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August 2, 2022

Shona D. Green, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118

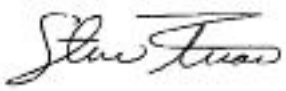
Re: D.T.C. 22-4 – CRC Communications LLC d/b/a OTELCO v. Massachusetts Electric Company d/b/a National Grid and Verizon New England Inc.

Dear Ms. Green,

On behalf of Massachusetts Electric Company d/b/a National Grid ("National Grid" or the "Company"), enclosed are the Company's responses to the Second Set of Information Requests issued by the Department of Telecommunications and Cable ("DTC").

Please contact me with any questions.

Very truly yours,



Steven Frias

cc: William Bendetson, Hearing Officer, Department of Telecommunications and Cable
Service List, D.T.C. 22-4

Information Request DTC-NG-2-1

Request:

On page 17 of its response, National Grid indicates that it is responsible for the cost of replacing a pole beyond its useful life: "In such instance, National Grid bears the cost of installing a new pole of the same height and class as the old pole, while the attacher would bear the incremental costs (if any) of a taller pole to accommodate its attachment." Please identify the incremental cost for a pole that increases from 35 feet to 40 feet and for a pole that increases from 35 feet to 45 feet.

Response:

The incremental cost for a pole that increases from 35 feet to 40 feet is $5,940.63. The incremental cost for a pole that increases from 35 feet to 45 feet is $6,104.10. These amounts are based on a distribution pole with 3 phase primary conductors and a triplex secondary. Furthermore, this is merely the incremental cost of the pole itself. Other factors could increase the cost of installing a larger pole. For example, factors such as what additional electrical equipment and guying structures exist and are attached to any specific distribution pole would impact the material, labor and transportation costs that are factored into the total overall cost of the pole upgrade.

Prepared by or under the supervision of: Joy Banks

Information Request DTC-NG-2-2

Request:

Please explain how National Grid's boxing policy changes in situations where a wire is already extended onto the "field" or "opposite" side of the pole, such as intersections or last-mile connections.

Response:

National Grid does not change its boxing policy if a pole already has opposite side attachments. Opposite side attachments are not authorized by National Grid because the practice can create unsafe work conditions. As noted in National Grid's boxing policy, provided as Attachment DTC-NG-1-32, on a case-by-case basis, National Grid will consider if an exception to the boxing may be appropriate in certain limited circumstances, and whether a pole may be already boxed is one factor taken into consideration in making this determination. No single factor is dispositive, including an existing opposite-side attachment, but the situation is assessed in totality.

Information Request DTC-NG-2-3

Request:

Please refer to Dr. Lawrence Slavin's pre-filed testimony on pages six and 13. Please describe National Grid's amenability to this approach under which OTELCO would be required to pay increased future costs caused by boxing.

Response:

Dr. Slavin proposes that as the cost-causer, OTELCO, should be responsible to "reimburse the pole owner(s) for any incremental expenses," caused by OTELCO's use of boxing, "with an additional obligation to facilitate the operation, possibly by temporarily detaching its lines from the pole(s), and lowering or diverting them, as necessary." National Grid has concerns with this approach and concludes it would be impractical and administratively burdensome to employ.

First, OTELCO's reimbursement proposal is inadequate because there is no mechanism to reimburse other affected third-party attachers. Currently, only pole owner(s) would receive payment for incremental expenses caused by boxing. Other pole users, including other licensed pole attachers that are OTELCO's direct competitors, will also be affected by boxing, but would not be reimbursed for the inconvenience of their incremental expense caused by OTELCO's boxing.

Second, OTELCO's proposed reimbursement construct is deficient because it ignores the incremental expense associated with boxing prior to pole replacement. Pole users may incur additional costs prior to replacement of the pole. OTELCO's boxing will restrict pole climbing. Maintenance and emergency restoration work which required two workers on the pole would need two bucket trucks at the site, rather than one bucket truck and one climbing worker. This additional expense will be incurred during routine work and emergency restoration work, and would not be covered by reimbursement for pole replacements.

Third, OTELCO's approach will be administratively burdensome and will lead to disputes between pole owner(s) and all pole users. National Grid cannot only allow OTELCO to box; if the Company permits boxing for OTELCO, it has to allow the practice for all similarly-situated third-party attachers. This compounds the complications caused by boxing, once it is widely used in the Massachusetts service territory. The use of Dr. Slavin's cost causer approach will require additional record keeping by pole owner(s) and users to identify a potential boxing cost-causer for each pole. Detailed records will be required for pole owners and/or users to determine whether additional costs billable to the cost-causer may apply. This would require that a cost-causer

responsible for future additional costs be identified at the time of attachment and that this information be shared with all pole owner(s) and users at that time. Additionally, friction between pole users and disputes over allocation of costs will likely be brought before the Department.

Information Request DTC-NG-2-4

Request:

Please refer to Dr. Lawrence Slavin's pre-filed testimony on page 16 (lines 12-15). Please specify whether National Grid would permit an attachment below Verizon's copper in this situation.

Response:

National Grid has no authority to permit an attachment below Verizon's copper as it is in Verizon's attachment space.

Information Request DTC-NG-2-5

Request:

Please refer to David Allen's pre-filed testimony on page seven (lines 17-22). Please respond to the claim that National Grid refused to allow Osmose to provide the level of cost detail to OTELCO in Massachusetts that it provides to OTELCO in New York. If confirming the accuracy of the claim, please explain why this is the case.

Response:

National Grid declined the request to allow Osmose to provide the level of cost detail to OTELCO in Massachusetts that it provides to OTELCO in New York because the significant effort required to do so would delay survey and design timelines for not only OTELCO, but all other attachment requests.

Additionally, the New York Public Service Commission (PSC) has different requirements for make-ready cost detail. Massachusetts Electric Company is not governed by the PSC and it does not have the resources to accommodate such a request. The decision is based on non-discriminatory access to similarly situated attachers in Massachusetts and providing the same services to all similarly situated attachers, in Massachusetts, including OTELCO. Providing this additional service to OTELCO would amount to preferential treatment.

Additionally, New York and Massachusetts have different regulatory constructs making a true apples-to-apples comparison difficult. At a high level, the New York State Public Service Commission requires that Make Ready work be completed by National Grid within 45 days of the date payment is received by the pole owner. As a result, National Grid has dedicated additional resources to New York work, which comes at an increased cost to attachers, and can extend the timeframes for attachments because of the workload and distribution of work. For example, where National Grid does not have the resources to complete Make Ready work within the required 45 days, National Grid will give the Make Ready work to the applicant to hire a National Grid approved Make Ready contractor to complete the Make Ready work within National Grid's required 90 days – though at times, it will take applicants longer to complete their work than 90 days. National Grid's approved Make Ready contractors may provide a cost estimate or "bid", to the applicant, detailed pole-by-pole. In New York, make ready work is handled in a different manner and by different parties, sometimes contractors and not National Grid internal staff, accounting for different work products and levels of detail.

Prepared by or under the supervision of: Joy Banks

Information Request DTC-NG-2-6

Request:

Please refer to David Allen's pre-filed testimony on pages 11-12. Please explain why a detailed cost breakdown is unreasonable in light of these alleged errors.

Response:

National Grid is willing to provide additional cost breakdown, in its sole discretion, when the cost is unusually high. National Grid evaluates all charges billed to the customer and designs the work cost effectively and in the customer's best interest.

It is unreasonable to require National Grid to automatically provide a granular detailed pole by pole estimate to all attachers because of the volume of third-party attachment work National Grid must complete. Dedicating time to provide that level detail for each pole would significantly delay the make ready invoicing process, and in turn, significantly slow down the cycle time for pole attachments for all attachers. Additionally, providing extra detailed costs breakdowns will come at an increased cost to the attachers. Please see the response to Information Request DTC-NG-1-30.

OTELCO is misconstruing what occurred for these six instances. OTELCO is claiming that they were improperly billed for make-ready work that involved pre-existing NESC violations, which is incorrect as the make-ready design process had not yet been completed. In the typical process, Osmose would have designed the job, designated which elements were billable and non-billable, and submitted that plan to National Grid Design for final review and confirmation. During that final review, National Grid confirms or changes any elements which were inadvertently miscategorized by Osmose as billable versus nonbillable. The second level of review by National Grid is a control measure to make sure make-ready costs are billed appropriately.

Here, OTELCO reviewed Osmose's design plans ***prior to submittal to*** National Grid Design. When National Grid reviewed Osmose's plans, it recategorized certain items as non-billable, per the standard process. Essentially, OTELCO is claiming there was an issue with designations of make-ready costs before the entire process was completed.

Prepared by or under the supervision of: Joy Banks

Information Request DTC-NG-2-7

Request:

Please describe National Grid's process for surveying its poles outside of the make-ready process, including the frequency of routine inspections.

Response:

Outside of the make-ready process, National Grid conducts distribution line patrols on a five-year cycle, which includes the examination of poles. Please see Attachment DTC-NG-2-7 for an overview on National Grid's Distribution Line Patrol and Maintenance Procedure.

INTRODUCTION

The purpose of this procedure is to outline the requirements for the patrol and maintenance activities associated with National Grid Distribution feeders.

The inspection procedures shall be dictated by the individual state's regulatory agency. If the regulatory agency in a specific state (MA & RI) does not require inspection procedures the inspections can still be performed in those states per this EOP but are not required.

The Distribution Maintenance Program was designed to provide for a patrol and inspection of each distribution feeder once every five (5) years. The patrols are conducted by a Distribution Inspector identifying all required maintenance on a *Windows*® based hand-held computer. The maintenance items identified through this patrol are separated into five priority levels 1, 2, 3, 4 and 9. The maintenance codes identified default to the appropriate priority level. The default priority level can be adjusted by the individual performing the inspection based on actual field conditions. These priority levels are defined as follows:

Level 1 - An identified facility/component or tree condition that shall be repaired/replaced within 30 days for (NE) and 7 days for (NY).

Level 2 - Identified facility/component condition that shall be repaired/replaced within 1 year or as scheduled by Program Management for NE.

Level 3 – Identified facility/component condition that shall be repaired/replaced within 3 years or as scheduled by Program Management for NE.

Level 4 – This priority category is to collect inventory information on actual field conditions to be used by Investment Strategy and Work Planning.

Level 9 – This priority category is to collect inventory information for temporary repairs made by operations to restore service or maintain public safety until permanent repairs can be made.

All Level 1 priority conditions identified in the field shall be called in by the Distribution Inspector as follows:

1. Notification by location:
   New York: System Operations Dispatch 1-877-716-4996
   NE North: Bay State West & Central: Northborough Control Center 1-508-421-7879
   NE North: North & Granite: Northborough Control Center 1-508-421-7879
   NE South: Bay State South & Ocean State (RI): Northborough Control Center 1-508-421-7885

2. Detailed information provided to the regional notification location:
   a. Identify yourself as a Company Distribution Inspector and your work reporting area.
   b. Details of the Level 1 Priority Condition:
      i. Problem found.
      ii. District, Feeder No., Line No., Tax District and Pole No.

iii. Street address and any additional information that would assist in finding the location of the problem.

iv. If you are standing by or have secured the location.

3. Notify area Inspections Supervisor for follow-up.

PURPOSE

This procedure applies to all personnel involved with or responsible for the inspection and repair of Overhead (OH) Distribution and Sub Transmission facilities, Underground Residential Developments (URDs) and Underground Commercial Developments (UCDs).

ACCOUNTABILITY

1. Electric Work Methods
   A. Update procedure as necessary
2. Electric Operations
   A. Ensure the work generated by the Distribution Maintenance Program and assigned by Asset Strategy and Investment Planning is completed in the appropriate time frame.
   B. Request assistance from Distribution Line Contracting when necessary to complete work assigned in the appropriate time frame.
3. Distribution Line Contracting
   A. At the request of Operations obtain, schedule and manage contractors to perform inspections and required maintenance.
   B. Provide input into program revisions.
4. Distribution Inspector
   A. Demonstrate the ability to identify maintenance concerns and the aptitude to become proficient in the use of a hand-held computer and desktop computer.
   B. Demonstrate the understanding and requirements of this NG EOP D004.
   C. Possess the ability to do walking patrols, collect information on a hand held, download to a desk top computer, edit data, provide requested information/reports/work tickets to supervision, and track/close out work completed in the database system.
5. Distribution Network Strategy
   A. Select program codes/circuits to be scheduled for maintenance repair work using data collected through Distribution Maintenance Program.
   B. Approve changes to the maintenance code table.
   C. Select circuits to be patrolled for a running five-year cycle.
   D. Provide input into program revisions.
6. Inspections and Maintenance
   A. Ensure circuits scheduled for patrol are completed each year.
   B. Provide qualified personnel as inspectors to provide consistent and accurate identified maintenance concerns/problems.
   C. Provide program management.
   D. Report System Maintenance progress monthly by Division.
7. Process and Systems.
   A. Provide and support database.

REFERENCES

National Grid Safety Procedures
National Grid Employee Safety Handbook
NY PSC Order 04-M-0159
NY PSC Order Adopting Changes to Electric Safety Standard, December 2008
Elevated Equipment Voltage Testing NG-EOP G016
Underground Inspection NG-EOP UG006
Work Methods Bulletin 11-14 Voltage Regulation Limits
Massachusetts DTE Directive 12/9/05

TRAINING

Provided by appropriate National Grid training program.

DOCUMENT CONTENTS

Table of Contents

1.0 SAFETY REQUIREMENTS

1.1 All work shall be performed in accordance with:

- 1.1.1. National Grid Employee Safety Handbook
- 1.1.2. Applicable National Grid Electric Operating Procedures (EOP)
- 1.1.3. Applicable National Grid Safety and Health Procedures (SHP)

1.2. All applicable and appropriate Personal Protective Equipment (PPE) shall be worn.

1.3. The employee in charge of the work shall conduct a written pre-job brief with the employees involved prior to the start of each job. Using the Job Brief Form as an aide, discussions for performing the work should include:

- 1.3.1. Traffic control devices – Work Area Protection (WAP)
- 1.3.2. Emergency Events: communication methods (code blue), first responders, and closest hospital.

1.4. Minimum Approach Distances (MAD) to energized lines or exposed live parts shall be maintained (refer to Employee Safety Handbook Tables 2A, 2B and Appendix A for distances).

- 1.4.1. Use of DI Foot wear if MAD will be broken, according to NG-EOP G026 “Mechanized Equipment Grounding”

1.5 Identify if a Process Hazard Assessment (PHA) is required. Refer to NG-EOP G037 “Process Hazard Analysis”

1.6 Identify if an ARC flash assessment is required. Refer to NG-EOP G035 “ARC Flash Awareness and Mitigation” and Work Methods Infonet site for Arc Flash Table to determine working distance and energy levels – see link below:

Arc Flash Mitigation Tables

2.0 DISTRIBUTION PATROL

2.1 New York

2.1.1 Distribution Patrols are conducted by a Distribution Inspector that has been trained to identify deficiencies or non-standard construction conditions on National Grid facilities.

2.1.2 Distribution patrols are scheduled in such a manner that each distribution feeder is examined in the field once every five (5) years. In NY, the patrols shall be completed by December 31 due to regulatory reporting.

2.1.3 New Distribution Feeders added to the system will be incorporated through our Geographic Information System (GIS) system and added to the appropriate inspection cycle.

2.1.4 If the Distribution Inspector finds unmapped facilities from the information supplied from GIS, the inspector shall add the information into the *Windows*® based hand-held computer for maintenance tracking purposes. NG-EOP G011,

Preparation and Distribution of Electric Facilities Records, identifies the correct procedure for updating GIS records, if needed.

2.2 Rhode Island

2.2.1 Distribution Patrols are conducted by a Distribution Inspector that has been trained to identify deficiencies or non-standard construction conditions on National Grid facilities.

2.2.2 Distribution patrols are scheduled in such a manner that each distribution feeder is examined in the field once every five (5) years. In RI the patrols shall be completed by March 31. The most current Distribution Patrol schedule can be found in the Distribution Maintenance Program data base (RPT 1310 Feeder Patrol Status).

2.2.3 New Distribution Feeders added to the system will be incorporated through our Geographic Information System (GIS) system and added to the appropriate inspection cycle.

2.2.4 If the Distribution Inspector finds unmapped facilities from the information supplied from GIS, the inspector shall add the information into the *Windows*® based hand-held computer for maintenance tracking purposes. NG-EOP G011, Preparation and Distribution of Electric Facilities Records, identifies the correct procedure for updating GIS records, if needed.

2.3 Massachusetts

2.3.1 Distribution Patrols are conducted by a Distribution Inspector that has been trained to identify deficiencies or non-standard construction conditions on National Grid facilities.

2.3.2 Distribution patrols are scheduled in such a manner that each distribution feeder is examined in the field once every five (5) years. In MA, the patrols shall be completed by December 31 due to regulatory reporting. The most current Distribution Patrol schedule can be found in the Distribution Maintenance Program data base (RPT 1310 Feeder Patrol Status).

2.3.3 New Distribution Feeders added to the system will be incorporated through our Geographic Information System (GIS) system and added to the appropriate inspection cycle.

2.3.4 If the Distribution Inspector finds unmapped facilities from the information supplied from GIS, the inspector shall add the information into the *Windows*® based hand-held computer for maintenance tracking purposes. NG-EOP G011, Preparation and Distribution of Electric Facilities Records, identifies the correct procedure for updating GIS records, if needed.

2.4 Records

2.4.1 Distribution Patrol data is recorded by the Distribution Inspector on a *Windows*® based hand-held computer and downloaded to the Distribution Maintenance Program.

2.4.2 The Distribution Inspector should also complete maintenance code 118 - stencil installed and maintenance code 220 - guy wire marker, maintenance code 660 - switchgear missing nomenclature, maintenance code 681- transformer missing nomenclature, and maintenance code 745 - enclosure missing nomenclature if found deficient upon inspection while at the site or enter the appropriate code as a Level 4 maintenance item including a comment.

2.4.3 Maintenance Codes are shown on the Distribution Field Survey Worksheet #NG0236 (Page 8). The Distribution Field Survey Worksheet can be used by the field to record maintenance items and is used for informational purposes only.

2.4.4 The latest distribution maintenance codes are downloaded to the hand-held computer each time there is a change that affects the maintenance code table contained in the Distribution Maintenance Database. Printed copies of the latest maintenance code tables may be obtained by running a report on the look up tables from the Distribution Maintenance Database.

2.5 The *Windows*® based hand-held computer is to be used as the primary vehicle for recording maintenance problems in the field. There may be times where it is not practicable to use the hand-held computer. In these cases, the person performing the inspection should record the information on the Distribution Field Survey Worksheet (#NG0236).

https://teams.nationalgrid.com/sites/Syracuse/SitePages/Home.aspx

Once complete, the Distribution Field Survey Worksheet information shall be input into the Distribution Maintenance Database by the inspector, clerk, or supervisor or their designee.

3.0 EQUIPMENT TO BE INSPECTED AND MAINTENANCE CODES

3.1 This EOP requires the visual inspection of the following facilities as designated above for New York, Rhode Island or Massachusetts:

a. Wood Pole Mounted Street Light
b. Poles
c. Crossarms
d. Insulators
e. Primary
f. Transformers
g. Capacitor
h. Regulator
i. Sectionalizer
j. Recloser
k. Switches
l. Ground
m. Guy
n. Anchor
o. Secondary
p. Service
q. ROW
r. GIS
s. Spacer Cable
t. Cutout
u. Risers
v. Switchgear
w. Padmount Transformers
x. Enclosures

4.0 DISTRIBUTION MAINTENANCE DATABASE

4.1 The Distribution Maintenance Database consists of information collected in the field downloaded from the *Windows*® based hand-held computer and data gathered from other sources entered from the desktop computer. The *Windows*® based hand-held computer can be downloaded to any National Grid desk top computer that is connected to the network by an employee that has been authorized to perform this function. The Distribution Maintenance Database is used by various departments throughout National Grid to generate maintenance reports and cost estimates.

4.2 The Distribution Maintenance Database contains information to be used by Asset Strategy and Investment Planning to track maintenance codes that may affect reliability (R), affect reliability that have a specific program in place to address (RP), or may not directly affect reliability (NR):

5.0 MAINTENANCE SCHEDULE

5.1 Maintenance activities are scheduled by maintenance codes. Maintenance codes are given a priority level to aide in the scheduling of work assuring a safe and reliable distribution system.

5.2 All “Level 1 Priority” conditions identified shall be repaired/corrected within:

5.2.1 New England – 30 days

5.2.2 New York – 7 days.

5.3 NY Only - all “Level 2 Priority” conditions identified shall be repaired/corrected within 1 year. In NE, work will be reviewed, prioritized and scheduled according to the Annual Work Plan

5.4 NY Only - All “Level 3 Priority” conditions shall be repaired within 3 years. In NE, work will be reviewed, prioritized and scheduled according to the Annual Work Plan

5.5 All Level 4 Priority is for inventory purposes only.

5.6 All Level 9 priority conditions should be completed within 90 days. Level 9 priority conditions not completed within 90 days, the company shall periodically perform site visits to monitor the condition of the temporary repair. Refer to NG-EOP G029 – Tracking Temporary Repairs to Electric System for details on Level 9 priority conditions.

5.7 NY Only - Once the Distribution Feeder is completed in the Distribution Maintenance Database or 21 days have elapsed since the inspection, the Level 2 and Level 3 Priority maintenance codes are downloaded into STORMS. Expense maintenance work goes straight to scheduling while the capital work goes to Distribution Design. Level 1 Priority maintenance codes are communicated by the Distribution Inspector directly to the field operations group for the area where the feeder is located.

6.0 COMPLETION OF MAINTENANCE CODES

6.1 Level 1 priority maintenance codes completion process:

6.1.1 Distribution Inspector contacts System Operations Dispatch (SOD) providing information on the Level 1 maintenance item and fills out a Level 1 Priority Report Form (page 11).

6.1.2 SOD generates an ABB OMS order for Regional Control

6.1.3 Inspections Supervisor captures ABB OMS ID # and details for Level 1 maintenance item status. Inspections Supervisor tracks Level 1 maintenance status with operations ensuring that the Level 1 item is completed within 30 days (NE) and 7 days (NY). Inspection Supervisor closes out the Level 1 maintenance item in the Distribution Maintenance Database by adding the ABB OMS ID # number to maintenance record.

6.2 NY Only - Level 2 and Level 3 priority maintenance codes are completed in the Distribution Maintenance database once the 699 requirement is completed in STORMS for the work request associated with the maintenance code.

ALL MAINTENANCE WORK IS TO BE COMPLETED PER NATIONAL GRID DISTRIBUTION STANDARDS.

ALL MAINTENANCE WORK PERFORMED THAT WAS IDENTIFIED ON THE WORK ORDER OR DISCOVERED DURING THE REPLACEMENT/REPAIR/CORRECTION OF THE ORIGINAL MAINTENANCE PROBLEM SHALL BE LISTED ON THE DATABASE AND THEN CLOSED OUT WHEN COMPLETE.

Reference Only

DISTRIBUTION FIELD SURVEY WORKSHEET

nationalgrid

REGION	DISTRICT	EMPLOYEE ID	DATE
FEEDER	TAX DISTRICT/TOWN	MAP #	
LINE # / ROUTE #	POLE #/SUFFIX #		
LOCATION			
# MAIN LINE CATV ATTACHMENT 1 2 3 4 5	# MAIN LINE TELEPHONE ATTACHMENT 1 2 3 4 5	STREET LIGHT ATTACHED ☐ Yes ☐ No	

WOOD POLE MOUNTED STREET LIGHT	P/Q	REGULATOR	P/Q	SPACER CABLE	P/Q
098 1,2 (NR) ☐ Street Light Hazard Cond.	/	170 1,2 (NR) ☐ Oil Weeping	/	270 1,2,3,9 (R) ☐ Damaged/Missing Spacer	/
099 2 (NR) ☐ Not Bonded	/	171 1,2 (R) ☐ Bushings Broken/Cracked	/	271 1,2,3,9 (R) ☐ Bracket Damage	/
POLE		172 2 (R) ☐ Missing Ground Wire	/	272 3 (R) ☐ Bracket Not Bonded	/
106 3,9 (NR) ☐ Dbl Wood-NG Trnsf Req'd	/	174 4 (NR) ☐ Control Cab Height/Ground	/	273 3 (R) ☐ Messenger Not Bonded	/
107 4 (NR) ☐ Dbl Wood-Tel Trnsf Req'd	/	175 3 (R) ☐ Improper/Missing Bond	/	274 3 (R) ☐ Messenger Guard Missing	/
108 4 (NR) ☐ Dbl Wood-CATV Trnsf Req'd	/	176 3 (R) ☐ Animal Guard Missing	/	276 3 (R) ☐ Uncovered Splice	/
110 1,2,9 (R) ☐ Broken/severely damaged	/	177 3 (R) ☐ LA Blown/Missing/Improper	/	**CUTOUT**	
111 1,2,3,4 (RP) ☐ Visual Rotting Grd Line	/			280 2 (R) ☐ Defective Cutout	/
112 1,2,3 (RP) ☐ Woodpecker Holes - Replace	/	**SECTIONALIZER**		281 2 (R) ☐ Potted Porcelain	/
113 3 (NR) ☐ CuNap Treated Bthmark Yr	/	180 1,2 (NR) ☐ Oil Weeping	/	287 4 (NR) ☐ 3 Phase Equip Mount	/
114 2 (R) ☐ Woodpecker Holes	/	181 2 (R) ☐ Bushings Broken/Cracked	/	288 3 (NR) ☐ S&C SMD - 20 Power Fuse	/
115 1,2,3,9 (NR) ☐ Riser Guard Req'd	/	182 2 (R) ☐ Missing Ground Wire	/	**RISER**	
116 1,2,3,9 (RP) ☐ Visual Rotting Pole Top	/	183 4 (NR) ☐ Control Cab Height/Ground	/	290 1,2,3,9 (NR) ☐ Improp Cable Supp/Term	/
117 1,2 (NR) ☐ Leaning Pole	/	184 3 (R) ☐ Improper/Missing Bond	/	291 2 (R) ☐ Improper/Missing Bond	/
118 4 P (NR) ☐ Stencil / Correction Req'd	/	185 3 (R) ☐ Animal Guard Missing	/	292 3 (R) ☐ Animal Guard Missing	/
119 4 (NR) ☐ Bird's Nest	/	186 3 (R) ☐ LA Blown/Missing/Improper	/	293 2,3 (R) ☐ LA Blown/Missing/Improper	/
CROSSARM		**RECLOSER**		**CONDUCTOR**	
120 1,2,4,9 (R) ☐ Damage Arm	/	190 1,2 (R) ☐ Oil Weeping	/	300 4 (NR) ☐ Pool Clearance	/
121 1,2,4,9 (NR) ☐ Loose/Defective Pins	/	191 1,2 (R) ☐ Bushings Broken/Cracked	/	**HANDHOLES**	
122 3 (NR) ☐ Wooden Pine 13.2kv	/	192 2(R) ☐ Missing Ground Wire	/	600 1,2,9 (NR) ☐ Broken/Damaged/Unsecured	/
123 1,2,4,9 (R) ☐ Loose Brace, Hrdwr	/	193 4 (NR) ☐ Control Cab Height/Ground	/	601 4 (NR) ☐ Improper Grade	/
124 1,2,4,9 (R) ☐ Damage Dbl Crossarm	/	194 3(R) ☐ Improper/Missing Bond	/	602 P (NR) ☐ Missing Nomenclature	/
125 1,2,4,9 (R) ☐ Damage Alley Arm	/	195 3 (R) ☐ Animal Guard Missing	/	603 1 (R) ☐ Secondary Needs Repair	/
127 1,2 (R) ☐ Primary On Arm	/	196 2,3 (R) ☐ LA Blown/Missing/Improper	/	604 4 (NR) ☐ Other (use comments)	/
128 3,9 (R) ☐ Loose Ridge Pin	/	197 2 (R) ☐ TripSaver - Light On	/	605 4 (NR) ☐ Excessive Vegetation	/
INSULATOR		**SWITCH**		**SWITCHGEAR**	
130 1,2 (R) ☐ Broken/Cracked/Flashed	/	203 1,2 (R) ☐ Gang Oper'd Defective	/	651 1,2,3 (R) ☐ Barrier Brkn/Dmgd/Unsec	/
131 1,2,9 (R) ☐ Floating	/	204 1,2,3 (R) ☐ Single Phase Defective	/	652 1,2 (NR) ☐ Base Broken/Damaged	/
132 4 (NR) ☐ I7 Aluminum Capped	/	205 3 (R) ☐ Improper/Missing Bond	/	656 1,2,9 (R) ☐ Door Broken/Damaged	/
133 3 (R) ☐ Non-Standard Voltage	/	207 3,4 (R) ☐ LA Blown/Missing/Improper	/	657 1 (NR) ☐ Excessive Vegetation	/
134 4 (NR) ☐ AL Cap Assoc w/Switch/Fuse	/	208 2 (NR) ☐ Handle Not Bonded	/	660 P (NR) ☐ Missing Nomenclature	/
PRIMARY		**GROUND**		661 4 (NR) ☐ Other	/
140 1,2,9 (R) ☐ Insuff. Grnd Clearance	/	210 1,2,9 (R) Wire Broken/Loose	/	662 4 (NR) ☐ Rusted/Paint Peeling	/
141 1,2,3 ☐ Damaged Cond/Brkn Strands	/	211 1,2 (R) ☐ Hazard Condition	/	**PAD TRANSFORMER**	
142 1 (NR) ☐ Limbs on Primary	/	212 3 (NR) ☐ Guard Req'd	/	673 1,2 (R) ☐ Door Broken/Damaged	/
145 1,2,3 (R) ☐ Dmg'd Stirups/Connector	/	213 3,4 (NR) ☐ Non Standard	/	676 4 (NR) ☐ Excessive Vegetation	/
146 1,2,3 (R) ☐ Improper Sag	/	214 3,9 (NR) ☐ Not Bonded to Neutral	/	681 4,P (NR) ☐ Missing Nomenclature	/
147 3 (R) ☐ LA Missing Transition	/	**GUY**		684 1,2 (NR) ☐ Oil Weeping	/
148 3 (R) ☐ LA Missing End of Line	/	215 3(NR) ☐ Guy-Span Not In Compliance w/Code	/	685 1,2,3,4,9 (NR) ☐ Pad Broken/Damaged	/
149 3 (R) ☐ LA Blown	/			686 4 (NR) ☐ Protection (Ballards)	/
TRANSFORMER		220 4,P (NR) ☐ Guy Wire Marker	/	687 4 (NR) ☐ Rusted/Paint Peeling	/
150 1,2 (NR) ☐ Oil Weeping	/	221 3 (NR) ☐ Not in Compliance w/Code	/	688 1,2,9 (NR) ☐ Pushed Off Base	/
151 1,2 (R) ☐ Bushings Broken/Cracked	/	222 3,9 (NR) ☐ Excessive Slack	/	**ENCLOSURES**	
152 2 (R) ☐ Missing Ground Wire	/	223 1,2,3,9 (R) ☐ Broken Wire	/	740 1,2,3,4 (R) ☐ Base Broken/Cracked	/
153 2,3,4 (R) ☐ LA Blown/Missing/Improper	/	**ANCHOR**		741 1,2,3,9 P (R) ☐ Door Brkn/Dmgd/Unsec	/
154 3,4 (NR) ☐ Not in Use	/	226 1,2,3,9 (NR) ☐ Req'd - Jt. Owned	/	743 4 (NR) ☐ Excessive Vegetation	/
155 3,4 (R) ☐ Animal guards required	/	227 1,2,3,9 (NR) ☐ Req'd - Sole NG	/	745 4 P (R) ☐ Missing Nomenclature	/
156 3 (NR) ☐ Non Std Install of Gap	/	**SECONDARY**		746 4 (NR) ☐ Rusted/Paint Peeling	/
157 2 (R) ☐ Improper/Missing Bond	/	231 1 (NR) ☐ Limb on Secondary	/	**POLE INSPECTION**	
CAPACITOR		232 1,2,9 (NR) ☐ Improper Sag	/	801 1,2,3,4 (R) ☐ Identified Priority Pole	/
160 1,2 (NR) ☐ Oil Weeping	/	234 1,2,3,9 (NR) ☐ Floating	/	802 1,2,3,4 (R) ☐ Identified Reject Pole	/
161 1,2 (R) ☐ Bulging	/	**SERVICE**		803 4 (NR) ☐ Excessive Checking	/
162 1,2 (R) ☐ Bushings Broken/Cracked	/	240 1 (NR) ☐ Ins. Loose from House	/	804 4 (NR) ☐ Climbing Inspection	/
163 2 (R) ☐ Missing Ground Wire	/	241 1 (NR) ☐ Limb on Service	/		
164 2 (NR) ☐ Blown Fuse	/	243 1,9 (NR) ☐ Non Std/Unsecured	/		
165 3 (NR) ☐ Improper/Missing Bond	/	**ROW**			
166 3 (R) ☐ Animal Guard Missing	/	250 4 (NR) ☐ Brush/Tree/Washout	/		
167 3 (R) ☐ LA Blown/Missing/Improper	/	**GIS**			
168 4 (NR) ☐ Control Cab Heigh/Ground	/	260 4(NR) ☐ Map Doesn't Match Field	/		
169 4 (NR) ☐ Capacitor Out of Service	/	261 4(NR) ☐ Pole/Line Numbering Error	/		
		262 4(NR) ☐ Equip/Hardware/Missing	/		
		263 4(NR) ☐ Equip Removed in Field, Remove From GIS	/		
		264 4(NR) ☐ Misc.-Transmission Overbuilt	/		
		269 4 (NR) ☐ Other GPS/GIS Errors	/		

KEY

P/Q = Priority / Quantity
NR = Maint. Code May Not Direct Affect Reliability
R = Maint. Code May Affect Reliability
RP = Maint. Code May Affect Reilability and Has Speci?c Program to Place to Address

Comments:

NG0236 (02.15)

Level "1" & Elevated Voltage Priority Report Form

Any Level "1" Priority or Elevated Voltage condition found must be called into Dispatch.

Feeder:_____

Line #:_____

Pole #:_____

Closest Meter #:_____

Street Address: _____

City/Town: _____

Level "1" Priority/Elevated Voltage condition found.

_____

_____

Call Dispatch to inform that this is either an Elevated Voltage call or an Inspection issue.

Dispatcher notified: _____

Date/Time: _____

Inspector: _____

7.0 REVISION HISTORY

Version	Date	Description of Revision
1.0	04/01/11	This document supersedes document dated 08/17/09.
2.0	04/27/15	This document supersedes document dated 12/03/14
3.0	04/25/17	Four-year revision, separated by state and removed priority levels 2 & 3 for MA & RI, NY Remains the same, Aligned with UG 006 for uniformity.
4.0	10/01/20	Updated Accountability section to reflect department name changes, Section 1: Added Safety Section, Introduction, Section 5.2, 6.1.3: Updated Repair time for New England.

Information Request DTC-NG-2-8

Request:

Please describe the pole survey information National Grid makes available to potential new attachers before an attachment application is submitted.

Response:

Prospective attachers submit attachment applications based on their own engineering survey and design investigation. Upon request, National Grid can provide detailed pole inventories based on the project scope, including pole inventories retrieved from the Company's GIS system.

Information Request DTC-NG-2-9

Request:

Please identify the circumstances under which National Grid upgrades an existing pole to triplex without a new attacher.

Response:

National Grid will upgrade secondary wire to triplex during system updates where capacity is needed, such as in reconductoring projects or in cases where rack spool secondary can be removed to create space to avoid pole replacements for future new attachers.

Information Request DTC-NG-2-10

Request:

Please respond to OTELCO's claims in DTC-OTEL-1-18.

Response:

In the response to Information Request DTC-OTEL-1-18, OTELCO is arguing that "OTELCO is being billed to make space on the pole for OTELCO's attachment, and it is being billed to correct pre-existing non-conformance – which provides a benefit to the pole owner regardless of whether or not OTELCO's attachment is placed on the pole. If current attachments need to be moved to make a pole compliant, and then moved again to make space for OTELCO's attachment, there should be a cost concession for the compliance correction."

National Grid disagrees with this argument. The only benefit to the pole owner is the discovery of the pre-existing non-compliance. Once the discovery has been made on the non-compliance, the situational remediation outlined in the Company's response to Information Request DTC-NG-2-22 takes effect. OTELCO is not paying to make the pole compliant. OTELCO is responsible for any billable make ready that is required ***after*** the non-compliance is remediated.

OTELCO would be responsible for billable pole replacement costs because the pole would require replacement with a taller pole to accommodate OTELCO's new attachment even after the current non-compliance situation is remediated.

Please note that if OTELCO chooses not to complete the application for attachment, then the violator is held fully responsible for bringing the pole into compliance.

Please also see the Company's response to Information Request DTC-NG-2-22.

Prepared by or under the supervision of: Joy Banks

Information Request DTC-NG-2-11

Request:

Please refer to OTEL-NG 1-13. Please identify whether National Grid has ever permitted attachers to attach below any ILEC's wires on any of the Massachusetts poles that National Grid solely or jointly owns.

Response:

National Grid has not permitted attachers to attach below any ILEC's wires on any of the Massachusetts poles that National Grid solely or jointly owns.

Prepared by or under the supervision of: Frederick Griffin

Information Request DTC-NG-2-12

Request:

Please refer to page 27 of Attachment DTC-NG-1-2 (IOP #9). Given that National Grid is responsible for inspecting all jointly owned poles, please describe the necessity of both joint owners conducting a field survey on a given pole, if only one party is required to inspect the pole to ensure its integrity.

Response:

The inspection identified in IOP #9 and the inspection for third-party attachments serve different and distinct purposes.

In accordance with the IOP #9, National Grid is responsible for inspecting all jointly owned poles for purposes of maintenance and ensuring pole integrity of the over 700,000 poles in its Massachusetts territory. These inspections are conducted on a continuous rolling cycle. The inspection program considers the pole in its current state and does not consider potential attachment requests.

The third-party attachment process requires both joint owners to conduct a field survey on a given pole to determine make ready requirements based on a new attachment request and to ensure a joint reconciliation of work to be performed is agreeable to both parties.

Prepared by or under the supervision of: Joy Banks

Information Request DTC-NG-2-13

Request:

Please refer to page 33 of Attachment DTC-NG-1-2 (IOP #13). Please define "single stream pole attachment transfer process" and provide a complete and detailed description of the referenced trial, including what the trial entailed, what National Grid learned from the trial, and how this information is used to inform the current make-ready process.

Response:

"Single Stream Pole Attachment Transfer Process" is a technique that National Grid and Verizon piloted to streamline the transfer of attachments in the pole space below the power company's facilities. National Grid and Verizon conducted a "Single Stream Pole Attachment Transfer Process" pilot in the Town of Billerica, MA in November – December 2016 using a dedicated, independent administrator to coordinate a field review of all pending transfers for licensed third-party attachers, identify any unknown pole attachments, and determine the resources required to complete all third party attachment transfers in the pole space between the power company's facilities and Verizon facilities in a single dispatch.

The trial involved transferring 25 attachments over a period of four business days, making 18 poles ready for removal. In this case, the Town of Billerica ultimately chose to move its own attachments. While the pilot was promising and supported the soundness of the technique, more work is needed to refine the costs and operational approach. Further pilots were suspended. The procedure has not been finalized and negotiations are anticipated as a part of the review of the Joint Ownership Agreement in May 2023.

Prepared by or under the supervision of: Joy Banks

Information Request DTC-NG-2-14

Request:

Please refer to DTC-NG 1-3. Please (i) identify whether the vendor performs a site visit to survey every pole applied for by the customer, and (ii) identify the joint owner that has final say as to whether a pole needs to be replaced.

Response:

The vendor performs a site visit on behalf of National Grid to survey every pole applied for by the customer. A reconciliation of pole surveyed is conducted with the joint owner, Verizon, to decide whether a pole needs to be replaced.

Information Request DTC-NG-2-15

Request:

Please confirm that when a NESC violation or other violation is discovered during a survey precipitated by an attachment application and the new attachment requires a pole replacement even after remediation of the violation, the violation is not actually remediated before the pole is replaced but it is the replacement of the pole and resulting reattachment of the wires that ultimately remediates the violation.

Response:

National Grid confirms that when a NESC violation or other violation is discovered during a survey precipitated by an attachment application and the new attachment requires a pole replacement even after remediation of the violation, the violation is remediated during the replacement of the pole and resulting reattachment of the wires.

However, if the new attachment request is cancelled and the pole replacement does not occur, National Grid requires the violation to be remedied as a result of the discovery.

Information Request DTC-NG-2-16

Request:

Please refer to National Grid's response to DTC-NG 1-30. Given the constant change of individual cost units based on materials inventory, please clarify how National Grid arrives at a fixed Make-Ready Work Estimate. Please also specify whether National Grid aggregates individual cost units at one point in time to arrive at a final estimate.

Response:

National Grid calculates a fixed Make-Ready Work Estimate based on the available cost unit at the time of design completion. Inventories are secured for that make-ready estimate. While individual cost units based on materials inventory are updated based on real time forecasting, National Grid does not recalculate the make-ready estimate when the design has been approved and a new unit may be required during the construction phase.

Information Request DTC-NG-2-17

Request:

Please refer to Section 8.3 (Make-Ready Work Fees) of National Grid's Pole Attachment Agreement with OTELCO, provided as Exh. 3 to OTELCO's complaint. Please specify, based on experience in recent years, whether actual make-ready costs are above or below the amount that attachers paid based on estimated costs. If National Grid conducts a true-up at the end of make-ready work, please describe the process.

Response:

Section 8.3 of the Pole Attachment Agreement between National Grid and OTELCO provides that "[t]he Parties agree that after Licensor completes the Make-Ready Work identified in Licensor's cost estimate, there shall be no adjustment of Licensee's payment to Licensor's actual costs for completion of the Make-Ready Work, whether Licensor's actual costs are more or less than the estimated costs paid by Licensee." Consistent with this language, National Grid does not true-up estimate to actual costs for make-ready work.

National Grid determines make-ready costs based on actual material costs, anticipated construction costs for internal crews, and any anticipated transportation, police detail, forestry requirements and miscellaneous costs, such as swamp matting. Based on experience in recent years, actual make-ready costs are more than the amount that attachers paid based on estimated costs. Particularly with projects of a larger scope, National Grid secures contracted resources to meet customer timelines, which in turn, results in increased construction costs for unplanned determinants.

Prepared by or under the supervision of: Joy Banks

Information Request DTC-NG-2-18

Request:

Please refer to DTC-NG 1-18. National Grid indicates that if a new pole is replacing an existing pole due to age and the new pole is the same height as the old pole and triplex is being used to create more space, then the attacher pays for the new pole. Please confirm the accuracy of this statement or whether National Grid intended to say that the attacher will cover the costs of upgrading to triplex. If the statement is accurate, please explain how the attacher is the cost causer of the new pole in this situation.

Response:

The statement in the response to Information Request DTC-NG-1-18 is incorrect. The corrected statement is :

> "If the pole installed is the same height as the old pole and the triplex upgrade is being done to create additional space for the attacher to meet clearance requirements, then the attacher will cover the costs of the triplex upgrade."

The upgrade to triplex is to replace the rack spool secondary which takes up more space on the pole than a triplex attachment. This provides the space required for the applicant's attachment without National Grid needing to install a taller pole for clearance in some cases. If the pole change is the same height and class, National Grid will cover the cost of the pole, but the applicant is responsible for the cost of the triplex upgrade.

Information Request DTC-NG-2-19

Request:

Please refer to DTC-NG 1-32. Please describe any instances where National Grid's policy regarding boxing of jointly owned poles has conflicted with Verizon's policy regarding boxing of jointly owned poles, and how such conflicts were resolved.

Response:

There have been no such instances. .

Information Request DTC-NG-2-20

Request:

Please refer to Attachment DTC-NG-1-32. Please identify the relative importance that National Grid gives each of the eight factors, using past examples, to determine the circumstances in which boxing is permitted. Please state whether National Grid has employed this policy on each pole for which OTELCO requested boxing.

Response:

There are no examples of "the relative importance that National Grid gives to the eight factors" in its boxing policy, as OTELCO is the only customer who has requested that National Grid deviate from the policy. Moreover, as noted in the following excerpt from the Company's policy, no individual factor is dispositive:

:

> "Boxing of a pole may occur on exception however such determination shall be made on a case-by-case basis. **Boxing is not permissible solely to accelerate a construction schedule or avoid customary make-ready work.** Prior to boxing, alternatives shall be considered, e.g., overlashing, rearrangement of existing communication and electric attachments to provide required clearance, pole-top extension, pole replacement and other techniques. Factors to be considered by the pole owner in determining if boxing is appropriate for a particular attachment include, but are not limited to, the factors listed below. The pole owner will use the same criteria to determine whether applicants can box as it uses to determine whether it will box when installing its own communication attachments. **No single factor is necessarily dispositive, and the fact that one or more such factors may be present for a particular attachment on a particular pole does not mean that use of boxing will be authorized by the pole owner if the presence of other factors militates against boxing in that instance**:" Attachment DTC-NG-1-32, at 1 (emphasis added).

National Grid confirms it is applying its policy on each of OTELCO's requested poles.

Prepared by or under the supervision of: Paul Anundson

Information Request DTC-NG-2-21

Request:

Please reconcile National Grid's response to DTC-NG 1-32 that a party could use boxing to attach to a National Grid-owned pole if the pole is already boxed, with its response to DTC-NG 1-6 that National Grid has no record of boxed poles, that boxing is contrary to National Grid's operational practices, and that National Grid would have denied any requests for boxing.

Response:

As boxing is not an authorized practice, National Grid does not have records of boxed poles in its service territory. National Grid's response to Information Request DTC-NG 1-32 and the associated policy on boxing state that a party may be allowed, on a case-by-case basis, in limited circumstances, to use boxing to attach to a National Grid-owned pole if the pole is already boxed where the joint owner has boxed or allowed it on the pole.

Information Request DTC-NG-2-22

Request:

Please state whether there are incremental make-ready costs associated with replacing a pole that had non-compliant attachments that could not otherwise be brought into compliance as compared to replacing a compliant pole that simply does not have enough space to accommodate an additional attacher. If so, please identify and quantify such incremental costs.

Response:

There are not "incremental costs" for make-ready associated with replacing a pole that had non-compliant attachments that could not otherwise be brought into compliance as compared to replacing a compliant pole that simply does not have enough space to accommodate an additional attacher. To illustrate, please see the situations below:

1. If the current attacher is attached in non-compliance and their attachment can be moved to remediate non-compliance on the existing pole, but there is still no room for the new attacher then, the new attacher will pay to replace the pole. The new attacher is considered the cost causer for the pole replacement.

    a. If the new attacher chooses not to proceed with the attachment request to a pole that fits into the above scenario then, the non-compliant attacher is still responsible for the attachment move to resolve the non-compliance.

2. If the current attacher is attached in non-compliance and the pole needs to be replaced to make room for the non-compliant attacher, and this taller pole replacement makes room for the new attacher, then the non-compliant attacher is the cost causer and pays to replace the pole, allowing the new attacher to attach with no make ready work billable to the new attacher.

    a. If the new attacher chooses not to proceed with the attachment request, to a pole that fits into the above scenario then, the non-compliant attacher is still responsible for the pole replacement to resolve the non-compliance.

Prepared by or under the supervision of: Joy Banks

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 22-4

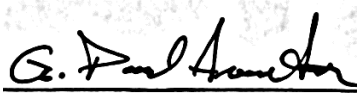
Affidavit of G. Paul Anundson

I, G. Paul Anundson, do attest and swear to the following:

1. I am Principal Engineer, Electric Planning and Design – New England for National Grid USA Service Company, Inc. ("Service Company"). My current duties include development of design and construction standards for distribution and sub-transmission lines for National Grid's electric distribution activities in New England, including those of Massachusetts Electric Company d/b/a National Grid ("Company").

2. The responses to information requests which were filed in this docket and bear my name, were prepared by me or under my supervision are true and accurate to the best of my knowledge and belief.

Signed under the pains and penalties of perjury,



G. Paul Anundson

Date: August 2, 2022

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 22-4

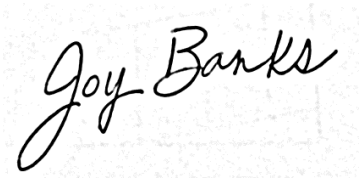
Affidavit of Joy A. Banks

I, Joy A. Banks, do attest and swear to the following:

1. I am Manager, Third-Party Attachments – New England for National Grid USA Service Company, Inc. ("Service Company"). My current duties include management of third-party pole attachment responsibilities for National Grid's electric distribution activities in New England, including those of Massachusetts Electric Company d/b/a National Grid ("Company").

2. The responses to information requests which were filed in this docket and bear my name, were prepared by me or under my supervision are true and accurate to the best of my knowledge and belief.

Signed under the pains and penalties of perjury,



Joy A. Banks

Date: August 2, 2022

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 22-4

Affidavit of Frederick Griffin

I, Frederick Griffin, do attest and swear to the following:

1. I am Senior Engineer, Electric Distribution Design – New England for National Grid USA Service Company, Inc. ("Service Company"). My current duties include review and approval of distribution design make ready changes for National Grid's electric distribution overhead facilities in New England, including those of Massachusetts Electric Company d/b/a National Grid ("Company").

2. The responses to information requests which were filed in this docket and bear my name, were prepared by me or under my supervision are true and accurate to the best of my knowledge and belief.

Signed under the pains and penalties of perjury,

Frederick Griffin

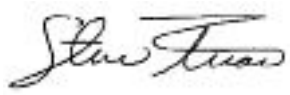
Date: August 2, 2022

COMMONWEALTH OF MASSACHUSETTS
Before the
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

CRC COMMUNICATIONS LLC, D/B/A OTELCO	)	
Complainant,	)	
v.	)	D.T.C. 22-4
MASSACHUSETTS ELECTRIC COMPANY D/B/A NATIONAL GRID AND VERIZON NEW ENGLAND INC.	)	
Respondents	)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically served the foregoing documents upon the Service List for the above-captioned proceeding, in accordance with the requirements of 207 CMR 1.05.



Steven Frias, Esq.
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99 High Street, Suite 2900
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(617) 951-1400

Dated: August 2, 2022