QUARTERLY CHECK-IN



POLE ATTACHMENT SERVICES QUARTERLY WORKSHOP



PRESENTED BY:

Pole Attachment Services Dept.

04 SEP 2025

SAFETY

BACK TO SCHOOL TRAFFIC SAFETY



- Bus Laws
  - Yellow flashing lights means bus is preparing to stop and load/unload students, slow down and proceed with caution
  - Red flashing lights with extended stop sign means students are loading/unloading and drivers in both directions must stop; do not pass bus until red lights stop flashing & extended stop sign has been pulled in
- Watch out for students and other pedestrians
  - Reverse responsibly
  - Slow down & be alert (also watch out for bicycles)
  - Complete Stops
  - Speed Limit
  - Eliminate distractions
  - Remain vigilante and anticipate potential obstacles



AGENDA

- Safety
- Announcements
- General Topics
- 4th Further Notice of Proposed Rulemaking
- 5th Report and Order
- Applications
- Additional Items

GRID TRANSFORMATION SERVICES

- Gautam Kakaiya is the Director for Grid Transformation Services; he started with CPS Energy in 2023
- Gautam has previously led the Grid Modernization team including the execution of the Community Energy Resiliency (CER) Program
- Prior to joining CPS Energy, Gautam has previous experience in the energy sector as a Project Manager in R&D in natural gas distribution and transmission and as a design engineer in the nuclear power generation industry



GENERAL TOPICS

DEPARTMENT EMAILS

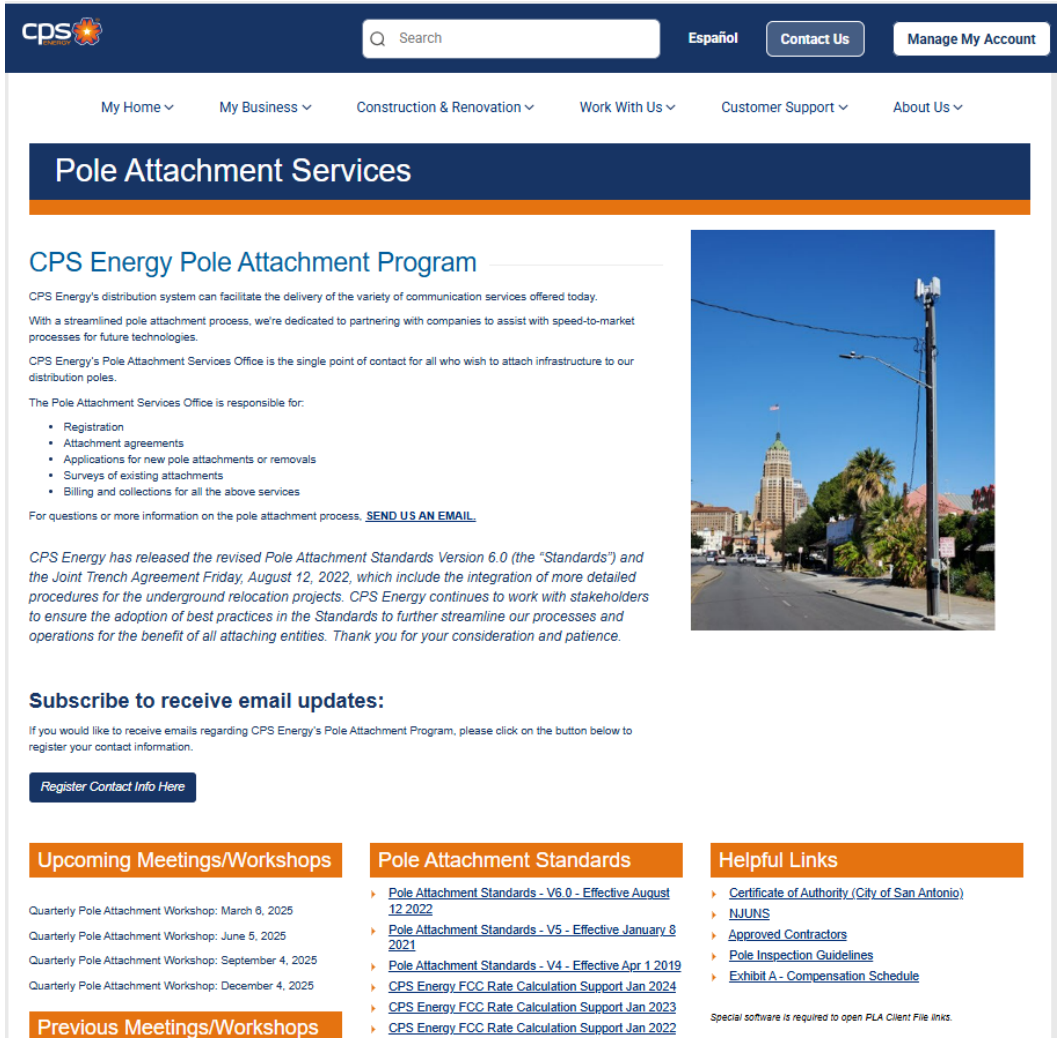
- PAS Team
  - wsmeathers@cpsenergy.com
  - jvortega@cpsenergy.com
  - ralanis@cpsenergy.com
- General Questions
  - poleattach@cpsenergy.com
- Pole Applications Mailbox
  - poleapplications@cpsenergy.com
- Bandit Signs
  - banditsigns@cpsenergy.com



Bandit Signs

POLE ATTACHMENT SERVICES WEBPAGE

- Upcoming Meetings/Workshop
- Previous Presentations
- Pole Attachment Standards
- Rate Calculations
- Agreements
- Approved Contractors
- Forms



APPROVED CONTRACTORS

Engineering
ADB ★★★
Aeparmia ★
AWE, LLC ★
Binkley & Barfield ★★★
Black & McDonald ★★★
Byers Engineering ★
Cobb Fendley ★★★
Millenium/DeBauche ★
ENTRUST ★★★
Halff ★★★
LJA Telecom ★★★
Merrick & Company ★★★
Mountain, LTD. ★★★
Orbital Engineering ★
Quanta Utility Eng. Services ★★★
Surveying & Mapping, LLC ★★★
TDC2, LLC ★
TechServ ★★★
Telecom Staffing, LLC ★★★
TexasPro Engineering ★★★
TOP Engineers + ★★★
Tower Engineering Prof., Inc. ★★★
TRC, Inc. ★★★
Utility.Engineering ★★★

Electrical Distribution Construction
Chain Electric
Pike Electric
Greenstone
Source Power

One-Touch Transfer Construction
BComm Constructors, LLC
Ervin Cable Construction, LLC
Quest Utility Construction, Inc.
S&S Cable Communications
Tero Technologies Inc.
TEXSTAR Enterprises, Inc.
TX Superior Communications, LLC
JC Communications
ADB Companies
A2 Total Telecom Services LLC
B Robinson Inc.
CJ Hood Communications
US Aerial
HMI Utilities
Global Optics

Vegetation Management
Asplundh Tree Expert
Davey Tree Surgery
McCoy Tree Surgery

★ Option 1: Pole Loading Analysis (PLA) & Application submittal

★★ Option 2: Make ready engineering

★★★ Option 3: Pole Loading Analysis (PLA), Application submittal & Make ready engineering

APPROVED ENGINEERING FIRMS

- The PAS team periodically identifies firms that have not submitted applications & then will remove them from the Approved Engineering Firms list
  - This review will be conducted every 6 months
- It takes 90 days for individual credentials to expire
  - The firms removed had been inactive for much longer
- Firms will need to re-apply to become approved, going through the entire approval process as if it were the first time

Engineering Firms that are collectively working on the applications & EMR design are to submit applications together

REGISTRATION & ANNUAL REPORTING FORM A1

- Is **Required** to be completed annually by **September 1st** of every year
- The form can be found on the Pole Attachment page on the CPS Energy website

Attaching Entity Registration & Annual Reporting Form

To be completed annually by September 1st or as required due to contact information changes

Submit form via email to poleattach@cpsenergy.com , Email Subject Line: Annual Registration & Reporting Form

Date Form Submitted to CPS Energy: _____

Attaching Entity General Information	
Attaching Entity Name	
Corporate Address	
Local Address	
Form Submitted by	
Telephone Number	
Email	

Does This Entity Hold a Certificate from the Public Utility Commission of Texas?	Y / N
If Yes, Indicate Certificate Number and Date Received	

Has This Entity Been Granted a Franchise, Licensee Agreement, Permit, or Ordinance by the City of San Antonio?	Y / N
If Yes, Indicate Certificate Number and Date Received	

A1 Registration & Annual Reporting Form

PAS GIS TRAINING CLASSES

GENERAL TOPICS

- Future Trainings – Please submit the name & company to get on the list for the next available training (TBD)
  - Date: TBD (working on scheduling) with training for availability
    - Next class is @ capacity, continue to submit for future training sessions
  - Duration: 5 days Mon – Fri
  - Location: Virtual
- For more information, please email poleattach@cpsenergy.com
- The maximum class size is 6 & the minimum is 3
- **You will receive a set-up walkthrough from the GIS team that needs to be completed prior to the course starting**

PAS GIS TRAINING CLASSES

GENERAL TOPICS

- GIS training **DOES NOT** cover:
  - Pole Attachment Standards
  - Distribution Standards and Specifications
  - Pole Attachment Process
  - **Replace Design Training**

- GIS Training DOES cover basic GIS design training to submit EMR designs which include:
  - Transformers, Streetlights Etc.
  - Pole change outs (PCO)
  - Setting mid-span poles

CPS Energy led GIS training isn't a replacement for design training

PAS GIS TRAINING CLASSES
POLE APPLICATION PROCESS

Engineering Firms should:

- Make sure that all new &/or replacement employees as well as contractors are trained on:
  - Pole Attachment Standards & pole attachment process
  - Electrical make ready designs to streamline the rejections
- Continue to train their employees on the importance of communication regarding worker safety zones & applicable clearances

It's the engineering contractor's responsibility to learn how to fill out the application & understand CPS Energy standards

POLE ATTACHMENT STANDARDS

- **CPS Energy has re-launched its efforts to further develop the standards in August 2025**

- CPS Energy is proactively seeking feedback on its processes as part of the revisions to the standards

- "While CPS Energy has looked to FCC pole attachment access rules for guidance, CPS Energy is not bound by such regulations. "

- "In adopting these Standards, CPS Energy has attempted to incorporate new and evolving best practices and recommendations that have been developed and endorsed at the national level, such as the Federal Communications Commission’s (FCC) recommendations..."

POLE ATTACHMENT STANDARDS: 4TH FURTHER NOTICE OF PROPOSED RULEMAKING CONSIDERATIONS

TIMEFRAMES TO ATTACH

- **FCC**
  - The FCC is seeking comment on proposal to require attaching entities to install their facilities on a pole within 120 days of completion of make-ready work
    - Requesting feedback on potential penalties if attaching entities fail to meet the timeline

- **Pole Attachment Standards**
  - Attaching Entity must exercise the right granted by the CPS Energy Notice to Proceed within ninety (90) calendar days of issuance of the Notice to Proceed
    - Attaching Entity May request an additional thirty (30) calendar day extension to the Notice to Proceed
    - The extension request must be received no later than seven (7) calendar days before the expiration date of the Notice to Proceed
  - Failure to install an Attachment within the effective period of the Notice to Proceed, or extended period if granted, will result in the expiration of the Application
  - Should the Attaching Entity wish to continue to install subject to the expired Application, the Attaching Entity must submit a new Application covering the same Attachment including all appropriate Application fees

MAKE READY ESTIMATES

- **FCC**
  - The FCC is seeking comment on whether attaching entities should be required to pay make-ready estimates within a set timeframe, such as 30 days

- **Pole Attachment Standards**
  - The estimate provided in the CPS Energy Authorization for Make-Ready Work form shall be valid for fifteen (15) days of issuance.
  - Should the Attaching Entity not indicate its acceptance within the fifteen (15) day time-frame, the Application shall be deemed cancelled.
  - CPS Energy will not schedule or release to construction any Make-Ready Electrical construction work on behalf of an Attaching Entity until the advance payment is received in full by CPS Energy.

OTMR FOR COMPLEX WORK

- **FCC**
  - The FCC is seeking comment on whether one touch make ready should be expanded to complex transfers.
    - Questions regarding contractor qualifications are also proposed.

- **Pole Attachment Standards**
  - One-Touch Transfer mean the transfer, relocation, or alteration of third-party Attachment Communication Facilities or Mid-span Installations whether conducted by an Attaching Entity or CPS Energy subject to the requirements described in Section IV.B.5, and Section V.B.5.
  - Simple Transfer means the transfer, relocation, or alteration of any Attachment or Overlash on an existing Pole or onto a new Pole that does not require cutting and splicing of the Communication Facility subject to such transfer, relocation, or alteration. A Simple Transfer may include the transfer, relocation, or alteration of a Wireless Installation that is mounted or otherwise supported by a Pole.

CONTRACTOR ONBOARDING

- **FCC**
  - Utilities shall respond to any request by an attacher to add an additional contractor to a utility-approved list within 30 days of receipt of request
  - The FCC, "require that requests to add attachers to utility-approved lists be deemed approved if a utility fails to respond to such requests by the 30-day deadline"
    - Utility shall promptly on-board the contractor as necessary to commence work

- **Pole Attachment Standards**
  - All Engineers considered by the Attaching Entity must be approved by CPS Energy before undertaking any engineering work on behalf of the Attaching Entity. CPS Energy approval shall not be unreasonably withheld, conditioned, or delayed. CPS Energy shall maintain a list of pre-approved Engineers on its website. The Attaching Entity's Engineer shall adhere to all Applicable Engineering Standards and requirements of CPS Energy. Failure to comply with such standards and requirements may result in CPS Energy retracting its approval of the Engineer. If CPS Energy reasonably determines that non-compliance by the Engineer resulted in substandard work, the Attaching Entity shall be required to remedy all work conducted by the Engineer that does not comply with the Applicable Engineering Standards and any other requirements of CPS Energy at the sole expense of the Attaching Entity.

POLE ATTACHMENT STANDARDS: 5TH REPORT AND ORDER CONSIDERATIONS

FCC ADVANCE NOTICE & MEET-AND-CONFER REQUIREMENTS

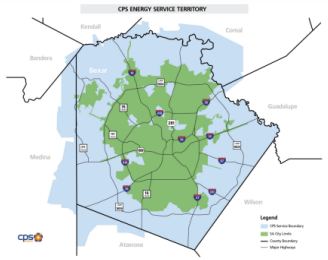
- Requires attachers to provide written notice to utilities of forthcoming pole attachment orders

- "Both attachers and utilities cite the need for better coordination in the pole attachment process. And the Commission has always encouraged a "high degree of pre-planning and coordination between attachers and pole owners to begin as early in the process as possible."

PROACTIVE COMMUNICATION

INCREASE IN APPLICATIONS / POLE COUNT

- Funding Programs – Texas Broadband Development Office
  - Boot
  - Boot II
  - Pole Replacement
  - IIJA BEAD
  - IIJA Digital Opportunity Program
- Other local level programs
- Please proactively communicate with the Pole Attachment Services Department regarding large scale deployments



Counties in CPS Energy Territory

- Atascosa
- Bandera
- Bexar
- Comal
- Guadalupe
- Kendall
- Medina

29

Slide from March Quarterly

FCC ADVANCE NOTICE & MEET-AND-CONFER REQUIREMENTS

- Advance Notice
  - Large Orders (3,000-6,000) require a minimum of 60-day advance notice
    - Require attachers and utilities to meet and confer within 30 days after advance notice is given to negotiate in good faith the mechanics and timing by which Large orders will be processed.
  - Mid-Size orders (300-3,000) poles require a minimum of a 15-day advance notice
  - Smaller orders, less than 300 poles, will not be subject to this requirement
  - "If an attacher fails to provide timely advance notice of such orders must, upon prompt notice from the utility, still wait for the relevant advance notice period before the applicable timeline begins"

- Meet and Confer
  - Require attachers and utilities to meet within the 30-day period after the attacher sends written notice for Large Orders

FCC APPLICATION TIMELINES

SURVEY & ESTIMATE

Pole Attachment Timelines			
Pole Access Phase	**Regular Orders**	**Mid-Sized Orders**	**Large Orders**
Application Completeness Review	10 BD	10 BD	10 BD
Survey/Review on Merits	45	60	90
Estimate	14	14	29
Total	73*	88*	133*

*Using 14 calendar days rather than 10 business days

FCC APPLICATION TIMELINES

ONE TOUCH MAKE READY

Pole Attachment Timelines			
Pole Access Phase	**Regular Orders**	**Mid-Sized Orders**	**Large Orders**
Application Completeness Review	10 BD	10 BD	10 BD
OTMR Application Review	15	30	45
Total	29*	44*	59*
*Using 14 calendar days rather than 10 business days			

APPLICATION TIMELINES

MAKE READY TIMEFRAMES

Pole Attachment Timelines			
Pole Access Phase	**Regular Orders**	**Mid-Sized Orders**	**Large Orders**
Above Comms Make-Ready (Electric Space)	90*	135*	180*
Communications Space Make-Ready	15*	30*	45*

*After Attacher Payment

APPLICATIONS

APPLICATION SUBMITTALS

- Submitting firms need to coordinate with their EMR WR Design teams during the entire Permit Application Review Process
  - Reviewing firms identified multiple instances where the Permitting teams were not coordinating with their EMR Design teams which created confusion & issues
- Modifications to the standard CPS Energy Pole Attachment Permit Application template makes it difficult for reviewing firms to process the application
- The Standard CPS Energy Pole Attachment Application template can be found in the CPS Pole Attachment Services website

COMMON APPLICATION ERRORS

- Application missing required information
  - CPS Energy Pole number (PL#) missing on application
  - Make ready not called for on the application
  - Missing required attachments at submittal of application
- Mistakes on Pole Loading Analysis
  - **All existing violations on pole are not fixed or creates a new violation**
  - Incorrect construction grades
  - Missing cables on pole
  - Incorrect cable tensions
  - Mid-span clearance issues
- The application review shot clock will reset with every application rejection
- Contractors should NOT change the attaching entities application name on rejections, only a REV designation should be added to the end of the application name
  - Example – Tag Number-Year-Application *Number_REV#

*Needs to be a new revision number, otherwise it causes billing issues

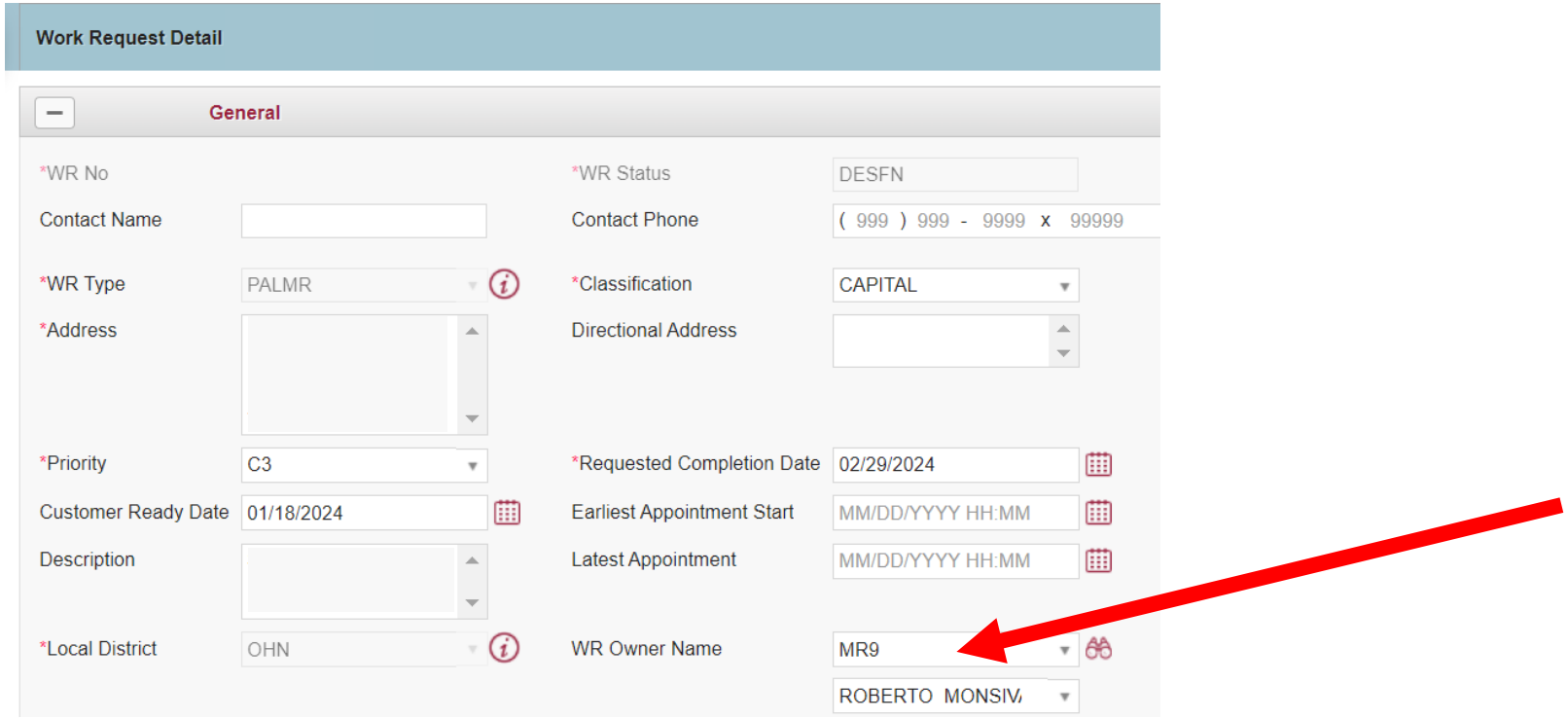
COMMON APPLICATION ERRORS

- Pole Loading Analysis (PLA) Report(s) should include coversheet stamped by a PE, or each individual PLA Report is to be stamped
- Pole information on PLA Reports should reflect that of application height information. Pole Capacity Utilization Percentage should also match on Application & more UTD PLA Reports
- Correct wire Sizes/Types, Equipment Sizes/Types, Tensions & Ownership need to be utilized
- Anchor(s)/Downguy(s) at appropriate Lead Lengths/Attachment Heights, as shown on the application. (If applicable)
- Pole Number, Class/Height, Species & Construction Grade, shown as it exists or is proposed on the application

PLA Analysis shall be valid for no longer than six (6) months from the time of Application Submission. After six (6) months, a new PLA analysis will be required

DESIGNER RESPONSIBILITY

- **The Designer is the owner of the Work Order & GIS from the creation through the As-Builts**
- Make sure that the designer's initials are indicated under Work Request Owner to ensure delivery of emails as tasks are completed



DESIGNER RESPONSIBILITY

- **EMR WR designer needs to coordinate with their internal Permitting Teams during the entire Permit Application Review Process**
  - Designers must verify if there are any overlapping WR Polygons in GIS during the design process prior to submitting the Application Package for review
  - If there are multiple WR Polygons in GIS, designer needs to coordinate with the other designer
  - Work Manager tasks need to have the appropriate Responsible Person once Work Order has been created
  - EMR WR's need to be pushed through scheduling & construction in a timely manner once they are approved

WORK MANAGER PROCESS

MAJOR TASKS

Attached Files

Remerge	Update	Refresh Date	Attachment File Name*	Description
		Nov 13, 2023	COSA_188645_20230831_extended.pdf	COSA PERMIT
		Oct 24, 2023	COSA_188645_20230831.pdf	COSA PERMIT
		Oct 24, 2023	WR#40761043 FINAL FOR CONSTRUCTION_PE Sealed.pdf	FINAL FOR CO
		Oct 06, 2023	40761043_2_202310061439_10-06-2023(14_39_35).pdf	DNU
		Jul 21, 2023	40761043_2_202307210832_7-21-2023(08_32_28).pdf	DNU

Total items: 22

Attachments for Work Request

*These are not the only attachments that would need to be attached; This is not a comprehensive list

- 2460 for Entrust- Zsofia Cassidy (CZ), TRC- Steven Chavez Martinez (CSTE), QUES- Brandon Perez (PBT1)
- Permit Attachments expected at task 2360*
  - Design for Review (preliminary)
  - Design for Construction (final)
  - Dig Tess (number should also be on the design)
  - Gas Maps
  - SAWS/Water Maps
  - CPS Energy Environmental forms/approvals (design notes should be in red)
- Permit attachments expected before 5000 approval
  - TXDOT approval
  - City/County approval

WORK MANAGER PROCESS

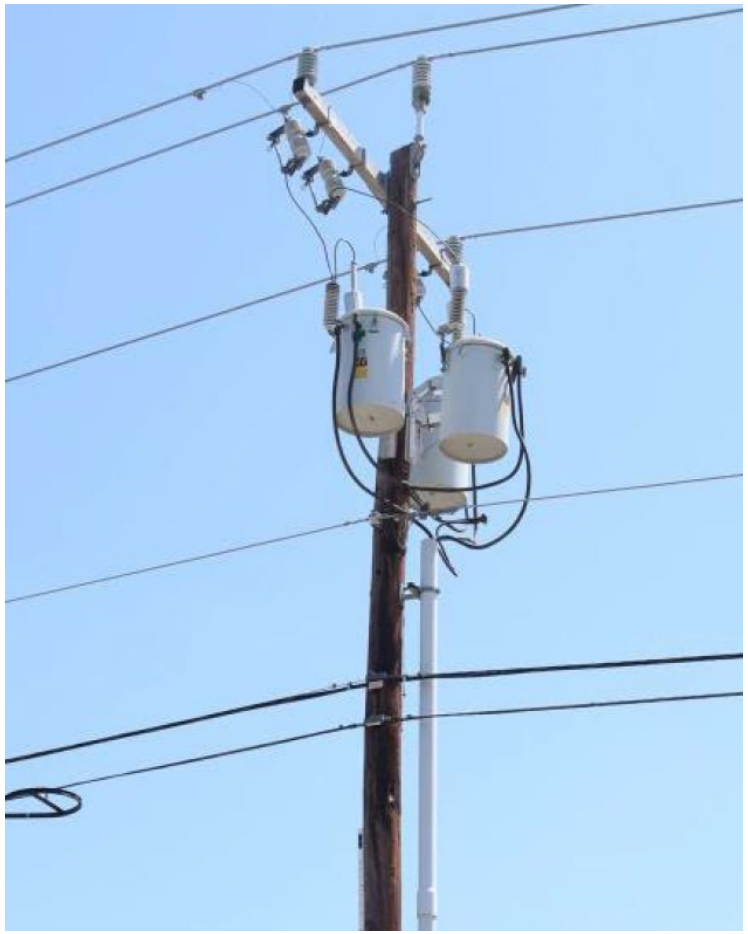
- **After task 5100 is completed, designer is responsible to progress job**

- **Task 6000 – Designer: Designer is responsible for:**
  - Finalizing the design
  - Coordinates the tree trimming if needed
  - Applies for any pending ROW permits
  - Re-stakes proposed pole locations
  - Prepares for construction

- **Ensure CIAC payment has been received prior to progressing the job to scheduling/construction**

ASSOCIATED WORK REQUESTS

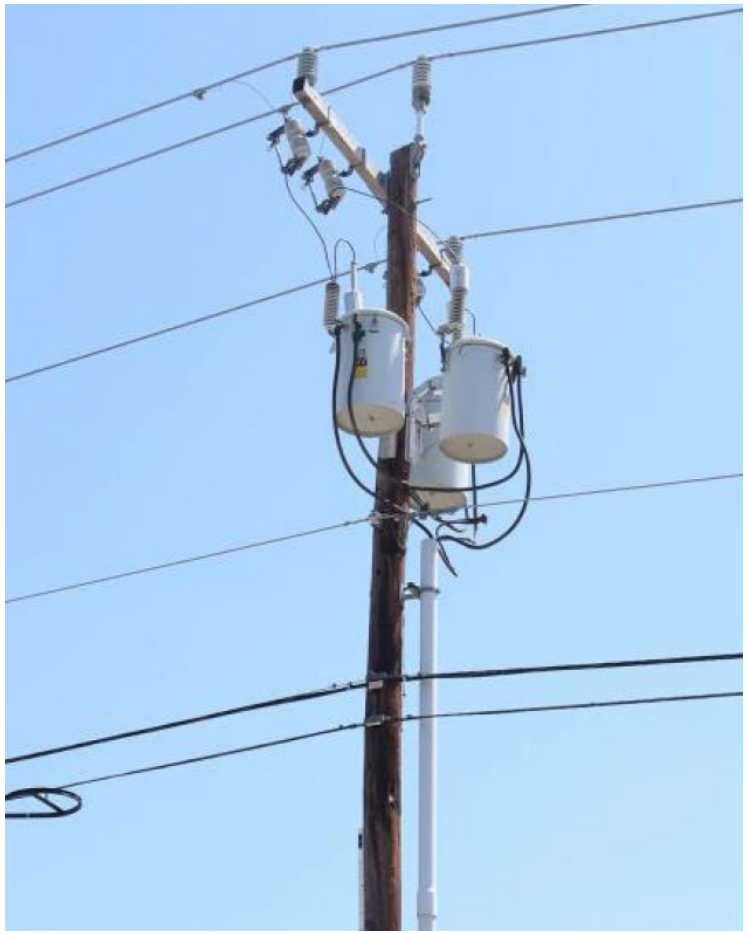
- All associated work requests should be submitted with the original application submission
  - Include Zach Tschoepe, ztschoepe@CPSEnergy.com, on the application submission if there is an associated UG WR
- This extends to final approvals at task 5000/5100
- All associated work requests must be paid prior to sending to task 5000/5100
  - The 5000/5100 notification email should include the associated work requests



Failure to submit all associated work requests with the project can result in delays for the applicant company.

TRANSFORMER- CRANE CALLOUTS

- Call for a crane for all three pot bank projects regardless of size.
- For a single transformer or two pot bank projects, call for a crane if the unit is 50kVA or greater
- 4 NSLP per transformer



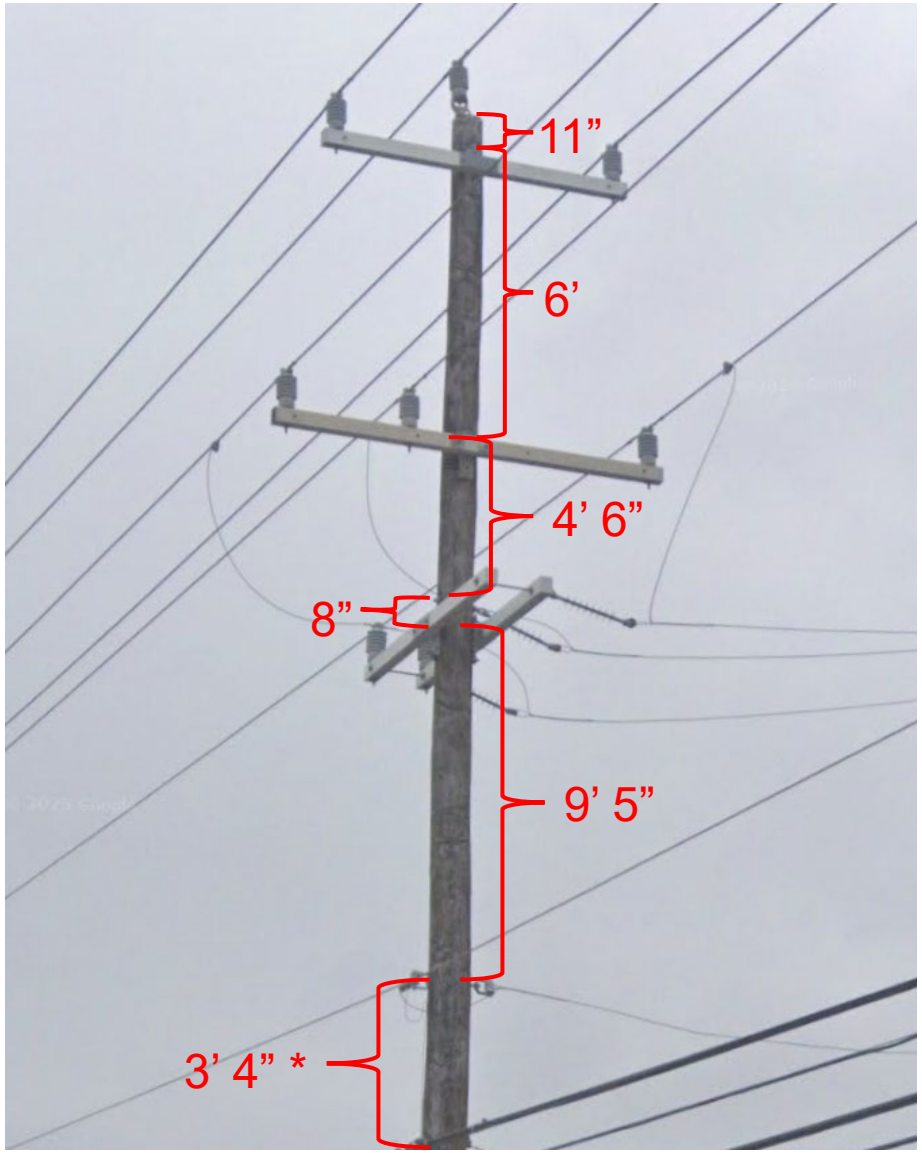
Failure to submit all associated work requests with the project can result in delays for the applicant company.

FRAMING



Double Circuit with Break-off

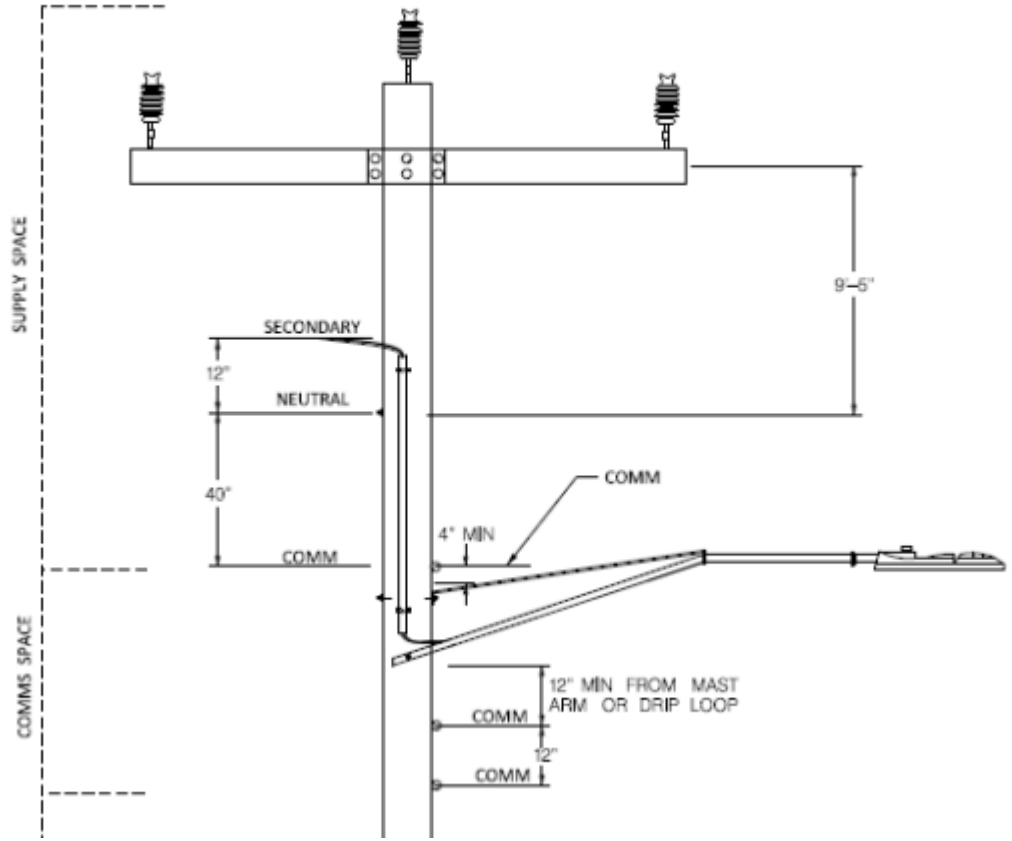
FRAMING



Double Circuit with Break-off

* This example is not taking the neutral jumper into account

VERTICAL CLEARANCE TO STREETLIGHTS

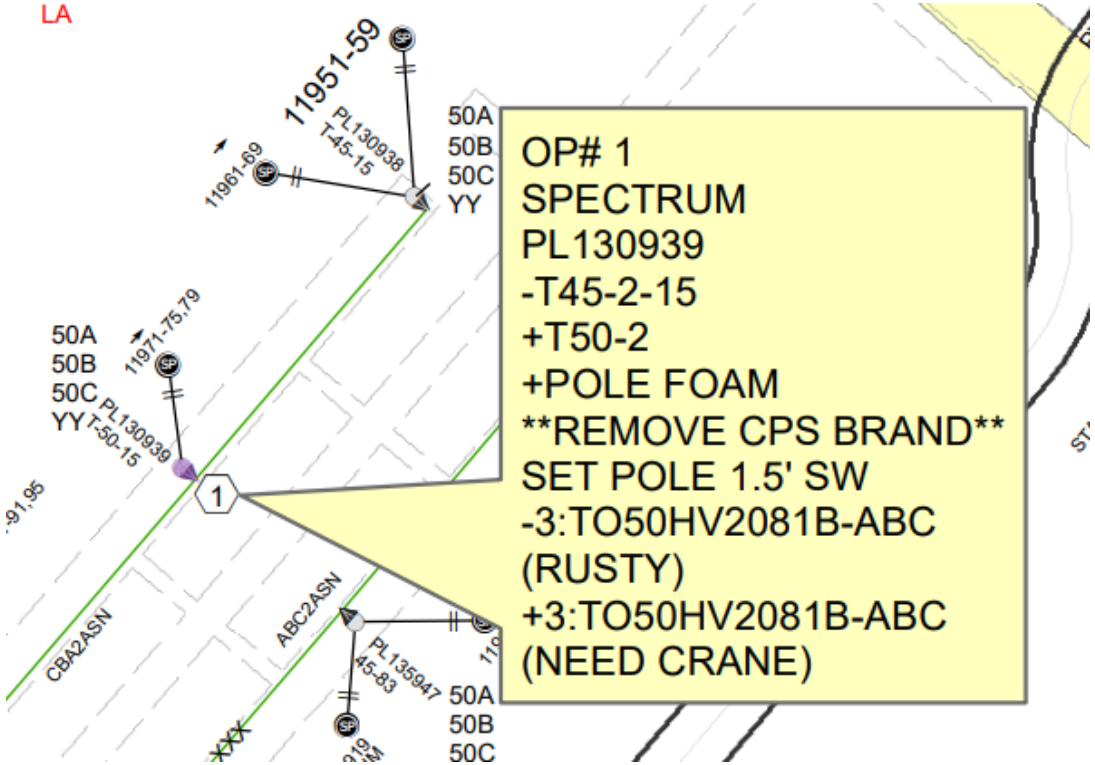


Appendix F-1

- The 12” minimum spacing from mast arm or drip loop is only applicable if the bracket is effectively grounded
- **40” separation** is required from the bottom of an ungrounded bracket

AT&T OWNED POLES
REPLACEMENT

- **The AT&T Occupancy Permit is insufficient to move forward with an AT&T pole changeout**
- **Required to have approval from AT&T for CPS Energy to change out an AT&T owned pole**
  - **This is coordinated through Engineering**
  - **Contact** ztschoepe@cpsenergy.com
- If approved, sketch should note that it is a T-pole as well as call out to remove CPS Energy brand



APPLICATION TIMELINE
"QUICK FIXES"

- **The 21 days ‘Pause’ when applications are sent back for corrections (commonly called quick fixes)**
- **The timeline ‘Resumes’ when the review firm receives the quick fix back**
  - **Subsequent pauses for additional quick fixes**
- Applicants shall receive a consolidated review for the total application (application form, PLA, EMR, etc.)

Applications in which the design needs to be fundamentally changed (e.g. additional pole replacements) are handled as rejections.

APPLICATION TIMEFRAMES
POST CONSTRUCTION

- Attachers must inform CPS Energy/Contractors when attachment construction is completed
  - Notice is required for application closeout
  - Final permit will not be received until passing post construction inspection

- Failure to attach
  - **Attacher must install within 90 days of receiving the notice to proceed**
    - If no communication is received regarding a request for a 30-day extension, the post construction inspection will take place
    - Failure to install within the original 90 days or the additionally granted 30-day extension will result in expiration of the application
    - Attaching Entity will be required to submit a new application

AS-BUILTS

- CPS Energy is running weekly reports for work requests in As-Built Status

1. Responsible designer shall review documents attached at task 16500 for As-Builts
2. After entering and completing the as-builts, send revision for as-built verification through GIS
3. In ARM, at Task 17000, add supervisor initials CZ, CSTE, or PBT1
   - "Completed on 03/07/2024 submitted to Entrust/TRC by SWAY"

- If the applicable designer has left the approved engineering firm's company, it is that engineering firm's responsibility to submit

- Supervisor that completes as-built verification shall notify designer that work request is closed

INVOICES

- Attaching entities will receive invoices related to application closeout activities such as for post construction inspections and as-built verification after they have attached

- Invoices for activity performed by CPS Energy's contractors are due within 45 days
  - Failure to pay within 60 days may result in a suspension of applications

POLE TRANSFERS

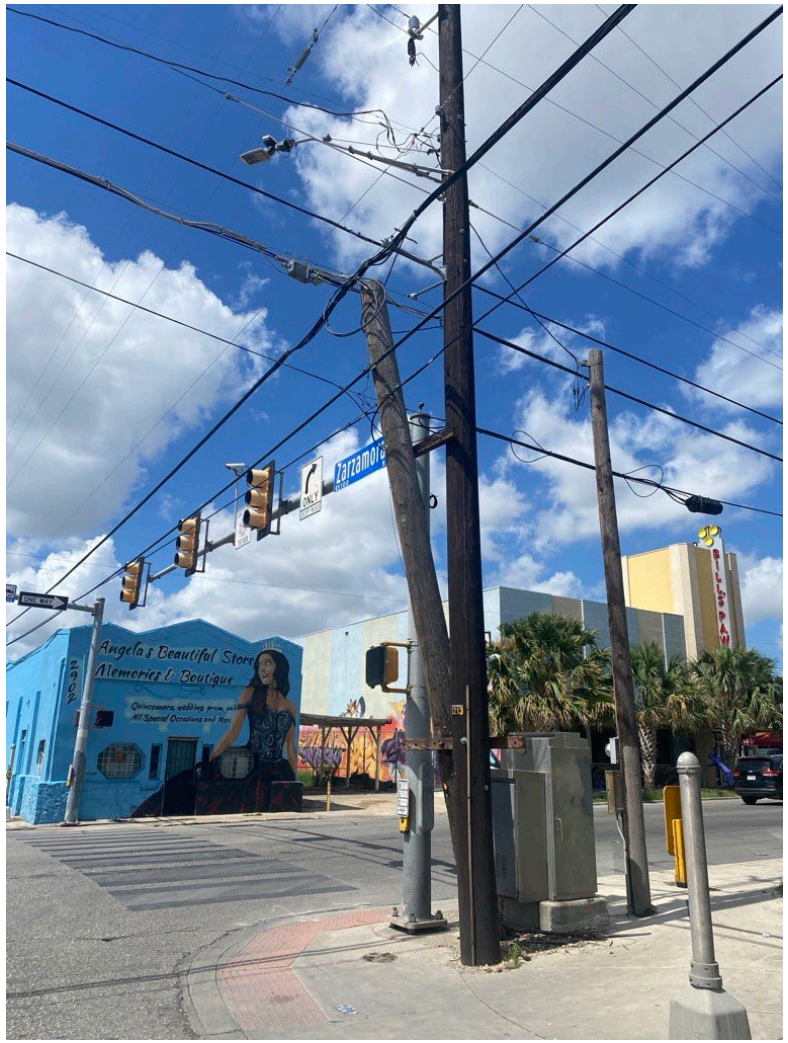
NJUNS NOTIFICATIONS

- CPS Energy utilizes different types of NJUNS notifications:
  - Pole Transfers (PT) tickets
  - Violation (VIO) tickets
  - New (New) tickets
- NJUNS training materials can be found on the training page & includes:
  - NJUNS User's guide
  - Training Videos
  - Best Practices
- **If any attaching entity needs assistance or additional training, please reach out to the Pole Attachment Services team**

The next web-based training can be found at the NJUNS Training page, where you can subscribe to receive notifications

NJUNS TRANSFERS

- Attaching entities need to query NJUNS regularly to keep up with their Next to Go steps
- CPS Energy continues to stress the importance of timely transfers
  - Customer complaints
  - Safety concerns
- NJUNS registration is a requirement for **ALL** attaching entities



POLE TRANSFERS

- Pole chunks should be removed when transfers are completed
- If braces need to be moved to facilitate transfers; reach out to the PAS team



Temporary Cross Arm Brace



Pole Chunk

TAGGING

- Tagging Requirements For:
  - Attachments
  - Banner Attachments
  - Overlashings
  - Wireless installations
- Minimum of 95% of attachments need to be tagged



Assigned Two Digit Tag

ANNOUNCEMENTS

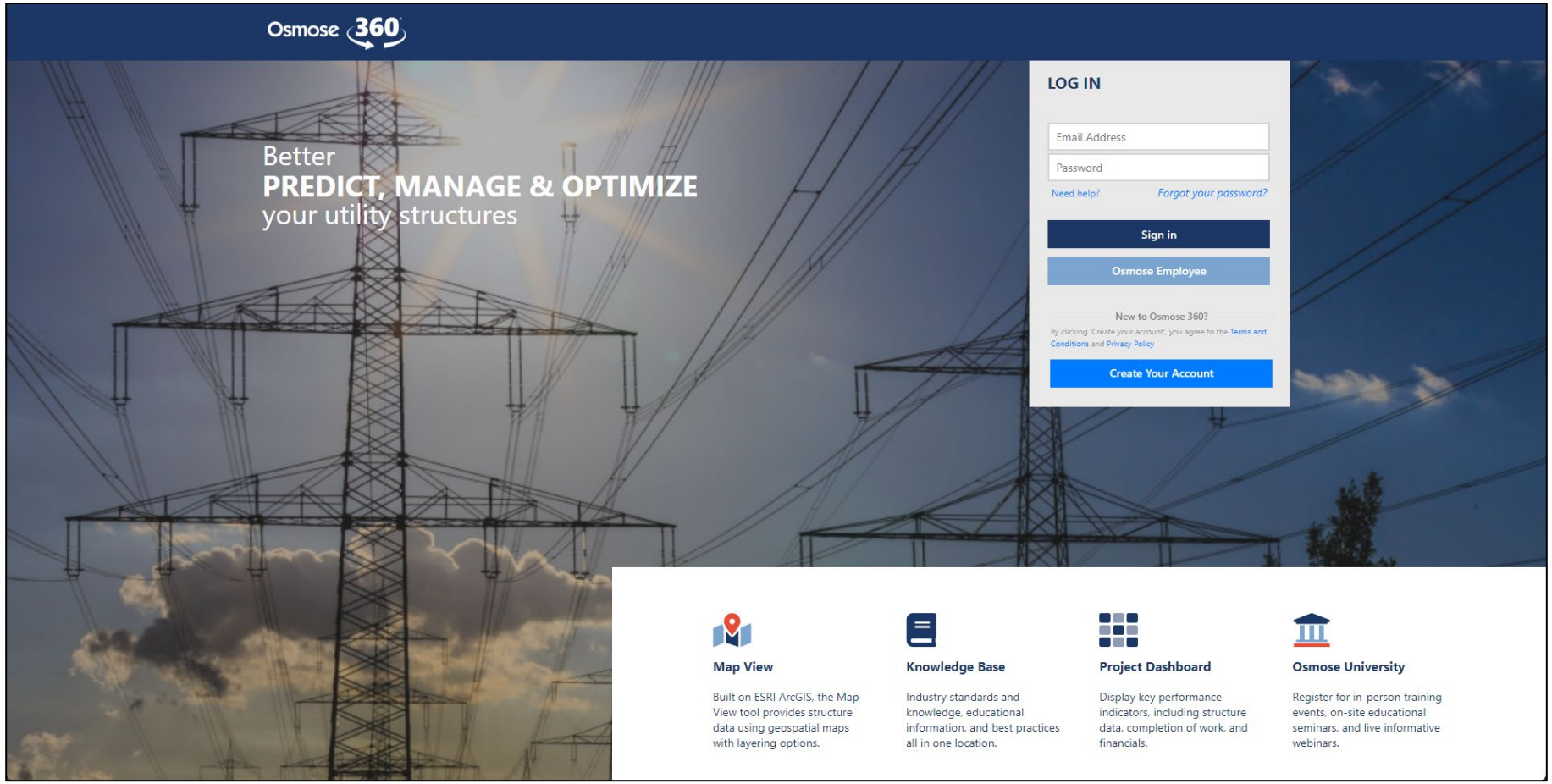
POLE INVENTORY PROJECT
UPDATE

- The pole attachment inventory was paused on 5/9/25
  - Concerns were raised regarding pole ownership
- Working to implement a method to be sure that pole ownership is appropriately captured
  - Ensure that CPS Energy is inventorying and invoicing appropriately



OSMOSE 360

INFORMATION/REGISTRATION



Osmose360.com
CPS0897

ANNOUNCEMENTS

- Next Quarterly Dates:
  - December 4th, 2025

- Contact poleattach@cpsenergy.com to get on the list for GIS training


QUESTIONS?