

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. TT 02-68**

**Respondent:** John M. Rendon  
**Title:** Senior Program Manager

**REQUEST:** Department of Telecommunications and Energy

**DATED:** May 1, 2002

**ITEM:** DTE 1 Please refer to proposed changes to Tariff No. 15, Section 30.16.2:

Please explain why Verizon proposes to charge the Power rate element "per amp – per feed," when in its cover-letter Verizon states it will charge for Power on a "per load-amp basis."

**REPLY:** The Power rate element in Section 30.16.2, reflects the rate the customer will be charged per amp, per feed. The cover-letter and the proposed changes to Tariff No. 15, Section 16.2.1 (G) clarify that the Power rate element will be applied to only the load amps ordered by the customer. Sections 16.2.1 (G) reads as follows:

"The Telephone Company will provide DC power to the collocation arrangement as specified by the customer in its collocation application. The customer will specify the load on each feed and the size of the fuse to be placed on each feed. **Charges for DC power will be applied per load amp based on the total number of load amps ordered on each feed.** "

While Verizon feels that its proposed language appropriately reflects that DC power would be charged on a per load amp, per feed basis, should the Department deem it necessary, Verizon is willing to modify the DC Power description in Section 30.16.2 to mirror the DC power description language in MA DTE 17, Section 5.3.8 ("Per load amp on each feed").

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**ITEM:** DTE 2 Please refer to proposed changes to Tariff No. 15, Section 30.16.2:

Please explain why Verizon applies an annual nonrecurring Power charge in Tariff No. 15, when in Tariff No. 17 it applies a monthly recurring power charge.

**REPLY:** The DC power rate structure in DTE MA No. 15, Section 31.16.2 was established as an annual charge when originally filed , but administered (customer billing) on a monthly basis as specified in DTE MA No. 15, Section 16.5.B.

The DC power rate in DTE MA No. 17, Part M, Section 5.2.3. was filed subsequent to the DTE MA No. 15 tariff and was established as a monthly rate. The DC power rate(s) in both MA 15 and 17 have been applied on a monthly basis.

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**ITEM:** DTE 3 Please refer to proposed changes to Tariff No. 15, Section 30.16.2:

Please explain under what legal authority the Department could approve Verizon's proposed retroactive application of this rate change and why such approval would not violate the prohibition against retroactive ratemaking.

**REPLY:** Verizon is making this voluntary proposal for a retroactive change to the application of the Tariff 15 DC power charges from a per amp, per feed fused basis to a load amp, per feed basis in an effort to make these proposed changes to Tariff 15 coincide with substantially identical changes to Tariff 17 that became effective on February 11, 2001. Such application would assure that similarly situated carriers who ordered services under these tariffs after February 11, 2001, are treated similarly. While there is no clear legal authority authorizing the Department to engage in retroactive ratemaking, Verizon believes its proposal is reasonable and consistent with the above stated objective.