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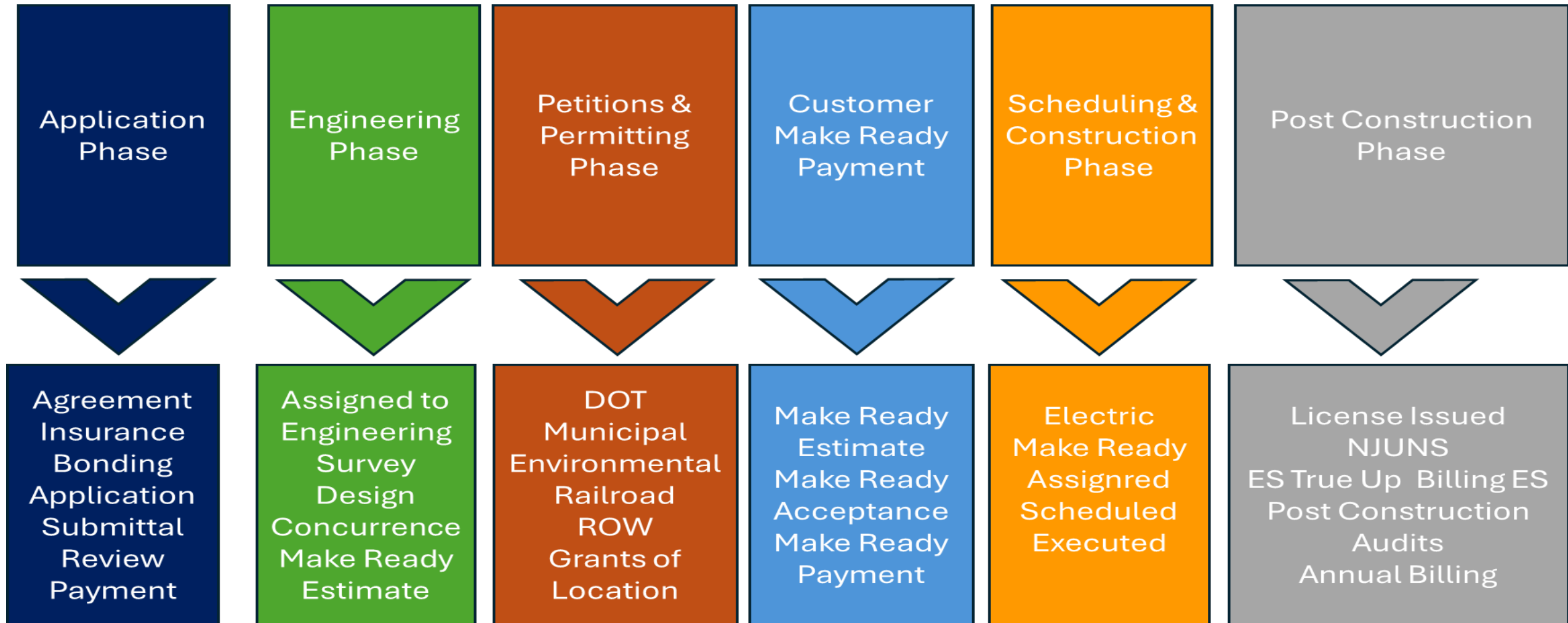
**D.P.U. 25-10/D.T.C. 25-1 Pole  
Attachment Inquiry**





**Topic 3: Attachment Application,  
Survey, and Make-Ready Work and  
Associated Costs**

**Describe/provide visuals for the different stages of your company's application, survey, and make-ready work process. Distinguish between simple- and complex-make-ready work.**



**Describe/provide visuals for the different stages of your company’s application, survey, and make-ready work process. Distinguish between simple- and complex-make-ready work.**

Simple Make Ready	Complex Make Ready
Make Ready Work required in Communication Space (eg shifting of attachments)	Make Ready work required in the Power Space
Transferring existing attachments: The process involves moving existing attachments from one location on the pole to another.	Make Ready work requiring Pole Replacements
No Antennas on poles	Make Ready work required on Small Cell Antenna poles
No service outages or damage: Low risk of causing service disruptions or damaging existing infrastructure	Make Ready work requiring outages or splicing in the Communication Space
No splicing or cutting: No cutting or splicing of existing communication cables.	Make Ready work in the Communication Space approaching the electric minimum approach distance (MAD)

**Provide a link to the place on your company's Massachusetts webpage for entities seeking to attach to poles owned by your company. Address whether the webpage includes access to applications, template aerial license agreements, other internal policies and information relating to pole attachments, appropriate company contacts for the state, and a summary list of the most current annual pole attachment rates for different types attachments (cable television, wireline telecommunications, wireless telecommunications, etc.). If your company does not have such a webpage or the webpage does not provide such details, discuss why.**

- EDC's are in the process of planning and creating a webpage for MA 3rd Party Attachments within its existing company website
- Internal policies are sent via email to attachers including:
  - Updated pole attachment rates
  - Document identifying application process
  - Bi-weekly, Monthly reminders and communications

**For jointly-owned poles, discuss whether the EDCs and Verizon can implement a single application, survey, and/or make-ready process. Explain why or why not.**

**Discuss items for the Departments to consider if we apply a single application, survey, and/or make-ready process to the EDCs and Verizon.**

<b>Considerations</b>
• Pole owners maintain different application portals and cost associated with survey, design, make ready and annual billing.
• Pole owners have unique interest in survey execution in the Power Space vs. Comms Space
• Pole owners must comply with collective bargaining agreements to execute work.
• Pole owners utilize different backend work management and pole inventory systems.
• Electric make ready requires qualified line workers to perform work in the electric space
• Possible conflicts of interest and sharing of assets/resources among competitors.
• Contractual obligations prevent current MSAs from performing surveys for both pole owners
• A single source designer could develop biases that would not be agreeable by all parties without oversight
• Both electric and telephone construction standards would need to be maintained by the engineering firm with equal respect for all parties involved.
• Liability concerns
• Administrative costs to Electric ratepayers
• Impact to Reliability



**In your company's experience, discuss considerations in relation to poles jointly-owned with MLPs.**

- **An MLP (Municipal Light Plant) is a locally owned utility that provides electricity and/or gas services to residents in a municipality. MLPs are typically run by municipal light boards or commissions, and in some cases, by the mayor or a board of selectmen.**
- **An EDC would not share pole ownership with an MLP.**



**Describe how your company accounts for sole- versus jointly-owned poles in an attachment application. In other words, if an applicant's project requires attachments on both sole- and jointly-owned poles, does this require multiple applications with the same EDC/pole owner, or a single application?**

- **The EDCs have one application that includes both sole and jointly-owned poles.**
- **Where applicable, the applicant must also apply to the joint pole owner (Verizon) in parallel.**
- **Pole owners maintain different systems and require separate applications.**

**Discuss whether your company's current application processes and/or aerial license agreements require attachers, including wireless, broadband and EVSE, to be registered with either of the agencies in some capacity to be eligible to submit an attachment application and/or attach to utility poles. If so, discuss why.**

### **Eligibility Requirements**

- Not tethered to registration with the DTC/DPU
- Must have fully executed Pole Attachment Agreement signed by both parties
- Bonding and insurance liabilities are covered
- Billing is current
- Applicant must advise if registered CLEC, Legally eligible entity, or Private attachment status.

**Discuss any limitations or considerations for the agencies to mandate the use of agreed-upon contractors to move all attachments in the communications space (including cable television and broadband attachers, municipal attachments, telephone provider attachments, etc.)? As part of your response, address liability considerations, including for municipal/fire/alarm attachments?**

- EDCs would support this Single Visit Transfer concept as long the work is restricted to the communication space

Other considerations for implementation:

- Approval would be required from all attachers before any conductors are touched, particularly in municipal space.
- Cost sharing plan would need to be developed for each relocation
- Streetlight ownership would need to be known prior to touching the existing streetlights.
- Approved and agreed upon procedure would be needed to address any unlicensed or illegally attached equipment (should not be automatically transferred)
- Pole owners would need to be notified to remove the bare pole

**Discuss additional liability and insurance considerations. For instance, for existing attachers in the communications space, is loss-of-service a consideration in certain instances when conducting make-ready work? If so, describe those instances.**

- Loss of service does need to be considered when performing make ready work in both power and communications space(s). E.g. Pole replacement and/or shifting of electric and splicing could result in a customer outage
- Power space attachments that transition into communication space would be considered an increased safety risk for communication workers
- Unmetered equipment that is installed illegally poses increased safety risk plus any electric usage by this equipment is passed on to ratepayers. E.g. Cameras

**Discuss the best timing and coordination for attachers to contact pole owners, especially for large planned projects before an application is submitted.**

Timing	Key Points
<b>Early Engagement is Key</b>	<ul style="list-style-type: none"><li>• Contact pole owners as early as possible especially for large projects. (12-24 months)</li><li>• Broadband demand has quadrupled in the past few years avg. cycle time is approx. 372 days.</li><li>• Think about permitting requirements, which can take months for processing.</li><li>• Resources for engineering may need to be procured for large projects.</li><li>• Ensure you speak to the EDC's about projected costs and timelines.</li><li>• Do not rely on consultants to provide cost estimates or projected timelines.</li><li>• Other applicants may be in the pipeline for the same towns as you are considering.</li><li>• Ensure funding timelines align with realistic project cost and timelines.</li></ul>

## **Describe when and how make-ready costs are allocated/charged between attachers.**

- First-come, first-served application process—costs are not shared between attachers.
- Applicants are responsible for all make-ready costs associated with creating space to attach at each pole.
- Applicants do not pay to remediate existing violations, aka, pre-existing conditions.
  
- **Typical costs include:**
  - Material & labor per unit
  - Permitting & Police, Traffic Control Costs
  - Tree trimming
  - Swamp matting
  - Other make-ready construction expenses

**Describe when and how costs are incurred by attachers arising from planned utility upgrades to utility pole infrastructure.**

#### **Planned utility upgrades**

- Utility upgrades to pole infrastructure **are not** billed to attachers.
- Attachers incur costs for relocating their attachment during upgrades; transfers for pole work.

**Discuss how attachers are notified when they need to shift their attachments to a different location on a pole versus to a new pole. Discuss your processes for ensuring that attachers' facilities are moved in a timely manner.**

	<b>Key Points for transfer to a new pole</b>
<b>NJUNS Notifications</b>	<p><b>Notifications are sent when:</b></p> <ul style="list-style-type: none"> <li>▪ The EDC opens a ticket that includes the attacher.</li> <li>▪ A ticket is updated with pending or Next To Go (NTG) steps.</li> <li>▪ A step is completed, specifically notifying the NTG member.</li> </ul> <p><b>Ticket Dashboard:</b></p> <ul style="list-style-type: none"> <li>▪ Attachers can log in to NJUNS at any time to view their ticket queue</li> </ul>
<b>Processes for Ensuring Timely Movement</b>	<p><b>Accountability Measures:</b></p> <ul style="list-style-type: none"> <li>▪ Weekly reports highlight days since the last action for major applicants/attachers.</li> <li>▪ Any attacher that is 120+ days on NTG transfers may be subject to suspension of new application submittal until the backlog is up to date.</li> <li>▪ All attachers, including Municipalities, will be required (through new agreements) to have an NJUNS account.</li> </ul> <p><b>Regular Reviews:</b></p> <ul style="list-style-type: none"> <li>▪ EDC's review aging work in NJUNS with attachers to ensure timely transfers.</li> </ul> <p><b>Targeted Outreach:</b></p> <ul style="list-style-type: none"> <li>▪ Engagement with attachers who have outstanding tasks to expedite the process.</li> </ul>

**Discuss considerations that need to be addressed if the agencies mandate the use of a list of qualified contractors to perform make-ready work in the communications space.**

Consideration	Key Points
<b>Qualified Contractors</b>	<ul style="list-style-type: none"> <li>▪ Agencies may mandate approved contractors for make-ready work in the communication space. Those working in <b>Secondary/Primary Space</b> must be certified for <b>electric space</b>.</li> <li>▪ If attachments are <b>within minimum approach distance (MAD)</b> to secondary lines, contractors must be <b>qualified for electric space work</b>. (Working in the Electric Space would require extensive training comparable to an Electric Utility Lineman – which takes many years)</li> </ul>
<b>Contractual Agreements</b>	<ul style="list-style-type: none"> <li>▪ Agreements required for all parties on the pole, including municipal and unlicensed attachments.</li> <li>▪ Existing Labor Agreements must be reviewed for compliance among all involved parties.</li> <li>▪ If one vendor performs all communication make-ready, a <b>post-construction audit</b> must be enforced.</li> </ul>
<b>Streetlight Ownership</b>	<ul style="list-style-type: none"> <li>▪ Ownership must be verified before work begins.</li> <li>▪ Electric company handles company-owned lights</li> <li>▪ Qualified communication contractor would need to work with any customer-owned lights with those owners.</li> </ul>
<b>Unlicensed/Illegal Attachments</b>	<ul style="list-style-type: none"> <li>▪ Clear procedures needed for unlicensed or illegally attached equipment.</li> <li>▪ Unmetered power-fed devices should not be automatically transferred.</li> </ul>

**Identify any additional considerations relating to this topic that the Departments should consider and discuss why.**

### **Additional Considerations**

- Post Construction Audits:
  - If a single vendor were to perform all the communication space make ready, a post construction audit should be considered.



Thanks  
for listening.



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