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**D.P.U. 25-10/D.T.C. 25-1
Pole Attachment Inquiry**





**TOPIC 2: ROW Planning and
Coordination with Municipalities,
MassDOT & Public Safety.**

In your company’s experience, when and how often do the following apply to survey and make-ready work for attachments and pole replacements, and how do these items impact planning and timing for survey and make-ready work conducted on public ROWs?

Roadway moratoriums – e.g., seasonal versus trenching moratoriums, trenching from pole to a residence/business (same-side) versus trenching to an opposite-side residence or business; and

Licensing/permitting for survey and make-ready work to be performed on utility poles and conduit.

Situation	Impacts to Survey	Impacts to Make Ready	How often
Roadway Moratoriums	Low Impact	Medium Impact Low Impact	ES- Summer Cape Moratoriums, Boston winter moratoriums, etc.) NG- Less than 1% of all jobs
Land-Owner Refusal	Low Impact	Low Impact	1% Impact In very rare occasions, surveyors need to be escorted onto private property, requiring coordination in advance.
Locked Gates	Low Impact	Low Impact	5% No Access
DOT Permitting	Low Impact	Medium Impact	25% of poles on DOT Property require permitting, typically creating delays in Make Ready Timelines
Municipal Petitions	Low Impact	Low- Medium Impact	New Pole Sets, Relocations
Seasonal Trenching Moratoriums	Low Impact	Medium Impact	Limited to Seasonality Cape Cod/Martha's Vineyard/Nantucket, etc. Moreso in Eversource Territory

For licensing/permitting for survey and make-ready work to be performed on utility poles, in your company's experience:

Which stages of the attachment process require licensing/ permitting and police details/flaggers? For instance, does this apply to survey work?

Situation	Required for Survey	Required for Make Ready	When
DOT Permitting	No	Yes	Work performed on state highways ROW
Police Detail/Flaggers	No	Yes	Work performed on state highways ROW
Railroad Permitting	No	Yes	Work performed over/near Railways
Municipal Pole Petitions	No	Yes	New Pole Sets

If a pole is jointly owned, multiple licenses/permits ARE NOT required.

The pole owner responsible for setting the pole would obtain the required permits for the make ready. Joint pole owners would have agreed upon the work required prior to setting the pole.

For licensing/permitting for survey and make-ready work to be performed on utility poles:

What level of detail is required on ROW licenses/permits applicable to simple- versus complex-make-ready work?

ROW Permitting	Level of Detail Simple Make Ready Medium	Level of Detail Complex Make Ready High	Comments
<p>DOT Permitting</p> <p>Process can take 3-12+ months.</p>	<p>Some Districts allow work to be performed under an existing maintenance permit, but even in those cases, a Traffic Management Plan is required.</p>	<ul style="list-style-type: none"> • Submit engineering plans <ul style="list-style-type: none"> • Prepare Traffic Management Plan • Detailed description of work required 	<ul style="list-style-type: none"> • Costly for the customer • Execution is Complex • Application Process is Time consuming (Hours) • Multiple stages of completion at the DOT

Must each attached obtain separate licenses/permits to shift their attachments or add new attachments?

Yes. Highway access permits are required when physical work or activities take place within, or impact, the State Highway Right-of-Way or property owned or under the custody and control of MassDOT-Highway. Some Districts allow the use of maintenance permits for transfers that are not crossing the road.

Discuss how municipal and MassDOT requirements may influence the time it takes to perform survey and make-ready work (simple- and complex-make-ready).

Situation	Required for Survey	Required for Make Ready	Impacts
<p>DOT Permitting Municipal Pole Petitions Railroad Permitting</p>	<p style="text-align: center;">No</p> <p>The permitting process has NO IMPACT to Survey. EDC Survey determines the need for Permits/Petitions.</p>	<p style="text-align: center;">Yes</p> <ul style="list-style-type: none"> • DOT permitting process impacts the time it takes for the Make Ready work to commence. • Cycle Times for DOT permitting runs on average 272 days, including the time it takes for back and forth preparation of the documentation. • Outlying issues with the municipality can uphold their decision to allow commencement of the work. E.g. Double poles. 	<ul style="list-style-type: none"> • The permitting process is initiated upon the customer's acceptance of the make ready costs, which include permitting fees. • DOT Permits are initiated in SHAPS and take an average of 272 days to complete, depending on the project scope of work. • Municipal Pole Petitions take an average of 60 days. This includes initial request and final approvals which take place over the course of 2 town hall meetings. • RR Permits can take upwards of 18 months to be approved; however, they are much more infrequent. • Work cannot commence until the permitting process is completed

If the agencies adopted mandatory timelines for survey and make-ready work, suggested timeframes are listed in the table for Permitting /ROW. Determinations were made after comprehensive review of 700 CMR 13.00 and considerations of current cycle times. Current cycle time for DOT Permits on complex work is down from 353 days, to 272 days from the date the application was received.

	Phase	Proposed Timelines for Current Work Volumes 2025				
Process	↓ Process Step / Application Type →	Simple	Complex (Electric M-R)	Large App. (300+)	Large App. (Electric M-R)	3,000+
Application	review / determine application is complete	10*	10*	10*	10*	
	review resubmitted application for completeness	5*	5*	5*	5*	
Survey & Make Ready (M-R)	grant or deny a complete application / complete survey	45	45	60	60	negotiable
	provide M-R estimate after completing survey	14	14	14	14	negotiable
	for attacher to accept M-R estimate / make payment	14	14	14	14	negotiable
	to complete M-R work	30	90	75	135	negotiable
	additional days to complete electric M-R work	0	15	0	15	negotiable
Permitting/ ROW	DOT Permitting	160	160	250	250	negotiable
	RR Permits	180	180	270	270	negotiable
	Municipal Petitions	NA	45	60	60	negotiable
	FAA Permitting	45	45	60	60	negotiable
	* business days					

In your company’s experience, if/when do municipalities require public hearings for the replacement of existing utility poles or the addition of new wireline or wireless attachments? What are the timing and process requirements for scheduling such hearings? Are there ever municipal limitations on increases to pole heights or on timing for pole replacements?

Situation	Required Municipal Hearing	Timing & Process
Pole Replacement	No	<ul style="list-style-type: none"> • Public hearing is required • Petition form is completed • Petition is sent to the joint owner for a signature • Petition submitted to the municipality • Petition scheduled on meeting agenda, usually for the next month. • The town will then notify the abutters via mail • Topic is brought up at the next month’s town meeting. • The process generally takes 2-3 months • Municipalities limitations vary across the state, are unique in nature, and are addressed on a case-by-case basis.
New Pole Set	Yes	
Pole Relocation	Yes	
Wireline Attachment	No	
New Wireless Attachment	No	

Grants of location can be delayed if there are outlying issues with the municipality that are upholding their decision to allow commencement of the work. e.g. Double poles, Streetlight Transfers . In these cases, the EDC's work to resolve Municipal concerns, while continuing to pursue the required approvals needed to progress the initial request. Cases are not typical.

Identify any additional considerations that the Departments should consider and discuss why.

Additional Considerations	Why
Applicant Lead Times	Applicants are estimating timelines without consideration of required design time and permitting, despite upfront transparency for average cycle times.
Design Reviews & Changes	Applicants often scrutinize make ready estimates to reduce pole replacements, resulting in delays in submitting permitting applications and causing rippling delays for the pipeline of applicants awaiting Survey & Design.
DOT Permitting Process	<ul style="list-style-type: none"> Standardization of DOT Process across the state, currently different regions have different operating procedures. The Utilization of maintenance permits should be encouraged and used to accommodate simple make-ready requests.
Environmental Permitting	Environmental Permitting timeframes and effort should also be considered as they can lead to additional costs and schedule delays. Historical Properties, endangered species, work within 200' of a body of water, is Swamp Matting required?
Applicant Preliminary Design	Applicants are not visiting their proposed sites to understand general field conditions, pole heights, forestry needs, available space and clearance requirements. Broadening their understanding of NESC Requirements would set better expectations for cost and time.
Funding Timelines	Funding timelines are rigorous and are insufficient for large projects and current work volumes.



Thanks
for listening.



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