Submitted by: Peabody Municipal Light Plant
DPU 25-10/DTC 25-1

By the Numbers
The Departments request the following information from all utility pole and conduit owners, including the EDCs, Verizon, MLPs, and others. Please identify as of December 31, 2024:

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

Total:
- PMLP: 1994
- Joint: 8682

Peabody:
- PMLP: 1918
- Joint: 7693

South Lynnfield:
- PMLP: 76
- Joint: 989

- 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.

Total:
- PMLP: 205
- Joint: 763

Peabody:
- PMLP: 190
- Joint: 657

South Lynnfield:
- PMLP: 15
- Joint: 106

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

Total:
- PMLP: 129

- Joint: 4979

Peabody:
- PMLP: 123
- Joint: 4570

South Lynnfield:
- PMLP: 6
- Joint: 409

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

Total:
- PMLP: 45'
- Joint: 40'

Peabody:
- PMLP: 45'
- Joint: 40'

South Lynnfield:
- PMLP: 40'
- Joint: 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.

Total:		
	Cable	9408
	Broadband Fiber	9322
	Telecommunication	14779
	Fire Alarm	3669
	Third Party Electric	79
	Security	2
Peabody:		
	Cable	8468
	Broadband Fiber	9033
	Telecommunication	13785
	Fire Alarm	3213
	Third Party Electric	64
	Security	2
Lynnfield:		
	Cable	940
	Broadband Fiber	290
	Telecommunication	993
	Fire Alarm	456
	Third Party Electric	15
	Security	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 Length in Miles: 528.91
Public ROWs: 486.68 or 92%

- 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 Length in Miles: 105.15
Public ROWs: 56.54 or 53.77%

- 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.

Here are the current pole attachment rates:
Sole Owned per year: $11.56
Joint Owned per year: $6.40

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

  No differences.

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

  They have been updated in the past 5 years and have increased yearly per signed agreement with each attacher.

- 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 we use the Massachusetts formula

- 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.

  They are billed quarterly for the percentage of the pole that is owned by PMLP.

- 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.

Wireless rates are: $270.00 per year. This rate was calculated based on a study of the costs associated with pole maintenance and the impact of wireless attachments on these poles.

- 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.

We currently don't have pole mounted EV charger rates.

- 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).

We use the Massachusetts formula and provide inputs from our annual DPU report.

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.

c. Existing Planning and Practices

The Departments request that the EDCs, Verizon, and MLPs that own utility poles and conduit discuss in detail your company's existing planning and practices for utility pole and conduit access work conducted on public ROWs in the Commonwealth, addressing the following information, as well as any other relevant information. Provide copies of relevant practices, policies, and template agreements used by your company applicable to these topics.

There is no conduit access as we provide electric service. The new attacher sends an application along with a survey completed at the expense of the attacher. Once the survey is completed and reviewed by PMLP, the make ready work is completed at the expense of the attacher. Once the make ready work is completed, the application is approved.

As noted above, please provide as attachments to your comments and not as weblinks. For attachments to your comments, please mark those documents consistent with the instructions provided in Section V., below. If applicable, please clarify in any response whether practices, procedures, or cost calculations are specific to cable, telecommunications, electric, or pole-mounted EVSE attachments.

Our third party agreement template is attached to the end of this document. We don't have any language specific to pole mounted EVSE attachments.

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

See attached third party agreement.

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.

Explained above.

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

We currently size the poles and facilities according to make-ready survey information consistent with existing attachers and our own facilities.

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

Third-party attachers pay independent survey companies and PMLP bills labor and materials for make-ready work in agreement with the third party agreement.

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?

There is no timeline as we complete our work in a timely manner to accommodate the new attacher's schedule.

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.

We do not utilize OTMR for our own electric work. Third party attachers may use it but we are not aware.

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

PMLP and any third party attacher participate in NJUNS for all poles in our service territory.

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

No.

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

No.

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.).

40" clearances from secondaries and above, 20" clearance from streetlights. Proper clearance is needed over roadways, parking lots, etc.

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.

No.

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.

We have URD's scattered throughout the service territory which are fed underground within the complex. All new neighborhoods are required to be fed with underground utilities.

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

We have a line construction contractor which works alongside our CB employees.

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

If any worker protection is needed for the work in a specific area, they inform the company and we provide the appropriate protection.

- 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.

N/A

- Explain whether your company allows temporary attachments and, if so, describe your company's procedures for attaching and replacing temporary attachments. ▪ 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?

Depends on the timeline for the third party attacher.

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

If there is no compliance with the third party attacher or if the scope of work is larger than normal.

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

The scheduling will be determined by the needs of the third party attacher.

- 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.

We would accommodate the third party attachers according to the timelines of both the third party attachers and other company projects. For a recent larger project, we added on dedicated contractor crews for the make-ready work. Any smaller projects got dealt with by our internal line crews.

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

Electric work is usually the first to be completed so it doesn't need to be coordinated.

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

Weather would be the only real determining factor and any other issues related to the general maintenance of the electric system.

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

We don't move other attachers. Others may be moved due to clearance issues.

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.

We do not survey. Make-ready costs are based on labor to complete the work and any additional materials needed.

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

If the pole needs to be replaced for added height or if the pole to be attached to needs to be replaced due to a hazardous condition.

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

Boxing a pole in is not standard practice as it creates issues in the future to replace the pole or work on it.

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

Emergency work would consist of making repairs following an outage such as one caused by a car accident or tree contact, cable failure etc.

- 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.

We replace poles for the reasons mentioned above in addition to rotting found during inspections. We have a 10 year cycle of all of the poles in our service territory and a 5 year cycle for our critical circuits.

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

We have a GIS system to maintain records of attachments. NJUNS is used to coordinate with different attachers following a pole replacement. Emergency pole replacement occurs when there is a significant risk of the pole failing or if it has been broken either by storm, vegetation, or being hit by a vehicle. Routine pole replacements will have a work order written by Engineering which will be reviewed and then given to the line department.

- 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).

We don't track costs for routine work unless it is billable to a customer. Billable work whether emergency or routine would be calculated by the Engineering or Distribution Departments.

- 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.

We have a contractor which works daily with our line crews and we use them as well as our collective bargaining employees for completing routine and emergency work as needed. If a storm is forecasted, we will sometimes request additional crews from the contractor or a different contractor for support.

2. To State and local entities that manage public ROWs

The Departments seek to understand in greater detail the timelines and processes required at the state and local level for utilities and attachers to conduct pole and conduit work on public ROWs. As the Departments contemplate revisions to existing pole attachment and conduit access requirements applicable to the EDCs, MLPs, Verizon, and other pole and conduit owners pursuant to G.L. c. 166, § 25A, and 220 CMR 45.00, we must ensure that our actions do not result in inadvertent conflicts with other existing laws or otherwise jeopardize the safety of utility workers, third-party contractors, and the public at large. With these considerations in mind, the Departments seek to understand in greater detail the timelines and processes required at the state and local level for utilities and attachers to conduct pole and conduit work on public ROWs. The

Departments respectfully request and welcome input from state and local officials on the following questions:

- For routine utility pole and conduit work: 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? ▪ Are particular types of projects fast-tracked or given higher priority? If so, describe circumstances in which these scenarios would apply.

N/A

- 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.?

N/A

- 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.

N/A

- 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?

N/A

- 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?

N/A

- 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.

N/A

3. To all interested stakeholders

- 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.

Our current process hasn't had any issues or hold up to attachers.

- 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?

None that we are aware of.

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

We believe that third party attachers should pay their fair share of the costs associated with owning and maintaining pole facilities. The unusable space on a pole is common to all attachers and we believe that the unusable space should be taken into account when calculating attachment fees.

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

We meet deadlines with attachers and haven't had any issues regarding timelines on projects therefore we don't have an opinion on the matter.

- 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?

Agreed upon contractors for survey work and make ready work in non-electric space is acceptable to us.

- 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.

We don't expect any issues with complying with reasonable deadlines barring any extensive emergency work.

- 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.

See next question response below.

- 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.

We do not use alternative attachment practices such as opposite side construction (boxing in) as it restricts maintenance for future work. Regarding wired or wireless attachers or pole mounted EVSE, we believe that any prospective attacher should pay a fair market value for these attachments as they are avoiding all phases of installing expensive infrastructure and future maintenance of their own by attaching to existing utility poles.

- 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?

See answer above.

- 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.

Pole mounted EVSE's are different than third party attachments as they are new electric services on these already crowded poles. There are individual electric service requirements per pole, and with this as well as the cables being accessible to the public, creates some safety concerns. In addition to this, the pole or conduit owners still maintain the infrastructure going forward. An alternative could be to install a riser conduit and have a separate nearby EV charger service.

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

We do not currently have any pole mounted EVSE's in our service territory. With them being on the horizon, we will most likely have to add specifications and reasonable requirements to our Electric Service Installations Handbook regarding them.

- 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.

We will comply with whatever is required by the DPU and don't have an opinion otherwise.

- 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.

We already work with our joint owner on these surveys.

- 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?

N/A

C. Double Poles

The EDCs and telephone companies like Verizon are subject to double pole replacement requirements under G.L. c. 164, § 34B. The EDCs and Verizon also submit biannual double pole reports to the Department of Public Utilities.30 The Departments request that the EDCs and Verizon provide the following information.

- 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.

  - Solely = 142
  - Jointly = 421

This is from 2020-2024. Historical data prior to that is not tracked.

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

141

- 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.

25

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

There is a delay in the process as each attacher transfers to the new pole. A double pole will exist until each attacher goes out and performs their work to transfer their equipment to the new pole.

- 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.

We frequently work down a list of our double poles to be removed if all other parties have transferred. This is only in the case of side set poles.

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

Other than complicated pole replacements, if all other attachers transfer in a timely manner, then 90 days should be enough time to eliminate double poles.

- 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 because many poles will need to be replaced in order to make new usable space for the new attachers.

D. Agency Webpages, Databases, and Related Considerations
The Departments request input on the following from all interested stakeholders. D.P.U. 25-10/D.T.C. 25-1 Page 32

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

We maintain our NJUNS system and manage double poles accordingly and we don't see the need to add another burden to send required data to the departments. We will comply with what is required.

- 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

- 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. We think that the DPU has jurisdiction over utilities in MA.

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

No, this would add another burden to utilities to send in required data.

identify limitations to implementing such a database;

N/A

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

N/A

discuss how the costs for implementing and maintaining such a database should be recovered;
N/A

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

address any other relevant considerations.

N/A

- 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?

N/A

Additionally, the Departments seek input on:

- the effectiveness of the current complaint adjudication procedures;

N/A

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

N/A

Accordingly, we seek input on the matters that are implicated by ROW and pole-mounted EVSE and request responses to the below questions.

- 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?

Anything with that level of complexity complicates future pole maintenance. If there is a hit pole, then the EVSE equipment is damaged and would require the owner to transfer their equipment over to the new pole which would slow down the double pole process. We don't know the limitations of these but would assume that fast chargers require services too large for pole mounted equipment. Ground mounted is preferable.

- 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 -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.

Partially funded by a state grant, PMLP and the City of Peabody worked together to install 6 level 3 chargers in 3 different parking lots in downtown Peabody. These were ground mounted charging stations. The chargers were installed to prepare for growth of EV's and attract people to the downtown area. The biggest delay for the project timeline was the lead time for the charging equipment.

- 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?

We have limited experience installing these and therefore have little to add in response to this question.

- 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?

We are not aware of any pole mounted EVSE in MA. We have several private fast charger installations in our service territory. We don't have an opinion on the impact of ownership or the impact on environmental justice populations.

- 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?

Cities, towns and joint pole owners.

- 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?

PMLP doesn't have an opinion on the matter.

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

PMLP is unaware of any funding available for this.

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

Proposals should consider the difficulty of future maintenance on these facilities. It is our strong preference that these chargers do not go on poles, especially if there is a concern with the amount of double poles in the Commonwealth.

- 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?

We don't have any existing pole mounted EVSE in our service territory. For existing ROW EVSE, PMLP maintains the system installed in conjunction with the City of Peabody.

- 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?

Pole mounted EVSE equipment should be transferred as any other attacher via the NJUNS database to continue the double pole remediation process.