



December 22, 2011

Honorable Jaclyn A. Brillling, Secretary
State of New York
Public Service Commission
Office of the Secretary
Three Empire State Plaza
Albany, NY 12223

Dear Secretary Brillling:

The enclosed leaves, issued by Niagara Mohawk Power Corporation d/b/a National Grid, are being transmitted for filing in accordance with the requirements of the New York State Public Service Commission ("Commission").

Second Revised Leaf No. 36
First Revised Leaf No. 195
First Revised Leaf No. 196

To PSC No. 220 Electricity

Effective: March 19, 2012

The purpose of this filing is to revise Rule No. 35 – Cable System Operator and Telecommunication Service Provider Wire Line Attachment Rates to Electric Distribution Poles including Wireless Attachment Rates. Specifically, the Company proposes to update the following rates:

1. Rule No. 35.1 – Cable System Operator System Operator and Telecommunication Service Provider Wireline Attachment Rate
2. Rule No. 35.2.2.1 1 - Wireless Attachment Rate A: The attachment fee charged Wireless Service Providers for attachment of Wireless Facilities to an existing Electric Distribution Pole
3. Rule No. 35.2.2.1.2 - Wireless Attachment Rate B: The attachment fee charged Wireless Service Providers for attachment of Wireless Facilities to a National Grid Electric Distribution Pole and such attachment requires excess pole height.

The updated attachment rates reflect current pole ownership costs and the approved allocation of such pole costs to third party pole attachers. The wire line rate was last updated in 1995. The wireless rate was last updated in 2006. The updated rates when implemented will result in an additional \$801,000 invoiced annually for third party use of electric assets. This filing also includes edits to the Definitions and Abbreviations section providing clarification on pole attachments.

Attachment 1 included with this filing sets for the calculation used to revise the rates included with this filing. Attachment 2 provides the support for the proposed calculation included in Attachment 1.

Honorable Jaclyn A. Brillling, Secretary

2

Also, waiver of newspaper advertising as required by §66(12)(b) of the Public Service Law is requested for this filing since the attachers will be notified of this filing.

Any questions regarding this filing may be directed to Ms. Maureen Gontarek, Manager, Outdoor Lighting and Attachments, (315) 428-5712.

Sincerely,

Patricia J. Rivers
Senior Rate Analyst
Electric Pricing Department

PJR