



DEVAL L. PATRICK
GOVERNOR

MAEVE VALLELY BARTLETT
SECRETARY OF ENERGY
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THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

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COMMISSIONER

September 9, 2014

VIA First Class and Electronic Mail

Catrice C. Williams, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, Massachusetts 02118-6500

RE: Comcast of Massachusetts III, Inc. v. Peabody Municipal Light Plant and
Peabody Municipal Lighting Commission, D.T.C. 14-2

Dear Secretary Williams:

Enclosed please find the Department of Public Utilities' first set of information requests to the Peabody Municipal Light Plant and Peabody Municipal Lighting Commission in the above-referenced proceeding. If you have any questions, please let me know at: (617) 305-3500.

Sincerely,

/s/

Jonathan A. Goldberg
Hearing Officer

Enc.

cc: Service List for DTC 14-2

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Comcast of Massachusetts III, Inc.

Complainant

v.

D.T.C. 14-2

Peabody Municipal Light Plant and Peabody
Municipal Lighting Commission

Respondents

**FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF PUBLIC UTILITIES
TO PEABODY MUNICIPAL LIGHT PLANT AND PEABODY MUNICIPAL
LIGHTING COMMISSION**

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Public Utilities (“DPU”) submits its First Set of Information Requests to the Peabody Municipal Light Plant and Peabody Municipal Lighting Commission (collectively, “PMLP”).

Instructions

Please provide responses to the following Information Requests by close of business on **September 18, 2014**.

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to PMLP in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if PMLP or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers. Where applicable, provide supporting workpapers and calculations in the form of working Microsoft Excel spreadsheets with all cell references and formulae intact.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If PMLP finds that any one of these requests is ambiguous, please notify counsel for the DPU so that the request may be clarified prior to the preparation of a written response.
7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
8. Provide one copy of each response on three-hole punched paper to counsel for the DPU.

Requests

- | | |
|--------------|---|
| DPU-PMLP 1-1 | Refer to Comcast of Massachusetts III, Inc’s Complaint, Exh. 13, “Calculation of PMLP Maximum Lawful Pole Attachment Rates Using 2012 DPU Annual Report Data.” Please calculate a pole attachment rate for Solely Owned and Jointly Owned poles as per the Massachusetts Formula. Clearly show the operation of the formula and cite all inputs used by PMLP in the calculation of these rates. |
| DPU-PMLP 1-2 | Refer to PMLP’s response to Information Request DPU-PMLP 1-1. Please indicate the source and describe the rationale for the figure that PMLP used for “Normalized Tax Expense.” |
| DPU-PMLP 1-3 | Refer to PMLP’s response to Information Request DPU-PMLP 1-1. Please indicate the source and describe the rationale for the figure that PMLP used for “Rate of Return.” |
| DPU-PMLP 1-4 | Refer to PMLP’s response to Information Request DPU-PMLP 1-1. Please indicate the source and describe the rationale for the figure that PMLP used for “Annual Depreciation for Poles.” Provide all underlying calculations in support of this figure. |

Dated: September 9, 2014