May 8, 2025

BY ELECTRONIC MAIL ONLY: (dpu.efiling@mass.gov; kerri.phillips@mass.gov; scott.seigal@mass.gov; dtc.efiling@mass.gov; william.bendetson@mass.gov)

Mr. Mark D. Marini, Secretary
Department of Public Utilities (DPU)
One South Station, 3rd Floor
Boston, MA 02110

Ms. Shonda D. Green, Secretary
Department of Telecommunications and Cable (DTC)
1000 Washington Street, Suite 600
Boston, MA 02118

Re: Inquiry on Pole Attachments and Conduit Access on Public Rights of Way,
D.P.U. 25-10/D.T.C 25-1 – Comments from EVSE LLC, A Subsidiary of Control Module Inc.

To Whom It May Concern,

EVSE LLC deeply appreciates the opportunity to respond to this joint inquiry from DPU and DTC and please accept these comments in response to the forward-looking work you are doing here in investigating the potential and issues surrounding utility pole mounted charging in the MA market.

Our comments relate to elements of Section IV.F entitled “Facilitation of ROW and Pole-Mounted EVSE”, our background in pole-mounted charging projects across the country, a discussion of barriers to expansion of this technology, and some suggestions about how the DPU might be able to ensure broader and more consistent availability of this technology to communities in MA.

EVSE LLC, a subsidiary of Control Module Inc., is a Connecticut based company located just south of Springfield, MA in Enfield, CT. Our company has been in business since 1969 with EVSE manufacturing in this subsidiary since about 2011. Our patented, retractable cable design for our Level 2 charging stations has allowed us to provide the equipment for many varied projects throughout CT, MA and the USA. Our retractable cable design is unique in the industry and was conceived in response to our being in a snow-bound environment with concerns about the cable being snagged during plowing. Additionally, we had concerns about tripping hazards for pedestrians and employees from cables on the ground. As a result, our first chargers included cable management when it was not popular, and we became a vocal advocate for the necessity of cable management. Today, it is a requirement across the industry.

With the ability to retract our cables in a way unique to the industry, we now are able to mount our chargers to garage ceilings and 10-12 foot above the ground on wood and non-wood light poles and wood distribution poles. Where mounting on a utility or light pole is not appropriate, we can mount on a custom pole near a distribution pole and have power dropped to the custom pole from the distribution pole. Custom poles can now take on a variety of configurations such as solar light poles, contemporary light poles and other surrogates.

Beginning in 2016 with the Bureau of Street Lighting in Los Angeles, we now have 14 pilots/projects in various stages of progress utilizing light poles, utility poles and custom poles across the country. In addition to the Bureau of Street Lighting where we now have 350 light pole ports across the city, additional projects include National Grid (Melrose pilot, 15 ports on utility poles beginning and operating since May, 2021), Seattle City Light (60 ports on a mix of light, utility and custom poles), Portland GE (150 ports on utility poles), Reading Municipal Light & Power, Rumford-ME, Burlington Electric, Madison Gas & Electric, El Paso Electric, Dominion Energy (Utility and Light Poles), Old Dominion Electric Coop (2 pilots on wood distribution poles), and 2 new projects on the west coast just beginning. Additional pilots are deep in discussion. As illustrated here, there is a great deal of interest in pole mounted charging throughout the country.

The timelines to complete these projects have ranged from a few months to two years and more depending upon the complications encountered in the project. The National Grid/Melrose project has taken the longest time to implement of the project portfolio due to complexities introduced by having the need for the municipality to own the equipment and mount it on a National Grid/Verizon co-owned utility pole. Attachment agreements and liability insurance issues imposed on the municipality made it much more difficult for

the city then it would have needed to be if the utility had been allowed to own the EVSE equipment as well, thus the utility would own both the equipment and the poles.

Melrose's objectives for their project with National Grid had been to cost effectively mount the chargers using existing infrastructure, make the chargers visible to the public by having them curbside and encourage the community, particularly multi-family residents, to purchase EV's with on-street parking where there might not have had access previously. Melrose met all of its objectives by demonstrating a 50%+ savings in mounting the utility pole chargers over conventional ground mounted chargers, realizing that their residents in multi-family dwellings were actually purchasing EV's due to the new availability of charging, and finally that the charging stations would be used if made available. Responses in our other pilots have mirrored those in Melrose.

As mentioned in my previous comments above, the Melrose pilot was significantly impeded by the DPU mandate that the National Grid utility not be permitted to own EVSE equipment. That meant that despite owning the infrastructure in the poles, they could not own the equipment to mount on those poles. Thus, the municipality needed to bear the burden of purchasing the equipment, signing attachment agreements with both National Grid and Verizon for the co-owned utility poles, and ensuring their liability insurance for damage to the pole infrastructure met the National Grid thresholds. National Grid was enthusiastic about the project and eventually the parties were able to reach agreement. But the contractual issues caused a 5 to 6 month delay in the implementation of the program. It was a "heavy lift" for Melrose to perform the elements of this project and to keep it going over the last nearly 4 years. Bravo to them!

National Grid submitted its plan to the DPU, following the implementation of the Melrose project, which described its plan to own about 250 of the next phase chargers for a limited period of years and then turn them back to the municipalities after the term. The intent was to sponsor multiple municipalities for pole mounted charging in a similar manner to Melrose in future months as much interest and excitement had developed due to the publicity of the Melrose pilot. When the DPU again denied this request, future projects had to follow the Melrose model, and the program was relegated to the National Grid Make Ready program but without any promotion or sponsorship.

Had the program been able to move forward with National Grid there would still have been the problem of uneven access to comparable programs as Eversource did not have such a program or interest in such a program at the time. Both National Grid and Eversource service areas cover different regions of the Boston region so some communities would have had access through National Grid and nearby communities covered by Eversource would not have.

We have seen in our pilot projects throughout the country that the municipal and coop utilities seem to have more flexibility in pursuing pilot projects of this nature. Unfortunately, not all communities have access to these non-investor-owned alternatives.

Yet we have seen that, generally, the utility owns the infrastructure on which these chargers can be mounted. If the utility were allowed to own both the infrastructure and the chargers, whether it be investor-owned, municipal or cooperative, then the implementation of charging infrastructure could be accelerated across the landscape. Electrification goals might actually be achievable if the roadblocks to technology implementation were removed. Leverage of the utility infrastructure to meet these electrification objectives may be the only way to do this in a timely fashion rather than defaulting to a project by project plodding through time.

I would suggest that the best way to approach pole mounted charging would be that the utilities, whether investor-owned, municipal or coop, be allowed to own their own chargers and pole infrastructure. Provide constraints on investor-owned utility charger numbers and impose term limits on the charger ownership, if necessary. Incentivize the utilities to sponsor such pole mounted pilot programs allowing uniform coverage, pilot options and access across MA municipalities.

National Grid had been an advocate for this type of program during the Melrose pilot. We know that PURA in CT is now sponsoring a program to install 100 light/utility pole mounted chargers across the Eversource and United Illuminating service areas in the upcoming months and the utilities are cooperating with this. So it would seem Eversource would participate in such a program in MA.

As a last resort, if such an approach as I describe above is not deemed possible by the DPU, then the municipality can avoid attachment agreements and liability issues by purchasing their own infrastructure (light poles, solar light poles, custom poles) and charging equipment to mount to those poles. The only utility interface then needs to be a power drop from the utility. Financial assistance in deploying these kinds of alternative infrastructures would be helpful as well.

The last resort I mention above is certainly an option for the municipality but each municipality would make its own decision to pursue this path based upon its local resources and situation. The response across the MA landscape would not be predictable or uniformly distributed across the state. I argue that by using the utilities to sponsor and promote this piloting approach, with DPU's sponsorship and incentivization guidance, the desired objectives of rapid penetration of the technology evenly across the MA landscape and communities would be achievable. The CT PURA model suggests it would work in MA.

EVSE LLC thanks you for allowing us to present our ideas in this forum. Should you have an interest in our participation during your future discussions we would be interested in doing so.

Thank you.

Sincerely,

Dean Spacht

Dean Spacht
Executive Director of EVSE Sales, Light and Utility Pole Charging
Ph: 860.253.4230
Email: dspacht@controlmod.com