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June 21, 2022

Via Electronic Mail Only

Daniel C. Goldner, Chairman
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: Docket No. DRM 22-023; Puc 1300 Rulemaking, Utility Pole Attachments

Dear Chairman Goldner:

On behalf of Liberty Utilities (Granite State Electric) Corp., d/b/a Liberty, I write with two comments following the June 10, 2022, public comment hearing in the above docket.

First, there was a request that pole owners provide attachers with access to pole records on request and to potentially increase the type of pole records that the owners must maintain, such as plant records, units related to FERC account 364, and height and financial records. The stated reasons were that such access would help attachers better understand the rates and would help attachers speed up the attachment process. Liberty does not believe it is appropriate for the rules to require such enhanced record keeping and disclosures of the pole owners' records. The rate setting mechanism is sufficiently transparent and it would be an undue burden to require pole owners to make such information readily available to attachers.

Second, there was a suggestion to relax the rules governing the work done by attachers on the poles, including in and above the electric space, the suggestion being that such work is not always "complex," that, for example, self help should be allowed anywhere on pole, not just in the communications space. Liberty disagrees with changes to the rules governing the electric space. This issue was not previously discussed in this rulemaking and it poses many safety issues that deserve more thorough discussion and vetting.

Pursuant to the Commission's March 17, 2020, secretarial letter, only an electronic version of this letter will be filed. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Sheehan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael J. Sheehan

Cc: Service List