

# Rochester Public Utility Board Policy

## POLICY 31: ELECTRIC UTILITY UNDERGROUNDING

### POLICY OBJECTIVE:

The decision to underground existing or newly constructed electrical facilities within the RPU service territory can be impacted by numerous key inputs such as cost allocation, rate base, public policy, etc. This policy will provide guidance considerations and is intended to be utilized in conjunction with existing RPU Electric Service Rules and Procedures.

Advantages of undergrounding include increased reliability during high winds and storms, lower storm damage and restoration costs, fewer structures impacting sidewalks and roadways, fewer motor vehicle accidents, reduced live-wire contact, improved aesthetics, lower tree-trimming costs, and increased tree coverage. Mature boulevard street trees have a positive effect in reducing heating & cooling energy costs, promoting outdoor activity and active transportation (i.e. biking, walking), improving air quality, reducing stormwater runoff, and mitigating climate change.

The majority of the existing RPU electric distribution system is currently underground. Those electrical facilities under the 100 kV voltage classification constitute the distribution system. The Board's policy objective is to continue and enhance the movement of the Electric Utility toward 100% underground infrastructure. This shall be done over time in a technically prudent, practical, measured, and sustainable manner that respects, considers, and mitigates impacts to retail rates, while addressing cost allocation and other public policy considerations.

### POLICY STATEMENT:

1. Technical policies are routinely accepted by the RPU Board as a regular course of normal business, and they provide detailed guidance as to Electric Utility construction and interconnection.

The RPU Electric Service Rules and Procedures document details requirements related to undergrounding, and provides guidance to external parties such as contractors, developers, and other interconnecting parties. These detailed procedures include the following sections:

- a. Special Services
  - b. Overhead and Secondary Services
  - c. Underground Services – New Residential Developments
  - d. Underground Services – Residential Undergrounding in Overhead Areas
2. RPU will coordinate with other public entities, especially where public roadways and associated rights-of-way are being realigned, repurposed, or reconstructed. These projects often provide a viable opportunity to underground existing infrastructure in the most cost-effective manner.

RPU recognizes that a change from overhead to underground electric service may require additional modifications to an affected customer's private service. Where a customer chooses to retain their overhead service, RPU will convert as much associated electrical infrastructure to underground while accommodating the customer's request. This may require retaining one or more existing utility poles in an area that has otherwise been converted to underground service.

3. RPU shall consider public policy undergrounding initiatives and requests. Under most scenarios, the requesting third party is responsible for 100% of direct and indirect undergrounding cost. When undergrounding is requested via public policy initiatives, RPU will analyze the situation to consider

# Rochester Public Utility Board Policy

a fiscal contribution based upon deferred or avoided costs, or other opportunity benefits associated with the undergrounding, as compared to long-term continuation of overhead infrastructure.

4. RPU will routinely examine opportunities to leverage undergrounding as a catalyst to improve occupational safety, and/or improve reliability, when other options are generally ineffective or are not cost-effective in comparison. This examination will be held in concurrence with road projects, private development projects, and routine tree trimming evaluations. RPU will give priority to undergrounding existing infrastructure where pole replacement and associated tree trimming is not a long-term economic advantage
5. To the extent possible, RPU will conduct undergrounding activities in a manner that preserves existing tree cover.
6. RPU will work with joint-pole-attachers, such as communication companies, to vacate abandoned or converted-to-underground lines, in efforts to encourage undergrounding by those attachers. RPU will eliminate utility poles upon the completion of any undergrounding activity in limited situations where the joint-pole-attacher is providing service to a limited number of customers along rear property lines or has radio-based communication antenna on the pole. In such cases RPU may at its discretion retain ownership or transfer ownership of the pole to the remaining attacher. RPU will not maintain tree-trimming activities in an area where it has buried its utilities. The planting of trees and tree-trimming in areas where RPU has buried utilities will be governed by City of Rochester policy (which may allow planting of full-size street trees and prohibit vegetative pruning to occur in public right of ways).
7. When a decision is made to underground facilities, notice to impacted residents and property owners will be made as soon as practicable.
8. When a new development project (ex: new building structure) is in conflict with RPU's overhead facilities, the developer will be responsible to re-design their building to eliminate the conflicts or pay 100% of the costs for RPU to underground the existing overhead facilities. RPU will determine the starting and ending points of the underground project. Many times these points may extend beyond the developer's project due to engineering design logistics.

**RELEVANT LEGAL AUTHORITY:** City of Rochester Home Rule Charter Sections 15.03 & 15.09

**EFFECTIVE DATE OF POLICY:** September 29, 2020

**DATE OF POLICY REVIEW:** May 21, 2024

**POLICY APPROVAL:**

DocuSigned by:  
  
E4CAB2A814F5481...  
Board President

6/26/2024 | 11:08:28 CDT

Date