

MARITIME 
ELECTRIC
A FORTIS COMPANY

October 4, 2019



Island Regulatory & Appeals Commission
PO Box 577
Charlottetown PE C1A 7L1

Dear Commissioners:

Please find enclosed six copies of Maritime Electric's 2019 Supplemental Budget Request Application for Line Rebuilds – Make-Ready Work.

This Application represents two communication equipment attachment projects for Eastlink and the Company would like to proceed immediately upon receiving Commission approval.

If you require further information, please do not hesitate to contact me at 902-629-3641.

Yours truly,

MARITIME ELECTRIC



Gloria Crockett, CPA, CA
Manager, Regulatory & Financial Planning

GCC37
Enclosure

C A N A D A

PROVINCE OF PRINCE EDWARD ISLAND

**BEFORE THE ISLAND REGULATORY
AND APPEALS COMMISSION**

IN THE MATTER of Sections 8(1) and 17(1) of the Electric Power Act (R.S.P.E.I. 1988, Cap. E-4) and **IN THE MATTER** of the Application of Maritime Electric Company, Limited for an order of the Commission approving the 2019 Supplemental Capital Budget Request Application for Line Rebuilds and for certain approvals incidental to such an order.

**APPLICATION AND EVIDENCE
OF
MARITIME ELECTRIC COMPANY, LIMITED**

October 4, 2019

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1.0 APPLICATION

C A N A D A

PROVINCE OF PRINCE EDWARD ISLAND

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Introduction

1. Maritime Electric Company, Limited ("Maritime Electric" or the "Company") is a Corporation incorporated under the laws of Canada with its head or registered office at Charlottetown and carries on a business as a public utility subject to the Electric Power Act ("EPA" or the "Act") engaged in the production, purchase, transmission, distribution and sale of electricity within Prince Edward Island.

Application

2. Maritime Electric hereby applies for an order of the Island Regulatory and Appeals Commission ("IRAC" or the "Commission") approving a Supplemental Budget Request ("SBR") for the year 2019 as outlined in the attached evidence.
3. The proposals contained in this Application represent a just and reasonable balance of the interests of Maritime Electric, its customers and its attachment licensee, Eastlink. If approved, the Company will perform the necessary capital additions and improvements at a cost that is, in all circumstances, reasonable.

Maritime Electric

Procedure

4. Filed hereto is the Affidavit of John D. Gaudet, Jason C. Roberts, Angus S. Orford and Enrique A. Riveroll which contains the evidence in which Maritime Electric relies in this Application.

Dated at Charlottetown, Province of Prince Edward Island, this 4th day of October, 2019.



D. Spencer Campbell, Q. C.

STEWART MCKELVEY
65 Grafton Street, PO Box 2140
Charlottetown PE C1A 8B9
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Solicitors for Maritime Electric Company, Limited

2.0 AFFIDAVIT

C A N A D A

PROVINCE OF PRINCE EDWARD ISLAND

**BEFORE THE ISLAND REGULATORY
AND APPEALS COMMISSION**

IN THE MATTER of Sections 8(1) and 17(1) of the Electric Power Act (R.S.P.E.I. 1988, Cap. E-4) and **IN THE MATTER** of the Application of Maritime Electric Company, Limited for an order of the Commission approving the 2019 Supplemental Capital Budget Request Application for Line Rebuilds and for certain approvals incidental to such an order.

AFFIDAVIT

We, John David Gaudet of Charlottetown, Jason Christopher Roberts of Suffolk, Angus Sumner Orford of Charlottetown and Enrique Alfonso Riveroll of New Dominion, in Queens County, Province of Prince Edward Island, MAKE OATH AND SAY AS FOLLOWS:

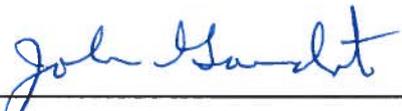
1. We are the President and Chief Executive Officer, Vice-President, Finance and Chief Financial Officer, Vice-President, Corporate Planning and Energy Supply and Vice-President, Customer Service of Maritime Electric respectively and, as such, have personal knowledge of the matters deposed to herein, except where noted, in which case we rely upon the information of others and in which case we verily believe such information to be true.
2. Maritime Electric is a public utility subject to the provisions of the Electric Power Act engaged in the production, purchase, transmission, distribution and sale of electricity within Prince Edward Island.

Maritime Electric

3. We prepared or supervised the preparation of the evidence and to the best of our knowledge and belief the evidence is true in substance and in fact. A copy of the evidence is attached to this, our Affidavit, and is collectively known as Exhibit "A", contained in Sections 3 and 4 and Appendices A through C inclusive.

4. Section 5 contains a proposed Order of the Commission based on the Company's Application.

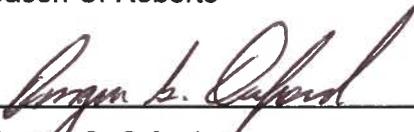
SWORN TO SEVERALLY at
Charlottetown, Province of Prince Edward Island,
the 4th day of October, 2019.
Before me:



John D. Gaudet



Jason C. Roberts



Angus S. Orford



Enrique A. Riveroll



A Commissioner for taking Affidavits
in the Supreme Court of Prince Edward Island.

EXHIBIT A

3.0 INTRODUCTION

3.1 Corporate Profile

Maritime Electric Company, Limited owns and operates a fully integrated system providing for the purchase, generation, transmission, distribution and sale of electricity throughout Prince Edward Island (“PEI”). The Company’s head office is located in Charlottetown with generating facilities in Charlottetown and Borden-Carleton.

Maritime Electric is the primary provider of electricity in PEI delivering over 90 per cent of the energy supplied in the province. To meet customers’ energy demand and supply requirements, the Company has contractual entitlement to capacity and energy from New Brunswick Power’s (“NB Power”) Point Lepreau Nuclear Generating Station (“Point Lepreau”) and an agreement for the purchase of capacity and system energy from NB Power delivered via four submarine cables leased from the Province of Prince Edward Island. The Company also purchases 92.5 megawatts (“MW”) of wind generated energy under contract with the PEI Energy Corporation and maintains 140 MW of on-Island oil fired generating capacity.

Maritime Electric strives to provide safe and reliable electricity service to its customers through capital investments to rebuild or replace aging assets and operations activities such as tree trimming or other line and substation maintenance programs. The Company recognizes that customers expect high levels of service at reasonable prices. Achieving a reasonable balance between reliability and economically priced service requires prudent planning of expenditures to ensure an effective use of available resources.

Joint use of utility poles with communication providers is one way that Maritime Electric maintains the balance between a high level of service and reasonably priced electricity for its customers. The EPA specifically addresses joint use of utility poles with communication providers in Section 8(1) which states:

“Every public utility that has conduits, poles, wires or other equipment for furnishing electric energy to the public shall, for reasonable compensation,

permit the use of the same by any other public utility furnishing electric energy to the public, or by an person providing a telephone or cable television service to the public, wherever public convenience and necessity requires the use, and when the use will not result in any detriment to the service already being rendered or in any danger to the safety of the public.”

A joint use pole is a pole that accommodates both power and communication lines and/or accessories. A pole is considered joint use if it is owned under a Joint Use Agreement (as has been in place between Maritime Electric and Bell Canada since 2003) or if the Company hosts communication equipment of an attachment licensee and collects attachment fees through a Support Structure License Agreement (“Agreement”) as is the case for Eastlink. With an attachment Agreement and where a pole or poles do not need to be upgraded to accommodate the communication equipment, costs associated with the operation, maintenance, repair and eventual replacement of the pole(s) are paid by the owner (“Maritime Electric”) and the communication provider (“Eastlink”) pays an annual attachment fee to rent space on the pole(s). If a pole(s) needs to be upgraded to attach communication equipment, the communication provider is responsible to pay a Contribution in Aid of Construction (“CIAC” or “Contribution”) for the costs to upgrade the pole(s) to Canadian Standards Association (“CSA”) standard that will safely accommodate the attachment(s). When this occurs, Maritime Electric often incurs additional costs to upgrade system components that are specific to electricity supply. These electricity supply system specific costs are not included in the Contribution from the attachment licensee.

Additional background concerning the attachment of communications equipment to pole(s) and the Agreement between Maritime Electric and Eastlink is provided in Section 4.1 of this Supplemental Budget Request (“SBR”).

3.2 Overview of Evidence

Under Section 17(1) of the Electric Power Act, Maritime Electric is required to submit to the Island Regulatory and Appeals Commission (“Commission” or “IRAC”), for its approval, an annual Capital Budget of proposed improvements or additions to the property of the public utility. On August 8, 2018, Maritime Electric filed its 2019 Capital Budget Application and subsequent approval was received by the Commission in Order UE18-09 on November 26, 2018.

Maritime Electric

On April 10, 2018 the Company filed the Capital Expenditure Justification Criteria (“CEJC”). Under Section 5.0 of the CEJC, a Supplemental Budget Request Application is to be filed with the Commission when the Company determines that a capital expenditure which was not anticipated at the time of the Capital Budget Application is necessary in the budget year and will result in an increase in capital expenditures above what was approved by IRAC.

This is the evidence in support of the Company’s proposed Supplemental Budget Request Application for Line Rebuilds. The Application is necessary to complete two communication equipment attachment projects for Eastlink that were not known or anticipated at the time of the filing the original 2019 Capital Budget Application. These two projects are of a size that the associated costs will exceed the provisional amount in Line Rebuilds that would normally be adequate for smaller attachment project requests.

4.0 SUPPLEMENTAL BUDGET REQUEST

4.1 Background

Electric power and communication companies typically need to place equipment in the same geographic area to deliver their services to consumers. For each company to erect and use their own poles is often impractical and/or impossible in many locations. For this reason, the sharing of utility poles with communication providers is a reasonable solution to a mutual problem and is provided for and supported under Section 8(1) of the EPA.

Maritime Electric customers benefit from the sharing of utility poles as the associated capital and operating costs are partially supported by the communication providers through joint ownership or attachment agreements. More specifically, cost sharing through joint ownership or attachment fees helps to support the following:

- Administration and management of electric utility assets;
- Survey and engineering design of poles and pole lines at a consistent standard;
- Pole supply, installation, support, removal and disposal;
- Vegetation management of pole lines to maintain service reliability;
- Worksite protection during pole and pole line upgrade projects (e.g., traffic control costs);
- Property access and related legal fees associated with establishing new pole lines; and
- Damage claims and site remediation costs.

Maritime Electric has been party to a Support Structure License Agreement with Eastlink (“Bragg Communications Incorporated”) since 2008. This Agreement was updated and renewed in 2016 and is currently in the process of being updated again for renewal. The Agreement continues to be in effect until a new agreement is signed. The Agreement sets out the terms and conditions for rental space on a joint use pole including the fees to be paid annually by the communication provider for each attachment. The update will primarily provide an increase to the attachment fees along with minor changes to the terms and conditions.

Maritime Electric

Under a Support Structure License Agreement, the pole owner is responsible for risk management, maintenance, vegetation management, replacement, and the general integrity and construction standard of the structure. As noted in Section 3.1 of this SBR, Eastlink is an attachment licensee and as such, it pays annual attachment fees to the owner of the pole for access. An attachment licensee does not have any ownership in the poles it attaches to but contributes a portion of the pole maintenance related costs through the attachment fees.

The make-ready projects proposed in this SBR involve power lines owned by Maritime Electric that would be converted to meet CSA standards specific to the attachment of communication equipment to overhead utility lines. Because the project is driven by the needs of the attachment licensee, the poles and related installation and/or removal costs to accommodate communications equipment are subject to a Contribution from the make-ready applicant, Eastlink. The portion of the contribution related to the cost of removal will be collected separately from the capital contribution and applied directly to the retirement cost.

In addition to the work required to convert a pole or poles to accommodate communication equipment, make-ready projects often also drive infrastructure upgrades (new conductor, neutral wire, insulators, etc.). This is the case when the conversion work cannot be carried out safely due to aged and deteriorated electrical system components. Such upgrades are specific to Maritime Electric's supply system that are deemed a benefit to Maritime Electric customers only and are not subject to a Contribution from the attachment licensee. See Section 4.2 of this SBR for further information on how make-ready project costs are allocated.

4.2 Line Rebuilds – Make-Ready Work

For the proposed make-ready projects identified and discussed in Section 4.3 of this SBR, Maritime Electric owned poles would be converted to joint use to accommodate Eastlink attachments. This results in two cost categories for the Company. One is the cost to upgrade a pole or poles to CSA joint use standards ("Make-Ready Conversion Cost") and the other is the cost to upgrade components that are specific to construction safety and the safe and reliable supply of power to Maritime Electric customers ("Maritime Electric Plant Specific Cost").

4.2.1 Make-Ready Conversion Cost

The Make-Ready Conversion Cost is a Maritime Electric capital expenditure as Eastlink is an attachment licensee and not a joint use partner and there is no pole ownership on the part of Eastlink. As such, Eastlink provides a CIAC equivalent to the Make-Ready Conversion Cost to cover the cost of pole replacement and/or pole line upgrades to accommodate communication equipment. Upon completion of a joint use make-ready conversion, Eastlink then pays a monthly attachment fee related to ongoing pole maintenance and future replacement costs.

Material and labour costs for make-ready projects are primarily related to pole installation and removal costs as well as other costs including the installation and/or removal of guys, anchors and associated hardware, tree trimming, survey and engineering, traffic control and transportation.

4.2.2 Maritime Electric Plant Specific Cost

The make-ready projects proposed in this SBR will also require line upgrades due to the condition of the existing electrical system components. These upgrades are of benefit only to Maritime Electric customers and for this reason they are not factored into the Make-Ready Conversion Cost or the Contribution made by communication providers. Such components include conductor, insulators, cross arms, transformers, lights, hardware and the related installation costs. Eastlink also has its own plant specific costs, such as the supply and installation of communications cable, that have not been provided to Maritime Electric and are not included in the budget costs provided in Section 4.3 of this SBR.

4.3 Proposed Make-Ready Projects

Eastlink is requesting two make-ready projects to upgrade existing distribution lines owned by Maritime Electric to meet CSA standards for communication attachments. These projects were not known to Maritime Electric at the time the Capital Budget Application was prepared and therefore not included in the Line Rebuilds section of the 2019 Capital Budget Application.

The 2019 Capital budget for Line Rebuild projects currently approved by IRAC is as follows:

Maritime Electric

Section 5.5	Line Rebuilds*	\$ 4,805,500
a.	Single Phase and Three Phase Rebuilds*	\$ 2,675,500
b.	Distribution Line Refurbishment	\$ 680,000
c.	Accelerated Distribution Component Replacement	\$ 1,450,000

* Includes original approved budget and Bell Aliant SBR approved by Order UE19-07.

The projects proposed in this Application are required by Eastlink to expand its rural network and meet customer demand and contractual service obligations. While these projects are required for Eastlink to expand its service area, they will also improve system safety and reliability for Maritime Electric and its customers. Benefits include the replacement of aged components, improvements to system reliability and voltage, reduced electrical losses and safety enhancements for workers by upgrading facilities to current standards.

4.3.1 Make-Ready Project Descriptions

For the reasons provided, Maritime Electric is seeking approval of this 2019 Supplemental Budget Request for the following make-ready projects:

a.	Baie-Egmont Make-Ready	\$565,000
	Location: Baie-Egmont	
	Line Type: Distribution – Single Phase	
	Distance: 5.1 kilometres	

Project Description:

Eastlink has requested to upgrade approximately 5 kilometres of single phase line on Route 11 to accommodate communication equipment attachments. The proposed make-ready will start at approximately 9337 Route 11 and end at approximately 10346 Route 11 in Baie-Egmont. Maritime Electric will replace deteriorated poles, old conductor, neutral wire and insulators as part of this project. The line (“WL2051”) is operated at 7,200 volts and is fed from the Wellington Substation.

Components:

The project, as proposed, will see a total of one hundred and one (101) poles installed. Forty-five (45) of the poles requiring replacement are aged Penta or eastern cedar poles and thirty-two (32) are too short to be used in a joint use application. In addition, 24 new poles will be added to reduce the spans in the line to meet strength requirements as a larger number of poles are required per kilometre to accommodate additional communications infrastructure under current construction standards. Nineteen (19) of the existing poles will be satisfactory after adding additional support. The old conductors will be replaced since there are multiple repair sleeves in this section of line. Images of the Baie-Egmont make-ready project are provided in Appendix A.

Construction:

To work in the right-of-way a permit from the PEI Department of Transportation, Infrastructure and Energy will be required for the project. It is intended that the new construction will occur on the same side of the road by leaning poles and carrying out the work with the existing line still energized. Traffic control will be necessary for the project along with substantial signage as both traffic volume and vehicle speed is high on Route 11.

The budget breakdown for the Baie-Egmont project is as follows:

Cost Components	Make-Ready Conversion Costs & Eastlink CIAC* (A)	Maritime Electric Plant Specific Costs ** (B)	Total Project SBR *** (C = A + B)
Material	\$ 58,000	\$ 29,000	\$ 87,000
Labour	129,000	349,000	\$ 478,000
TOTAL	\$ 187,000	\$ 378,000	\$ 565,000

* Eastlink provides a Contribution equivalent to 100% of the Make-Ready Conversion Cost of \$187,000.

** Maritime Electric Plant Specific Costs are specific to the supply of electricity and therefore are not included in the CIAC from Eastlink.

*** The Total Project SBR includes the total cost of the project as ownership of the line remains 100% with Maritime Electric.

- b. Mont Carmel Make-Ready** **\$761,000**
Location: Mont-Carmel
Line Type: Distribution – Single Phase
Distance: 8 kilometres

Project Description:

Eastlink has requested to upgrade approximately 3.3 kilometres of single phase line on Route 11 and 4.7 kilometres of single phase line on Route 177 to accommodate communication equipment attachments. The first section of the proposed make-ready will start at approximately 520 Route 177 and end at the intersection with Route 177 and Route 11. The second section will start at approximately 6221 Route 11 and end at approximately 6871 Route 11 in Mont-Carmel. Maritime Electric will replace deteriorated poles, old conductor, neutral wire and insulators as part of this project. The lines (WL3558 and WL2028) are operated at 7,200 volts and are fed from the Wellington Substation.

Components:

The project, as proposed, would see a total of one hundred and forty-two (142) poles installed. Fifty-six (56) of the poles requiring replacement are aged Penta or eastern cedar poles and forty-six (46) are too short to be used in a joint use application. In addition, forty (40) new poles will need to be added to reduce the spans in the line to meet strength requirements as a larger number of poles are required per kilometre to accommodate additional communications infrastructure under current construction standards. Thirty-three (33) of the existing poles will be satisfactory after adding additional support. The old conductors will be replaced since there are multiple repair sleeves in this section of line. Images of the Mont-Carmel make-ready project are provided in Appendix B.

Construction:

To work in the right-of-way a permit from the Department of Transportation, Infrastructure and Energy will be required for the project. It is intended that the new construction will occur on the same side of the road by leaning

Maritime Electric

poles and carrying out the work with the existing line still energized. Traffic control will be necessary for the project along with substantial signage as both traffic volume and vehicle speed can be high on Routes 11 and 177.

The budget breakdown for the Mont-Carmel project is as follows:

Cost Components	Make-Ready Conversion Costs & Eastlink CIAC* (A)	Maritime Electric Plant Specific Costs ** (B)	Total Project SBR *** (C = A + B)
Material	\$ 76,000	\$ 39,000	\$ 115,000
Labour	194,000	452,000	646,000
TOTAL	\$ 270,000	\$ 491,000	\$ 761,000

* Eastlink provides a Contribution equivalent to 100% of the Make-Ready Conversion Cost of \$270,000.

** Maritime Electric Plant Specific Costs are specific to the supply of electricity and therefore are not included in the CIAC from Eastlink.

*** The Total Project SBR includes the total cost of the project as ownership of the line remains 100% with Maritime Electric.

4.3.2 Total Cost of Projects

This 2019 Supplemental Budget Request for \$1,326,000 is based on the following make-ready project costs:

Make-Ready Projects	Make-Ready Conversion Costs & Eastlink CIAC* (A)	Maritime Electric Plant Specific Costs ** (B)	Total Project SBR *** (C = A + B)
Baie-Egmont Make-Ready	\$ 187,000	\$ 378,000	\$ 565,000
Mont Carmel Make-Ready	270,000	491,000	761,000
TOTAL	\$ 457,000	\$ 869,000	\$ 1,326,000

* Eastlink provides a Contribution equivalent to 100% of the Make-Ready Conversion Cost of \$457,000.

** Maritime Electric Plant Specific Costs are specific to the supply of electricity and therefore are not included in the CIAC from Eastlink.

*** The Total Project SBR includes the total cost of the project as ownership of the line remains 100% with Maritime Electric.

4.4 Proposed Capital Budget Revisions

The table below shows the proposed revision to the Line Rebuilds section (i.e. Section 5.5) of the 2019 Capital Budget Application submitted to IRAC on August 8, 2018 and approved by the Commission in Order UE 18-09:

Maritime Electric

Revised Capital Budget for Line Rebuilds (Section 5.5) including SBR				
Description	Approved UE 18-09	Bell Canada SBR Application (Approved UE19-07)	Eastlink SBR Application	Revised Capital Budget
Single Phase and Three Phase Rebuilds	\$ 2,115,000	\$ 560,500	\$ 1,326,000	\$ 4,001,500
Distribution Line Refurbishment	680,000	-		680,000
Accelerated Distribution Component Replacement	1,450,000	-		1,450,000
TOTAL	\$ 4,245,000	\$ 560,500	\$ 1,326,000	\$ 6,131,500

In addition, the budget for Customer Contributions will increase by \$457,000 from the \$400,000 approved by the Commission in Order UE18-09 to \$857,000 to reflect Eastlink's contribution for 100 per cent of the Make-Ready Conversion Cost included in the SBR total of \$1,326,000.

5.0 PROPOSED ORDER

C A N A D A

PROVINCE OF PRINCE EDWARD ISLAND

**BEFORE THE ISLAND REGULATORY
AND APPEALS COMMISSION**

IN THE MATTER of Sections 8(1) and 17(1) of the Electric Power Act (R.S.P.E.I. 1988, Cap. E-4) and **IN THE MATTER** of the Application of Maritime Electric Company, Limited for an order of the Commission approving the 2019 Supplemental Capital Budget Request Application for Line Rebuilds and for certain approvals incidental to such an order.

UPON receiving an Application by Maritime Electric Company, Limited (the “Company”) for approval of the Company’s Supplemental Budget Request for the year 2019;

AND UPON considering the Application and Evidence filed in support thereof;

Maritime Electric

NOW THEREFORE, for the reasons given in the annexed Reasons for Order and pursuant to the Electric Power Act;

IT IS ORDERED THAT

1. The 2019 Supplemental Capital Budget Request for Line Rebuilds of the Company, filed herein on October 4, 2019 and summarized below is approved:

2019 Supplementary Capital Budget Request Summary and Revised Capital Budget for Line Rebuilds	
Baie-Egmont	\$ 565,000
Mont-Carmel	\$ 761,000
Sub-total	\$ 1,326,000
Rebuilds Approved UE18-09	\$ 4,245,000
Bell Canada SBR Approved UE19-07	\$ 560,500
Revised Capital Budget Line Rebuilds	<u>\$ 6,131,500</u>

2. The 2019 budget for Customer Contributions will increase from \$400,000 to \$857,000 to reflect Eastlink's Contribution of \$457,000 for 100 per cent of the make-ready conversion cost included in this SBR total of \$1,326,000.

DATED at Charlottetown, Prince Edward Island, this ___ day of _____, 2019.

BY THE COMMISSION:

Chair

Commissioner

Commissioner

Commissioner

APPENDIX A

Images of Baie-Egmont Make-Ready

Baie-Egmont Make-Ready (Route 11)

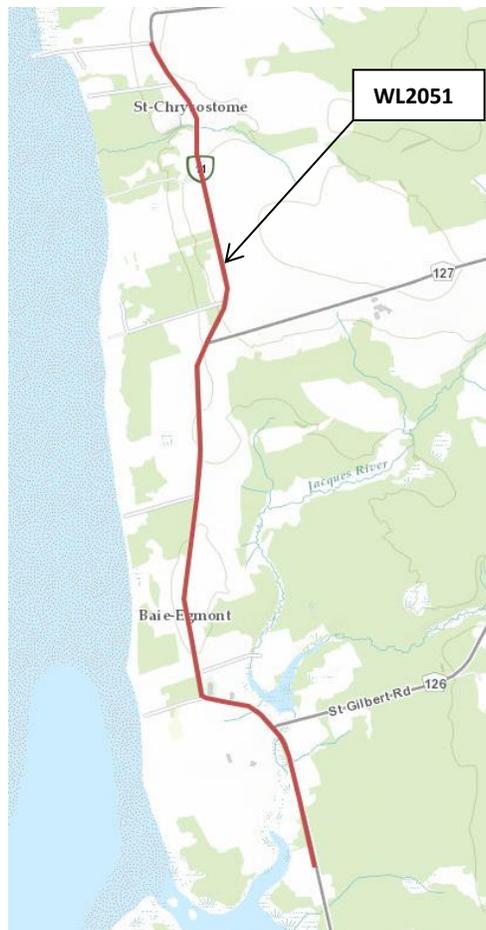
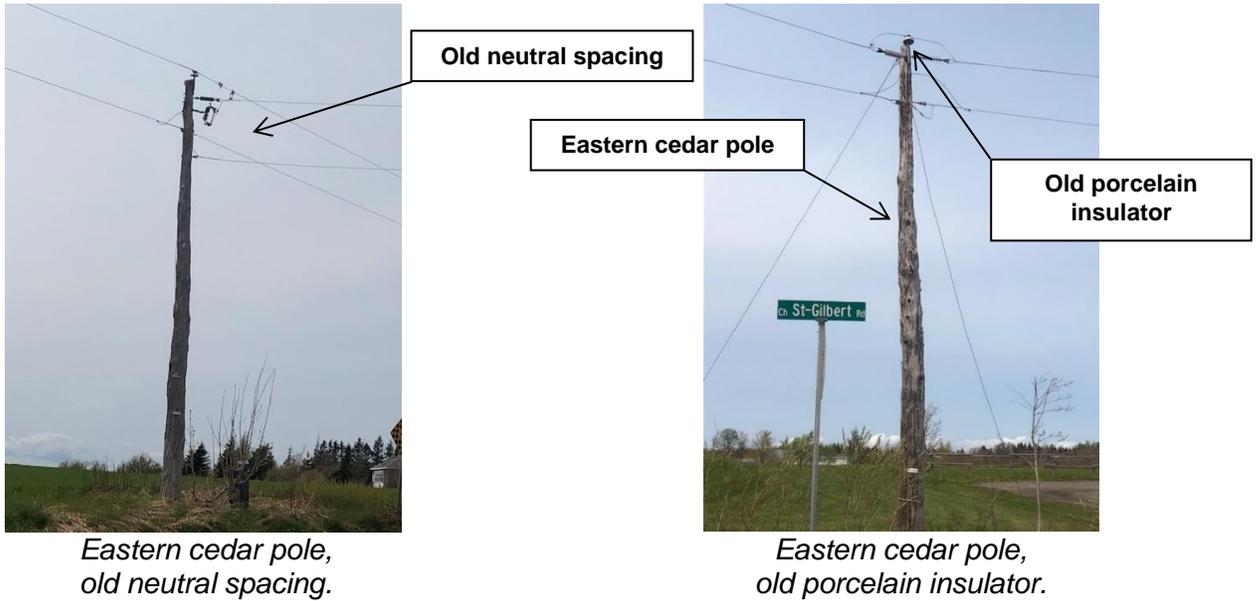


Figure 1: Route 11, Baie-Egmont, PE, Make-Ready (Single-Phase).

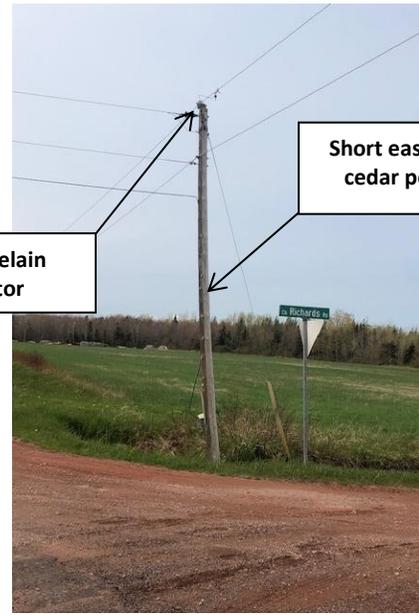
APPENDIX B

Images of Mont-Carmel Make-Ready

Mont-Carmel Make-Ready (Routes 11 and 177)



Cedar pole with old neutral spacing.



Short cedar pole with old porcelain insulator.



Figure 1: Route 11 & Route 177, Mont Carmel, PE, Make-Ready (Single Phase).