
a) Gross Pole Investment	167,247,387	2018 RGE fercform tab 204207 line 66 acct 364	
b) Total Gross Plant (Electric)	2,437,140,366	2018 RGE fercform tab 200201 line 8, col c Total Electric Plant in Service	
c) % Gross Pole Investment vs Gross Plant	6.8624%	= a / b	
d) Total Accumulated Deferred Income Taxes (Electric)			
(d1) ADIT (db acct)	139,598,425	2018 RGE fercform tab 234 line 8 Total Electric Acct 190	
(d2) ADIT Accel-Amortization liabilities	-	2018 RGE fercform tab 272273 line 8 Total Electric Acct 281	
(d3) ADIT Other Property liabilities	395,525,340	2018 RGE fercform tab 274275 line 2 col (k) Acct 282	
(d4) ADIT Other liabilities	60,960,535	2018 RGE fercform tab 276277 line 9 col (k) Acct 283 Total Electric	
e) Total deferred Taxes	316,887,450	- d1 + d2 + d3 + d4	
Accumulated deferred taxes (Pole)	21,746,223	= e * c	

Carrying Charge Rate			Calculation 3
Description	Amount	Source	
a) Administrative Rate	3.45%	From Calculation 4	
b) Maintenance Rate	21.01%	From Calculation 5	
c) Depreciation Rate	4.01%	From Calculation 6	
d) Taxes Rate	4.88%	From Calculation 7	
e) Return Rate	11.25%	FCC Default	
Carrying Charge Rate	44.60%	= a + b + c + d + e	

Administrative Carrying Charge			Calculation 4
Description	Amount	Source	
a) Total General & Administrative Expenses	50,499,562	2018 RGE fercform tab 320323 line 205 col (b)	
b) Gross Plant Investment (Electric)	2,437,140,366	2018 RGE fercform tab 200201 line 8 Total Utility Plant In Service	
c) Accumulated Depreciation (Electric)	656,628,148	2018 RGE fercform tab 200201 line 22 Total Electric Depreciation	
d) Accumulated Deferred Taxes (Electric)	316,887,450	From Calculation 2.(e)	
Administrative Carrying Charge	3.45%	= a / (b - c - d)	

Maintenance Carrying Charge			Calculation 5
Description	Amount	Source	
a) Maintenance of Overhead Lines Account 593	43,504,378	2018 RGE fercform tab 320323 line 156 col (b) Acct 593	
b) Investments in Overhead Line Acct 364, 365, 369			
- Investments in Pole Account 364	167,247,387	2018 RGE fercform tab 204207 line 66 col (g) Acct 364	
- Investments in Overhead Conductor Account 365	172,544,545	2018 RGE fercform tab 204207 line 67 col (g) Acct 365	
- Investments in Service Account 369	43,425,409	2018 RGE fercform tab 204207 line 71 col (g) Acct 369	
	<u>383,217,341</u>		
c) Depreciation of Investments in acct 364, 365, 369			
- Depr. Pole Investments in acct 364	44,656,148	2018 Powerplant Reserve Ledger (Request from Fixed Assets - Pineland) Acct 364	
- Depr. Overhead Conductor Investments in acct 365	52,317,315	2018 Powerplant Reserve Ledger (Request from Fixed Assets - Pineland) Acct 365	
- Depr. Service Investments in acct 369	29,343,029	2018 Powerplant Reserve Ledger (Request from Fixed Assets - Pineland) Acct 369	
	<u>126,316,492</u>		
d) Gross Plant (Electric)	2,437,140,366	2018 RGE fercform tab 200201 line 8 col (c)	
e) Total Acc.Def. Inc. Taxes (Electric)	316,887,450	From Calculation 2	
f) Accumulated Deferred Income Taxes related to account 364, 365, 369	49,827,563	= (b / d) * e	
Maintenance Carrying Charge	21.01%	= (a / (b - c - f))	

Depreciation Carrying Charge			Calculation 6
Description	Amount	Source	
a) Gross Pole Investment	167,247,387	2018 RGE fercform tab 204207 line 64 col (g) Acct 364	
b) Net Pole Investment	100,845,016	From Calculation 1	
c) Depreciation Rate for Pole	2.42%	PSC Case 15-E-0285, Appendix U, page 4 of 6 (JP)	
Depreciation Carrying Charge	4.01%	= (a / b) * c	

Taxes Carrying Charge			Calculation 7
Description	Amount	Source	
a) Account 408.1 Taxes other than Income Tax	90,009,655	2018 RGE fercform tab 114117 line 14 acct 408.1	
b) Account 409.1 Federal Income tax	39,716,741	2018 RGE fercform tab 114117 line 15 acct 409.1	
Account 409.1 Other Income Tax	1,856,207	2018 RGE fercform tab 114117 line 16 acct 409.1	
	41,572,948		
c) Account 410.1 Prov. Deferred Income Tax - db.	113,566,348	2018 RGE fercform tab 114117 line 17 acct 410.1	
d) Account 411.4 Investment Tax Credit	-	2018 RGE fercform tab 114117 line 19 acct 411.4	
e) Account 411.1 Prov. Deferred Income Tax - Cr.	136,750,859	2018 RGE fercform tab 114117 line 18 acct 411.1	
f) Subtotal (a + b + c + d - e)	108,398,092		
g) Gross Plant Investment (Total Plant)	3,701,448,203	2018 RGE fercform tab 200201 line 8 col b	
h) Accumulated Depreciation (Plant)	1,184,235,892	2018 RGE fercform tab 200201 line 22, col b	
i) Total defered Taxes (Total Plant)			
(i1) ADIT (Acc Def Inc Tax)	240,855,557	2018 RGE fercform tab 234 line18 col c	
(i2) ADIT Accel-Amortization liabilities	-	2018 RGE fercform tab 272273 line 8 col c	
(i3) ADIT Other Property liabilities	458,071,952	2018 RGE fercform tab 274275 line 9 acct 282	
(i4) ADIT Other liabilities	77,004,233	2018 RGE fercform tab 276277 line 19 acct 283	
	294,220,628	- i1 + i2 + i3 + i4	
j) Net Utility Plant in Service	2,222,991,683	g - h - i	
Taxes Carrying Charge	4.88%	f / j	

Determination of Total Number of RGE Equivalent Poles			Calculation 8
Description			
a) Total Distribution Poles	226,349		
b) Sole Owned Poles	76,949		
c) Joint Owned poles 33% Ownership	646		
d) Joint Owned poles 50% Ownership	148,754		
e) Percent Sole Owned (B / A)	34.00%		
f) Percent Joint Owned (C +D)/ A	66.00%		
g) No. of RGE Equivalent Poles	151,539		

Short Environmental Assessment Form

Part 1 - Project Information

Instructions for Completing

Part 1 – Project Information. The applicant or project sponsor is responsible for the completion of Part 1. Responses become part of the application for approval or funding, are subject to public review, and may be subject to further verification. Complete Part 1 based on information currently available. If additional research or investigation would be needed to fully respond to any item, please answer as thoroughly as possible based on current information.

Complete all items in Part 1. You may also provide any additional information which you believe will be needed by or useful to the lead agency; attach additional pages as necessary to supplement any item.

Part 1 – Project and Sponsor Information			
New York State Electric & Gas , Rochester Gas and Electric			
Name of Action or Project: Tariff Filing			
Project Location (describe, and attach a location map): NYSEG and RG&E Service territory throughout New York State			
Brief Description of Proposed Action: Per Commission Order in Case 16-M-0330, electric and telephone utilities subject to the jurisdiction of the Commission are required to file new or amended tariff amendments and associated Short Form Environmental Assessment Forms, setting rates for new wireless pole attachments, consistent with the Order. The nature of this action is the filing of tariffs. This action does not involve any new construction or change in land use.			
Name of Applicant or Sponsor: Carol Howland - Contact for EAF		Telephone: 607-762-8881 E-Mail: cahowland@nyseg.com	
Address: P.O. Box 5224			
City/PO: Binghamton		State: NY	Zip Code: 13902
1. Does the proposed action only involve the legislative adoption of a plan, local law, ordinance, administrative rule, or regulation? If Yes, attach a narrative description of the intent of the proposed action and the environmental resources that may be affected in the municipality and proceed to Part 2. If no, continue to question 2.		NO ☒	YES ☐
2. Does the proposed action require a permit, approval or funding from any other government Agency? If Yes, list agency(s) name and permit or approval:		NO ☒	YES ☐
3. a. Total acreage of the site of the proposed action?		0 acres	
b. Total acreage to be physically disturbed?		0 acres	
c. Total acreage (project site and any contiguous properties) owned or controlled by the applicant or project sponsor?		0 acres	
4. Check all land uses that occur on, are adjoining or near the proposed action:			
5. ☐ Urban ☐ Rural (non-agriculture) ☐ Industrial ☐ Commercial ☐ Residential (suburban) ☐ Forest ☐ Agriculture ☐ Aquatic ☒ Other(Specify): Statewide Action ☐ Parkland			

5. Is the proposed action,	NO	YES	N/A
a. A permitted use under the zoning regulations?	☐	☐	☒
b. Consistent with the adopted comprehensive plan?	☐	☐	☒
6. Is the proposed action consistent with the predominant character of the existing built or natural landscape?	NO	YES	
	☐	☒	
7. Is the site of the proposed action located in, or does it adjoin, a state listed Critical Environmental Area?	NO	YES	
Statewide action - No impact to critical environmental areas. If Yes, identify: _____	☒	☐	
8. a. Will the proposed action result in a substantial increase in traffic above present levels?	NO	YES	
	☒	☐	
b. Are public transportation services available at or near the site of the proposed action?	☒	☐	
c. Are any pedestrian accommodations or bicycle routes available on or near the site of the proposed action?	☒	☐	
9. Does the proposed action meet or exceed the state energy code requirements?	NO	YES	
If the proposed action will exceed requirements, describe design features and technologies: Revised tariff throughout NY	☐	☒	
10. Will the proposed action connect to an existing public/private water supply?	NO	YES	
If No, describe method for providing potable water: _____ Not Applicable	☒	☐	
11. Will the proposed action connect to existing wastewater utilities?	NO	YES	
If No, describe method for providing wastewater treatment: _____ Not Applicable	☒	☐	
12. a. Does the project site contain, or is it substantially contiguous to, a building, archaeological site, or district which is listed on the National or State Register of Historic Places, or that has been determined by the Commissioner of the NYS Office of Parks, Recreation and Historic Preservation to be eligible for listing on the State Register of Historic Places?	NO	YES	
	☒	☐	
Not Applicable	☒	☐	
b. Is the project site, or any portion of it, located in or adjacent to an area designated as sensitive for archaeological sites on the NY State Historic Preservation Office (SHPO) archaeological site inventory?			
13. a. Does any portion of the site of the proposed action, or lands adjoining the proposed action, contain wetlands or other waterbodies regulated by a federal, state or local agency?	NO	YES	
	☒	☐	
b. Would the proposed action physically alter, or encroach into, any existing wetland or waterbody?	☒	☐	
If Yes, identify the wetland or waterbody and extent of alterations in square feet or acres: _____ _____ _____			

14. Identify the typical habitat types that occur on, or are likely to be found on the project site. Check all that apply:		
☐ Shoreline ☐ Forest ☐ Agricultural/grasslands ☐ Early mid-successional ☐ Wetland ☐ Urban ☐ Suburban		
15. Does the site of the proposed action contain any species of animal, or associated habitats, listed by the State or Federal government as threatened or endangered?	NO ☒	YES ☐
16. Is the project site located in the 100-year flood plan?	NO ☒	YES ☐
17. Will the proposed action create storm water discharge, either from point or non-point sources? If Yes,	NO ☒	YES ☐
a. Will storm water discharges flow to adjacent properties?	☐	☐
b. Will storm water discharges be directed to established conveyance systems (runoff and storm drains)? If Yes, briefly describe:	☐	☐
18. Does the proposed action include construction or other activities that would result in the impoundment of water or other liquids (e.g., retention pond, waste lagoon, dam)? If Yes, explain the purpose and size of the impoundment:	NO ☒	YES ☐
19. Has the site of the proposed action or an adjoining property been the location of an active or closed solid waste management facility? If Yes, describe:	NO ☒	YES ☐
20. Has the site of the proposed action or an adjoining property been the subject of remediation (ongoing or completed) for hazardous waste? If Yes, describe:	NO ☒	YES ☐
I CERTIFY THAT THE INFORMATION PROVIDED ABOVE IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE		
Applicant/sponsor/name: <u>Carol Howland</u> Date: <u>June 17, 2019</u>		
Signature: <u>Carol Howland</u> Title: <u>Manager, Environmental Permitting</u>		