

September 30, 2021

TO: Debra Smith, General Manager and CEO

FROM: Kim Kinney, Division Administrator – FSBU ____

SUBJECT: Filing of DPP 500 P III-804 “Wireline Attachments on City Light Poles”

The attached Department Policy and Procedure DPP 500 P III-804 has been proposed for adoption and is being submitted for your approval.

The public comment period has concluded and there were no comments received for our notice of proposed rulemaking. In that regard, we are ready to finalize the DPP and request that you sign the enclosed memo and DPP document to be filed with the City Clerk’s Office.

The attached City Light Department Policy and Procedure has been reviewed and contained herein is my authorized approval for the above noted action.

Signature:		Date Approved:	09/30/2021
Title:	General Manager and CEO		

WIRELINE ATTACHMENTS ON CITY LIGHT POLES		
DPP NUMBER	DPP 500 P III-804	
EFFECTIVE DATE	10/01/2021	SUPERSEDES DPP 500 P III-804 dated 11/4/1994
APPROVED BY	<i>D. M. Smith</i>	

1.0 **PURPOSE:**

To clarify City Light Department (“Department”) policy for wireline attachments made to poles owned wholly or in part by the City and under the jurisdiction of the Department (“poles”), as further set forth in Seattle City Light’s Construction and Materials Standards and Practices (“Standards”) and the Master Pole Attachment Agreement (“MPAA”).

2.0 **POLICY**

2.1 Scope. This policy pertains to all attachments made in or below the communication space (e.g., cables and associated equipment, power supplies, and signs) to poles either owned or jointly owned by the Department.

2.2 Purpose of Infrastructure. The Department will accommodate the needs and interests of companies seeking to access and utilize Department infrastructure if and only if such use does not interfere with the core purpose and function of such infrastructure, which is for safe and reliable delivery of electric services. Users of any poles or other facilities must, at all times, ensure the continued operational integrity, safety, and reliability of the Department’s electric services, as well as the safety of Department personnel and the general public.

2.3 Application for Attachment.

2.3.1 General Requirements.

2.3.1.1 Prior to submitting an application, an Applicant must have an executed MPAA with the Department and must provide a valid Certificate of Insurance (“COI”) to the Department. The MPAA and COI must remain effective for as long as the Applicant has attachments on poles.

2.3.1.2 All Applicants must have an account with AldenOne. AldenOne is free for Applicants and is used to notify Applicants of violations or transfer requests for their attachments.

- 2.3.1.3** All Applicants seeking to install direct, overlash, or co-lash attachments, strand-mounted antenna assemblies, or power supplies are required to submit an application to the Department. This submittal must include a completed version of the current application form used by the Department, an aerial map of the poles requested, the type of attachment, and the desired attachment height on the pole.
- 2.3.1.4** The Applicant shall inform the Department within 30 days upon completion of the attachment.
- 2.3.1.5** Department will inspect each attachment and correct any work that does not comply with the Standards. The Department may require the Applicant to make corrections in the communications space. The Applicant shall pay for any costs and fees necessary to bring the attachment into compliance.

2.3.2 Overlash.

- 2.3.2.1** The Department will review and return a permit to overlash within 10 business days of receipt of a complete application. This review will not include the evaluation of any potential Make Ready Work required.
- 2.3.2.2** The Applicant shall inform the Department upon completion of the overlash.

- 2.3.3 Co-Lash.** As part of the application, Applicants seeking to Co-lash must submit to the Department evidence of written consent from the owner of the initial attachment.

2.3.4 Strand-Mounted Antenna Assemblies.

- 2.3.4.1** As part of the application, applications must include the pole numbers for both the pole to which the strand-mount will attach and the pole that will supply the power to the stand-mount.
- 2.3.4.2** Each application shall include a Non-Ionizing Electromagnetic Radiation (NIER) report for each manufacturer and model of equipment being installed.
- 2.3.4.3** Strand-mount antennas shall be installed and maintained in compliance with SCL Construction Standards.

2.3.5 Pole Attachments Made Below the Communication Space.

2.3.5.1 Power Supplies.

- 2.3.5.1.1** A separate power supply application must be submitted for each pole. The Applicant must check the box and sign on the application form requesting electrical service. The Applicant shall indicate the amperage requested for the power supply and include the specifications and a diagram for the proposed power supply.

2.3.5.1.2 Power supply applications may be combined with applications for strand-mounted antenna assemblies. These combined applications will contain one power supply; all associated strand-mounted antennas in the application must be connected to the one power supply.

2.3.5.1.3 Enclosures shall be installed in compliance with SCL Construction Standards

2.3.5.1.4 Power supplies shall be fused by the Department at the service point. Fuse options are detailed in City Light Standards. Billing for power consumption will be based on the fuse rating. If an Applicant can demonstrate to the Department's satisfaction that actual consumption, based on current load studies or load center reports, is less than the consumption based on the fuse rating, then billing may be based on an average of actual consumption. Average amps will be rounded up to the nearest whole amp. If the average of actual consumption is approved for use by the Department the Applicant must update the load center report by December 1st each year. Failure to do so will result in billing at the fuse rating in the following year. Applicants must also update load studies when equipment models or manufacturers have changed.

2.3.5.2 Non-Powered.

2.3.5.2.1 Mirrors. In addition to meeting the requirements for an application outlined in General Requirements (§2.3.1), the Applicant must also obtain approval from the relevant jurisdiction with authority over applicable right of way (such as Seattle Department of Transportation) prior to attaching a mirror to a pole.

2.3.5.2.2 Risers. An Applicant that has an existing attachment on a pole is not required to submit another application to attach risers on the same pole.

2.3.5.2.2.1 Risers must be installed in compliance with SCL Construction Standards.

2.3.5.2.2.2 If correct riser placement cannot be determined per SCL Construction Standards, contact Joint Use Engineering for guidance.

2.3.5.2.3 Cameras. Cameras, such as those used for law enforcement or traffic control, may be allowed by the Department and joint pole owners. Privately owned cameras must be approved by the Privacy Champion in advance of a request being considered by the Department.

2.3.6 Transmission Poles.

2.3.6.1 Wood Transmission Poles. In addition to the general requirements Applicants must provide detailed information regarding the proposed attachment including cable type, weight, and loading.

2.3.6.2 Metal Transmission Poles. Metal transmission poles are typically not eligible for attachment unless specifically authorized by the Department.

2.3.7 Out of Scope.

2.3.7.1 Traffic Signals. As part of the evaluation process, the Department may encounter traffic signals that require Make Ready Work. Performing this Make Ready Work and all associated billing is the responsibility of the relevant jurisdiction with authority over applicable public right of way. The Department will forward the request to the appropriate authority. This work must be complete prior to the Department issuing a permit to the Applicant.

2.3.7.2 Joint ownership in poles. Many poles in the Department's territory are owned jointly with other entities including Ziplly, Lumen, and King County Metro. It is the Applicant's responsibility to enter into an agreement or obtain any necessary approval from joint owners before attaching to jointly owned poles.

2.3.7.3 Poles not owned by the Department. The Department cannot review or approve requests to attach to infrastructure that is not owned in whole or in part by the Department. Applicants must apply to the owner for attachment on such infrastructure.

2.3.7.4 Metal streetlight poles. Metal streetlight poles are not eligible for attachment.

2.4 Make Ready Work.

2.4.1 Upon receipt of a complete application, the Department will evaluate the requested poles for any necessary work as detailed in the MPAA.

2.4.2 Construction Charges. An estimate of the cost for work to be performed by the Department will be provided to the Applicant. This estimate shall be paid before the work commences. Payment for work must be received within 30 days of billing instrument transmittal for amounts up to \$50,000 or within 60 days for amounts exceeding \$50,000. A final bill will be issued for time and material already accrued. The need for additional work ("Corrective Work") may also be identified after the Attachment is made or during subsequent inspections. A final bill will be issued upon the completion of the work to reconcile charges to actual expense.

2.4.3 Non-Departmental Charges. In addition to charges invoiced by the Department, there may be additional costs charged to the Applicant from co-owners or from other jurisdictions with authority over applicable public right of way for their portions of the work.

2.4.4 All Make Ready Work and Corrective Work is the financial responsibility of the Applicant and must be performed by the Department or its authorized agent.

Attachments may not be moved or adjusted without prior direction from the Department. With prior approval, Applicants may be permitted to self-perform some types of work. Only Department-authorized crews or agents are permitted to work in the Supply Space.

2.5 Permit Issuance.

2.5.1 Upon completion of Make Ready Work, the Department will issue a permit to attach to the requested poles. The permit will be valid for 180 days. During this time, the Applicant shall install its attachments and notify the Department within 30 days of installation.

2.5.2 Extensions. A 90-day extension may be requested by the Applicant by demonstrating a need therefor. City Light may allow or disallow this request at its sole discretion. Expiration of the permit, including any extensions will require a re-submittal of the application.

2.5.3 Out of Scope. The permit provides permission from the Department to attach. The permit does not provide permission from any co-owners or other jurisdictions with authority over applicable public right of way to attach to the pole or perform the work. The permit is not an electrical permit. If needed, the Applicant must apply for and obtain an electrical permit from the Seattle Department of Construction and Inspections or other Authority Having Jurisdiction.

2.6 Installation and Maintenance.

2.6.1 Installation.

2.6.1.1 Applicants shall install attachments in adherence with the MPAA and SCL Construction Standards.

2.6.1.2 Applicants shall install attachments at the height on the pole indicated on the permit issued by the Department.

2.6.1.3 Communication Brackets. Brackets must be installed per SCL Construction Standards. If directed by the Department to install Communication Brackets, the Applicant shall contact SCL Joint Use to purchase brackets.

2.6.2 Attachment Transfers.

2.6.2.1 Upon receiving a notification for attachment transfer from the Department in AldenOne, the Applicant will have 30 days to perform the work.

2.6.2.2 Applicant shall take a picture of each completed transfer with both the Organization Code and pole tag visible and upload the picture to the AldenOne notification.

2.6.2.3 Failure to perform the work within the allotted time may result in a fine detailed in §2.7. If an Applicant is unable to complete the transfer within the allotted time due to circumstances beyond their control, the Applicant must provide the Department the justification for delay, the AldenOne conversation number, and the expected completion date prior to the allotted time expiring. Failure to complete the transfer within the expected

completion date without communication from the Applicant will result in a fine as detailed in §2.7.

2.6.3 Guying and Anchoring.

2.6.3.1 Applicant shall install guys and anchors in compliance with Department Standards, Work Practices, and MPAA requirements.

2.6.3.2 Guy Markers used shall meet the requirements detailed in SCL Material Standards.

2.6.3.3 Applicant shall not utilize anchors owned by the Department or any co-owners.

2.6.4 Annual Rate

2.6.4.1 For every Attachment on a pole, the Applicant will be assessed an annual rental rate pursuant to SMC 21.49.065.

2.6.4.2 Attachments shall be billed upon permit issuance and are not pro-rated for the year that the permit was issued.

2.6.4.3 An annual rental invoice will be sent to the Applicant consistent with the MPAA. Data used in calculating annual rental rates will be reviewed by the Joint Use Manager prior to preparation of invoices.

2.6.4.4 Annual rental billing will continue until the Applicant informs the Department in writing or an agreed upon manner that the attachments have been removed.

2.7 Fines.

Department may impose fines for violations of the MPAA, safety codes, or Standards pursuant to the default provisions of the MPAA and consistent with Seattle Municipal Code Section 21.49.140. Fines that may be imposed are listed below in Table 1.

Table 1: Fines

Infraction	Fine per pole
Safety Code Violation (NESC) (WAC/OSHA/WISHA)	\$500
Failure to Attach Owner Tags or Warning Placards	\$100
Unauthorized strand mount antenna assembly	\$250
Failure to Transfer Lines within 30 days of receiving notice	\$500
Failure to follow attachment instructions from Department	\$250
Failure to obtain electrical permit	\$250
Violation of other Standard or MPAA	\$100
Unauthorized Attachment	5 times annual rent, plus interest

3.0 **DEFINITIONS:**

- 3.1 **Applicant.** The individual or entity that has applied for a permit to attach to a pole and who will be responsible for ownership, maintenance, and payment for any installed assets on poles.
- 3.2 **Attachment types**
 - 3.2.1 **Direct.** A new attachment that requires the Applicant to attach to the pole by means of a through-bolt, communication bracket, J-hook or other mechanical means. Not to include conduit.
 - 3.2.2 **Overlash.** Placing an additional cable on another cable or messenger wire owned and operated by the same company, person or entity.
 - 3.2.3 **Co-lash.** Placing an additional cable on another cable or messenger wire owned and operated by a different company, person or entity.
- 3.3 **Communication Space.** The space on the pole where communications cables and equipment can be located and accessed by a qualified communications worker. See SCL Construction Standard 0093.04.
- 3.4 **Communication Worker Safety Zone.** The minimum distance between the Communications Space and Supply Space as defined in NESC Section 235 and 238 and SCL Construction Standard 0093.04.
- 3.5 **Corrective Work.** Work discovered any time after the attachment has been installed, which the Department requires to be corrected by the Department or its authorized agent, at the expense of the Applicant, to meet applicable safety codes or Standards.
- 3.6 **Make Ready Work.** Work the Department requires to be performed by the Department or its authorized agent, at the expense of the applicant, as a condition of attaching to a pole, either before approving the Applicant's attachment, or as may be required to meet applicable safety codes.
- 3.7 **Supply Space.** The space on the pole where supply cables and equipment can be located and accessed only by qualified electrical workers. See SCL Construction Standard 0093.04.

4.0 **REFERENCES:**

- 4.1 National Electrical Safety Code (NESC)
- 4.2 Washington Administrative Code (WAC) 296-45 and WAC 296-46B
- 4.3 Seattle City Light Construction, Material Standards and Work Practices
- 4.4 SMC 21.49

5.0 **APPENDIX:**

- 5.1 Distribution: Posted online @ [Seattle City Light Public Policies](#)

REVISION HISTORY:

DATE	CHANGES MADE	REVISED BY
09/13/21	Revised policy and procedure to align with current business practices.	Author: Steve Crume Coordinator: Kim Kinney






DPP III-804 Wireline Attachments on City Light Poles

Final Audit Report

2021-09-30

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