Comments regarding Pole Attachment, Duct, Conduit, and Right-of-Way Complaint and Enforcement Procedures in Dockets D.P.U. 26-10/D.T.C. 26-1 and D.P.U. 25-10/ D.T.C. 25-1

Introduction

My name is Seth G. Parker and I reside at 26 Shornecliffe Rd. Newton, MA, 02458. I am a retired power system management consultant. I have been concerned about double poles in Newton for almost 10 years, and have been working with the Newton DPW on this matter. The growing number of double poles, and the delays to remove old poles, has worsened over this time. This is a systematic problem, not a utility-specific problem. My key recommendations and specific observations follow:

Key Recommendations:

- The D.P.U. and D.T.C. should review weekly NJUNS reports and require meaningful reports from pole owners.
- Pole owners should be responsible for contacting NTG (next-to-go) users who are delaying the process.
- The D.P.U. and D.T.C. should impose penalties or have a comparable enforcement mechanism for pole owners and users that delay the transfer of wires and removal of old poles.
- The D.P.U. and D.T.C. should approve a One-Touch Make-Ready process to expedite the removal of old poles and ultimately save ratepayers money by avoiding duplicative work.

My specific observations follow.

Old double poles must be removed within 90 days, but this almost never happens.

Massachusetts General Law, Part I, Title XXII, Chapter 164, Section 34B Replacement of Existing Poles, states "A distribution company or a telephone company engaging in the removal of an existing pole and the installation of a new pole in place thereof shall complete the transfer of wires, all repairs, and the removal of the existing pole from the site within 90 days from the date of installation of the new pole." In spite of this regulation, old poles are seldom removed within 90 days as the data below indicates.

The number of double poles in Massachusetts is growing rapidly.

The number of double poles owned by Eversource has increased by 1,495 over the past three years, or 39%, according to its Double Pole Reports submitted to the D.P.U.

- Dec 3, 2025 Report "As of October 31, 2025, Eversource has 5,329 double poles."
- Dec 13, 2024 Report, "As of October 31, 2024, Eversource has 3,995 double poles."
- Dec 20, 2023 Report, "As of October 31, 2023, Eversource has 3,834 double poles."

National Grid also has a growing number of double poles. According to its Double Pole Reports submitted to the D.P.U., the number has increased by 2,957 over the past three years, or 50%.

- Dec 1, 2025 Report: "During the reporting period, May 1, 2025 through October 31, 2025…leaving a total number of 8,914 "new" double poles remaining at the end."
- Nov 27, 2024 Report: "During the reporting period, May 1, 2024 through October 31, 2024…leaving a total number of 6,853 "new" double poles remaining at the end."
- Nov 30, 2023 Report: "During the reporting period, May 1, 2023, through October 31, 2023…leaving a total number of 5,957 "new" double poles remaining at the end."

Verizon provides detailed double poles data for eight utilities as Attachment A to its Semi-Annual Double Pole Reports. According to its most recent Report, Verizon's data indicates the number of new poles increased from 20,883 as of May 1, 2025 to 22,066 as of Oct 31, 2025, a gain of 1,183 double poles in only 6 months.

Since the data provided by Verizon is comprehensive, I checked the number of new poles remaining at the end of October over a longer time period. Over the past five years, the number of double poles has increased by 5,726 throughout Massachusetts.

- 2025: 22,066
- 2024: 18,539
- 2023: 18,917
- 2022: 16,924
- 2021: 16,706
- 2020: 16,340

The pole owners have not changed their approach in at least the past three years.

In its Double Pole Report of Dec 3, 2025 Eversource "proposed to eliminate its existing backlog of double poles and to streamline the process of installation of new poles" by:

1. Eliminating the current backlog of double pole sets within three years;

2. On January 12, 2015, Eversource terminated its contract with Pole Lifecycle Management ("PLM") and entered into a contract with National Joint Utilities Notification System ("NJUNS"). Along with other utilities, we continue 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 Eversource regional directors accountable for daily management of the NJUNS database and the elimination of the double pole backlog.

These are the identical actions proposed in Eversource's Double Pole Reports of Dec 13, 2024 and Jan 11, 2023. Nothing has changed in spite of the growing number of double poles.

Similar to Eversource, National Grid presented Compliance Plans in its Double Pole Reports that have essentially remained unchanged over the past three years. It is not clear if other utilities have changed their policies or not, but clearly this process needs real, tangible improvement.

Some double poles have been in place for over twenty years.

In its Double Pole Report of May 30, 2025, National Grid stated that "only 2 of the original 'backlog' poles remain." According to the spreadsheet filed with its Report, "Backlog double poles are those with a set date on or before January 31, 2004." In other words, these 2 poles have been in place for over twenty years. This is a depressing statistic that should not be paraded as an accomplishment of reducing the number of remaining "backlog" poles.

Original Backlog Data submitted by the utilities is meaningless.

Verizon, on behalf of multiple pole owners, submits a semi-annual report detailing the status of existing double-pole sets in Massachusetts. In its most recent Attachment A to its Double Pole Report in D.T.E. 03-87 of Nov 14, 2025, Verizon provided a spreadsheet as Attachment with a Backlog Summary Report for Reporting Period: May 1, 2025 to Oct 31, 2025 that indicated 99% of backlog double poles had a been removed. This data is meaningless and misleading, since it only tracks poles installed a long time ago.

Double poles in Massachusetts is a systematic problem.

The growing number of double poles, and the time it takes to remove them, is a systematic problem, not a utility-specific problem. Pole owners and users rely on NJUNS, but (i) this database may not be precisely correct and may not be up-to-date, (ii) moving the wires in a timely manner is voluntary, (iii) there may be disagreements over which company is next-to-go, and (iv) there is no enforcement mechanism.

Massachusetts General Law, Part I, Title XXII, Chapter 164, Section 34B Replacement of Existing Poles, also does not have an enforcement mechanism. The D.P.U. and D.T.E. should have better oversight and be permitted to impose penalties or have a comparable enforcement mechanism for unnecessary delays. Merely requiring more reports is not the answer.

The NJUNS organization provides a weekly report to all members (including Massachusetts utilities) with tickets indicating which member has been NTG for more than 30 days. Pole owners should be responsible for contacting the NTG member who is delaying the process. The D.P.U. and D.T.E. should receive these weekly reports and penalize NTG members who are 30 days or more behind.

Approving a One-Touch Make-Ready ("OTMR") procedure makes sense.

The joint investigation by the D.P.U. and D.T.C. includes OTMR procedures to simplify and expedite switching wires from old to new poles. This is a concept that has been tried and proven throughout the US. I would encourage the D.P.U. and D.T.C. to provide guidelines for pole users to enter into written agreements to protect all parties and to ensure reliable and safe work. OTMR would be much more efficient than having each pole user send its own crew to move its wire, saving time and expense that is ultimately borne by consumers.