D.P.U 25-10/D.T.C 25-1

Littleton Electric Light and Water Departments

Submitted by: David Ketchen, Assistant General Manager

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- By statewide total and by individual city and town, the number of single and jointly owned poles that your company owns.
    - Town of Littleton
        - LELD Owned Poles – 94
        - Joint Owned Poles – 3474
    - Town of Boxborough
        - LELD Owned Poles – 26
        - Joint Owned Poles – 1370

- 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.
    - LELWD does not currently track the number of conduits attached to poles, and will require a manual count in order to attain.

- By statewide total and by individual city and town, the number of poles that your company owns with streetlights attached.
    - Town of Littleton streetlights on Poles – 1093
    - Town of Boxborough streetlights on Poles – 177

- By statewide total and by individual city and town, the average height of single and jointly owned poles that your company owns.
    - Town of Littleton average pole height – 40’
    - Town of Boxborough average pole height – 40’

- 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.

    - Town of Littleton
        - Telecomm attachments - 3561
        - CATV attachments - 4039
    - Town of Boxborough
        - Telecomm attachments - 1595
        - CATV attachments - 1528
- 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.
    - Miles of overhead lines – 102.8 miles
    - App. Percentage in Public ROW – 95%
- 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.
    - Miles of underground lines – 69.03 miles
    - App. Percentage in Public ROW – 90%

- 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.
    - 2024 $10.09 (annual fee per attachment)
    - 2023 $10.21 (annual fee per attachment)
    - 2022 $8.49 (annual fee per attachment)
    - 2021 $7.43 (annual fee per attachment)
    - 2020 $9.28 (annual fee per attachment)

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

    - All attachers to poles in Littleton and Boxborough are charged the same rate by LELWD

- If the company's attachment and/or conduct access rates have not been updated in the past five years, explain why.
    - LELWD has not updated pole attachment rates in the past five years. The primary reasons being the amount of legal review and coordination time to re-negotiate contracts with each company that attaches to poles in our service territory. The majority of poles are jointly owned with Verizon which adds complexity to this coordination of updated contracts and pricing.

- 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.
    - Yes – LELWD uses the Massachusetts formula to calculate pole attachment rates

- 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.

    - LELWD directly bills pole attachers for LELWD's portion.

- 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.
    - LELWD does not currently have any pole attachments for wireless communication technology.

- 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.

    - LELWD does not currently have any EVSE pole attachments or any EVSE pole attachment requests.

- 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).
    - LELWD uses Uniform System of Accounts (FERC) when calculating pole attachment rates

Existing Planning and Practices

- Pole attachment and conduit access application, survey, and make-ready processes, for sole and jointly owned poles:
    - LELWD receives a standard document set for application filled out by the pole attached with the new pole attachment information. This includes:
        - "Application and Pole Attachment License"
        - "Authorization for Field Survey Work"
        - "Form 3 – LELP Itemized Pole Make-Ready Work Charges
        - A drawing showing the location of new pole attachment
    - LELWD reviews the information in the document set and verifies the poles listed are able to physically be attached to without make ready work.
    - LELWD signs the document set after verification and returns via email to pole attacher. If make ready work is required this will include a cost estimate to be paid prior to make ready work being performed.
    - If make ready work is to be performed, LELWD will make the changes then let the pole attached know when complete so attachments may happen.

- 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.
    - See details in previous answer.

- Describe any processes or resources for proactively facilitating future attachment requests prior to receiving an application.
    - LELWD follows NESC guidelines of clearances between primary voltage cables, secondary voltage cables, and leaves as much space as possible for communications lines to be mounted with required clearance from secondary cables.

- Describe the types and calculation of costs associated with each stage of the process charged to applicants.
    - Survey costs are the same for all pole attachers and has not been updated in recent years. The field survey charges are shown in an attached example pole attachment licensing documents that are filled out for each pole attachment.
    - Make ready costs are created individually per project and depends on the scope of work in making enough space or upgrading poles. These costs are derived from past projects of similar work to estimate labor hours and material to be used.

- 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?
    - If no make ready work is needed the process of verifying the pole information and documentation returning the documents typically takes 1-2 weeks.
    - If make ready work is required, the process described above and creating a cost estimate for the make ready work is typically 3-4 weeks.
    - These timelines are estimated from past projects and pole attachment licenses/applications. These timelines may be affected by the current influx of projects and workload, as well as any emergencies that may happen in the system that must be prioritized.

- 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.
    - LELWD does not utilize a OTMR method of pole attachments.

- Explain whether and how the company utilizes the NJUNS database for each of these processes.
    - LELWD uses NJUNS for double poles and notifications inbound and outbound to attachers when a pole is set to be removed or a pole has been replaced.

- Does your company limit the number of poles permitted per application? If so, discuss why and identify the limit.
    - LELWD does not limit the number of poles permitted per application.

- Are there any considerations that the Departments should be aware of for large versus small pole attachment applications?
    - LELWD does not treat the process of small vs large pole attachments differently.

- 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.).
    - LELWD does not currently have any requests for pole mounted EV attachments.

- 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.
    - Differences in type of roadway and speed limit do not change the pole attachment process for LELWD.

- 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, there are neighborhoods/areas that consist of only underground infrastructure. This is not done per municipal ordinances, and is done for reliability and aesthetic purposes. This is typically done in newer developments.

- When/how does your company utilize internal, collective bargaining employees versus third-party contractors for conducting any stage of this work?
    - LELWD does not use third-party contractors for any work regarding our pole attachment process.

- Describe how your company ensures safe, efficient make-ready practices when utilizing third-party contractors for utility pole and conduit access work.
    - LELWD does not use third-party contractors for any work regarding our pole attachment process.

- 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.
    - LELWD does not use third-party contractors for any work regarding our pole attachment process.

- Explain whether your company allows temporary attachments and, if so, describe your company's procedures for attaching and replacing temporary attachments.
    - There have been no requests for temporary attachments in record. It would be a specialized process and document set that would need to be created if a request was received.

- 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.
    - N/A

- How are attachment and conduit access applications and associated work prioritized and placed in order of queue of company and other attacher projects?
    - Pole attachment and conduit access work along with all projects are planned and started on a first come first serve basis.

- Discuss how and why attachment and conduit access applications and associated work may be reprioritized or delayed.
    - This work may be reprioritzed or delayed for any emergency situations that include outages to customers or any infrastructure that is found to be damaged and needing repair before any worse damage will be caused.

- Discuss whether and/or how the scheduling of pole attachment and conduit work may be impacted by other projects on ROWs.
    - Pole attachment and conduit access work along with all projects are planned and started on a first come first serve basis.

- 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.
    - LELWD would still plan and perform projects on a first come first serve basis whether it includes a small or large number of poles.

- Explain whether and how your company coordinates attachment project work with other attachers, pole owners, and municipal and/or local officials, as applicable.
    - LELWD does not coordinate attachment project work with other attachers or pole owners, it is expected that the new pole attacher coordinates with the other pole attachers if work is needed by them in order to attach.

- Explain whether attachment applications are more easily accommodated during a particular time of year, e.g., summer versus winter months. If so, discuss why.
    - In general, any incoming projects are more easily accommodated in the fall-winter time while general construction slows down.

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

- LELWD would not expect any pole attachments to be moved by any party except for the attachment owners or contractors that are authorized by the attachment owners.

- 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.
  - Survey costs are the same for all pole attachers and has not been updated in recent years. The field survey charges are shown in an attached example pole attachment licensing documents that are filled out for each pole attachment.
  - Make ready costs are created individually per project and depends on the scope of work in making enough space or upgrading poles. These costs are derived from past projects of similar work to estimate labor hours and material to be used. While cost disputes have not happened from a pole attachment make ready work cost estimate, a meeting would be had to show reasoning of all charges included.

- Explain how your company distinguishes between routine versus emergency utility pole and conduit work.
  - LELWD considers emergency pole and conduit work to be any physical infrastructure to be damaged to a point that puts a safety risk surrounding the equipment or is actively causing any form of outage/power quality issue.

- 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.
  - LELWD has staff that routinely uses a pole testing machine to test poles throughout the system, typically prioritizing areas that we know are older. Structural integrity is inspected everytime prior to climbing a utility pole. While not tested, during any coordination/planning of infrastructure upgrades to poles within the system, LELWD verifies age and strength of pole in order to replace poles when new equipment/line upgrades are occurring.

- Discuss the circumstances under which your company allocates the costs of pole replacements to attachers.

    - The cost of pole maintenance is factored into the calculation of annual pole attachment fees (Total cost divided by number of poles in system).
    - LELWD shares pole costs with Verizon as joint owners and they are charged a portion of the cost of poles replaced with their service attached.
- Explain any differences in non-emergency pole replacements when alternative attachment techniques (e.g., opposite side attachments) are present.
    - LELWD process for non-emergency pole replacements would not change for alternative attachment techniques are already being used unless the alternative technique creates a situation that does not allow the pole to be replaced or creates an unsafe method of replacing the pole. In the case of this, LELWD would contact the attacher utilizing the alternative technique and come to an agreeable action to remedy the pole replacement.

- Explain how your company tracks, at the individual pole level, routine versus emergency work, pole replacements, and attachments (e.g., NJUNS, internal databases, other).
    - Routine vs Emergency work is tracked separately within LELWD work order system as trouble calls vs normal work.
    - Pole replacements are tracked in NJUNS and our GIS mapping system.
    - Pole attachments are tracked in our GIS mapping system and pole licensing applications

- 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).
    - Cost estimates for all work is done in Trackvia and Meridian work management and billing systems. Pole attachments are tracked in our GIS database that is shown included in our mapping system.

- 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.
    - LELWD does not use third-party contractors unless deemed necessary in cases of emergency.