Utility Pole and Conduit Access Questionnaire
Holden Municipal Light Department
1 Holden Street – Holden, MA – 01520

The Departments request responses from stakeholders—including utility pole owners, municipal lighting plants, and state/local entities managing public rights-of-way (ROWs)—regarding utility pole attachments, conduit access, and double poles. The information collected will inform a future rulemaking process to update regulations (220 CMR 45.00 et seq.), and further actions may be taken based on the data provided.

Section 1: Utility Pole Ownership and Attachments

1. Provide the total number of utility poles your company owns, broken down by:
    - Sole Owned - unknown
    - Joint Owned – about 4,885
    - Total Poles – about 5,100
2. Provide the total number of poles your company owns with conduit attached for service to local residences and businesses, broken down by:
    - Provide the total number of poles your company owns with streetlights attached, broken down by: unknown
    - Provide the average height of single and jointly owned poles your company owns, broken down by: 40'
3. Provide the total number of attachments on your company's poles in Massachusetts by attachment type:
    - Verizon - unknown
    - Charter – Estimated 4,885 JO; 167 SO
    - Crown Castle – Estimated 150 JO; 6 SO
    - Pole-mounted EV attachments 0
    - Other (please specify)

Section 2: Overhead and Underground Infrastructure

7. Provide the total miles of overhead lines or wires your company owns in the Commonwealth and the approximate percentage located on public ROWs. 67.2 miles
    1. Total Miles Underground Conduit: 30 miles
    2. Percentage in ROW: Unknown
8. Provide the total miles of underground conduit your company owns in the Commonwealth and the approximate percentage located on public ROWs. 30 miles
    1. Total Miles Underground Conduit: 30 miles
    2. Percentage in ROW: Unknown

Section 3: Pole Attachment and Conduit Access Rates

9. Provide the pole attachment and conduit access rates charged to wireline (non-wireless) telecommunications and cable television attachers for each of the past five years (2020–2024) and for 2025 (if available). Include:
    - Differences in rates charged based on joint ownership, attach type, or region
        - Single Owned - $9.69

        - Joint Owned - $5.33
    - Explanation if rates have not been updated in the past five years
        - Updated in 2022, and again in 2025.
    - Confirmation of whether your company charges rates using the Massachusetts Formula
        - HMLD uses a Pole Attachment Fee Worksheet, not sure if it is the Massachusetts's formula but other MOU's use it.
    - Description of how attachment rates are billed for jointly owned poles (e.g., direct billing by each owner)
        - Billed annual, at year-end.

10. Provide the rates charged to wireless attachers for each of the past five years (2020–2024) and for 2025 (if available). Include:

- Explanation of how rates are calculated **-** HMLD uses a Pole Attachment Fee Worksheet, not sure if it is the Massachusetts's formula but other MOU's use it. The worksheet uses info regarding Net investment per pole, carrying charges, maintenance, depreciation, return, allocation of useable space and then calculates the pole attachment rate.
- Assumptions and sources relied upon – previous year's approved DPU report

11. Provide the rates charged to pole-mounted EVSE attachment providers for each of the past five years (2020–2024) and for 2025 (if available). Include:
    1. 2020 – SO $4.80, JO $2.40
    2. 2021-2024 - SO $9.27, JO $5.10
    3. 2025 – SO $9.69, JO $5.33
    - Explanation of how rates are calculated: HMLD uses a Pole Attachment Fee Worksheet, not sure if it is the Massachusetts's formula but other MOU's use it.

Section 4: Accounting Methods

12. Identify the accounting method used to calculate pole attachment and conduit rates (e.g., Generally Accepted Accounting Principles vs. Uniform System of Accounts).
    1. Uniform System of Accounts

Existing Planning and Practices

Section 5: General Company Practices

15. Describe your company's planning and practices for utility pole and conduit access work on public ROWs.
    1. Case by case basis

Section 6: Pole Attachment and Conduit Access Processes

18. What requirements must be met to proceed at each stage of the process?
    1. Application and pole attachment license process that includes field survey an applicable charge, make ready work and applicable charges to make room for attacher, followed by execution of license
19. Are there proactive measures in place to facilitate future attachment requests before an application is received?
    1. Not applicable
20. Provide details on the types and calculation of costs associated with each stage.

    1. Application and pole attachment license process that includes field survey an applicable charge, make ready work and applicable charges to make room for attacher, followed by execution of license.
21. What is the average timeline for each stage of the process? List factors influencing these timelines.
    1. Application an pole attachment license process that includes field survey and applicable charges (About 4 weeks). Make ready work and applicable charges to make room for attacher (About 4 weeks). Followed by execution (About 2 weeks)
22. Does your company's affiliate(s) use One-Touch Make-Ready (OTMR) in other states? If so, provide details on regulatory requirements and processing timelines.
    1. No
23. Does your company utilize the NJUNS database for tracking? If so, explain how.
    1. Yes, for managing double poles.
24. Are there limits on the number of poles per application? If so, explain.
    1. No
25. Are different considerations applied to large versus small pole attachment applications?
    1. No

Section 7: Regulatory and Safety Considerations

26. Identify applicable National Electrical Safety Code (NESC) rules for pole-mounted attachments (e.g., spacing, climbing space, weight restrictions).
    1. HMLD follows NESC rules.
27. Are processes different for urban vs. rural roads, or for state vs. local roads? Provide relevant laws or ordinances.
    1. May require additional safety considerations.
28. Are there areas where all service is underground? Identify these locations.
    1. Yes, HMLD requires all new services to be underground.
29. How does your company determine when to use internal employees vs. third-party contractors for pole and conduit work?
    1. HMLD always tries to utilize its own workforce for make ready work.
30. How does your company ensure safety and efficiency when third-party contractors perform work?
    1. HMLD performs the work per NESC.
31. Does your company allow temporary attachments? If so, describe the procedures.
    1. No

Section 8: Cost, Tracking, and Emergency Procedures

32. Explain how survey and make-ready costs are derived. What factors influence cost increases?
    1. Using hourly rates, truck rates and material costs. Factors that increase cost are cost of supplies and contract negotiations
33. How does your company track and differentiate between routine and emergency work?
    1. FERC accounting standards
34. What are the policies for using third-party contractors vs. internal employees for routine and emergency work?
    1. HMLD always tries to utilize its own workforce.

Stakeholder Coordination and Policy Considerations

Section 9: State and Local Entities

35. How do state and local officials prioritize applications for utility work on ROWs?
    1. HMLD officials perform this on a case-by-case basis
36. Are certain projects fast-tracked? If so, explain.
    1. Not particularly
37. How do state/local officials communicate larger infrastructure needs?
    1. Email/Phone or any other appropriate process
38. How is completed work reviewed for safety? What common remediation efforts are necessary?
    1. HMLD oversees all work for safety.
39. What considerations apply when trenching is required?
    1. All applicable rules and regulations for trenching should apply.

Section 10: Broadband and Clean Energy Deployment

40. How do storm response and emergency events impact infrastructure safety and routine work schedules?
    1. Storm response and emergency events delay routine work.
41. What scheduling limitations or safety concerns affect broadband and clean energy projects?
    1. HMLD has a small line crew with numerous projects going on, scheduling could be an issue.
42. How can utility pole and conduit owners improve coordination with state and local officials?
    1. Effective and timely communication

Section 11: Stakeholder Input on Process Improvement

43. What measures could streamline the pole attachment and conduit access process in Massachusetts?
    1. Use the existing process and make as much electronic as possible. The NJUNS system is extremely effective for this.
44. Should Massachusetts adopt pole attachment requirements similar to the FCC? Why or why not?
    1. MLPs should retain local control.
45. Should the Massachusetts Formula be revised for telecommunications and cable attachers? If so, how?
    1. MLPs should retain local control.
46. Should wireless attachments and pole-mounted EVSE be incorporated into the Massachusetts Formula?
    1. Yes
47. Should utility pole owners be required to publicly post attachment and conduit rates?
    1. No

Section 12: Double Pole Management

48. Provide data on the number of double poles installed and removed annually over the past ten years.
    1. This number is unknown.

49. What is the current total number of double poles in your service territory?
    1. 96 poles
50. How does your company prioritize and manage double pole removal?
    1. As there is time, staff removes double poles.
51. Should double poles remain in place beyond 90 days? If so, explain.
    1. Often times, there are areas that are upgraded that require electric utilities to work on a large section at one time where the sequence of operations is – poles set, new equipment installed, cutover performed that requires over 90 days to complete
52. Do you anticipate an increase in double poles due to broadband and clean energy expansion?
    1. Yes, this will increase double poles.

Section 13: Database and Transparency Initiatives

53. Should the Departments create a dedicated utility pole webpage? If so, what data should it include?
    1. No
54. Should telecommunications and broadband attachers be required to register before attaching to poles?
    1. Yes
55. Should a public database track pole attachment and conduit cost data? If so, what key considerations should be included?
    1. Yes – include pole numbers and locations
56. Provide any additional comments or suggestions related to this inquiry.
    1. N/A

Submission Instructions

Thank you for your participation. Please submit responses electronically as outlined in the official inquiry documentation.