



July 27, 2015

Honorable Kathleen H. Burgess, Secretary
State of New York
Public Service Commission
Office of the Secretary
Three Empire State Plaza
Albany, NY 12223

Dear Secretary Burgess:

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. 195
Second Revised Leaf No. 196

To PSC No. 220 Electricity

Effective: November 23, 2015

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 and Telecommunication Service Provider Wireline Attachment Rate;
2. Rule No. 35.2.2.1.1 – Wireless Attachment Rate A: The attachment fee charged to Wireless Service Providers for attachment of Wireless Facilities to an existing Electric Distribution Pole; and
3. Rule No 35.2.2.1.2 – Wireless Attachment Rate B: The attachment fee charged to 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 2012. The wireless rate was also last updated in 2012. The current rates result in an under-recovery from third party pole attachers of approximately \$695,000 in pole ownership costs. The updated rates when implemented will address this shortfall and result in an appropriate allocation of such pole costs to third parties using electric assets. This filing also corrects a typographical error in the title of Rule 35.1.

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

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 Mr. Edward (Ted) Lombardi, Manager, Outdoor Lighting and Attachments, (781) 907-3256.

Sincerely,

/s/ Patricia J. Rivers

Patricia J. Rivers
Lead Rate Analyst
New York Electric Pricing

PJR