## AMERICAN ELECTRIC POWER TRANSMISSION STRUCTURE ATTACHMENT POLICY

AEP has a fiduciary duty to our customers and stakeholders to provide and maintain safe, efficient, and reliable energy. AEP expects third-party Communication Companies (CC) proposing attachment(s) to AEP Transmission structures to value AEP's duties and not add any unnecessary costs to AEP projects. Due to new standards, environmental restrictions, safety concerns, and construction requirements, AEP Transmission requires that CC follow the policy and process outlined below when attaching, transferring, and relocating to AEP Transmission structures.

## General

AEP Transmission does not allow third-party foreign attachments on Transmission Line structures that do not have AEP Distribution underbuild. CC must have an active Pole Attachment agreement with an AEP operating company in order to attach. AEP reserves the right to deny third party attachments where such attachments would compromise clearance or strength requirements.

Safety is a concern for everyone. During the time of any inspection, construction, and maintenance activity, CC shall consider the electric wires of AEP to be energized, that working in the vicinity of the wires poses potential hazards, and shall warn its Employees, Agents, Contractors, and Subcontractors of the potential dangers. CC shall not be working within the energized work zone unless they are a qualified electrical contractor. All facilities must be designed and installed in accordance with the National Electrical Safety Code (NESC), applicable state and federal laws, municipal ordinances and regulations, and AEP Standards. No exceptions to the AEP Standards are permitted without written approval from AEP Transmission. The CC must provide the design sag and tension of each proposed cable to AEP, so that AEP can confirm compliance with these requirements and Standards.

## **Proposal Process for New Attachments**

During the design phase of aerial cable facilities proposed by CC for installation on AEP Transmission Structures, CC shall expect the following:

- CC will submit the *Permission to Attach* form as identified in the Pole Attachment Agreement. A maximum of 50 pole attachments on each Proposal is allowed for manageable processing. If multiple communication conductors are proposed, each must be submitted on a separate form.
- Should the CC require attachment to more than 50 poles, contact the local AEP operating company Joint Use (JU) Representative to discuss processing requirements and scheduling. Provide a current route map of the request prior to this discussion.

- No attachments shall be made to AEP structures prior to receiving a written approval of the CC Proposal from AEP.
- AEP will perform a Pole Loading analysis on each Structure to evaluate applicable clearances and the capacity of the pole to handle the additional loading.
- The cost of the associated field surveying and engineering required to determine if the proposed installation will not exceed the design capabilities of the installed Transmission Line Structure will be paid for by the requesting CC. Payment may be requested in advance.
- Rates for inspection for single pole loading calculations and other engineering services are subject to change. Current rates can be obtained from the JU Representative.
- Estimated engineering costs for multi-pole or complex structures will be provided to the CC by AEP or AEP Consultants following an evaluation of the *Permission to Attach* form. CC authorization of the cost estimate is required before AEP will proceed with the analysis.
- All Riser requests must be identified in the CC proposal. Written approval by AEP Transmission is required prior to installation.
- Overlashing additional cable to existing messenger wire must be requested in the same fashion as a new attachment.
- Review of transmission structures generally are, but not guaranteed to be, completed within 45 Days.

## **Transfer and Relocation Process**

The CC must comply with the following requirements when transferring or relocating their cables from existing to new AEP Transmission facilities.

- AEP will notify CC of project rebuilds that have existing Joint Use (JU) attachments, and their associated schedules. CC are required to meet AEP Transmission project schedules when transferring CC facilities to the new AEP Transmission facilities or the CC may be denied permission to attachment.
- Prior to the Transmission Engineering Phase, CC must notify AEP of cables to be abandoned.
- If CC do not have access to the equipment or qualified workers to transfer cable, due to the height or location of the attachment(s), CC must coordinate the work with AEP qualified contractors. Only AEP approved qualified workers are allowed in the supply space. Communication workers shall not enter the supply space.
- CC are responsible for the transfer, relocation, or removal of abandoned cables and all associated hardware within 30 calendar days of notification of construction completion in order to meet State specific pole removal requirements and timelines.
- If CC are non-compliant, AEP may contract with third party contractors to make JU transfers with all costs billed to the CC. AEP Contractors will transfer the cables and leave the wires un-spliced.

- On the 31st day following construction complete AEP contractors will remove all temporary access roads. Cost incurred by extending access beyond 30 days including restoration thereafter will be billed to the CC.
- Drilling holes for attachments into AEP structures shall not be performed without
  written authorization from AEP Transmission. Only approved AEP Distribution
  and Transmission Contractors are allowed to drill and treat steel poles. Any
  resultant damage caused by unauthorized drilling will be billed to the
  corresponding CC.
- When drilling into steel poles is not permitted, the CC shall band attachments using stainless steel bands of sufficient strength to resist the force of all the proposed attachments, including all guys.