voltpost

August 8, 2025

Commonwealth of Massachusetts
Department of Public Utilities
Department of Telecommunications and Cable
One South Station
Boston, MA 02110

Re: D.P.U. 25-10 / D.T.C. 25-1 – Inquiry on Utility Pole Attachment, Conduit Access, Double Pole, and Related Considerations

To Whom It May Concern:

Voltpost, Inc. appreciates the opportunity to submit comments in response to the Joint Inquiry (D.P.U. 25-10 / D.T.C. 25-1) issued by the Massachusetts Department of Public Utilities and the Department of Telecommunications and Cable. We commend the Commonwealth's leadership in facilitating the clean energy transition, broadband deployment, and equitable access to transportation electrification infrastructure.

As a leading pole-mounted EV charging station owner and operator, Voltpost supports the Departments' efforts to modernize regulatory frameworks and streamline processes for utility pole and conduit access. We recognize the critical role that public rights-of-way, utility infrastructure, and interagency collaboration play in achieving the Commonwealth's ambitious climate and equity goals. We especially value the Departments' recognition of pole-mounted EVSE as a tool to expand access to EV charging in underserved and space-constrained communities.

The Voltpost Level 2 charging system is mounted on lampposts and leverages the existing conduit or overhead power to reduce installation time and cost. Retrofitting the existing infrastructure lowers construction and trenching costs, the largest cost of charger installation. The Voltpost platform can also be deployed as a standalone charging system with a pedestal. The Voltpost charging platform addresses the need for accessible curbside charging in high-density residential and commercial areas. Voltpost serves EV drivers living in multi-unit housing who lack dedicated parking spaces and have nowhere to charge an EV near their home. The Voltpost charging platform makes EV ownership accessible to disadvantaged communities, increases clean mobility, plus reduces GHG emissions and air pollution.

Since the company's inception in 2021, the company has piloted Voltpost in New York, Michigan, and Illinois, and has been awarded $8.7 million in contracts to deploy 300+ units across 12 states, including Massachusetts. This year, Voltpost will deploy pole-mounted EVSE for residents of low-income housing in Barnstable County, in partnership with Zipcar, Equal Energy Mobility, and Better Together Brain Trust (Bt2).

Pole-mounted chargers have been successfully deployed across the United States. This technology is expanding and offers a great solution for residents of MFH who lack access to at-home charging.

Our submission provides recommendations and responses focused on the facilitation of pole-mounted EVSE deployment, best practices from our experience operating in New York, Michigan, and Illinois, and opportunities for regulatory alignment to enable faster, more equitable charging infrastructure development in Massachusetts.

We thank the Departments for their thoughtful engagement with stakeholders and for the opportunity to contribute to this proceeding.

Sincerely,

DocuSigned by:
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Facilitation of ROW and Pole-Mounted EVSE

1. **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?**

There are several advantages to the deployment of pole-mounted ROW EVSE:

- Rapid Deployment: Voltpost pole-mounted chargers can be installed in just a few hours with little to no construction or trenching, making them significantly quicker and easier to deploy than traditional standalone units.
- Lower Cost: Installation costs can be reduced by up to 70%, and total customer costs can be 25%–85% lower than leading alternatives, offering a highly scalable and cost-effective charging solution.
- Minimal Disruption: Voltpost installation is less invasive to streetscape and public ROW, avoiding the need for concrete work or sidewalk cuts.
- Reduced Curbside Clutter: By leveraging existing infrastructure like lampposts and utility poles, pole-mounted EVSE helps preserve pedestrian space and reduce visual and physical clutter.
- Lower Carbon Footprint: The minimal materials and construction required for installation lead to a smaller environmental impact compared to ground-mounted alternatives.

Most residential lampposts in the US operate at 120 volts. However, in commercial or industrial settings, lampposts often run at higher voltages to support larger or more efficient lighting systems. In certain older installations or specialized applications, lampposts may also operate at 240V. Given these power limitations, lampposts generally cannot support direct current fast charging and are better suited for Level 1 and Level 2 chargers.

Voltpost installation requires 208- 240VAC with 40A of capacity per charger for appropriate charging speeds (i.e. a dual-port Voltpost charger needs 80A). Upgraded power and/or new meter service may be needed for some installations. In these cases, Voltpost works directly with the local utility and installation partners to complete the required make-ready work.

2. **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 location to deploy the ROW or pole-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.**

ROW pole-mounted deployment projects have been conducted with Seattle City Light and the Los Angeles Bureau of Streetlighting. The projects offer valuable insights into the deployment of this kind of EVSE. Collectively, these pilots have deployed several hundred chargers, with the overarching goal of accelerating EV infrastructure deployment in a cost-effective, minimally disruptive, and community-responsive manner. Many of these programs were launched to address specific local and regional concerns, such as the lack of accessible EV charging in dense urban areas, the high cost of traditional ground-mounted installations, and the need to equitably expand EV access to low- and moderate-income communities.

Seattle City Light piloted a retractable EV charger mounted on utility or street light poles to serve homes without garage access. The charger cable drops when in use and retracts afterward, helping reduce tripping hazards and cable damage. While installation costs varied at each site, average costs were less than traditional curbside charging because the chargers tap into existing pole power infrastructure. In Seattle's first wave of this program, the city received over 1,100 applications for 30 planned chargers, highlighting high demand and contested street space. This pole-mounted system offered a practical, cost-effective solution for urban EV access and highlighted the need for careful site selection and community coordination.

Los Angeles is expanding their EV charging infrastructure by installing 10,000 pole-mounted chargers on existing streetlight poles, leveraging their built-in 240V power and freed-up capacity from energy-efficient LED upgrades. Over 750 chargers are already in place. Chargers deployed through this program are mounted 10 feet above ground to minimize damage risks and are especially suited for dense urban areas with limited space, helping improve access for residents in multi-unit buildings. This is a notable design evolution, as the initial placement of chargers was at eye level, which led to increased vandalism. In response, the equipment was repositioned 10 feet up the pole—a modification that has proven successful in reducing damage and improving operational reliability.

The planning and design criteria for these pilots were guided by considerations such as local EV adoption rates, socio-economic conditions, pedestrian and curbside usage patterns, and existing electrical infrastructure capacity. In some cases, pilot programs were coordinated with lamppost upgrades or municipal lighting infrastructure projects, allowing utilities and municipalities to leverage existing conduit and electrical service to minimize installation costs. The average deployment timeline for pole-mounted EVSE in these pilots was significantly shorter than for traditional installations, with many units installed in a matter of hours rather than days or weeks. Costs were also lower—often substantially—due to the reduced need for trenching, civil work, and new utility service.

One of the major lessons learned from these pilots includes the importance of designing with the streetscape in mind, as well as the benefit of aligning deployment with ongoing infrastructure modernization efforts. As the EDCs install new lampposts or upgrade existing assets, Voltpost suggests that they proactively integrate EVSE-ready conduit and electrical connections. This forward-looking approach will enable rapid, low-cost deployment of pole-mounted EV chargers, particularly in underserved communities where funding, space, and parking may be limited.

3. **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?**

The absence of standardized agreements that facilitate access to utility and municipally owned poles creates a major challenge for site selection and deployment. While larger pole owners such as Verizon operate under established regulatory frameworks that enable infrastructure sharing, many municipalities and public utilities lack clear internal processes for approving EVSE installations on city-owned poles. This creates confusion and delays in permitting, siting, and installation. Municipalities often lack awareness of how to engage in EVSE deployment, and without their buy-in, location selection may not align with community needs, resulting in underutilization of the infrastructure.

Another barrier is tied to uncertainty around maintenance responsibilities. Pole owners express concern about the management or removal of EVSE equipment in the case of pole upgrades or repairs. To address this, Voltpost recommends EVSE providers commit to responding to maintenance needs with the same urgency and protocol as telecom or utility equipment owners, demonstrating reliability and fostering trust. Similarly, utility interconnection processes—especially for lower-voltage pole-mounted chargers—are not always optimized or clearly defined.

To overcome these barriers, the Massachusetts Department of Public Utilities (DPU) should take a proactive role in enabling a consistent and supportive policy environment. Clear examples of this support include creating a regulatory pathway for pole-mounted EVSE, clarifying how existing make-ready programs and pole attachment rules apply to EV charging, and promoting the use of statewide or regional framework agreements between EVSE companies and pole owners. DPU should also provide guidance and technical assistance to municipalities, many of whom need support in developing internal procedures and understanding their role in charging infrastructure deployment. By encouraging partnerships between EVSE providers, utilities, and local governments, and by simplifying interconnection and maintenance protocols, the DPU can facilitate a faster, more cost-effective, and equitable expansion of pole-mounted EVSE. Additionally, the Department should consider broader factors such as equitable access, site visibility, integration with transportation planning, and adaptability to future charging technologies to ensure long-term success.

Promising examples of how utilities can adapt their procedures to better accommodate this type of infrastructure include National Grid NY's internal processes.. National Grid's pole attachment process for private EVSE installations requires that installers provide device specifications and pole-specific design sketches for review and approval by National Grid's Standards team. Since each pole varies, a unique sketch is required for every proposed attachment location. At the same time, an agreement must be established with the municipality that owns the public ROW where the pole is located. National Grid currently only executes private attachment agreements with municipalities or certain institutional entities. Therefore, applicants must either have the

municipality submit the application directly or obtain a letter of authorization (LOA) allowing the applicant to act on the municipality's behalf.

Once the agreement is in place and designs are approved, a design vendor surveys the selected poles and submits plans for National Grid's review. After paying the post-construction inspection fee, the utility assesses whether electric make-ready work is needed; if so, that work must be completed before a conditional license is issued. The applicant can then attach and energize the charger, though it should not be used until the post-construction inspection is complete. A final review follows, after which a license is granted with an annual fee applied per pole. Attachment owners must register in the ENGin system to ensure coordination for future pole maintenance or replacement. Voltpost suggests DPU and EDCs implement a similar structure that allows attachment owners to be immediately notified of any scheduled maintenance or infrastructure changes on poles to avoid delays.

An important constraint is that many National Grid NY poles are jointly owned with Verizon, which does not permit EV charger attachments. As such, attachments can only be made to National Grid sole-owned poles. Voltpost is actively working with National Grid NY on upcoming deployments in New York State. We aim to provide insight and learnings from these deployments to inform National Grid NY and neighboring utilities' pole-attachement procedures.

4. **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?**

As mentioned above, Voltpost is deploying pole-mounted EVSE in the Commonwealth with the Preservation of Affordable Housing (POAH) for low-income residents. Voltpost will own and operate the units deployed through this MassCEC-funded project.

Voltpost dissuades the EDCs from seeking to own and operate ROW and pole-mounted EVSE. A better approach would be EDCs working in partnership to support Charge Point Operators such as Voltpost. The EV charging experience for drivers is complex, whether this is environmental justice populations or non-environmental justice populations. The hardware is one small aspect of the overall experience, the software running the hardware is another, identifying the best locations for charging to be deployed, customer support, maintenance (reactive and planned), upgrades, changing regulatory requirements, they all feed into the overall experience and is what a Charge Point Operator excels at, across all territories, not just one state. Whether environmental justice populations or non-environmental justice populations, the ownership model does not need to change. On a case by case basis, it may be desirable to examine the grants or financial support opportunities that are available to Charge Point Operators to cover any potential higher costs or lower initial utilization.

5. **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?**

The Department of Public Utilities should direct a broad set of stakeholders to submit plans that facilitate the deployment of ROW and pole-mounted EVSE across the Commonwealth. Key among these are state and local transportation and infrastructure authorities such as MassDOT, municipal governments, parking authorities, planning commissions, and lighting authorities, all of whom play critical roles in managing public rights-of-way and street-level infrastructure. Third-party pole owners, including telecommunications companies like Verizon, should also be required to submit plans or participate in coordinated frameworks to ensure streamlined access to poles not owned by utilities. Where applicable, to promote equitable deployment, DPU should involve environmental justice organizations, tribal communities, and affordable housing authorities to ensure that charging infrastructure reaches underserved areas and reflects community needs. Requiring engagement from this broad coalition of public and private stakeholders will help ensure that ROW and pole-mounted EVSE deployment is efficient and aligned with statewide decarbonization and transportation goals.

6. **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?**

DPU policies and practices should prioritize targeted investment, inclusive planning, and community partnerships to streamline permitting, standardized utility coordination, and financial support for local governments and property owners in rural or LMI areas. By engaging local stakeholders, including community-based organizations, tribal governments, and affordable housing authorities, the planning process can identify high-need locations and ensure that charger placement supports residents' transportation patterns and access needs. These policies should also support affordable pricing structures, including low-cost or subsidized charging rates for income-eligible drivers. Implementing deployment strategies that explicitly allocate a portion of funding and infrastructure to underserved areas, with incentives or requirements, will encourage installation where market-driven investment might not otherwise occur.

Voltpost strives to prioritize equity and accessibility across all charger deployments. In Massachusetts, we are actively working with the Preservation of Affordable Housing (POAH), Equal Energy Mobility, and Zipcar to deploy pole-mounted EVSE at affordable housing sites in Barnstable County for residents to utilize electric carshare. Car ownership comes with high upfront and ongoing costs, which can make EV adoption out of reach for lower-income individuals. Electric carshare programs eliminate these cost burdens by offering affordable, on-demand access to EVs without the need for personal ownership. By co-locating pole-mounted or ROW EVSE with dedicated carshare parking, municipalities and service providers can ensure that community members in underserved or transit-challenged areas have reliable access to clean transportation options. This approach also amplifies the environmental and public health benefits of

electrification by reducing emissions and improving air quality in communities that often face disproportionate pollution burdens. Moreover, carshare programs can serve as an entry point for EV education and exposure, fostering greater long-term adoption and building support for broader electrification efforts. With carshare companies like Zipcar setting vehicle electrification targets in the coming years, this model offers an ideal solution.

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

The current funding landscape for EVSE deployments in general has become less active in recent months. While funding through the federal NEVI and CFI programs is paused, some states have made funds available for clean transportation projects that enable the deployment of ROW and pole-mounted EVSE.

In light of the slowed deployment of federal funding for EV infrastructure projects, Voltpost is proactively focusing on state- and utility-level programs to ensure continued progress on our mission to deliver equitable and scalable EV charging solutions. Many states remain committed to advancing transportation electrification and are offering robust incentives and make-ready programs to support deployment.

Key programs include:

- **California**: The Bay Area Air Quality District (BAAD) Charge! and California Energy Commission's Communities and Charge programs provide grant funding to offset costs associated with purchasing and installing publicly accessible EV charging stations across California.
- **Massachusetts:** Eversource MA and MassEVIP Public Access charging incentive programs are meant to be stacked, enabling property owners and managers with publicly accessible parking to acquire EVSE.
- **Michigan**: Utility-led programs such as DTE Energy Multifamily and Workplace programs, focus on make-ready infrastructure and demand charge mitigation in dense urban areas like Detroit.
- **New York**: NYSERDA's Charge Ready NY 2.0 and utility make-ready programs such as Con Edison's PowerReady are meant to be stacked to fund ROW charger deployments.

In addition to these markets, we are closely monitoring developments in states where we are deploying Voltpost in 2025 where continued clean transportation investments are backed by state climate goals and energy plans. Voltpost remains committed to working with local governments, utilities, and property owners to unlock the full value of state-level incentives and deliver meaningful ROW pole-mounted EV charging access in key markets.

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

ROW and pole-mounted EVSE plan proposals should explicitly promote the use of existing utility poles by demonstrating how this approach minimizes installation impacts, reduces the carbon

footprint of chargers, and offers a cost-effective deployment strategy. The evaluation criteria for these proposals should prioritize low-disruption installation methods, such as avoiding trenching and major construction, along with strategies to reuse existing infrastructure rather than introducing new street furniture. Utilizing utility poles for EVSE significantly lowers the materials and labor required, contributing to a reduced environmental impact and faster project timelines. Plans should also include cost comparisons to traditional standalone alternatives to highlight long-term savings for both providers and the public.

9. **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?**

Voltpost suggests that Charge Point Operators oversee the operation and maintenance of ROW and pole-mounted EVSE. This maximizes uptime and reduces strain on the municipality and EDCs.

10. **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?**

Standard public liability clauses apply. Contracts should consider language around uptime. There is a natural incentive for “good” CPOs to achieve this as they seek to expand deployments.

11. **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 attachment agreements for EVSE should include clear terms and conditions that specify maximum response times for EVSE operators in the event of outages, pole damage, or safety hazards, ensuring rapid coordination and restoration of service. To support infrastructure modernization and prevent long-term clutter, agreements should also include provisions for the transfer of EVSE attachments from legacy poles to new ones during double pole removal efforts with coordinated timelines and communication protocols between EDCs and EVSE providers to prevent delays and ensure public safety.

By mounting 10 feet up the pole, Voltpost units are, by design, minimized to flood and storm risk. Our chargers have a phone number and an email address for users to notify the Voltpost team of any emergencies, where emergency response times can then be triggered.