



OCC ARGUES FOR CONNECTICUT UTILITY POLE DATABASE AND STREAMLINED POLE INFRASTRUCTURE PROCEDURES IN RECENT BRIEF

January 12, 2018

In a comprehensive brief filed with the Public Utilities Regulatory Authority (PURA) on January 5, 2018, the Office of Consumer Counsel (OCC), including the State Broadband Office within OCC, argued in the public interest for better administration over utility poles in the State of Connecticut. Utility poles are of course a familiar sight throughout the State, but they are becoming an increasingly important aspect of the State economy not only because of electric reliability, but also because competition to provide high-speed internet services, also known as broadband, occurs largely through attachments on the poles. It is vital to the State's future economic development, healthcare, educational opportunities, and public safety that we start treating utility pole administration as a more serious and organized endeavor.

Several years ago, the two electric utilities (Eversource and United Illuminating) were appointed by PURA to be the single pole administrators (SPAs), with primary responsibility for organizing pole attachment processes, in part because: (1) they are joint owners of most poles already (in a joint ownership arrangement with Frontier or Verizon); (2) they are not in the telecommunications or internet business and are more likely to take neutral positions on pole access; (3) they are regulated as rate-of-return companies and thus are subject to financial reviews by PURA and the OCC, with prescribed income for investments in utility infrastructure such as poles; and (4) the electric utilities have arguably the most important and certainly the most dangerous equipment on the poles, being the electric wires and transformers near the top of each pole.

However, despite being named the SPAs, PURA did not put the electric utilities in charge of the communications space on the pole, which often is comprised of multiple telecom attachments, leaving the pole management responsibility for that section of the poles in the hands of the state's two incumbent local exchange carriers (ILECs), Frontier and Verizon. As a result, neither the electric utilities nor the telecommunications companies have felt responsible for management of the entire pole. Instead of streamlining processes as had been hoped when the electric utilities were established as SPAs, even formerly simple requests have become bogged down by substantial delays, essentially falling through the cracks in the management process caused by a lack of regulatory oversight and inconsistent orders.

For example, requests to attach additional lines to existing attachments on poles (a process known as “overlashing”) are now often taking months to process because the electric utilities are requiring that a very detailed engineering study, known as a “full pole loading analysis”, be required and paid for by non-pole-owner attachers, for every overlashed pole. This is an expensive and time-consuming endeavor that is only endorsed by the electric company pole owners and not considered necessary by the ILECs or other parties. If the Connecticut PURA orders this unnecessary procedure, Connecticut would become one of the very few states that require it. This would forestall development of the robustly competitive market for advanced internet technology services this state needs.

We believe there is one project that would eliminate many problems related to the management of the public rights of way in Connecticut. OCC strongly argues in the brief that PURA should order the production of a Connecticut Utility Pole (CUP) database. Overall, the electric utilities are trying to shift what ought to be their responsibilities (to know the status of *their poles* and to know the equipment that is already attached to *their poles*) onto the parties seeking to attach and overlash. The missing piece here is information. Both the electric utilities and the ILECs are doing their own inspections of the poles, but the data and information gathered by the four pole owners are not shared with each other, let alone with PURA or the attachers to the poles. To streamline the public rights of way management processes (known as “make ready”), promote the public interest in electric, telecommunications, and broadband service reliability, and protect public safety from the hazard of falling poles or equipment, this state demands better information sharing and a single repository for all data about the poles *that is already being collected*. For this reason, PURA should order the development of a Connecticut Utility Pole (CUP) database which will collect and organize information about every pole in the State.

The next step in this proceeding (PURA Docket No. 11-03-07RE01) is the filing of reply briefs on January 12, followed ultimately by a ruling in March.

Please visit  [OCC's website.](#)