GEORGETOWN MUNICIPAL LIGHT DEPARTMENT

DPU POLE DUCT CONDUIT INQUIRY

BY THE NUMBERS

By statewide total and by individual city and town, the number of single and jointly owned poles that your company owns.

Sole Owned	235
Joint Owned	2297
Total Poles	2532

By statewide total and by individual city and town, the number of poles that your company owns with conduit attached for wires providing service to local residences and businesses.

Riser Poles for Electric Service	290

By statewide total and by individual city and town, the number of poles that your company owns with streetlights attached.

Wood Poles with Street lights	800 (estimate)

By statewide total and by individual city and town, the average height of single and jointly owned poles that your company owns.

Average Height of Poles	38’

By statewide total and by individual city and town, the total number of attachments on your company's Massachusetts poles by attachment type, i.e., telecommunication, cable television, wireless, pole-mounted EV attachments, etc.

Verizon Attachments	2297
Comcast Attachments	2239
Municipal Attachments	858
EV Attachments	0
Wireless Attachments	0

The total miles of overhead lines or wires that your company owns in the Commonwealth and approximately what percentage of those lines are located on public ROWs.

Total Miles Overhead	55
Percentage in ROW	Not Tracked

The total miles of underground conduit that your company owns in the Commonwealth and approximately what percentage of that conduit is located on public ROWs.

Total Miles Underground Conduit	21
Percentage in ROW	Not Tracked

The pole attachment and conduit access rates charged by your company to wireline (i.e., non-wireless) telecommunications and cable television attachers for each of the past five calendar years through 2024, and to the extent that they have been established, 2025. Please identify with specificity any assumptions and sources, including lines, tabs, and/or page numbers, relied upon.

Pole Attachment Rate	$10.64 sole owned poles
	$5.32 joint owned poles

a) **Identify and discuss any differences in rates charged to attachers on jointly owned poles or other differences due to type of attacher, region, etc.**

Split with other owner is on joint owned poles

b) **If the company's attachment and/or conduit access rates have not been updated in the past five years, explain why.**

Rates were updated in 2019

c) **Confirm whether your company charges attachment and conduit rates utilizing the Massachusetts Formula. See D.P.U. 19-76-A/D.T.C. 19-4-A at 16-17 (discussing the history of the Massachusetts Formula and the data to be used). If your company charges pole attachment and/or conduit access rates that differ from those that would apply using the Massachusetts Formula, explain why and provide a comparison of the current rate(s) charged versus the applicable rates calculated using the Massachusetts Formula.**

GMLD utilizes the Massachusetts formula.

d) **For poles that are jointly owned, discuss how attachment rates are billed to attachers, e.g., direct billing to attachers by each pole owner or some other method.**

Yes, direct billing by pole owner to attacher.

The rates charged by your company to wireless attachers for each of the past five calendar years through 2024, and to the extent that they have been established, for 2025. Please explain how wireless attachment rates are calculated and identify any sources and assumptions relied upon.

Not Applicable

The rates charged by your company to pole-mounted EVSE attachment providers for each of the past five calendar years through 2024, and to the extent that they have been established, for 2025. Please explain how pole-mounted EVSE attachment rates are calculated and identify any sources and assumptions relied upon.

Not Applicable.

The accounting method relied on by your company in calculating your existing pole attachment and conduit rates (e.g., Generally Accepted Accounting Principles versus Uniform System of Accounts). See D.P.U. 19-76-A/D.T.C. 19-4-A at 16-19; Accounting Practices and Recordkeeping of Telecommunications Carriers, D.T.C. 18-3, Notice of Proposed Requirements and Further Request for Comment at 2-3, 11-13 (2022).

Uniform System of Accounts

***To the extent that any of the above data is not available at the level of detail requested, the Departments request that utility pole and conduit owners explain why in their written comments.**

EXISTING PLANNING AND PRACTICES

1. **Pole attachment and conduit access application, survey, and make-ready processes, for sole and jointly owned poles:**

a) **Describe how the company conducts each of these processes for enabling pole attachments and conduit access for prospective attachers and what is required to move to the next stage of the process.**

Application and Pole Attachment License Process that includes field survey and applicable charges, make ready work and applicable charges to make room for attacher, followed by execution of license.

b) **Describe any processes or resources for proactively facilitating future attachment requests prior to receiving an application.**

Not Applicable.

c) **Describe the types and calculation of costs associated with each stage of the process charged to applicants.**

Application and Pole Attachment License Process that includes field survey and applicable charges, make ready work and applicable charges to make room for attacher, followed by execution of license.

d) What is the average timeline associated with each of these processes? What are the reasons for these timelines? How or why may these timelines be affected?

Application and Pole Attachment License Process that includes field survey and applicable charges (4 weeks), make ready work and applicable charges to make room for attacher (4 weeks), followed by execution of license. (2 weeks)

e) Discuss whether your company's affiliates, if applicable, utilize OTMR practices in other states or jurisdictions. If so, summarize by affiliate name and state applicable federal or state law(s) and regulations and the affiliate's OTMR processes, including those applicable to simple and more complex make-ready work, and describe the average timeline in the jurisdiction for pole attachment and conduit access application, survey, and make-ready work. If the average timelines differ from any applicable regulatory requirements, discuss why.

No

f) Explain whether and how the company utilizes the NJUNS database for each of these processes.

Just for managing double poles when needed.

g) Does your company limit the number of poles permitted per application? If so, discuss why and identify the limit.

No

h) Are there any considerations that the Departments should be aware of for large versus small pole attachment applications?

No

i) Explain NESC considerations and identify applicable NESC rules for municipal, telecommunications, cable, and pole-mounted EV attachments (e.g., climbing space, spacing between attachments, weight on poles, etc.).

GMLD follows NESC rules.

j) Are there any differences in processes and needs based on the roadway's speed limit and/or roadway type (e.g., state road versus local road, rural versus urban road, etc.)? If so, please describe those differences, identify state laws and municipal ordinances applicable within the company's service territory, and provide copies of the language of those state laws and ordinances. If your company's service territory exceeds twenty cities and towns, please provide a sampling of applicable municipal ordinances in at least twenty municipalities representing a mixture of urban, suburban, and rural areas.

May require additional safety considerations when working on poles.

k) Are there any cities or towns in your company's service territory with neighborhoods or areas in which service is provided entirely through underground conduit, i.e., no overhead lines or utility poles on public ROWs? If so, identify any applicable cities and towns to which this applies, and provide a sampling of any applicable municipal ordinances.

Yes, GMLD requires overhead utilities in new residential subdivisions to be installed underground.

l) **When/how does your company utilize internal, collective bargaining employees versus third-party contractors for conducting any stage of this work?**

GMLD utilizes its internal union workforce.

m) **Describe how your company ensures safe, efficient make-ready practices when utilizing third-party contractors for utility pole and conduit access work.**

GMLD performs its own make ready work per the NESC.

n) **If your company's affiliates perform OTMR in other states or jurisdictions, describe the role of third-party contractors and organized labor in performing OTMR in each such state or jurisdiction.**

Not applicable.

o) **Explain whether your company allows temporary attachments and, if so, describe your company's procedures for attaching and replacing temporary attachments.**

No.

p) **Discuss whether your company's affiliates operating in other jurisdictions allow temporary attachments. If so, describe each affiliate's procedures for attaching and replaying temporary attachments.**

Not Applicable.

q) How are attachment and conduit access applications and associated work prioritized and placed in order of queue of company and other attacher projects?

First come first serve.

r) Discuss how and why attachment and conduit access applications and associated work may be reprioritized or delayed.

Not Applicable.

s) Discuss whether and/or how the scheduling of pole attachment and conduit work may be impacted by other projects on ROWs.

Not Applicable.

t) Explain whether and how your company coordinates planned company projects with companies submitting applications for a small number of poles versus applications for a large number of poles.

There are not currently any differences.

u) Explain whether and how your company coordinates attachment project work with other attachers, pole owners, and municipal and/or local officials, as applicable.

Through process defined in Pole Attachment Agreement.

v) **Explain whether attachment applications are more easily accommodated during a particular time of year, e.g., summer versus winter months. If so, discuss why.**

Extreme weather and snow would slow down surveying and make ready work.

w) **Explain circumstances when your company or a requesting attacher may move attachments owned by other attachers.**

Never normally, maybe in some type of safety / emergency situation.

x) **Explain how your company derives survey and make-ready costs. As part of this response, identify factors that may increase such costs, explain how these costs are communicated to entities requesting to attach, and discuss how cost disputes are typically resolved.**

GMLD bills for actual cost per Pole Attachment Agreement

2. **Explain how your company distinguishes between routine versus emergency utility pole and conduit work.**

This would be handled on a case-by-case basis.

3. **Explain in detail practices and planning associated with non-emergency pole replacements. Include in this explanation a discussion of the factors your company considers when deciding whether a pole needs to be replaced (e.g., age, updates to or replacements of other distribution infrastructure and/or clean energy work, accommodation of attachment requests, NESC considerations). Also explain when and how often your company conducts routine inspections for structural integrity and other relevant factors for company-owned poles.**

GMLD would replace poles based on age, new work that would trigger NESC compliance. Routine inspections are conducted any time a pole is worked on for safety purposes, and periodically as deemed necessary by GMLD.

a) **Discuss the circumstances under which your company allocates the costs of pole replacements to attachers.**

When make-ready work triggers a pole replacement, these costs shall be born on the requesting attacher.

b) **Explain any differences in non-emergency pole replacements when alternative attachment techniques (e.g., opposite side attachments) are present.**

Not Applicable.

4. **Explain how your company tracks, at the individual pole level, routine versus emergency work, pole replacements, and attachments (e.g., NJUNS, internal databases, other).**

Both are tracked the same and prioritized by the General Line Foreman at GMLD.

5. **Explain how your company tracks, at the individual pole level, costs associated with routine versus emergency work, pole replacements, and attachments (e.g., NJUNS, internal databases, other).**

GMLD does not track costs at the individual pole level.

6. **For routine versus emergency utility pole and conduit work, explain the process(es) and policies used by your company to select and/or rely on third-party contractors versus internal, collective bargaining employees.**

GMLD utilizes it owns internal workforce for all distribution projects unless they require specialty equipment.

STATE AND LOCAL ENTITIES THAT MANAGE PUBLIC ROWs

1. **For routine utility pole and conduit work:**

    a. **How do state and local officials assess and prioritize applications to conduct utility projects on public ROWs in relation to other projects on public ROWs?**

GMLD officials perform this on a case-by-case basis.

        i. **Are particular types of projects fast-tracked or given higher priority? If so, describe circumstances in which these scenarios would apply.**

No.

b) How do state and local officials communicate with pole and conduit owners on needs for larger or higher-priority projects requiring multiple pole replacements, e.g., intersection and/or roadway expansions, addition of bike lanes, etc.?

Email / Phone or other appropriate process.

c) How do state and local officials review completed utility work for safety, including remediation of safety issues? Identify any common remediation work needed after utility work.

GMLD oversees its own work for safety

d) What considerations and/or limitations apply to pole and conduit owners if utility work requires trenching on public ROWs, as well as trenching from poles to local residences and businesses?

Applicable rules and regulations for trenching should apply.

2. **How does non-routine utility pole and conduit work as a result of storm response and emergency events affect the safety of this infrastructure and affect schedules for routine work on public ROWs?**

Delays it.

3. **As the Departments seek to coordinate and facilitate accelerated utility pole and conduit work for broadband deployment projects and clean energy projects, please identify any pertinent scheduling limitations or safety considerations. Additionally, discuss how utility pole and conduit owners can best coordinate with state and local officials.**

Be effective in communicating.

TO ALL INTERESTED STAKEHOLDERS

1. Please suggest and discuss in detail ways to streamline the pole attachment and conduit access process for attachers in Massachusetts. Suggested redline edits of 220 CMR 45.00 are welcome.

Use the existing process, make it electronic if able.

2. Are there any limitations under existing state law or practices, or any conflicts between FCC requirements and G.L. c. 166, § 25A, and other state laws, that may preclude adoption of pole attachment requirements similar to those adopted by the FCC in 47 CFR Subpart J?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

3. Should the Departments adopt requirements involving allocation of unusable space costs consistent with FCC regulation 47 CFR 1.1409? Why or why not?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

4. Should the Departments adopt timelines for access to utility poles consistent with FCC regulation 47 CFR 1.1411? Why or why not?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

5. Should the Departments mandate the use of agreed-upon contractors for non-electric attachment survey and make-ready work on poles consistent with FCC regulation 47 CFR 1.1412? Why or why not?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

6. If the Departments adopt mandatory deadlines for application, survey, and make-ready processes, describe the necessary requirements and other considerations for your company to adhere to these deadlines and identify any exemptions that should apply.

Recommended not mandatory.

7. Should the Departments consider revisions to the Massachusetts Formula applicable to telecommunications and cable television attachers? Why or why not? If so, describe in detail the revisions that should be made and why, and how best to procedurally effectuate those changes.

GMLD does not have a comment or does not have adequate experience on this topic to comment.

8. Should the Departments consider revising the Massachusetts Formula in relation to the usable space on poles and/or to additional attachments on poles? If so, how should the Departments account for wireless attachments, alternative attachment practices (such as opposite side construction), and pole-mounted EVSE.

GMLD does not have a comment or does not have adequate experience on this topic to comment.

9. Should the Departments expand the Massachusetts Formula to apply to wireless attachments and pole-mounted EVSE on utility poles? Why or why not? If so, should usable space assumptions and allocations be adjusted for wireless attachments, alternative attachment practices, and pole-mounted EV chargers?

Yes, make similar to wired.

10.Should the Departments expand application of 220 CMR 45.00 to attachments beyond those owned by telecommunications carriers and cable system operators, e.g., pole-mounted EVSE? Explain why or why not.

Yes, properly allocate costs.

11.What standards other than the NESC apply to pole-mounted EVSE?

ADA, NEC

12.Should the Departments require utility pole and conduit owners to publicly post pole attachment and conduit rates charged, as well as related requirements and policies, applicable to requesting attachments to promote transparency? Why or why not? If so, should the Departments similarly require annual informational filings with our agencies with pole attachment and conduit rate data? If not, explain why.

No, seems like an unneeded added measure.

13.Explain whether there are specific processes that may improve coordination between joint pole owners in processing attachment applications, such as a single pole application, a single field survey, or a single make-ready estimate.

I feel things work fine as they are today.

14.Are there any additional comments or suggestions from interested stakeholders on the matters described in this Section or issues addressed elsewhere in this inquiry? Are there any additional issues that the Departments need to consider and, if so, why?

None.

DOUBLE POLES

1. Based on data reported in D.T.E. 03-87, for each of the last ten years through October 2024, please provide separately the total number of solely and jointly owned double poles installed and removed in your company's service territory.

This has not been tracked.

2. Identify the total number of double poles in your company's service territory as of December 31, 2024.

30

3. Identify the total number of double poles in your company's service territory as of December 31, 2024, that have been in place longer than 90 days from the date of installation.

0

4. Discuss the different circumstances for why double poles may be installed.

Maintenance, system upgrades, MVA

5. Discuss the processes in place to install and remove solely and jointly owned double poles, including discussion of how such installations and removals are prioritized.

GMLD uses NJUNS system and prioritizes most often on install date, but other considerations may effect that.

6. Provide a detailed explanation for why double poles should be allowed to remain in place beyond 90 days.

Often areas are upgraded that require electric utilities to work on a large section at once where sequence of operation, i.e. poles sets happen first, then new equipment installed, then cutover performed that requires over 90 days to complete.

7. With the clean energy transition and broadband deployment efforts planned for the next decade, do utility pole owners anticipate an increase in double poles? Why or why not?

Yes, of course this will increase double poles.

1. Should the Departments each include a dedicated utility pole webpage on their websites? If so, what data should be included and why?

No

2. Should the Department of Telecommunications and Cable require an express registration form for all telecommunications and broadband attachers who seek to attach to poles in the Commonwealth? If not, explain why.

Yes

3. Should the Department of Public Utilities require some form of contact and/or registration form for pole-mounted EVSE attachers that seek to attach to poles in the Commonwealth? Please explain whether the Department of Public Utilities has jurisdiction to implement this requirement for these entities.

Yes, it is a utility asset.

4. Should the Departments explore implementation of a new database that provides access to interested stakeholders with access to pole- and conduit-related attachment and cost data? If so:

a) identify the type of data that should be included and why;

Yes, keep it simple, pole numbers and locations

b) identify limitations to implementing such a database;

Gathering and maintenance of data could be a limiting factor.

c) discuss whether and, if so, how such a database would be duplicative of existing practices and processes;

It could work together with NJUNS being an all-encompassing asset database that syncs to NJUNS that shows associated pole changeouts with that asset.

d) discuss how the costs for implementing and maintaining such a database should be recovered;

GMLD does not have a comment or does not have adequate experience on this topic to comment.

e) address which entity(ies) should be tasked with maintaining the database and discuss why; and

State

f) address any other relevant considerations.

None.

5. Are there any additional comments or suggestions on the matters described in this Section? Are there any additional issues that the Departments need to consider and, if so, why?

None.

1. the effectiveness of the current complaint adjudication procedures;

GMLD does not have a comment or does not have adequate experience on this topic to comment.

2. possible changes that would streamline the current complaint adjudication process;

GMLD does not have a comment or does not have adequate experience on this topic to comment.

3. whether and, if so, describe in detail how, an informal alternative dispute resolution option such as mediation may be implemented, while remaining consistent with Chapter 30A of the General Laws, to resolve complaints in a shorter timeframe than the formal complaint process.

GMLD does not have a comment or does not have adequate experience on this topic to comment.

FACILITATION OF ROW AND POLE MOUNTED EVSE

1. What are the advantages and disadvantages of ROW EVSE in relation to pole-mounted EVSE? How does each technology compare with traditional ground-mounted EVSE in terms of costs and complexity of deployment? Are there limitations to the types of EVSE (e.g., Level 1 chargers, Level 2 chargers, direct current faster chargers, or other charger types) that can be mounted on ROWs and utility poles?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

2. What ROW or pole-mounted EVSE pilot programs or municipal partnerships have been undertaken in Massachusetts or in other jurisdictions? Please describe: (a) the scope and goal(s) of these programs and partnerships, including whether the program or partnership was designed to address a specific concern (and identify the concern); (b) the design and planning criteria considered to determine the number, type, and location to deploy the ROW or pole-mounted EVSE (e.g., socio-economic conditions, EV density, system capacity, etc.); (c) the average timeline and costs to deploy ROW and/or pole-mounted EVSE; and (d) any lessons learned from these pilot programs or municipal partnerships.

GMLD does not have a comment or does not have adequate experience on this topic to comment.

3. What are the barriers to the deployment of ROW and/or pole-mounted EVSE and what strategies can be employed to overcome those barriers? What changes to the Department of Public Utilities' existing policies, practices, regulations, and/or requirements are necessary to help facilitate ROW and/or pole-mounted EVSE deployment, including partnerships between companies and municipalities or other governmental entities? Should the Department of Public Utilities consider other factors?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

4. Please identify and describe ROW and pole-mounted EVSE currently deployed in the Commonwealth which are owned and/or operated, in whole or in part, by a private entity, and provide details of the ownership and operation (e.g., privately-owned pole-mounted EVSE that is leased, operated, and maintained by a municipality or other third party). What are the potential impacts of EDC ownership of ROW or pole-mounted EVSE on the competitive market? Should the ownership model of ROW and pole-mounted EVSE differ for environmental justice populations and non-environmental justice populations, and why?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

5. In addition to the EDCs, which entities should the Department of Public Utilities direct to submit plans to facilitate the deployment of ROW or pole-mounted EVSE in the Commonwealth?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

6. What policies and practices should be implemented to ensure equitable access to ROW and/or pole-mounted EVSE in rural communities and in low- and moderate-income areas?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

7. What federal, state, or other funding is available to facilitate the deployment of ROW and/or pole-mounted EVSE?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

8. How should ROW and/or pole-mounted EVSE plan proposals promote the use of utility poles for pole-mounted EVSE?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

9. For existing ROW and pole-mounted EVSE deployed in the Commonwealth, who maintains the ROW and pole-mounted EVSE equipment in a state of good repair? What liability provisions are necessary to ensure that owners of ROW and pole-mounted EVSE, or their lessees, maintain equipment in a state of good repair? What terms and conditions are or should be incorporated into pole attachment agreements to address emergency storm response and the shifting of attachment to facilitate removal of double poles in a timely manner?

GMLD does not have a comment or does not have adequate experience on this topic to comment.

***All comments should be submitted in electronic format by e-mail attachment jointly to the Department of Public Utilities at dpu.efiling@mass.gov, kerri.phillips@mass.gov, and scott.seigal@mass.gov, to the Department of Telecommunications and Cable at dtc.efiling@mass.gov and william.bendetson@mass.gov.32 The text of the e-mail must specify: (1) the docket number of the proceeding (D.P.U. 25-10/D.T.C. 25-1); (2) the name of the person or entity submitting the filing; and (3) indicate that the document is a written comment. The electronic filing should also include the name, title, and telephone number of a person to contact in the event of questions about the filing. For comments and any attachments, the electronic file name for each document should identify the document but should not exceed 50 characters in length. Importantly, all large files submitted must be broken down into electronic files that do not exceed 20 MB. To facilitate transparency, commenters should not submit confidential materials in this matter.**