NSTAR ELECTRIC 800 Boylston Street, Boston, Massachusetts 02199

Via hand delivery

June 18, 2008

Mary L. Cottrell, Secretary
Department of Public Utilities
One South Station, 2nd Floor
Boston, MA 02110

RE: Double Pole Report, D.T.E./D.P.U. 03-87

Dear Ms. Cottrell:

On behalf of NSTAR Electric Company ("NSTAR Electric" or the "Company"), I am submitting NSTAR Electric's double pole report to the Department of Public Utilities (the "Department").[1] This report responds to the June 16, 2005 Hearing Officer Procedural Ruling that established a standardized format for the filing of semi-annual reports, as required pursuant to Report to the Legislature on Double Poles, D.T.E. 03-87, at 15-16 (2003). The Hearing Officer's June 16th ruling set forth a six-month reporting schedule for NSTAR Electric, Fitchburg Gas and Electric Light Company, Massachusetts Electric Company, Nantucket Electric Company, Verizon Massachusetts and Western Massachusetts Electric Company (together, the "Pole Owners") to file statewide information on the status of backlog and new double poles,[2] as well as the submission of company-specific information regarding the progress of the individual Pole Owners in relation to their compliance plans.

- **Background**

On January 27, 2004, NSTAR Electric submitted its Plan ("2004 Plan") for eliminating the backlog of double utility poles to the Department pursuant to D.T.E. 03-87. In its 2004 Plan, the Company proposed to eliminate its existing backlog of double poles and to streamline the process of installation of new poles to ensure that double poles are removed in a timely manner in the future by:

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1 Pursuant to Chapter 19 of the Acts of 2007, the former Department of Telecommunications and Energy ("DTE") was reorganized into two new agencies: the Department and the Department of Telecommunications and Cable ("DTC"). Jurisdictional powers of the DTE are divided between the two new agencies with the Department retaining jurisdiction over electric, natural gas, pipeline, water, siting and transportation issues.

2 Verizon, on behalf of the Pole Owners, jointly filed with the DTC its statewide report regarding double poles on June 11, 2008. In the interests of completeness, the Company is making this filing to the Department as its jurisdictional oversight agency, and has also provided a copy of the report to the DTC.

1. Eliminating the current backlog of double pole sets within three years;
2. Managing the Pole Lifecycle Management ("PLM") system database with other utilities to ensure that accurate information regarding double pole sets is reflected and that pole tenants are notified when they are "next in line" for moving their facilities from the old pole to the new pole in a set;
3. Dedicating work crews to eliminate the backlog, based on prioritization;
4. Prioritizing the elimination of double pole sets by first removing pole sets in communities with the highest volume of sets; and
5. Holding NSTAR Electric regional directors accountable for daily management of the PLM database and the elimination of the double pole backlog.

Consistent with the 2004 Plan, the Company has worked to eliminate the backlog of double-pole sets and to minimize new double-pole sets. Because of ongoing work between the Pole Owners and the continuing refinement of the PLM system, the process of notifying pole tenants of their responsibility to move their attachments is being initiated more quickly, which has resulted in the process having a steady reduction in the backlog. The Company is proactively managing the attachments of third parties to ensure the cooperation of all parties in the efficient removal of double-pole sets. To this end, NSTAR Electric, Verizon, Comcast and RCN meet regularly to discuss double poles and other issues within their respective service territories. Moreover, the Company has internal double-pole reduction team meetings and NSTAR Electric, Verizon and the other Pole Owners conduct monthly task force meetings to review and assess ongoing tracking and removal efforts. NSTAR Electric has also maintained its use of crews for wide-scale removal of double poles within defined municipalities with higher concentrations of double-pole sets. These combined actions have resulted in the efficient reduction and management of double-pole sets within the NSTAR Electric service territory, both in the field and administratively.

- **Double-Pole Plan in Capital Projects Scheduling List**

Consistent with the settlement approved in D.T.E. 05-85, the Company has made specific commitments with regard to expediting the removal of double poles in its service territory. Particularly, Section 2.25 of the Settlement Agreement required NSTAR Electric to file a specific list of projects, the Capital Projects Scheduling List ("CPSL"), designed to improve reliability and safety. The CPSL, filed on February 22, 2006, included a specific program plan for the inspection, replacement, restoration and transfer of double poles. The objectives of the Double-Pole Program are: (1) to enhance the safety and reliability of electric service to all customers served by the Company; and (2) to reduce the number and duration of double poles in the municipalities served by NSTAR Electric. This plan was based on current projections of work-force availability and the schedules for distribution and transmission system construction and maintenance projects. Subject to constraints imposed by third-party transfers, emerging system

conditions, reliability requirements and work force availability, the Company's 2008 performance goals for the Double-Pole Program include:

- Elimination of double-pole sets created prior to 2007;
- Mitigate the propagation of new double-pole sets created in 2008 and beyond by expediting the transfer and removal activities at those locations;
- Ongoing pole inspections to determine the condition of poles and to mitigate potential for double-pole sets. NSTAR Electric's goal is to complete 49,000 inspections by December 31, 2008;
- Ongoing completion of all priority distribution-pole replacements and restorations to mitigate new double-pole sets.

Additionally in 2006, the Company set an objective to complete all transfers of electric facilities contemporaneously with a new pole set when the pole is added as part of a planned project. NSTAR Electric has continued this practice in 2008, and will continue to do so in 2009. However, additional time may be required between the pole set and the pole transfers under the following circumstances:

- In the event of major storms that require the diversion of resources;
- When a pole relocation is required in a location that differs from the original set; and
- When pole replacements are installed as part of a reconductoring project, which scheduling may vary from month-to-month.

Thus, in accordance with the Department-approved settlement in D.T.E. 05-85, NSTAR Electric has agreed to aggressively monitor and remove double poles, through the implementation of its Double-Pole Program.

- **Joint Report**

On June 11, 2008, NSTAR Electric, with the other Pole Owners, submitted a Joint Report detailing the status of existing double-pole sets in the Commonwealth as of April 30, 2008. NSTAR Electric and the Pole Owners remain committed to working collaboratively to monitor and address issues of new pole placement that arise from continued growth in the distribution system and the addition of new infrastructure projects, as well as the ongoing complications of coordinating the transfer of facilities off of double poles by various attachers, each with their own rights and interests.

- **Current Status for NSTAR Electric**

Attached to this NSTAR Electric-specific report is the summary data from the PLM system for Double Pole Activity for the time period November 1, 2007 through April 30, 2008, on an NSTAR Electric system-wide basis (see Attachment A, appended

hereto). On November 1, 2007, NSTAR Electric had 3,281 double poles.[3] Of this total, there were 150 double poles that were created prior to January 31, 2004. As of April 30, 2008, NSTAR Electric had reduced that quantity to 126 with 1,259 (91%) of the original 1,385 backlog double poles removed. Of the remaining 126 backlog double poles, 113 of those locations (90%), NSTAR Electric completed the needed transfers and was awaiting transfer activity by other attached parties. The remaining 13 double pole locations consisted of 4 (3%) transfers that required the coordination of service interruptions to our customers to complete and 9 (7%) removals that NSTAR Electric had to perform. With regard to NSTAR Electric's ongoing program to eliminate the backlog of double-pole sets placed prior to January 2004, the Company has developed a strategy that will:

- Complete the remaining 4 transfers;
- Remove those 9 double poles that have been identified as "ready for removal";
- Continue "chunking"[4] poles where appropriate; and
- Coordinate with the Pole Owners and other utilities to expedite the removal of the remaining 113 double poles from the backlog.

Regarding the additional 2008 Work Plan initiatives, NSTAR Electric typically focuses on completing capacity and reliability projects to prepare for the peak load period during the first half of each year. As such, both our internal and external resources focus on completing all of the transfers associated with this system reinforcement work. As of April 30, 2008, NSTAR Electric was the remediation owner for 3,703 poles. NSTAR Electric has completed the transfer of its facilities at 3,300 of the 3,703 double pole locations (90%) and is awaiting action by other parties so that we may complete our remediation responsibilities. During this same period, NSTAR removed 1,077 double poles.

In summary, the Company has made significant progress in addressing pending activity on current populations with only 10% awaiting NSTAR activity. Although the overall pole count increased over the period, NSTAR's pending activity continues to decrease. In addition, it has removed 91% of the current backlog of double-pole sets within its service territory. NSTAR will continue to coordinate and collaborate with the other Pole Owners and utilities to ensure continued progress in eliminating both current and remaining backlog double poles.

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3 The number of double poles is represented as double poles where NSTAR Electric is the remediation party. Data represented is as of November 1, 2007.

4 "Chunking" involves the practice whereby NSTAR Electric removes virtually all of an existing old pole when the new replacement pole is placed and the electric facilities are transferred, leaving only an approximately 3-4 foot "stub" braced at the top of the new pole. When the last transfer is completed, the stub is removed, usually by the party making that transfer. This practice expedites the removal of large portions of the pole and generally eliminates the need for NSTAR Electric to return to a particular double-pole set to remove the old pole.

NSTAR Electric is committed to working with the Department, Pole Owners and the various attachers to continue to make progress in the removal of double-pole sets. We continue to convey our goals to the major communication companies that will be impacted by our focus on double-pole mitigation so that they may adequately support the initiative.

Thank you for your attention to this matter. Please do not hesitate to contact me if I can be of further assistance.

Sincerely,

Kerry Britland (RFP)

~~Kerry~~ Britland

cc: Laura Olton, General Counsel, DPU
Barry Perlmutter, Electric Power Division, DPU
Sharon Gillett, Commissioner, DTC

Enclosures

Table 1 –
Summary of Backlog Poles Pre-2004

Double Poles & Transfers – NSTAR System Status
Total Backlog Quantity as of April 30, 2008
(Includes Verizon & NSTAR Poles in NSTAR Territory)
(Source – Double Pole Database)

Action Required	Backlog Quantity April 30, 2008
Original Quantity of Backlog Poles	1385
Backlog Poles Completed	1259
Total Backlog Poles Still to Complete	126
NSTAR Backlog transfers to Complete	4
NSTAR Backlog Poles Ready for Removal	9