



Lori A. Cole
Manager - Regulatory & Tariffs

September 26, 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 Allowing Wireless Pole Attachment Rates To Go Into Effect on a Temporary Basis, issued and effective on September 20, 2019 (the “Order”), in the above-referenced proceeding. The tariff leaves and Statements will become effective October 1, 2019.

P.S.C. No. 119 – Electric, Schedule for Electric Service
POLE Statement No. 2 to NYSEG
Leaf No. 150, Revision 4

P.S.C. No. 19 – Electric, Schedule for Electric Service
POLE Statement No. 5 to RG&E
Leaf No. 86.1, Revision 5

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Overview

Pursuant to the Commission's Order Approving Petition in Part and Continuing Proceeding, issued and effective on March 14, 2019, the Companies filed amended tariff leaves on June 19, 2019 incorporating rates for per-foot wireless pole attachment rental rates¹. On July 16, 2019, the Commission issued an Order Suspending Wireless Pole Attachment Rate Tariff Filings and Granting a Filing Extension to the New York Municipal Power Agency. Furthermore, on July 19, 2019, The Wireless Association ("CTIA") filed a petition requesting that the wireless pole attachment rates be allowed to go into effect on a temporary basis.

Purpose of Filing

The Companies are submitting tariff amendments in compliance with Ordering Clause No. 1 of the Order to reflect the current wireline pole attachment rate and the wireless pole attachment rate on a temporary basis.

The POLE Statements submitted by the Companies reflect the wireless pole attachment rates that were submitted on June 19, 2019 by the Companies and the wireline pole attachment rates. NYSEG is better aligning the placement of the wireline and wireless attachment rates by publishing both rates on the POLE Statement; the Company is not revising the current wireline attachment rate from what appeared in PSC No. 119, on Leaf No. 150, Revision 3. Publishing both the wireline and wireless attachment rates on the POLE Statement will allow NYSEG to display the rates in the same format as RG&E.

Newspaper Publication

In accordance with Ordering Clause No. 2 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 Commission's March Order.