**Tara Rondeau**

**General Manager**

**Paxton Municipal Light Department**

**508-756-9508**

**Utility Pole and Conduit Access Questionnaire**

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:
	* Individual town: 2126
2. Provide the total number of jointly owned poles your company owns, broken down by:
	* Individual town: 1950
3. Provide the total number of poles your company owns with conduit attached for service to local residences and businesses, broken down by:
	* Individual town: We do not keep track of this.
4. Provide the total number of poles your company owns with streetlights attached, broken down by:
	* Individual town: 423
5. Provide the average height of single and jointly owned poles your company owns, broken down by:
	* Individual town: 35’
6. Provide the total number of attachments on your company’s poles in Massachusetts by attachment type:
	* Telecommunications: 1950
	* Cable television: 1907
	* Wireless: 0
	* Pole-mounted EV attachments: 0
	* Other (please specify): 0

**Section 2: Overhead and Underground Infrastructure**

1. Provide the total miles of overhead lines or wires your company owns in the Town and the approximate percentage located on public ROWs. 32.5 miles. We do not track amount separately in ROWs.
2. Provide the total miles of underground conduit your company owns in the Town and the approximate percentage located on public ROWs. 13.54 miles. We do not track amount separately in ROWs.

**Section 3: Pole Attachment and Conduit Access Rates**

1. 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:
	* Assumptions and sources relied upon (including lines, tabs, and/or page numbers)

Use our audited annual DPU report for expenses and plant costs.

* + Differences in rates charged based on joint ownership, attacher type, or region

|  |
| --- |
| Cable |
| Year | Joint OwnedCharge | Sole OwnedCharge |
| 2020 | $2.40 | $4.80 |
| 2021 | $3.87 | $7.74 |
| 2022 | $4.87 | $9.74 |
| 2023 | $4.87 | $9.74 |
| 2024 | $4.87 | $9.74 |

* + Explanation if rates have not been updated in the past five years
	+ Confirmation of whether your company charges rates using the Massachusetts Formula: Use the Massachusetts formula
	+ Description of how attachment rates are billed for jointly owned poles (e.g., direct billing by each owner): direct billing by each owner
1. Provide the rates charged to wireless attachers for each of the past five years (2020–2024) and for 2025 (if available). Include: N/A we have none.
2. 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: N/A. We have none.

**Section 4: Accounting Methods**

1. Identify the accounting method used to calculate pole attachment and conduit rates (e.g., Generally Accepted Accounting Principles vs. Uniform System of Accounts): Uniform System of Accounts.
2. If following the Uniform System of Accounts, reference applicable sections of D.P.U. 19-76-A/D.T.C. 19-4-A.
3. If using alternative accounting practices, explain the rationale and implications for rate calculations. N/A

**Existing Planning and Practices**

**Section 5: General Company Practices**

1. Describe your company’s planning and practices for utility pole and conduit access work on public ROWs. It is no different than any other pole attachment application process.
2. Provide copies of relevant policies, practices, and template agreements for pole attachment and conduit access.

**Section 6: Pole Attachment and Conduit Access Processes**

1. How does your company conduct the following processes?
* Application submission. Submit via email or mail.
* Survey: All depends on the area and type of application request. Whether or not any engineering services could be needed. We are too small to have any engineers on staff.
* Make-ready work.
1. What requirements must be met to proceed at each stage of the process?
2. Are there proactive measures in place to facilitate future attachment requests before an application is received?
3. Provide details on the types and calculation of costs associated with each stage. Actual costs are charged.
4. What is the average timeline for each stage of the process? List factors influencing these timelines.
5. 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. No
6. Does your company utilize the NJUNS database for tracking? If so, explain how. No
7. Are there limits on the number of poles per application? If so, explain. No
8. Are different considerations applied to large versus small pole attachment applications? No

**Section 7: Regulatory and Safety Considerations**

1. Identify applicable National Electrical Safety Code (NESC) rules for pole-mounted attachments (e.g., spacing, climbing space, weight restrictions). We follow all NESC rules applying to pole attachments, grounding, etc.
2. Are processes different for urban vs. rural roads, or for state vs. local roads? Provide relevant laws or ordinances.
3. Are there areas where all service is underground? Identify these locations. Any new subdivisions within the Town after the town adopted the Bylaw.
4. How does your company determine when to use internal employees vs. third-party contractors for pole and conduit work? We use all internal employees unless the work is not within their scope of abilities.
5. How does your company ensure safety and efficiency when third-party contractors perform work?
6. Does your company allow temporary attachments? If so, describe the procedures. Depends on attachment. All require permission.

**Section 8: Cost, Tracking, and Emergency Procedures**

1. Explain how survey and make-ready costs are derived. What factors influence cost increases?
2. How does your company track and differentiate between routine and emergency work?
3. What are the policies for using third-party contractors vs. internal employees for routine and emergency work?

**Stakeholder Coordination and Policy Considerations**

**Section 9: State and Local Entities**

1. How do state and local officials prioritize applications for utility work on ROWs?
2. Are certain projects fast-tracked? If so, explain.
3. How do state/local officials communicate larger infrastructure needs?
4. How is completed work reviewed for safety? What common remediation efforts are necessary?
5. What considerations apply when trenching is required?

**Section 10: Broadband and Clean Energy Deployment**

1. How do storm response and emergency events impact infrastructure safety and routine work schedules?
2. What scheduling limitations or safety concerns affect broadband and clean energy projects?
3. How can utility pole and conduit owners improve coordination with state and local officials?

**Section 11: Stakeholder Input on Process Improvement**

1. What measures could streamline the pole attachment and conduit access process in Massachusetts?
2. Should Massachusetts adopt pole attachment requirements similar to the FCC? Why or why not? NO....they are in the best interests of the telecommunications sector and not thinking of the lineworkers.
3. Should the Massachusetts Formula be revised for telecommunications and cable attachers? If so, how?
4. Should wireless attachments and pole-mounted EVSE be incorporated into the Massachusetts Formula? No, they are completely different than simple attachments such as phone or cable. It is more complex, they take up more space on a pole and weigh more which needs to be considered.
5. Should utility pole owners be required to publicly post attachment and conduit rates?

**Section 12: Double Pole Management**

1. Provide data on the number of double poles installed and removed annually over the past ten years.
2. What is the current total number of double poles in your service territory? 3
3. How does your company prioritize and manage double pole removal?
4. Should double poles remain in place beyond 90 days? If so, explain.
5. Do you anticipate an increase in double poles due to broadband and clean energy expansion?

**Section 13: Database and Transparency Initiatives**

1. Should the Departments create a dedicated utility pole webpage? If so, what data should it include? NO
2. Should telecommunications and broadband attachers be required to register before attaching to poles? NO
3. Should a public database track pole attachment and conduit cost data? If so, what key considerations should be included? NO
4. Provide any additional comments or suggestions related to this inquiry.

**Submission Instructions**

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

Notes: There is more to pole usage that needs to be taken into consideration when setting these rates for any type of attachment. The current calculation methods, whether FCC or Massachusetts, are strictly based on the use of the pole space and wear and tear. What everyone forgets is the cost that we incur due to overtime to investigate lines that are down after hours and on weekends. 9 times out of 10 they are cable lines. We pay our linemen a lot of overtime for work that is not related to power that we have no way to recoup as the calculations are currently written.

That is one problem that needs to be addressed. Adding other things to the poles will create even more costs to the utility that should have a way to be recouped besides just wear and tear. We are non-profits and overtime impacts us much more than IOUs.

As MLP’s are not regulated by the DPU and they are governed by local control under MGL Chapter 164, pole attachment rules and regulations should be set by the individual town bylaws and light dept. policies not by a state mandate that is supposed to be a “one size fits all” order. The people should be able to determine whether or not they want these companies, attachments etc, within their community and how they would like to work with them, not be told directly by the state that they MUST allow these attachments and how they should be charging rates.