



June 12, 2019

Honorable Kathleen H. Burgess, Secretary
State of New York
Public Service Commission
Office of the Secretary, 19th Floor
Three Empire State Plaza
Albany, New York 12223-1350

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

Dear Secretary Burgess:

Enclosed are the following tariff leaves transmitted for filing by Niagara Mohawk Power Corporation d/b/a National Grid (“Company”) in compliance with the order from the New York Public Service Commission (“Commission”) issued March 14, 2019 in the above referenced proceeding (the “Order”).

Third Revised Leaf No. 36
Original Leaf No. 36.1
Original Leaf No. 37.3
Third Revised Leaf No. 195
Fourth Revised Leaf No. 196

To P.S.C. No. 220 Electricity
Effective: August 1, 2019

This filing is made in compliance with the Order, which directed the Company to file, within 90 days, tariff amendments and associated Short Form Environmental Assessment Forms, setting new rates for wireless pole attachments, consistent with the discussion in the Order to become effective on August 1, 2019. A further revised redline and clean version of the tariff leaves are attached. Attachment 1 contains redlined tariff leaves showing where the changes to the above leaves have occurred. Attachment 2 is the associated Short Form Environmental Assessment Forms. Attachment 3 contains the workpapers supporting the Wireless Attachment Rate Calculation.

To conform the tariff to the discussion in the Order, the Company added and revised definitions governing pole attachments. The Order also directed Niagara Mohawk to replace its existing flat rates for distributed antenna systems with the new rates and terms for wireless attachments. Consistent with the more detailed process for charging for wireless equipment, the Company is also adding clarifying language to the provisions governing accessory equipment associated with wireline attachments, to improve consistency in how wireline and wireless attachments are treated.

In addition, the Company is also using this opportunity to provide a periodic update of its Wireline Attachment Rate, found in Rule 35.1, as part of this filing. The associated workpapers are contained in Attachment 3.

In accordance with Ordering Clause 5 of this order, the requirements of PSL §66 (12) (b), §92 (2) (a), and 16 NYCRR §720-8.1 concerning newspaper publication of the proposed tariff amendments have been waived.

Please advise the undersigned of any action taken regarding this filing.

Respectfully Submitted,

/s/ Carol Teixeira

Carol Teixeira
Manager, NY Electric Pricing

Enc.

cc: Mary Ann Sorrentino, DPS Staff
Johanna Miller, DPS Staff
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