

South Hadley Electric Light Department
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www.sheld.org

March 17, 2025

DELIVERED ELECTRONICALLY

RE: D.P.U. 25-10/D.T.C. 25-1 – Notice of Inquiry and Request for Comments: Pole Attachment and Conduit Access on Public Rights of Way.

To Whom it May Concern,

As requested, the South Hadley Electric Light Department (SHELD) has developed responses to the inquiries associated with the aforementioned Docket Numbers.

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

SHELD Response:

South Hadley Electric Light Department (SHELD) processes all requests with the same level of priority, depending on the quantity of the request, a response is typically provided within a few days of receiving the request. SHELD understands the need to have this data quickly to support ongoing engineering, permitting, etc, for these critical projects, and is ready to support these requests expeditiously.

- 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.?

SHELD Response:

In the town of South Hadley, the majority of poles are joint-owned between Verizon and SHELD. SHELD would expect to see an official request presented for the project by the sponsoring agency, and since the poles are jointly owned, that same notification would also need to be provided to Verizon. As previously stated, SHELD would work to provide responses in an expeditious manner.

- 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.

SHELD Response:

SHELD reviews completed utility work to ensure compliance with applicable standards.

- 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?

SHELD Response:

Excavators should give proper notice, pre-mark site and Digsafe. Conduit attachments on SHELD-owned poles should be SCH80 or rigid galvanized. Depths are dictated by applicable codes (NEC, etc.).

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

SHELD Response:

All non-routine work should be completed as to not impact the safety of infrastructure or impact routine work schedules. Emergency work identified as such should be remediated immediately upon conclusion of emergency.

- 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.

SHELD Response:

SHELD should be given adequate advance notice of planned projects to ensure appropriate review and consideration of each project. SHELD believes that some sort of a universal submission portal process should be adopted, this effort would allow for consistent, complete and timely reviews of applications. Application development and submission effort would be a single effort for the entity while the joint owners of the poles could review the same application. Currently for a single pole review, two separate applications that vary slightly from each other need to be submitted to the two separate owners. This make the process more timely and expensive, and may result in duplicate/inaccurate outcomes depending on which entity owns the poles and is responsible for setting the poles.

We at SHELD appreciate the opportunity to provide comments. Please feel free to reach out if you should have any questions.

Regards,



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