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July 29, 2022

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

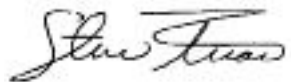
Re: D.T.C. 22-4 – CRC Communications LLC d/b/a OTELCO v. Massachusetts
Electric Company d/b/a National Grid and Verizon New England Inc.

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 CRC Communications LLC, d/b/a OTELCO.

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 OTELCO-NG-2-1

Request:

a) Refer to National Grid Response to OTELCO's Complaint ("Response") at page 22, which discusses the creation of "a weak spot in the pole where the wood may slot along the wood grain structure." Please provide any specifications, standards, and/or training materials addressing the installation of an additional attachment on the opposite side of the pole, including but not limited to any guidance or rules concerning additional hole(s) in the pole in line with the existing holes, and the potential for creation of "a weak spot in the pole where the wood may slot along the wood grain structure."

b) Refer to National Grid Response at page 22, which discusses "[p]otential physical conflicts between the hardware, bolts, nuts washers and wire support hardware...created by the closely spaced hardware present when a pole is boxed." Please provide any specifications, standards, and/or training materials addressing these potential physical conflicts created by closely spaced hardware present when a pole is boxed.

Response:

a) National Grid avoids slotting poles around bolt holes by following a common industry practice of maintaining solid wood between in line holes in a pole of six times the diameter of the holes. National Grid's construction standards provide the details of bolt hole locations and spacings for construction of its facilities. This practice is built into National Grid's construction drawings that show how to construct facilities. National Grid's standards do not document practices that are discouraged or prohibited for safety and reliability reasons. National Grid's standards have been provided as Attachment DTC-NG-1-6-A.

b) Because National Grid does not install facilities in the communication space on poles, there are no standards or practices for that method of construction. The reference in the Company's response was only to note the potential for conflict between communication facilities when they are in close proximity. The Company notes that in general, communication facilities consist of a messenger wire supporting other cable(s) that are used to provide the communication services. At the pole, the messenger is attached to the pole with a clamp bolted to the pole with the communication cable(s) hanging below the clamp and messenger. When these attachments are close together there is a potential for physical conflict between the cables and the hardware supporting the next cable, whether or not the cables are on the same side of the pole. National Grid generally follows NESC guidance for spacing of communication facilities in the communication

space of a pole "The spacing between messengers supporting communication cables should be not less than 300 mm (12 in) except by agreement between the parties involved including the pole owner(s)." *NESC Rule 235H1*. With attachments are placed 12" apart following this guidance, additional guidance on the proximity of holes in a pole has been unnecessary.

Information Request OTELCO-NG-2-2

Request:

Refer to National Grid Response at pages 5 and 17. How does National Grid define the “useful life” of a pole? Please include in your response an explanation of at what point National Grid considers a pole to be “beyond” its “useful life?”

Response:

National Grid considers many factors when determining a pole to be beyond its useful life. The estimated average service life of a pole is 45 years for ratemaking purposes, as approved by the Department of Public Utilities in the Company's most recent rate case, D.P.U. 18-150, at 150. Actual service life factors include the specifications, the quality of treatment, the conditions to which the pole is exposed, and how well the pole is maintained during its use.

Information Request OTELCO-NG-2-3

Request:

Refer to National Grid Response at page 25, which states that "Verizon is responsible for removing the last piece of wood from the old pole after all transfers to the new pole are complete."

- a) Is Verizon complying with its contractual obligation for removing such poles, including poles covered by joint use/ownership agreements?
- b) Does Verizon remove the poles within the applicable timeframe?
- c) What is the average number of days Verizon takes to remove a pole once Verizon is notified of the need to transfer to a new pole?
- d) How long does it typically take Verizon to remove a pole once the next highest line is transferred?

Response:

- a) Verizon is complying with its contractual obligation for poles covered by joint use/ownership agreements.
- b) Verizon removes the poles within the applicable timeframe, and is reliant upon attachers making their transfers within their allotted timeframe.
- c) The average number of days Verizon takes to remove a pole once Verizon is notified of the need to transfer to a new pole is dependent upon other attachers to make timely transfers.
- d) In accordance with IOP #6 in the Joint Ownership agreement, attachers have 30 days to conduct their transfers, once notified, and Verizon removes the pole butt upon completion of their transfer.

Information Request OTELCO-NG-2-4

Request:

When was the last time National Grid updated its pole attachment contracts, agreements, and internal pole processes (e.g., Joint Ownership Agreements, Pole Attachment Agreements, vegetation management and storm restoration processes, mutual aid agreements, collective bargaining agreements, etc.)? Does National Grid have a planned frequency for updating such documents and processes?

Response:

National Grid updated its pole attachment agreements in 2019 to include changes in attachment rates, timeline expectations, and annual rate adjustments. National Grid reviews the attachment agreement when necessary to accommodate changes for items such as risk and insurance requirements, design rates, and procedural changes.

National Grid reviews its Joint Pole Ownership Agreement with Verizon on a three-year cycle to accommodate any operational changes and ensure alignment with our process and procedures.

Vegetation management, storm restoration, mutual aid agreements, and collective bargaining agreements are negotiated when necessary due to work methods, standards and safety changes and are independent of the third-party process.

In general, National Grid reviews its process and procedures on an annual basis and reactively based on safety incidents.

Information Request OTELCO-NG-2-5

Request:

Refer to Information Request OTELCO-NG-1-14, and National Grid's response. National Grid states that it does not have any documents, including agreements, emails, or letters, that address opposite side construction (also known as "boxing") or attaching below Verizon. Does National Grid's joint ownership agreement with Verizon or any document related to that agreement address boxing or attaching below Verizon? If so, please: (1) produce such documents; and (2) amend National Grid's response to OTELCO-NG-1-14 to be fully responsive and provide all relevant documents in National Grid's possession, custody, or control.

Response:

National Grid does not have any documents, emails or letters with other pole attachers, apart from OTELCO, that address opposite side construction or attaching below Verizon because neither is a common practice. Since neither National Grid or Verizon permits boxing, or allows third parties to attach below Verizon, these practices have no relevance in daily operations.

National Grid interpreted Information Request OTELCO-NG-1-14 as asking about other third-party attachers, not pole owners such as Verizon. National Grid has a Joint Ownership Agreement with Verizon, provided as Attachment DTC-NG-1-2. The only mention of boxing in the Joint Ownership Agreement with Verizon expressly notes that "[b]ecause Pole Boxing can create an unsafe condition, it is permissible only a case-by-case basis ..." See Attachment DTC-NG-1-2, at 26. Verizon is the "last to go" and executes all pole removals and restoration of the site following its transfer process, as described in the Joint Ownership Agreement.

Information Request OTELCO-NG-2-6

Request:

Refer to Information Request OTELCO-NG-1-7, and National Grid's response.

- a) Did any of the accidents identified in National Grid's response to OTELCO-NG-1-7 involve poles with communications lines on both sides of the pole i.e., poles that were boxed? If so, please identify and describe the nature of those accidents.
- b) In addition, please identify and describe the nature of any accidents involving boxing on Owner Poles in Massachusetts in the last ten (10) years

Response:

- a. National Grid does not track whether the incidents identified in response to Information Request OTELCO-NG-1-7 involved a pole that was boxed.
- b. National Grid does not have records of any incidents involving boxing on owner poles in Massachusetts in the last ten (10) years. National Grid does not permit boxing on poles as standard practice and does not track this information.

Information Request OTELCO-NG-2-7

Request:

Refer to DTC Information Request DTC-NG 1-2 and National Grid's response, including Attachment DTC-NG-1-2 (Joint Ownership Agreement by and between National Grid and Verizon). Please provide all communications between National Grid and Verizon regarding the boxed poles identified in Exhibit F to the Declaration of David Allen, and state whether the boxing was regarded as interference pursuant to IOP #8(1). If the boxing was not regarded as interference, why was it not?

Response:

There are no written communications by and between National Grid and Verizon regarding the boxed poles identified in Exhibit F to the Declaration of David Allen because National Grid and Verizon do not allow this practice.

For the four poles in Easthampton identified in Exhibit F to the Declaration of David Allen, National Grid does not own these poles and does not have any information pertaining to the poles.

For the five poles in Palmer and Northampton, please see Attachment OTELCO-NG-2-7. Of these five poles, four have attachments. In 2012, the Company formalized its policy, which generally prohibits boxing, except in limited case-by-case situations. See Attachment DTC-NG-1-32. The Company has no records or information that suggest boxing was allowed prior to 2012. The attachments on these poles occurred prior to 2012.

National Grid Pole #	Verizon Telephone Pole #	Street Name	Town	Associated Application Name	Latitude	Longitude	Are there any communications between National Grid and Verizon regarding the boxed pole?	Is there opposite side attachments ("boxing") below power space? If yes, who is boxing?	Was boxing regarded as interference pursuant to IOP #8(1)?	If boxing was not regarded as interference, why was it not?
19	651	Sykes Street	Palmer	PALM D6_1	42.1797	-72.3472	No	Yes. MBI (top comm attachment) Comcast (above Verizon attachment) Verizon (bottom attachment)	No	Pole locations where boxing is present are addressed when identified by National Grid.
33	646	Sykes Street	Palmer	PALM D6_1	42.1812	-72.3478	No	No	No	No communication space boxing currently present on pole, thus no interference
56	622	Sykes Street	Palmer	PALM D6_1	42.1886	-72.3492	No	Yes. Comcast (above 2nd Verizon attachment) Verizon Telephone (bottom attachment)	No	Pole locations where boxing is present are addressed when identified by National Grid.
16	16	Chestnut St	Northampton	NORT A10_1	42.3373	-72.6669	No	Yes. Comcast (top comm attachment)	No	Pole locations where boxing is present are addressed when identified by National Grid.
17	17	Chestnut St	Northampton	NORT A10_1	42.3376	-72.6669	No	Yes. Comcast (above 2nd Verizon attachment) Verizon Telephone (bottom attachment)	No	Pole locations where boxing is present are addressed when identified by National Grid.
46	126	Northampton St	Easthampton	EAST A3D5	42.2841	-72.6662	These are not National Grid owned poles.			
58	114	Northampton St	Easthampton	EAST A3D5	42.287	-72.6632				
59	113	Northampton St	Easthampton	EAST A3D5	42.2873	-72.6629				
108-46	35	Main St	Easthampton	EAST D3 D4	42.2628	-72.6819				

Information Request OTELCO-NG-2-8

Request:

Refer to DTC Information Request DTC-NG-1-34 and National Grid's response, which said that "National Grid has not authorized any third-party to box out a pole due to safety concerns." Has National Grid allowed Verizon or any other pole owner to "box out" a pole?

Response:

National Grid has not authorized any third-party to box out a pole due to safety and system reliability concerns. Please refer to the Joint Ownership Agreement between National Grid and Verizon, IOP #8, at page 24, for the agreed upon terms on boxing, which is only allowed in very limited circumstances. National Grid has not allowed Verizon, the only entity with which National Grid owns poles jointly, to box poles.

Information Request OTELCO-NG-2-9

Request:

Refer to DTC Information Request DTC-NG-1-35 and National Grid's response. Does National Grid contract with any party other than Osmose Utilities Services, Inc. to perform this work (i.e., field surveys and inspections for submitted third-party applications) in Massachusetts?

Response:

In addition to OSMOSE, National Grid works with the following design contractors, Clough Harbor, and TRC Design Inc., and Davey Resource Group.

Information Request OTELCO-NG-2-10

Request:

Refer to OTELCO Information Request OTELCO-NG-1-19 and National Grid's response. Does National Grid bill a third-party attacher for line transfers to a new pole when, as explained in subpoint (a) to National Grid's response to OTELCO-NG-1-19, National Grid has not billed the cost of the new pole the attacher?

Response:

As explained in Information Request OTELCO-NG-1-19, subpart (a), National Grid does not bill a new third party attacher when there is a pre-existing condition in which the violation can be remedied without a pole replacement. The design and survey process considers necessary pole replacements in the pipeline at the time of the attacher's request to attach.

The non-compliant attached third party bears the operational cost to remediate the non-compliance. If a pole replacement is required to provide enough space to attach, prior to the new third party attacher's request, then a separate work order would be issued to replace the pole and the cost would be billed to the non-compliant attacher and installed prior to the design for the new third party attacher's request.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

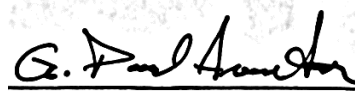
D.T.C. 22-4

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,

A handwritten signature in black ink, appearing to read "G. Paul Anundson", is written over a horizontal line.

G. Paul Anundson

Date: July 29, 2022

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

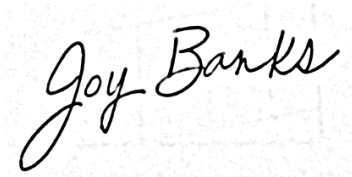
D.T.C. 22-4

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,

A handwritten signature in black ink that reads "Joy Banks". The signature is written in a cursive, flowing style. The "J" is large and loops around the "o", and the "Banks" is written in a similar cursive script.

Joy A. Banks

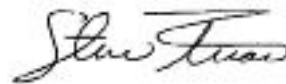
Date: July 29, 2022

COMMONWEALTH OF MASSACHUSETTS
Before the
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

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

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.
Keegan Werlin LLP
99 High Street, Suite 2900
Boston, Massachusetts 02110
(617) 951-1400

Dated: July 29, 2022