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October 14, 2026

VIA E-FILING[1]

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Connecticut Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 26-05-10: Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules

Dear Secretary Gaudiosi:

Enclosed please find the Sixth Set of Interrogatories of the New England Connectivity and Telecommunications Association ("NECTA") directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource") in the above-captioned docket.

Please feel free to contact the undersigned should you have any questions.

I certify that a copy hereof has been sent to all participants of record as reflected on the Authority's service list as of this date. A copy has also been filed with the Authority as an electronic web filing and is complete.

Very truly yours,



David W. Bogan

Enclosure

CC: Service List

[1] Pursuant to the Undocketed Motion to Temporarily Suspend Filing Paper Copies (Jun. 19, 2020), this filing is being submitted by electronic copy only, with a paper copy to delivered or mailed according to a subsequent determination by the Authority.

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	:	Docket No. 26-05-10
	:	October 14, 2026

NEW ENGLAND CONNECTIVITY AND TELECOMMUNICATIONS ASSOCIATION'S SIXTH SET OF FOLLOW-UP INTERROGATORIES REGARDING MAKE-READY COSTS AND COST ALLOCATION

The New England Connectivity and Telecommunications Association ("NECTA") hereby requests responses from The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or the "Company") to the following follow-up interrogatories regarding make-ready costs and non-billable cost allocations in the above-captioned proceeding by **October 28, 2026**.

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.

INTERROGATORIES

NECTA-128 Refer to NECTA-008, p. 2 (GIS population of 730,325 poles, including 94,686 solely owned and 635,639 jointly owned poles), and Exhibit CLP-RATES-2.14, p. 7 of 7 (664,725 physical poles, comprising 76,993 solely owned and 587,732 jointly owned poles, converted to 370,859 equivalent poles).

a. Reconcile the 730,325 GIS poles to the 664,725 poles used in the rental-rate formula, quantifying every category that explains the 65,600-pole difference.
b. For each reconciling category, identify the count of solely owned and jointly owned poles, and explain the reason for exclusion from the pole count used in the pole attachment rate formula.
c. For each reconciling category, identify the poles that are physically installed and in service but omitted from the formula denominator.

NECTA-129 Refer to NECTA-059 Attachment 1 lines 23–29 ($63,608,379 of completed construction not classified in Account 106010, with a reported quantity of 77,320), NECTA-062 (non-unitized poles cannot be identified from the provided classification), and NECTA-058 (work-order movement from Account 107 to 106 and subsequently 101).

a. Explain precisely what the reported 77,320 “Non-unitized” quantity represents, its units of measure and the source from which it was derived; identify whether it includes any physical pole count.
b. Identify the number and ownership of poles associated with the $1,065,950 December 2025 adjusting journal entry described in NECTA-059 Attachment 1. A complete response will state whether their quantity is recognized in the formula denominator and reconcile any mismatch.

NECTA-130 Refer to Exhibit CLP-RATES-2, Workpaper 2.14, pp. 3 and 7 (gross/net investment and equivalent poles), NECTA-059 Attachment 1, p. 1 (Accounts 101010 and 106010, and December 2025 journal entry), and NECTA-062, p. 1 (only unitized 101010 pole retirement units are counted).

a. Provide a reconciliation that places the total and equivalent-pole denominators and gross/net Account 364 investment on a common population.
b. Identify any changes to accumulated depreciation, accumulated deferred income taxes, or other rate-model inputs needed if the pole count or underlying investment population is modified under subpart a.

NECTA-131 Refer to NECTA-059, page 1, and NECTA-059 Attachment 1, lines 10–24; NECTA-064 and NECTA-065. To the extent not already provided in response to NECTA-118, provide the following:

a. For every retirement-unit entry in NECTA-059 Attachment 1—including INSULATOR, PIN/POST; INSULATOR, STRING; the four “POLE Fully Owned/Jointly Owned” categories; POLE PLATFORM; POLE TOP FRAMING; TRANSFORMER, OVERHEAD < 500 KVA; XFMR, INST OVERHEAD < 500 KVA; and Non-unitized—provide the Company definition, unit of measurement, retirement-unit code, criteria for recording an addition or retirement, and typical equipment/materials, labor, and overhead costs included.
b. Produce any retirement-unit dictionary, continuing-property-record manual, plant-accounting instructions, accounting guides, technical publications or other Company documents that define or govern retirement units.
c. If a listed retirement-unit description has a different meaning from standard engineering terminology, explain that difference and identify the Eversource document that controls its meaning.

NECTA-132 Refer to NECTA-059 Attachment 1, page 1, line 18 (790,582 POLE TOP FRAMING units; $258,449,437), and NECTA-064, page 1. To the extent not already provided in response to NECTA-118, provide the following:

a. Define “POLE TOP FRAMING” as used in Eversource’s retirement-unit records. Identify separately whether it includes crossarms and braces, extension arms, conductor-support brackets, insulator pins/supports, guys or anchors, pole-top pins, bolts, mounting hardware, conductor-support structures without crossarms, labor, removal, and other costs; for every included component, state whether it supports the common pole structure, electric facilities, or both.
b. Produce the Company’s pole-top-framing construction standards, standard drawings and assemblies, design guides, engineering manuals, technical bulletins, approved manufacturer specifications, and existing construction or as-built photographs illustrating the configurations recorded in this retirement unit.
c. Explain the retirement-unit quantity of 790,582. State precisely what one “POLE TOP FRAMING” unit counts.
d. Provide a component-level cost breakout of the $258,449,437 balance, or, if not maintained, the compatible-unit/material-cost and work-order records from which an estimate can be reconstructed. At a minimum, separately identify crossarms and braces, electric-specific brackets/extensions/insulator supports, common structural supports, and all other or unclassified costs.
e. Provide at least one representative 2023–2025 installed or replaced pole-top-framing assembly for each major standard configuration, with drawing, bill of material, installation work order, and capitalized cost detail identifying material, labor, and overhead.

NECTA-133 Refer to NECTA-059 Attachment 1, line 17 (204 POLE PLATFORM units; $5,070,824), and NECTA-064. To the extent not already provided in response to NECTA-118, provide the following:

a. Define “POLE PLATFORM” in Eversource’s retirement-unit records, identify what a recorded unit represents, and describe the equipment typically supported (for example, transformers, regulators, other electrical equipment, or common structural elements). State whether any platform is mounted on more than one pole.
b. Provide the Company’s engineering drawings, structure/platform standards, specifications, diagrams, bills of material, compatible-unit definitions, construction/maintenance manuals, and available photographs depicting each platform design covered by the retirement unit.

c. Provide a listing of the 204 platform units, by type and available identifying code, and identify any portion representing investment in the common pole structure versus equipment-specific support. A complete response will supply supporting records or explain why no allocation can be made.

NECTA-134 Refer to NECTA-059 Attachment 1, lines 11–12 and 19–20; the FERC Account 364 plant instructions in 18 C.F.R. Part 101; and NECTA-064. To the extent not already provided in response to NECTA-118, provide the following:

a. Define each of the following retirement units exactly as used by the Company: INSULATOR, PIN/POST; INSULATOR, STRING; TRANSFORMER, OVERHEAD < 500 KVA; and XFMR, INST OVERHEAD < 500 KVA. Specifically define "XFMR" and "INST" and state whether "INST" means installation, instrument, or something else.
b. For each retirement unit classification, identify the equipment, fixtures, and installation work captured in Account 364; identify corresponding engineering drawings, specifications, compatible-unit records, bills of material, manuals, and existing photographs.
c. Explain the accounting basis for recording the specific items in FERC Account 364 rather than Account 365 (Overhead Conductors and Devices) or Account 368 (Line Transformers), as applicable.
d. Explain the absence of a reported quantity for three of these categories and reconcile the reported quantities and book costs.

NECTA-135 Refer to NECTA-059, Attachment 1, lines 23–29; NECTA-062 and NECTA-063.

a. For the $63,608,379 of Account 106010 completed construction not classified to specific retirement units, explain whether and to what extent the amount includes pole-top framing, pole platforms, crossarms, braces, brackets, insulators, or transformer-support equipment.
b. For the $1,065,950 December 2025 adjusting journal entry associated with Frontier jointly owned pole investment, identify the specific property types or work orders represented, and whether appurtenance costs are included.
c. Identify any amounts in Account 106010 as of December 31, 2025 that were later classified to POLE TOP FRAMING, POLE PLATFORM, or the other non-pole retirement units. Provide a reconciliation of subsequent unitizations to the December 2025 balance, where available.

[Signature Page Follows]

Respectfully submitted,

THE NEW ENGLAND CONNECTIVITY AND TELECOMMUNICATIONS ASSOCIATION



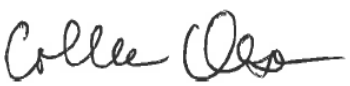
By: _____

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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 Hartford, Connecticut this 14th day of October, 2026.



By: _____
Colleen Olsen
Commissioner of the Superior Court