



January 23, 2019

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VIA EMAIL: [scott@marchantlaw.com](mailto:scott@marchantlaw.com)

**RE: RG & E Cellular Tower / Town of Canandaigua**

Dear Scott,

In response to your request for a list of specific items the Town of Canandaigua would like addressed, I suggest that your client produce the following:

1. Specific justifications for waivers from the setback and "fall zone" provisions of the Town's Special Use Permit requirements.
2. Specific explanation of why the proposed cellular tower is a necessity.
3. Specific explanation of the value that the proposed cellular tower will provide to RG & E customers.
4. Verification that there are no alternatives to the proposed cellular tower. This verification should include:
  - a. Alternative Locations
  - b. Alternative methods of achieving the desired result
5. Provide GeoTech Report to MRB Group.
6. Address the questions posed in the attached document entitled "Questions for Rochester Gas & Electric regarding Application for Special Use Permit and Site Plan Approval."

To: Scott Marchant, Esq.  
Date: January 23, 2019  
RE: RG & E Cellular Tower

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If you have any questions or would like to discuss further please do not hesitate to contact me.

Sincerely,

LAW OFFICES OF  
CHRISTIAN M. NADLER



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Christian M. Nadler, Esq.

CC: Tom Schwartz  
Gary Humes  
Eric Cooper  
Lance Brabant

Encls.

Town of Canandaigua Planning Board  
Questions for Rochester Gas & Electric regarding  
Application for Special Use Permit and Site Plan Approval

Based on the discussion and material presented at the 7 January 2019 meeting of the Town of Canandaigua Planning Board regarding the application for a Special Use Permit and Site Plan Approval presented by Rochester Gas & Electric (RG&E), the Planning Board seeks further clarification and justification for the proposed Special Use Permit. RG&E is asked to submit written answers to the following questions in sufficient time for Planning Board members to consider the responses prior to the Planning Board meeting scheduled for 26 February 2019.

1. Scope of Smart Grid project within the Town of Canandaigua: The proposed installation of a 100' mast at the Monks Rd. substation is only one part of a more complex plan to integrate smart grid technologies into the utility service being provided to the Town of Canandaigua customers. The Planning Board seeks further information on the overall scope, architecture, primary elements, and cost of this project. To support this level of understanding, RG&E is asked to provide the following:
  - a. A high-level architecture diagram of the operational concept of the smart grid technology being integrated.
  - b. A list of the primary elements and scope of the overall project to include, but not limited to, network communication equipment, software improvements, changes to ground substation equipment, technician and crew communications equipment, technical manuals and documentation, training, and security and safety measures.
  - c. The parameters that will be measured, analyzed, and controlled through the introduction of smart grid technologies.
  - d. The safeguards against cybersecurity and other communications-based threats, that will be implemented with this improvement.
  - e. A timeline to complete the design, installation, and initial deployment of smart grid technologies in support of the Town of Canandaigua.
  - f. The total cost of designing, installing, integrating, deploying, and sustaining smart grid technologies for the Town of Canandaigua customers – i.e. the total cost of the overall project.
  - g. The source of funds for the project.
  - h. Expected year when project will be available to the customer.
  - i. Expected life (in years) of the improvement.
2. Reliability measures and Value to the Customer: Per the RG&E application, the mast and antenna installation at their Monks Rd. substation will enable line of sight (LOS) communications with the antenna's and communication equipment at their Bristol Mountain facility – all in support of implementing smart grid technologies to allow remote monitoring and control of the substation thus improving the reliability, efficiency, and security of service. The Planning Board seeks further information necessary to quantify the expected improvements to customer service that are anticipated from the integration of smart grid technologies and evaluate value of that improved service to the consumer. RG&E is therefore requested to provide the following:



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- a. The current methods/metrics used by RG&E to measure reliability.
  - b. The actual reliability performance observed annually over the past 5 years for service to the Town of Canandaigua.
  - c. The reliability of the Monks Rd. substation compared to other substations serving the Town of Canandaigua.
  - d. The expected improvement in reliability based on implementation of smart grid technologies.
  - e. The total number of customers (broken out by residents and non-residents) served by the Monks Rd. substation.
  - f. The total area of coverage served by the Monks Rd. substation.
  - g. The number of critical facilities (i.e. Hospitals, Emergency Call Centers, First Responder facilities, Law Enforcement and Public Work facilities, etc.) that are serviced by the Monks Rd. substation.
3. Alternative Methods: The Planning Board has consistently inquired about alternative methods or approaches that could be implemented to achieve the communication paths required to implement the project. The Planning Board requires more evidence and assurance that methods and approaches to achieve the desired communication networks - without the need of a 100' mast located at the Monks Rd. substation – have been considered and evaluated. To meet this need, RG&E is asked to provide the following:
  - a. Analysis of alternative approaches considered by RG&E prior to the request of current application for Special Use Permit.
  - b. Any analysis of alternatives conducted by RG&E since the current application was first filed, based on discussions held with the Town of Canandaigua Planning Board.
  - c. Projected changes to the project plan should the application for Special Use Permit be denied, and the quantitative impact of such changes to the Town of Canandaigua customers.