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**From:** Haller, Stephen P. <Stephen.Haller@nationalgrid.com>  
**Sent:** Monday, July 29, 2019 3:19 PM  
**To:** APA Regulatory Programs Comments  
**Subject:** APA General Permit 2019G-1 Replacement of Certain Utility Poles

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To Whom It May Concern – National Grid respectfully submits the following comments/questions regarding the above mentioned proposed General Permit. Please let myself or Tracy Miller know if you have any questions. Thank you.

1. Item c. under “Eligibility” states that the jurisdiction for the project is the replacement of utility poles involving an increase in height and resulting in a final height above grade in excess of 40 feet and/or wetlands. Can you clarify that this permit would be applicable to a project increasing the height of poles in excess of 40 feet with no wetland impacts? Can you clarify that this permit would be applicable for projects replacing poles in wetlands with no increase in height? If we understand it correctly, it would also be applicable in situations where both conditions are present (because of the use of the “and/or” statement).
2. The previous permit that this will replace required submission of an annual summary of work completed. No annual reporting is mentioned in this draft permit. Is that correct?
3. This draft permit would be applicable for a project of any size? What would be the threshold for a project requiring the need for a Major Project Permit? Would that be determined on a case by case basis? Does this draft permit seek to replace the need for that?
4. Permit approval would be within 10 days. Would the Agency be able to issue a NIPA if more information was required?
5. Will permit approvals need to be filed with the County Clerk’s office like Major Project permit approvals do?
6. It is also our understanding that this would trump the need for an 814 permit when increasing height above ground greater than 40 feet (but not more than 25%), however, this doesn’t call out increases in height above ground but less than 40 feet that would otherwise trigger the need for an 814 permit. Can you clarify whether this was also the intention of this proposed GP?

### Stephen Haller

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