First Set of Information Requests of Complainants - CABLE-1

Request:

Please provide the current joint use agreement between Massachusetts Electric Company ("MECo") and Bell Atlantic (or any corporate predecessor, like New England Telephone and Telegraph Company).

Response:

Massachusetts Electric does not have a joint use agreement with Bell Atlantic. Massachusetts Electric does have a joint ownership agreement with Bell Atlantic. A copy of this Joint Ownership Agreement is attached.

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-2

Request:

Please refer to the materials provided by MECo in advance of the filing of this Complaint. Please explain on Attachment 3, page 1 of 1, the line entry for "completed construction not classified." State whether MECo now has a breakdown by account 364 subaccount for this $30,951,421.00 line entry and provide that breakdown if it now exists.

Response:

The "Completed Construction Not Classified" account or Account 106 is an account for construction projects which have been completed (placed in service) but have not been "unitized" or segregated into the individual unit of plant accounts for each specific type of plant. Therefore as projects are "unitized" and dollars are moved from Account 106 to the individual plant accounts, additional dollars are accumulated in Account 106 from new construction projects which have been completed, but have not been "unitized". A "Completed Construction Not Classified" account exists for each major plant unit code of property (i.e. poles, meters, etc.).

The balance in the "Completed Construction Not Classified" account as of December 31, 1997 and March 31, 1998 was $30,951,421 and $31,236,272, respectively. To the extent that any amounts have been unitized, the detail is now inherenent to the Company's plant records.

Response prepared by or under the supervision of: D.M. Webster

First Set of Information Requests of Complainants - CABLE-3

Request:

Please provide MECo's 1997 revenues from annual pole attachment license fees. Please separately identify revenues received from cable operators and other parties.

Response:

The following is a breakdown of revenues recorded by Mass. Electric in 1997:

Revenue recorded from Cable Operators	$1,952,698
Revenue recorded from Other Operators	$ 22,849
Total Revenue recorded in 1997	$1,974,547

Response prepared by or under the supervision of: D.M. Webster

First Set of Information Requests of Complainants - CABLE-4

Request:

Please provide MECO's 1997 revenues from the sale of electricity at retail.

Response:

Mass. Electric's 1997 revenues from the sale of electricity at retail amounted to $1,583,407,051.

Response prepared by or under the supervision of: D.M. Webster

First Set of Information Requests of Complainants - CABLE-5

Request:

Please explain how MECo accounts for payments by pole attachment licensees other than annual pole attachment license fees.

Response:

Response prepared by or under the supervision of:

First Set of Information Requests of Complainants - CABLE-6

Request:

Please describe how MECo determined its pole counts and pole ownership figures and provide the date(s) as of when MECo determined the pole counts and equivalent number of poles used in Attachment 1, pages 5 and 6. Explain "other" as it appears in the listing of poles.

Response:

Mass. Electric used a summarized report of its detailed pole inventory database to determine its pole counts by ownership and pole size. The poles counts are based upon only wood poles. These wood poles are then segregated by pole height and ownership type as shown on page 2 of Exhibit DMW-1. The summary pole report for all wood poles is dated April 23, 1998. The summary pole report for those poles with cable attachments is dated April 28, 1998. These reports have been included in Exhibit DMW-1 as pages 6 and 7, respectively.

The summary report shows the pole ownership in the following categories: (1) solely owned, (2) jointly owned and (3) other. The poles located in the other category represents only those poles which are not owned by the Company, but rather are owned by customers of the Company. In certain cases, customers are required to pay for the installation of additional poles, beyond the service line extension agreements provided for in Mass. Electric's Terms and Conditions, which are needed to provide electric service to those customers. The costs of these poles are not contained in the Company's plant investment account and therefore these poles should not be included in the calculation to develop the net cost per bare pole.

In my affidavit, I stated that the "other" category contained poles not owned by the Company, empty locations and leased poles. While the Company does have empty pole locations on its pole inventory database, when the data was sorted to extract only wood poles, the empty locations were also excluded from the data. However, contrary to my affidavit, I have determined that poles leased to Mass. Electric are not included in the pole inventory database. This fact does not have any effect on the pole attachment rate calculation because these poles, correctly so, were not included in the calculation.

Upon investigating the actual pole count information, I have also determined that costs associated with poles other than wood were included in the net plant investment amount. It is improper to include costs associated with other pole types when developing the cost per bare pole because metal and other poles do not have CATV attachments. These non-wood poles should be removed from the calculation to comply with the pole attachment rate formula approved by the Department in Docket 97-82. In addition, I found that included in the wood pole counts were wood poles dedicated to streetlighting and transmission. These poles should also be excluded from the pole attachment rate calculation since the Company's investment for these poles are not included in the distribution pole account (Account 364) but rather are accounted for as a portion of the streetlight and transmission investments, respectively.

First Set of Information Requests of Complainants - CABLE-6
(Continued)

I have attached a revised Exhibit DMW-1 to reflect these changes. Included in the revised Exhibit is a copy of the revised pole summary reports dated June 18, 1998. The effect of these adjustments on the calculation increases the pole attachment rate by 21¢ per solely owned pole.

Response prepared by or under the supervision of: D.M. Webster

First Set of Information Requests of Complainants - CABLE-7

Request:

Please provide all studies, surveys, reports and analyses prepared by or for MECo on (1) pole height and/or (2) the amount of usable space for all poles and all poles with cable attachments. Include all such documents submitted in D.P.U. 95-40 and prepared subsequent to those documents.

Response:

As explained in the affidavits of Messrs. Anundson and Webster, Mass. Electric's determinations of pole height are derived from its pole inventory database. (See also the Response to CABLE-19.) Mr. Webster has provided Mass. Electric's current calculation of average pole height for Mass. Electric's poles with cable attachments as shown on page 3 of Exhibit DMW-1. Mr. Webster has also provided Mass. Electric's current calculation of usable space on page 4 of Exhibit DMW-1. Attached is the single document submitted by MECo in D.P.U. 95-40 regarding pole attachments.

Response prepared by or under the supervision of: Legal Department

First Set of Information Requests of Complainants - CABLE-8

Request:

Please provide for inspection the hearing transcripts in D.P.U. 95-40.

Response:

The hearing transcripts in D.P.U. 95-40 are enclosed in electronic form for the requesting party only. The 15 diskettes will be copied for any other participant in the discovery phase of this docket on request to MECo.

Response prepared by or under the supervision of: Legal Department

First Set of Information Requests of Complainants - CABLE-9

Request:

Please provide the MECo briefs in D.P.U. 95-40 as they related to pole attachment issues.

Response:

The appropriate sections from Mass. Electric's Initial Brief and Reply Brief are attached.

Response prepared by or under the supervision of: Legal Department

First Set of Information Requests of Complainants - CABLE-10

Request:

Please provide a brief description of NEES Communications, Inc., and its activities in Massachusetts, including the services which it presently offers, and whether it or any affiliate has attached any facilities to poles owned solely or jointly by MECo.

Response:

NEESCom is a wholly-owned, nonutility subsidiary of the New England Electric System which provides telecommunications infrastructure and dark fiber leases to the telecom industry. NEESCom has attached fiber to Mass. Electric poles under an Aerial License Agreement which is on file with the Department.

Response prepared by or under the supervision of: Legal Department

First Set of Information Requests of Complainants - CABLE-11

Request:

Please provide the Company's current manual of construction procedures and construction specifications.

Response:

A copy of "NEES Distribution Construction Standards Book" is attached. Because of the voluminous nature of this document, only one copy is being submitted to the requesting party and one to the Department. Additional copies can be made available upon request.

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-12

Request:

Please state whether MECo adheres to the NESC regarding (1) its own overhead plant construction, (2) attachments by joint owners and (3) attachments by third parties.

Response:

Yes, Massachusetts Electric follows the NESC for construction of its own overhead facilities and contractually requires adherence to the NESC by all joint users, including joint owners and licensed attachers to its poles.

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-13

Request:

Please provide all specifications for attachments heights of conductors and other facilities on the pole.

Response:

See NEES Distribution Construction Standards, Section 1800 (provided in response to CABLE-11).

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-14

Request:

Please refer to Attachment 1, page 7 of 7. Please provide a detailed explanation of the manner in which MECo determined average usable space of 9.073 feet. Please state for each line item whether the MECo approach is the same as the approach adopted by the Federal Communications Commission.

Response:

Please refer to Exhibit DMW-1, page 4 of 7.

The first component of the calculation to determine average usable space per pole is to determine the average pole height of the poles which have cable attachment. As shown in Exhibit DMW -1, page 3 of 7, the average pole height of Mass. Electric poles with cable attachments amounts to 36.47 feet. The average pole height is calculated using actual pole data from the Company's pole inventory database. This is in compliance with the methodology approved by the Massachusetts Department of Telecommunications and Energy in Docket 97-82. In its decision, the Department stated that the Federal Communications Commission (FCC) rebuttable presumptions regarding average pole height shall be used unless the actual average pole height for those poles containing cable attachments can be calculated from actual pole records. Therefore, Mass. Electric has calculated the average pole height in accordance with the Department's approved formula.

In order to complete the calculation of usable space, I subtracted from this average pole height the amount of pole space lost to burial, minimum attachment height, worker safety space and other unusable portions of the pole.

In compliance with Mass. Electric's distribution construction specifications and the National Electric Safety Code (NESC), the burial amount Mass. Electric subtracts is derived applying a formula of 10 percent of average pole height plus two feet. Mass. Electric's average burial depth based upon the actual average pole height of 36.47 feet is 5.647 feet. The FCC formula to derive the rebuttable presumption of 13.5 feet of usable space per pole uses a burial depth of 6.0 feet per pole and an average pole height of 37.5 feet. Since Mass. Electric's actual pole height is less than 37.5 feet, applying the FCC standard burial depth of 6.0 feet would understate Mass. Electric's actual average usable space per pole.

First Set of Information Requests of Complainants - CABLE-14
(Continued)

Mass. Electric has used the average minimum attachment height of 18.0 feet in its calculation. The is the minimum attachment height approved by the Department in Docket 97-82 and the same exclusion used in the FCC calculation.

Mass. Electric has also removed from its calculation the NESC worker safety space of forty inches (3.33 feet) and 5 inches (.42 feet) of unusable space at the top of the pole resulting from the attachment of pole top pins to the poles. These elements are not components of the FCC calculation to determine usable space.

Using the components described above, the average usable space calculation amounts to 9.073 feet per pole.

It is important to note that the Department has taken jurisdiction over the pole attachment rate calculation in Massachusetts, therefore the FCC formula does not apply.

Response prepared by or under the supervision of: D.M. Webster

First Set of Information Requests of Complainants - CABLE-15

Request:

Please provide workpapers showing how MECo derived the use ratio of 11.02% shown on Attachment 1, pages 1 of 7 and 7 of 7. Does MECo agree that it treats 5" of pole top and 40" of space above minimum grade clearance as unusable while the DTE treated such space as usable in Boston Edison, D.P.U. 97-82 (1998)? Does MECo agree that it treats 5" of pole top and 40" of space above minimum grade clearance as unusable while the FCC treats such space as usable?

Response:

The use ratio is calculated by dividing the space occupied by a cable attachment by the average usable space per pole. In its recent order in Docket 97-82, the Department ruled that it would use the FCC rebuttable presumption that a cable attachment occupies one foot of space. Therefore the use ratio in the Mass. Electric calculation is the result of dividing the 1 foot of attachment space by the average usable space per pole of 9.043 feet (see Response to Cable-14). This calculation result in a use ratio of 11.02% as shown in Exhibit DMW - 1, page 4.

Massachusetts Electric treats the top 5" of the pole as unusable, but denies that the DTE made a specific determination on this issue in Boston Edison, D.P.U. 97-82 (1998).

Massachusetts Electric treats the 40" worker safety space between the communications and electric supply spaces as unusable. Massachusetts Electric agrees that the FCC has, in the past, considered the worker safety space usable, but notes that the FCC itself raised this issue as a question in an ongoing rulemaking at the agency. See *Notice of Proposed Rulemaking in the Matter of Amendment of Rules and Policies Governing Pole Attachments*, CS Docket No. 97-98, 12 F.C.C.R. 7449 (March 14, 1997).

Response prepared by or under the supervision of: G.P. Anundson & D.M. Webster

First Set of Information Requests of Complainants - CABLE-16

Request:

Please provide all specifications for the attachment of streetlights to poles; the tariffs governing compensation for streetlights; and the annual revenues received for streetlights and/or attachments.

Response:

See NEES Distribution Construction Standards, Section 6000 (provided in response to CABLE-11).

Please see the attached Terms and Conditions and streetlight tariffs as required by the Department in Docket Nos. 96-25 and 97-65..

Response prepared by or under the supervision of: G.P. Anundson & D.M. Webster

First Set of Information Requests of Complainants - CABLE-17

Request:

Please refer to MECo's May 29, 1998 Response and Request for Hearing. On page 5, paragraph 2, MECo claims that it cannot respond to allegations made in paragraph 4 of the Complaint. Please identify specifically what MECo finds "vague and unclear."

Response:

Complainants state that "Mass. Electric or Mass. Electric affiliates have offered to construct and engaged in the construction of communications facilities on behalf of other parties for attachment to poles or conduit owned or controlled by Mass. Electric". Complaint at 4. Massachusetts Electric Company and NEES Communications have independently constructed fiber optic cable installations on MECo distribution poles and in MECo conduit. Both companies have independently leased some fibers to other parties. Also, both companies have independently offered to construct and lease fibers to other parties. MECo has not leased or offered to lease fibers to NEES Com. NEES Com has offered to lease fibers to MECo, but MECO has not accepted this offer.

Nantucket Electric Company has constructed a fiber optic cable and leased fibers to others. Nantucket has also offered to lease fibers to others. Nantucket Electric does not lease fibers to NEES Com.

To the best of my knowledge, no other MECo affiliate has constructed and leased fibers to others. Mass. Electric could not discern whether "the construction of communications facilities" means the attachment of fiber optic cables to Mass. Electric poles.

Mass. Electric's response to CABLE-18 is based on this foregoing understanding.

Response prepared by or under the supervision of: N. Deegan

First Set of Information Requests of Complainants - CABLE-18

Request:

Please state whether MECo or any affiliate has constructed or offered to construct communications lines to be attached to poles or within conduit for use by other parties for communications purposes.

Response:

In 1996, MECO constructed approximately 27 miles of fiber on poles and in conduit in the towns of Westboro, Marlboro, Southboro, and Northboro for internal communications. MECO leased approximately 40% of the fibers to Teleport Communications Group. Also, MECO offered to lease additional fibers to others. However, the offers were not accepted by any other entities. NEES Com has not leased any fiber from MECo.

In 1996, Nantucket Electric constructed 31 miles of fiber cable embedded in a power cable between Harwich, MA and Nantucket Island for internal communications. In 1997, Nantucket leased 6 fibers to MediaOne and offered to lease fibers to others. No other leasing agreements have been signed to date. NEES Com has not leased any fiber from Nantucket Electric.

In 1998, NEES Com installed 3 miles of fiber optic cable on distribution poles in Westboro and Northboro and leased fibers to Teleport.

To the best of my knowledge, no other fiber cables have been constructed for leasing by NEES companies. Several small fiber cable installations have been constructed for the sole use of the operating companies.

Response prepared by or under the supervision of: N. Deegan

First Set of Information Requests of Complainants - CABLE-19

Request:

Please provide the "detailed survey records" referred to on page 6, paragraph 7 of MECo's Response and Request for Hearing.

Response:

Mass. Electric's pole inventory database contains detailed record information on the poles that constitute part of Mass. Electric's distribution network. This pole inventory database is derived, in part, from actual field surveys. The database itself is mainframe-based and printouts of the pole inventory database are voluminous in nature. MECO will make the printouts available for inspection by an authorized representative of the Complainants during normal business hours at a time mutually convenient to both parties.

Response prepared by or under the supervision of: Legal Department

First Set of Information Requests of Complainants - CABLE-20

Request:

Please refer the affidavit of Mr. Anundson. Please explain the basis for the usable space definition employed by Mr. Anundson.

Response:

As described in paragraph 5 of Mr. Anundson's affidavit, the definition of usable spaces is found in G.L. c. 166, § 25A.

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-21

Request:

Please provide the "distribution construction standards" referred to in paragraph 6 of Mr Anundson's affidavit.

Response:

Provided in response to CABLE-11.

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-22

Request:

Please state whether MECo uses pole top extenders. Please describe any other construction methods (e.g., pole pins) by which attachments may be made above the top of a pole.

Response:

Mass. Electric has used a small number of fiberglass pole extensions. These are nonstandard installations used only in unusual circumstances.

Pole top pins are attached to the pole with a top bolt connection at 5" on center below the top of the pole. A portion of the pole above this 5/8" diameter by 12" bolt is used to keep the bolt from splitting out the pole top.

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-23

Request:

Please refer the affidavit of Mr. Anundson, pages 3-4, paragraph 11. Please provide all information pertaining to:

a. The training received by electrical workers
b. The training received by communications workers
c. The qualifications of electrical workers
d. The qualifications of communications workers
e. The cost and expense of equipment used by electric distribution companies for pole work.
f. The cost and expense of equipment used by communications companies for pole work.

Response:

a. Massachusetts Electric overheadline workers are trained in four-step progression. In order, these progression steps are: Apprentice, Third Class, Second Class and First Class Lineworker. This training progression is designed to comply with the specific requirements of OSHA in in 29 CFR 1910.269 for training on identification of exposed live parts and their voltage, minimum approach distances and special precautionary techniques, personal protective equipment, insulating and shielding materials, and insulated tools for working on or near live lines. This progression is a minimum 30-month program and includes a minimum of 72 days of formal classroom training. Major subject areas include basic electrical safety, including hazard recognition, and work area and personal protection; methods for work around live lines; maintenance, operations and construction work practices, methods and equipment; basic electrical theory; and aerial rescue.
b. While Mass. Electric does not train communications workers, the specific OSHA training requirements for electrical workers do not apply for communications workers working on the poles. In fact, the corresponding section of OSHA for communications workers, 29 CFR 1910.268, does not impose any electrical safety training requirements for those workers.
c. The NESC addresses work rules for electric utility workers in Sections 41, 42, and 44. For electric utility workers, OSHA addresses maintenance work rules in 29 CFR 1910.269 and construction work rules in 29 CFR 1926.950-960.
d. The NESC addresses work rules for communications workers in Sections 41, 42, and 43. For telecommunications workers, OSHA addresses maintenance work rules in 29 CFR 1910.268 and construction work rules in the general provisions of 29 CFR 1926.
e. In 1998, Massachusetts Electric purchased equipment at costs of $103,735.00 for a truck equipped with an aerial manlift device and $ 136,580.00 for a truck equipped with a material handling manlift device.
f. A typical uninsulated aerial manlift used by communications cost approximately $45,000 to $60,000. This price range reflects a 30' reach non-insulated aerial manlift on a 15,000 pound GVW chassis and a basic utility body. The cost range reflects the wide range of truck chassis, drive train and options available.

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-24

Request:

Please refer the affidavit of Mr. Anundson, page 4, paragraph 14. Does the NESC ever permit communications lines and electrical lines to be separated by less than 40? If yes, please describe those circumstances.

Response:

The NESC establishes two separation requirements that must be met to establish the worker safety space. The first is a separation requirement at the pole. The second is a separation requirement at any point in the span between poles. The required separation in the span typically forces the separation at the pole to be larger than 40".

The separation at the pole required to create the worker safety space is specified in NESC Table 235-5. Row 1.a., Column 1 of Table 235-5 specifies a minimum 40" vertical separation at the pole between the nearest surfaces of the lowest supply wire and the highest communications wire. Because this is a surface to surface clearance, the minimum center to center spacing at the pole must be larger. This requirement applies for typical joint use lines where the supply wire nearest to the communications is an electric secondary (600V maximum). Footnote 6 of Table 235-5 allows a reduction of this clearance to 30" where the lowest supply wire is an effectively grounded neutral wire or a shielded electric secondary supported on an effectively grounded neutral wire and the communications wire messenger is bonded to the supply neutral. Construction of electric secondary using a shielded cable is uncommon and not an approved standard practice at Massachusetts Electric. A neutral wire without secondary wires can only be installed where there is an electric line, but no electric customers. Even where this may occur, Massachusetts Electric typically allows for an electric secondary in the future.

Creating the worker safety space also requires that the separation at any point in the span is also met. This requirement is defined in NESC Rule 235C2b(1)(a) as 75% of the clearance required in Table 235-5. This means that where the required clearance at the pole is 40" the required clearance at any point in the span is 30". This clearance requirement applies when the upper wire is at the greater of its sag at: (1) maximum operating temperature and (2) ice loaded and the lower wire is at the same ambient conditions as the upper wire. This requirement allows for normal vertical movement of the wires as ambient weather and operating conditions vary. For example, even for a short (150') span construction, ice loading a standard Massachusetts Electric secondary cable, would increase its sag by 16". (Reference: NEES Distribution Construction Standards - STD 1162, Page 1, Table II, Maximum Design Sags and Tensions - Final, for: 32°F, no ice, no wind and 32°F, 1/2" ice, no wind). This 16" increase in sag adds to the required clearance in the span to require 46" (not 40") separation at the pole.

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-25

Request:

Please refer to the affidavit of Mr. Webster, page 5, paragraph 3.c. How many of the "other" poles are leased poles, as opposed to vacant pole sites? Who is the owner of leased poles? How does the MECO account for lease payments?

Response:

Please see response to Cable-6. The pole inventory database does not include leased poles and leased poles are not included in the calculation.

Response prepared by or under the supervision of: D.M. Webster

First Set of Information Requests of Complainants - CABLE-26

Request:

Please state whether MECo has permittedwireless attachments to its distribution poles. If so, please describe the physical arrangements by which wireless attachments are accommodated and whether these arrangements increase the height of poles to which wireless facilities are attached.

Response:

No, Mass. Electric has not licensed any wireless attachments for its distribution poles.

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-27

Request:

Please provide all written notices of pole attachment rate increases which Nantucket Electric Company sent to the cable operator serving Nantucket. Please identify the proposed pole attachment rates and provide all backup worksheets, calculations and assumptions, and 1997 Annual Return of Nantucket Electric Company.

Response:

Nantucket Electric Company, which is not a defendant or named party in this case, did not provide written notice of pole attachment rate increase to the cable television operator serving Nantucket at the same time as Mass. Electric provided notices to its attaching parties. However, the cable television operator serving Nantucket has signed a comprehensive agreement covering all of its affiliates in all of the NEES retail companies' states (Massachusetts, New Hampshire and Rhode Island) at the increased rates, as shown in that agreement.

For many ratemaking purposes, Nantucket Electric is considered by the DTE to be part of Massachusetts Electric Company. With the exception of an undersea cable surcharge, customers of Nantucket, pay the same rates as Mass. Electric customers. Mass. Electric's pole attachment rates would be advantageous to the cable television operator serving Nantucket since Mass. Electric's rate is approximately 25% lower than a rate developed on Nantucket-only data would be. The calculation, attached as Exhibit DMW-2, has been prepared in the same manner as the calculation for Mass. Electric's rate as filed in this proceeding on May 29, 1998.

Response prepared by or under the supervision of: Legal Department/D.M. Webster

First Set of Information Requests of Complainants - CABLE-28

Request:

What portion of the Account 364 balance does MECo content is bare pole? Provide all supporting information, including any analysis of Account 364 by subaccount.

Response:

To comply with the Department's approved formula for calculating pole attachment rates, Mass. Electric derives its net pole investment in the following manner:

> Total investment in poles, towers and fixtures (FERC account 364) less the investment in poles other than wood which have been recorded in account 364. This results in Mass. Electric's gross investment in wood poles, including appurtenances. From this balance, an apportioned amount of depreciation and accumulated deferred taxes are removed from Mass. Electric's gross wood pole investment. The resulting balance after removing depreciation and accumulated deferred taxes is then reduced by 15%, as approved by the Department in Docket 97-82 as being a reasonable exclusion amount, to eliminate the investment in appurtenances included in account 364.

Please see the revised Exhibit DMW-1 included in Mass. Electric's response to Cable-6 and the affidavit of David M. Webster, pages 2 through 5 for a complete explanation of the calculation of the net pole investment described above.

Response prepared by or under the supervision of: D.M. Webster

First Set of Information Requests of Complainants - CABLE-29

Request:

Please provide all changes in pole ownership or maintenance arrangements between MECo and Bell Atlantic since 1994. Provide documentation of these changes.

Response:

No such changes have been made.

Response prepared by or under the supervision of: G.P. Anundson

First Set of Information Requests of Complainants - CABLE-30

Request:

Please provide MECo's Account 364 balance for each year from 1990-1997.

Response:

Year	Account 364 Balance
1990	161,964,631
1991	175,193,744
1992	186,490,328
1993	198,550,993
1994	207,679,932
1995	221,835,357
1996	237,713,000
1997	249,907,963

Response prepared by or under the supervision of: D.M. Webster