



800 Boylston Street, Boston, Massachusetts 02199

Via hand delivery

February 20, 2014

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

RE: Double Pole Report, D.T.E./D.P.U. 03-87

Dear Mr. Marini:

On behalf of NSTAR Electric Company (“NSTAR Electric” or the “Company”), I am submitting NSTAR Electric’s double pole report to the Department of Public Utilities (the “Department”).¹ This report responds to the June 16, 2005 Hearing Officer Procedural Ruling that established a standardized format for the filing of semi-annual reports, as required pursuant to Report to the Legislature on Double Poles, D.T.E. 03-87, at 15-16 (2003). The Hearing Officer’s June 16th ruling sets forth a six-month reporting schedule for NSTAR Electric, Fitchburg Gas and Electric Light Company, Massachusetts Electric Company, Nantucket Electric Company, Verizon Massachusetts and Western Massachusetts Electric Company (together, the “Pole Owners”) to file statewide information on the status of backlog and new double poles,² as well as the submission of company-specific information regarding the progress of the individual Pole Owners in relation to their compliance plans.

• **Background**

On January 27, 2004, NSTAR Electric submitted its Plan (“2004 Plan”) for eliminating the backlog of double utility poles to the Department pursuant to D.T.E. 03-87. In its 2004 Plan, the Company proposed to eliminate its existing backlog of double poles and to streamline the process of installation of new poles to ensure that double poles are removed in a timely manner in the future by:

1. Eliminating the current backlog of double pole sets within three years;

¹ Pursuant to Chapter 19 of the Acts of 2007, the former Department of Telecommunications and Energy (“DTE”) was reorganized into two new agencies: the Department and the Department of Telecommunications and Cable (“DTC”). Jurisdictional powers of the DTE were divided between the two new agencies with the Department retaining jurisdiction over electric, natural gas, pipeline, water, siting and transportation issues.

² Verizon filed with the DTC its statewide report regarding double poles on December 3, 2013. In the interests of completeness, the Company makes this filing to the Department as its jurisdictional oversight agency, and has also provided a copy to the DTC.

2. Managing the Pole Lifecycle Management ("PLM") system database with other utilities to ensure that accurate information regarding double pole sets is reflected and that pole tenants are notified when they are "next in line" for moving their facilities from the old pole to the new pole in a set;
3. Dedicating work crews to eliminate the backlog, based on prioritization;
4. Prioritizing the elimination of double pole sets by first removing pole sets in communities with the highest volume of sets; and
5. Holding NSTAR Electric regional directors accountable for daily management of the PLM database and the elimination of the double pole backlog.

Consistent with the 2004 Plan, the Company has worked to eliminate the backlog of double-pole sets and to minimize new double-pole sets. Because of ongoing work between the Pole Owners and the continuing refinement of the PLM system, the process of notifying pole tenants of their responsibility to move their attachments is being initiated more quickly. The Company is proactively managing the attachments of third parties to ensure the cooperation of all parties in the efficient removal of double-pole sets.

- **Double-Pole Plan in Capital Projects Scheduling List**

Consistent with the settlement approved in D.T.E. 05-85, the Company has made specific commitments with regard to expediting the removal of double poles in its service territory. Particularly, Section 2.25 of the Settlement Agreement required NSTAR Electric to file a specific list of projects, the Capital Projects Scheduling List ("CPSL"), designed to improve reliability and safety. The CPSL, filed on February 22, 2006, included a specific program plan for the inspection, replacement, restoration and transfer of double poles. The objectives of the Double-Pole Program are: (1) to enhance the safety and reliability of electric service to all customers served by the Company; and (2) to reduce the number and duration of double poles in the municipalities served by NSTAR Electric. This plan was based on current projections of work-force availability and the schedules for distribution and transmission system construction and maintenance projects. Subject to constraints imposed by third-party transfers, emerging system conditions, reliability requirements and work force availability, the Company's 201 performance goals for the Double-Pole Program include:

- Elimination of double-pole sets created prior to 2004;
- Mitigate the propagation of new double-pole sets created in 2010 and beyond by expediting the transfer and removal activities at those locations;
- Ongoing pole inspections to determine the condition of poles and to mitigate potential for double-pole sets. NSTAR Electric exceeded its goal to complete inspection of 24,000 poles in 2011 with the inspection of 25,425 poles. Similarly, for 2012, NSTAR Electric exceeded its goal of 23,000 inspections with the inspection of 34,000 poles. NSTAR Electric has set a goal to complete 25,000 pole inspections by December 31, 2013.

- Ongoing completion of all priority distribution-pole replacements and restorations to mitigate new double-pole sets.

Additionally in 2006, the Company set an objective to complete all transfers of electric facilities contemporaneously with a new pole set when the pole is added as part of a planned project. NSTAR Electric has continued this practice in 2013. However, additional time may be required between the pole set and the pole transfers under the following circumstances:

- In the event of major storms that require the diversion of resources;
- When a pole relocation is required in a location that differs from the original set; and
- When pole replacements are installed as part of a reconductoring project, which scheduling may vary from month-to-month.

Thus, in accordance with the Department-approved settlement in D.T.E. 05-85, NSTAR Electric has agreed to aggressively monitor and remove double poles, through the implementation of its Double-Pole Program.

- **Joint Report**

On December 3, 2013, Verizon, on behalf of the Pole Owners, submitted its report detailing the status of existing double-pole sets in the Commonwealth as of October 31, 2013. NSTAR Electric and the Pole Owners remain committed to working collaboratively to monitor and address issues of new pole placement that arise from continued growth in the distribution system and the addition of new infrastructure projects, as well as the ongoing complications of coordinating the transfer of facilities off of double poles by various attachers, each with their own rights and interests.

- **Current Status for NSTAR Electric**

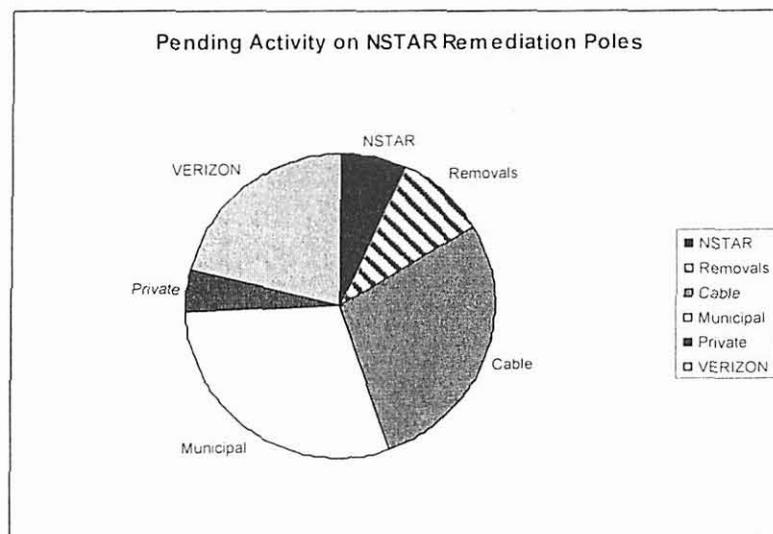
Attached to this NSTAR Electric-specific report is the summary data from the PLM system for Double Pole Activity for the time period May 1, 2013 through October 31, 2013, on an NSTAR Electric system-wide basis. On May 1, 2013, NSTAR Electric had 21 double poles that were created prior to January 31, 2004.³ As of October 31, 2013, NSTAR Electric had reduced that quantity to 21 with 1364 (98%) of the original backlog double poles removed. Of the remaining backlog double poles, NSTAR Electric has completed its transfers at 100% of those locations. 18 of the remaining 21 (86%) poles are awaiting transfer activity by other attached parties. 3 of the remaining 21 (14%) poles are scheduled to be removed by NSTAR Electric. With regard to NSTAR

³ The number of double poles is represented as double poles where NSTAR Electric is the remediation party. Data represented is as of November 1, 2013.

Electric's ongoing program to eliminate the backlog of double-pole sets placed prior to January 2004, the Company has developed a strategy that will:

- Remove the double poles that have been identified as "ready for removal";
- Coordinate with the Pole Owners and other utilities to expedite the removal of the remaining double poles from the backlog.

Regarding the additional 2013 Work Plan initiatives, NSTAR Electric typically focuses on completing capacity and reliability projects to prepare for the peak load period during the first half of each year. As such, both our internal and external resources focus on completing all of the transfers associated with this system reinforcement work. As of October 31, 2013, NSTAR Electric was the remediation owner for 3,500 poles. NSTAR Electric has completed the transfer of its facilities at 3268 (93%) of the 3,500 double pole locations. Of those 3,500 poles, 2,928 (84%) are awaiting action by other parties so that we may complete our remediation responsibilities. Pending pole transfers are distributed as shown in chart below:



During this reporting period, NSTAR Electric removed 735 double poles.

During this period, NSTAR Electric has continued its 2013 pole inspections cycle, in which the Company expects to inspect in excess of 23,000 by December 31, 2013.

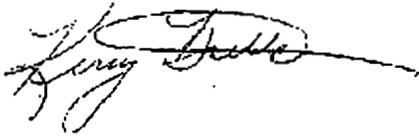
In summary, the Company is making significant progress in addressing all pending activities, and has removed percent of the backlog of double-pole sets within its service territory. The Company continues to improve efficiencies and reduce the time required to complete activities. System improvement projects have resulted in an increase in overall pole count and pending NSTAR Electric activity. In addition, NSTAR Electric will continue to coordinate and collaborate with the other Pole Owners and

utilities to ensure continued progress in eliminating both current and remaining backlog double poles.

NSTAR Electric is committed to working with the Department, Pole Owners and the various attachers to continue to make progress in the removal of double-pole sets. We continue to convey our goals to the major communication companies that will be impacted by our focus on double-pole mitigation so that they may adequately support the initiative.

Thank you for your attention to this matter. Please do not hesitate to contact me if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry Britland", with a long horizontal flourish extending to the right.

Kerry Britland

cc: Rebecca Tepper, General Counsel, DPU
Geoffrey Why, Commissioner, DTC