STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	**JULY 30, 2026**

THE OFFICE OF CONSUMER COUNSEL'S SECOND SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy to the following interrogatories in the above-captioned proceeding by **August 13, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or

control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify or correct your responses to each of these interrogatories and production throughout until a final decision in adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-142 through OCC-191 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-142. (STORM AUDITS)

a. If the Company has audited and/or contracted with a vendor to audit and/or review the storm costs requested in this proceeding, please indicate the date of the audit/review, the scope of the review, the type of the review, and the entity conducting it.
b. Please provide all reports and/or final written conclusions of audits and/or reviews performed on the storm costs requested in this proceeding.

OCC-143. (STORM) Please refer to Exhibit CLP-Storm-1, p. 8, indicating the Company is seeking recovery for storms occurring between January 2024 and March 2025.

a. Did the Company incur any storm costs for the remainder of 2025?

b. If yes to (a), please explain if the Company intends to seek recovery of those costs and in what proceeding.

OCC-144. (Poles) How many poles does Eversource currently fully own in Connecticut?

OCC-145. (Poles)

a. How many poles does Eversource currently jointly own with another entity in Connecticut?
b. Please provide a table reflecting the entities, e.g., ILECs, municipalities or other entities, that jointly own poles with Eversource in Connecticut and the number of poles that are jointly owned.
c. Do any residents co-own poles with Eversource in Connecticut? If so, how many?

OCC-146. (Poles) Please provide the actual costs incurred by Eversource for the years: 2021, 2022, 2023, 2024, and 2025 for the following:

a. Pole inspections;
b. Pole replacement due to age/end of life;
c. Electric wire and facilities transfers to new poles;
d. Pole replacement due to damages unrelated to storms, such as motor vehicle accidents;
e. Structural reinforcements for provision of electric service;
f. Pole maintenance (please specify what kinds of maintenance were conducted and the costs associated with each type of maintenance);
g. Transfer or removal of unused wires in the communication space.

OCC-147. (Poles) Please provide both the budgeted costs and the actual costs incurred by Eversource for the years: 2021, 2022, 2023, 2024, and 2025 for the following pole-related incidences:

a. Make-ready;
b. Processing new attachment applications in the communications gain;
c. Engineering for new attachments in the communications gain;
d. Pole inspections following a new attachment in the communications gain;
e. Double pole transfers, removals and related work;
f. Generating bills to attachers;
g. Sending bills to attachers;
h. Collections of unpaid revenue of amounts billed to attachers;
i. Any other pole-related costs (please describe each cost).

OCC-148. (Poles) Please generally describe the process of creating bills, issuing bills, and collecting revenue from pole attachers.

OCC-149. (Poles) Please describe the manner in which Eversource remits pole attachment revenue to the ILEC, where applicable.

OCC-150. (Poles) Please provide the amount of unrecovered pole attachment costs that were billed to a specific attacher as of years' end in 2021, 2022, 2023, 2024, and 2025 listed by year on a per-attacher basis.

OCC-151. (Poles) Please confirm the amounts of unrecovered pole attachment revenue currently outstanding, by attacher billed.

OCC-152. (Poles) Please confirm the number of days an attacher has to remit payment for a bill to Eversource for pole attachment fees and other costs due from the attacher. Also confirm whether this due date is set forth in the Pole Attachment agreement.

OCC-153. (Poles) Please confirm how often Eversource bills attachers for pole attachments fees.

OCC-154. (Poles) Please confirm when a new pole attacher begins being billed by Eversource for pole attachment fees.

OCC-155. (Poles) Please confirm when Eversource begins billing pole attachment fees to a pole attacher that has deployed a temporary attachment on an Eversource owned or co-owned pole.

OCC-156. (Poles) Does the Company perform routine inspections on poles? If so, how often and what is the cost of a routine inspection per pole?

OCC-157. (Poles) Please identify what costs, if any, Eversource incurred related to temporary pole attachments by year in 2021, 2022, 2023, 2024, and 2025.

OCC-158. (Poles) Please explain how long after a pole attachment invoice due date Eversource considers the unpaid invoice amount unrecoverable.

OCC-159. (Poles) Please describe Eversource's process for collections of overdue pole attachment fees or other pole related charges and indicate how many collections actions it pursued by year from 2021-2025.

OCC-160. (Poles) Please explain how Eversource determines how much pole attachment revenue it should remit to the ILEC (per pole, and in total). If the process is different in different areas of the state, please specify by area.

OCC-161. (Poles) In the Company's role as sole pole owner:

a. Please list the categories of revenue that Eversource collects that is associated with its sole ownership of poles in Connecticut.
b. Please indicate how much revenue Eversource collected by year, in 2021, 2022, 2023, 2024, and 2025, related to each category of revenue Eversource collects that is associated with its sole ownership of poles.

OCC-162. (Poles) In its role as joint pole owner

a. Please list the categories of revenue that Eversource collects that is associated with its joint ownership of poles in Connecticut.
b. Please indicate how much revenue Eversource collected by year, in 2021, 2022, 2023, 2024, and 2025, related to each category of revenue Eversource collects that is associated with its joint co-ownership of poles.

OCC-163. (Poles) In its role as Single Pole Administrator:

a. Please provide data explaining whether and how much pole attachment fees collected offset the cost of pole management, by year, in 2021, 2022, 2023, 2024, and 2025.
b. Please also specify how much cost of pole management was not offset by attachment fees for each of those years, and why the whole cost was not fully offset, as applicable.

OCC-164. (Poles) Please reference Exhibit CLP-RATES-2.14. Is the cost of insurance included in calculating carrying charges? If not, please explain why.

OCC-165. (Poles) Please reference Exhibit CLP-RATES-2.14.

a. Do all companies holding a certificate of cable franchise authority, certificate of video franchise authority, or certificate of public convenience and necessity to own and operate a community antenna television in Connecticut pay Eversource the current maximum attachment rate of $22.61 for a pole fully owned by Eversource and a maximum attachment rate of $11.31 for a pole jointly owned (co-owned) by Eversource and the ILEC?
b. Do any of the companies billed the cable rate pay Eversource less than the maximum attachment rate for either fully owned or jointly owned poles? If yes, how many and why?

OCC-166. (Poles) Please reference Exhibit CLP-RATES-2.14 concerning the "Telecom Pole Attachment Formula". For purposes of this and other related interrogatories, the

term "telecom" refers to providers of communications services other than those billed the cable attachment rate.

a. Do all telecom companies in Connecticut pay Eversource the maximum attachment rate of $25.07 for a pole fully owned by Eversource in an urban area and a maximum attachment rate of $12.53 for a pole jointly owned (co-owned) by Eversource and the ILEC in an urban area?
b. Please provide an explanation as to how "urban" is defined when setting urban rates.
c. Do any telecom attachers pay Eversource less than the maximum attachment rate for either fully owned or jointly owned poles? If yes, how many and why?

OCC-167. (Poles) Please reference Exhibit CLP-RATES-2.14.

a. Do all telecom companies in Connecticut pay Eversource the maximum attachment rate of $25.20 for a pole fully owned by Eversource in a non-urban area, and a maximum attachment rate of $12.60 for a pole jointly owned (co-owned) by Eversource and the ILEC in a non-urban area?
b. Please provide an explanation as to how "non-urban" is defined when setting non-urban rates.
c. Do any telecom attachers pay Eversource less than the maximum attachment rate for either fully owned or jointly owned poles? If yes, how many and why?

OCC-168. (Poles) Please provide a list of all areas categorized as urban and a list of all areas categorized as non-urban.

a. Please provide a map showing all urban versus non-urban areas in Connecticut for the purposes of pole attachment rates.
b. Have the locations of any poles changed from designation from urban to non-urban or from non-urban to urban in the last five years? If yes, how many and which direction was the change?

OCC-169. (Poles) Please reference Exhibit CLP-RATES-2.14. At page 2 of 7, it appears at Lines 49 and 50 specify that there are 3 attaching entities in non-urban areas, and 5 attaching entities in urban areas. Please identify each entity by area.

OCC-170. (Poles) Please specify each type of attacher on an Eversource pole (ILEC; competitive telecommunications provider; CATV, CCFA or CVFA holders; wireless; municipalities; and others):

a. Please list all of the entities that are pole attachers on Eversource owned or co-owned poles in Connecticut.

b. Does the pole attachment rate vary by attacher? If so, please explain how it varies and why it varies.
c. Please identify which pole attachment rates/fees are regulated or capped for specific type of attacher, and which pole attachment rates/fees are not regulated for other specific types of attachers.
d. For the entities that attach to Eversource owned or co-owned poles whose pole attachments rates/fees are not regulated, how does Eversource determine the amount of the attachment rate/fee to charge them?
e. How does Eversource determine at what cadence it will bill each attacher?
f. Please list the pole attachment rates by attacher in 2026 as billed by Eversource.

OCC-171. (Poles) Does Verizon/ Frontier ("ILEC") participate in setting pole attachment fee rates for attachers on poles that are co-owned by the ILEC and Eversource?

OCC-172. (Poles) Does Eversource have to take action in managing the communications gain on poles and how does Eversource track the costs it incurs for these actions?

OCC-173. (Poles) Did Eversource collect any pole-related revenue from ILECs in Connecticut in 2021, 2022, 2023, 2024, and/or 2025? If yes, please provide a chart by company reflecting the amount of such revenue by year and the category of the revenue remitted to Eversource.

OCC-174. (Poles) How much was Eversource liable for state and federal taxes related to pole revenue it collected from attachers, by year, in 2021, 2022, 2023, 2024, and/or 2025?

OCC-175. (Poles) What percentage of the overall cost of pole management does the ILEC bear versus the electric ratepayer in Connecticut?

OCC-176. (Poles) How much has Eversource been billed for legal and lobbying fees to address proposed legislation related to poles in Connecticut in FY 2026? Does Eversource attribute that expense to be covered by revenue it receives from pole attachment fees or charges for other pole attachment work.

OCC-177. (Poles) Please reference Exhibit CLP-REVREQ-4 (Make-Ready Pole Work). Please confirm if the total amount of cost identified in field D7, $16,580,868, is to be recovered from the ratepayer due to being non-billable to any third party.

OCC-178. (Poles) Please reference Exhibit CLP-REVREQ-4 (Make-Ready Pole Work). Please confirm if any of the Third Party Pole Make Ready costs in Column D that are deemed to have a nonbillable reason such as "correct pre-existing condition/violation" in Column E are caused by temporary attachments.

OCC-179. (Poles) Please reference Exhibit CLP-REVREQ-4 (Make-Ready Pole Work). Please provide a real-world example of each type of non-billable reason code. Examples from the Exhibit include: Make Ready - Correct pre-existing condition/violation - Clearance; Make Ready - Correct pre-existing condition/violation - Loading; Pole replacement - Pole Clearance (pre-existing condition/violation); Pole replacement - Pole defective (pre-existing condition/violation).

OCC-180. (Poles) Please provide a spreadsheet identifying each pole owned and/or co-owned by Eversource, its location, the date of its last inspection, whether it is currently identified as compliant or noncompliant. If the pole is identified as noncompliant in any way, specify when it was discovered to be noncompliant by Eversource.

OCC-181. (Poles) Please list and describe the duties and obligations of Eversource in its role as "single pole administrator" ("SPA").

OCC-182. (Poles) Please summarize the process by which a wireline communication attacher gets to attach its facilities to a utility pole, from the pole attachment permit application, to engineering, make-ready and actual attachment. In each step of the process, please state Eversource's role as SPA.

OCC-183. (Poles) From the perspective of the Single Pole Administrator, please describe the responsibilities of Verizon/Frontier in its role as custodian of the communications gain on poles?

OCC-184. (Poles) Please summarize the relationship between Eversource and Verizon/Frontier/SNET with respect to Eversource's role as SPA and that of Verizon/Frontier/SNET as steward of the communications gain. Could that relationship be improved and, if so, how?

OCC-185. (Pole) Under condition no. 7 of the final decision in Docket No. 20-04-31, The Southern New England Telephone Company d/b/a Frontier Communications of Connecticut (SNET) Bankruptcy Proceeding and Change of Control, PURA stated that "Frontier and SNET shall continue to negotiate in good faith with the EDCs regarding mutually agreed upon terms for the transfer of ownership interest in

jointly owned utility poles to the EDCs and submit semiannually reports to the Authority regarding the status of such negotiations by June 30 and December 31 of each year. If two consecutive status reports are submitted that reveal no significant progress, the Authority will consider assigning a mediation team from its Office of Education, Outreach, and Enforcement." Please answer the following:

a. Please describe chronologically since 2001 Eversource's efforts to engage with Frontier/SNET concerning the possible transfer of the ownership interest of Frontier/SNET in jointly owned utility poles to Eversource.
b. Please state the terms and conditions that Eversource proposed to Frontier/SNET for Eversource to acquire the full ownership of the now jointly owned utility poles.
c. Did Frontier/SNET make an offer for Eversource to acquire the full ownership of the now jointly owned utility poles?
d. Since Verizon acquired Frontier in January 2026, have there been any communications or discussions between Verizon/Frontier/SNET and Eversource concerning the transfer of all utility pole ownership to Eversource?
e. In their latest compliance filing to PURA in accordance with condition no. 7 in the Docket No. 20-04-31, submitted on June 29, 2026, Frontier/SNET represented the following: "Frontier had engaged in good faith negotiations with the EDCs regarding mutually agreed upon terms for the transfer of ownership interest in jointly owned utility poles to the EDCs. Frontier previously provided both Eversource and UI with requested financial data relating to Frontier's ownership interest in the poles at issue and a proposed term sheet. Frontier has previously requested feedback on the term sheet provided by Frontier and no further discussions have taken place." (i) Please confirm the accuracy of this statement as written: (ii) If Eversource takes issue with any portion of the Frontier/SNET statement, please explain Eversource's position with any such portion of the Frontier/SNET statement; and (iii) if the "term sheet" was provided by Frontier, please provide a copy of such term sheet.
f. Would Eversource be willing to engage with Verizon, which now owns Frontier/SNET, on Eversource's acquisition of the Frontier/SNET interest in each utility pole that is currently jointly owned by Eversource and Frontier/SNET? Please elaborate.
g. If Eversource were to become a single pole owner for those poles that are currently jointly owned with Verizon/Frontier/SNET, what efficiencies could inure to Eversource as the result of being both the SPA and the single pole owner.

OCC-186. (Poles) In preparing its application and materials for Docket No. 26-05-10, please state whether Eversource took into consideration the Authority's Decision in

Docket No. 24-10-04, Application of the United Illuminating Company to Amend Its Rare Schedule, which found that the communications attachments provided the same or similar services and thus should not be subject to different pole attachment fees based on the communications legacy characterization of the communications provider.

OCC-187. (Poles) In its role as SPA, please explain any areas of dispute that currently exist between Eversource and the communications providers with respect to cost-allocation and other shared costs or expenses concerning pole maintenance, facilities transfers, upgrades or updates to the Alden One software system?

OCC-188. (Poles) In its role as SPA, please summarize Eversource's working relationships with each wireline communications provider attached to a pole owned or jointly owned by Eversource. Could any of these working relationships be improved and, if so, how?

OCC-189. (Poles) When a storm or other event causes a massive service outage situation, with poles and utility wires downed, please elaborate on Eversource's role with respect to communications providers in those situations.

a. Do those communications providers get billed for certain aspects of Eversource's work attributable to such a provider or providers?
b. Please explain Eversource's methodology in such cases.
c. Please provide a listing, current as of the filing of the response to this interrogatory, of any such outstanding unpaid invoices by communications provider and date, including the amount of each invoice.

OCC-190. (Poles) Please answer the following questions and/or provide the following documents required by PURA in Decision, Docket No. 19-01-52RE01, *PURA Investigation of Developments in the Third-Party Pole Attachment Process – Make-Ready* (May 11, 2022).

a. (pp. 20-21). For jointly-owned poles, both pole owners "separately conduct field surveys and assign engineering resources to perform field visits. . . ." as part of the survey portion of the Engineering Phase. PURA accepted testimony that this survey work is "generally not duplicative as the EDC focuses on the electric gain, while the ILEC focuses on the communications gain; although some pole-loading analysis may overlap." Please explain the need for two separate surveys and explain why the SPA or the ILEC cannot perform the survey for the entire pole in most instances.
b. Please identify the number of positions currently filled at Eversource to perform field surveys, and indicate how many, if any, positions would need to be added

if Eversource were to perform the survey for the entire pole, e.g., both the electric gain and the communications gain?

c. Are there any other internal resource capacity issues related to the Engineering Phase of the pole attachment process? If so, please elaborate.
d. Please identify the number of positions currently filled at Eversource for lineworkers to do make-ready work.
e. (pp. 44-45). For "existing NESC noncompliant poles", readily identifiable "creator[s] of any specific violation[s], still have a "duty to resolve" the violation. As the SPA, how does Eversource address communications attachers who have caused the pole to be NESC non-compliant?
f. Please provide an unlocked Excel file identifying the communications attachers who have caused a pole owned wholly or jointly by Eversource to be non-compliant from January 1, 2023 to the present; include in the exhibit, the nature of the non-compliance and how the non-compliance was resolved.
g. (p. 46) For wireless attachments to poles, Eversource in Docket No. 19-01-52RE01 was cited for stating that "[w]ireless applications require significantly more engineering analysis than wireline applications due to the amount of equipment added to the pole." Is that statement still accurate? Is it technically feasible for more than one wireless pole attachment to be attached to a new utility pole?
h. (p. 64) Please provide copies of all Eversource reports concerning the Engineering Phase Timelines as required in Order No. 5 submitted to PURA since January 1, 2023 to the present.
i. (p. 64) Please provide copies of all Eversource reports concerning the Make-Ready Phase Timelines as required in Order No. 8 submitted to PURA since January 1, 2023 to the present.
j. (p.65) Please provide copies of all Eversource reports concerning the Attachment Application Tracking costs as required in Order No. 12 submitted to PURA since January 1, 2023 to the present.
k. (p.65) Per order no. 15, "[i]n their next general rate case, the EDCs shall submit detailed records of all costs attributed to the regulatory asset consistent with Section II.B.5. Billable and Non-billable Make Ready Costs." Please identify with specificity where in the record those detailed records were submitted. If they were not, please submit them as a response to this interrogatory subpart.
l. (p.66) Please provide copies of all Eversource reports concerning all costs incurred "associated with the operation, maintenance, and modification of AldenOne" as required in Order No. 26 submitted to PURA from January 1, 2023 to the present.

OCC-191. (Poles) Please provide the current pole attachment agreement with every attacher.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White

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CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 30th day of July, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court