


Make Ready Process for Utility Pole Attachments

4400.02.003

Revision #: 1




	Document Title: Make Ready Process for Utility Pole Attachments	Document No.:	4400.02.003
		Revision:	0

 People first. Safety always.	Document Title: Make Ready Process For Utility Pole Attachments	
	Document Type: 02 - Procedure	Document No.: 4400.02.003
Department: Third Party Attachment	Version: 02	Effective Date: 03/26/2026
For others, specify here		
Shared document with: Select one		
<i>* Select the Departments impacted by the document (If apply)</i>		
For other, specify here		

	Document Title: Make Ready Process for Utility Pole Attachments	Document No.:	4400.02.003
		Revision:	0

Table of Contents

1.0	ABOUT THIS DOCUMENT	4
1.1.	Summary	4
1.2.	Purpose	4
2.0	PROCEDURE	4
2.1.	Types of Make Ready	5
2.1.1.	Simple Make-Ready Work Communications	5
2.1.2.	Complex Make-Ready Communications (CMR-C).....	5
2.1.3.	Complex Make-Ready Electrical (CMR-E)	6
3.0	SUMMARY TABLE OF RESPONSIBILITIES	8
4.0	DOCUMENT REVISION HISTORY.....	9

	Document Title: Make Ready Process for Utility Pole Attachments	Document No.:	4400.02.003
		Revision:	0

1.0 ABOUT THIS DOCUMENT

1.1. Summary

This Make Ready Process for Utility Pole Attachment document is a user guide that provides an overview of the requirements and steps that all utility pole attachment licensees who are applying for a proposed new utility pole attachment (“Applicants” or “Licensees”) must follow when the proposed attachment will require make ready work to accommodate the proposed new installation of communications facilities on distribution utility poles. It explains the three categories of MakeReady work, responsibilities, documentation requirements, and timelines.1.2

1.2. Purpose

LUMA, as agent of PREPA prepared this Make Ready Process for Utility Pole Attachments user guide is to facilitate and streamline the application and review process for proposed new third-party attachments (“TPA”) that require make ready work on PREPA Utility poles. This document established a clear, standardized, and primarily online process for Applicants to follow when submitting requests through AldenOne, the designated platform. By outlining the categories of make-ready work, the applicable procedures for the different categories of make ready work, the responsibilities of the parties involved, and required documentation, this user guide is intended to improve transparency and promote consistency and efficiency of the TPA application review and approval process. This guide must be used in conjunction with the Third-Party Attachments (TPA) Engineering Standards and the Application Guide for Utility Pole Attachment Requests, both available on the LUMA website.

2.0 PROCEDURE

Make-ready refers to the work performed on existing utility infrastructure to prepare a utility pole for a new attachment. These activities ensure that the utility pole meets all structural, technical, and safety requirements before a third party is authorized to install its equipment. Make-ready work falls into three categories, each with distinct engineering requirements, approval steps, and authorized personnel responsible for completing the work.

	Document Title: Make Ready Process for Utility Pole Attachments	Document No.:	4400.02.003
		Revision:	0

2.1. Types of Make Ready

The Make Ready process is organized into three categories that classify the level of work required before new attachments can be installed on LUMA’s infrastructure. These categories include Simple Make Ready Work for Communications, Complex Make Ready for Communications (CMR-C), and Complex Make Ready Electrical (CMR-E). This structure helps ensure clarity, consistency, and proper coordination throughout the attachment workflow.

2.1.1. Simple Make-Ready Work Communications

Simple MakeReady Work, including one-touch make ready, refers to adjustments in the communication space on a utility pole that are minor, low impact-, and do not involve moving any other existing attachments. Characteristics of Simple MakeReady- Work may include but are not limited to;


1. Minor adjustments in the communication space, such as Re-spacing Licensee’s own existing communications cables (without relocating full attachments) and adjusting hardware within the allocated attachment area.
2. Can be safely performed by communications crews without requiring LUMA to reconfigure electrical facilities.

Any modification to the original utility pole design must be accompanied by an updated design stamped and certified by a Professional Engineer (PE) and submitted with the TPA permit application. All Simple Make-Ready Work will be performed by Licensee.

2.1.2. Complex Make-Ready Communications (CMR-C)

Complex MakeReady – Communications involves modifications in the communications space that require the rearrangement, or adjustment of other existing attachments on the PREPA utility pole. CMR – C work may include but is not limited to;

1. Existing third-party- communications attachments must be moved, raised, lowered, or rearranged.
2. The proposed attachment does not fit within available space without modifying other equipment.
3. Clearance or spacing requirements cannot be met without adjustments to existing communications lines.
4. The work requires coordination with other existing attaching entities to prevent service disruption.
5. Addition of guy wire in the communication space to remedy a failed utility pole loading analysis (“PLA”)

	Document Title: Make Ready Process for Utility Pole Attachments	Document No.:	4400.02.003
		Revision:	0

Any modification to the original utility pole design must be accompanied by an updated design stamped and certified by a Professional Engineer (PE) and submitted with the TPA permit application. In addition, as part of the permit application the Licensee must provide written approvals from all existing attachers affected by the proposed make ready design either (i) authorizing the Licensee to rearrange their existing attachment, or (ii) indicating that they will perform the rearrangement of their own attachment.

Under Process Option **A** of the Application Guide for Utility Pole Attachment Requests (“Application Option A”), when the Applicant prepares the proposed make-ready design, the Licensee shall submit the design together with its application and all other Required Documents through AldenOne. LUMA will review the application and proposed make-ready work and, if approved, the Licensee may proceed to perform the approved make-ready work, install the attachment, and submit a Notice of Completion through AldenOne.

Under Process Option **B** of the Application Guide for Utility Pole Attachment Requests (“Application Option B:), when LUMA prepares the make-ready design, LUMA will upload the approved design to AldenOne. Applicants must review the make-ready design and obtain the necessary written approvals from other existing attachers, if applicable, and submit the application. After the application is Submitted, LUMA will review and issue a conditional permit approval, subject to Applicants completion of the make-ready work in accordance with the make ready design. Licensee may then proceed to perform the approved make-ready work, install the attachment, and submit a Notice of Completion through AldenOne.

All Complex MakeReady – Communications work will be performed by Licensee/Applicant.


Regardless of who prepares the make ready design, Licensee/Applicant must always obtain and submit the necessary approvals from other existing attachers, if applicable.

2.1.3.Complex Make-Ready Electrical (CMR-E)

Complex Make Ready – Electrical (CMR-E) includes any work that affects the electrical space of the utility pole or requires relocation, reconfiguration, or modification of existing electrical equipment. This type of Make Ready is the most complex category and is required when a proposed attachment cannot be safely installed without electrical adjustments performed by the utility pole owner.

All CMR-E work may only be performed by LUMA.

Steps in Applications that may Require CMR-E

	Document Title: Make Ready Process for Utility Pole Attachments	Document No.:	4400.02.003
		Revision:	0

Step 1: In Application Option A, when the Applicant performs the Technical Evaluation (as defined in the Application Guide), Applicant may indicate if CMR-E work will be required, in which case LUMA will prepare the CMR-E design.

In Application Process Option B, when LUMA performs the Technical Evaluation, LUMA will also notify if a CMR-E is required.

Step 2: Once CMR-E is required, LUMA will review the utility pole(s) to determine if electrical adjustments are required, which may include;

- i. Relocating, rearranging, or upgrading electrical equipment
- ii. Adding a guy wire (tension cable)
- iii. Increasing electrical clearances or separation
- iv. Adjusting conductor positions or hardware
- v. Replacing the utility pole due to structural or clearance requirements
 - a. All work to be done in the communications space will be done by the License/Applicant.


Step 3: All engineering designs, drawings, and structural evaluations for CMRE are prepared by LUMA.

Step 4: LUMA will issue a cost estimate for all CMR-E work.

Step 5: Once the payment has been completed, the Licensee needs to provide payment evidence. After receiving full payment evidence, LUMA will:

- I. Refer project to the Operations Team
- II. Complete the work within 60 days, unless higher-priority electrical system needs require a delay, including major electric outage events, severe weather events, system emergencies, or limitations in crew availability.


Step 6: Once all electrical Make Ready work is completed, LUMA will notify that the work is complete. If any work is required in the communications space, the Licensee will be responsible for performing it. If applicable, LUMA will then issue the permit authorizing the Licensee to install its communications attachment. The Licensee is responsible for ensuring that all workers performing installation or maintenance meet the required qualifications. All attachments must comply with applicable safety, clearance, and engineering standards. Once the installation is complete, the Licensee must submit a Notice of Completion through AldenOne.

	Document Title: Make Ready Process for Utility Pole Attachments	Document No.:	4400.02.003
		Revision:	0

Step 7: LUMA will conduct a post-construction inspection to confirm the attachment was built per the approved design. Following a successful inspection, LUMA will close the related Conversation (or Notification) in Alden ONE, thereby completing the application process.

3.0 SUMMARY TABLE OF RESPONSIBILITIES

MakeReady Type	Design by Licensee?	PE Stamp Required by Licensee?	Who Performs Work?	Payment Needed Before Work?
Simple Make Ready	Yes	Yes	Licensee	N/A
CMR-C	Yes	Yes	Licensee	N/A
CMR-E	No	No	LUMA	Yes

	Document Title: Make Ready Process for Utility Pole Attachments	Document No.:	4400.02.003
		Revision:	0

4.0 DOCUMENT REVISION HISTORY

Revision	Effective Date	Lead Reviewer/Job Title	Description of Change
0	22MAR2026	Jessica Arnaldy/Section Manager	Initial Release
1	26MAR2026	Jessica Arnaldy/Section Manager	Add Utility references

End of Document