Date Filed: September 24, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: Office of Consumer Counsel

Question:

(POLES) Please refer to Exhibit CLP-TSP-1, p. 27, which states that many wood poles "do not meet current strength standards." Please clarify:

a. Of the total number of poles, what percentage are wood poles?
b. What are the sources of the loads on the poles?
c. To the extent some loads result from communications wires, has the Company studied the allocation of load attributable to each source (i.e., does the Company know the amount of load associated with each type of wire on the pole)? If so, please provide.
d. Would the poles meet current strength standards if they contained only electric lines?

Response:

The following statement "do not meet current strength standards" is in reference to The Company's current minimum pole class requirements when setting new poles. The statement does not refer to any pole testing performed under the pole integrity program.

The original statement indicated distribution poles that did not meet the current minimum pole class standard. Since then, the Company has completed a deeper review of its asset records and identified that 37% distribution poles do not have a verified class rating in Company records and were identified as not meeting the Company's current minimum pole class requirement.

Please refer to the following breakdown:

- 39% of distribution poles do not meet The Company's current minimum pole class standard
- 37% of distribution poles do not have a verified class rating in our asset records
- 24% of distribution poles meet The Company's current minimum pole class standard

The Company's pole integrity program is the basis for determining if poles no longer have sufficient strength to remain in-service. Please refer to the Company's response to information request NECTA-016[i] for the Company's pole inspection process.

Prior Referenced Response:

[i] NECTA-016 Question:

(Pole Management & SPA) Refer to Exhibit CLP-ADDITIONS-1 at p. 64 ("Replacements are based on annual inspections"). Provide the following:

a. Describe the Company's annual inspection process, including the number of poles inspected each year, the data collected during the inspection, the criteria used to determine the integrity of the pole, who performs the inspections, and how the information collected during the inspections is used.
b. Provide all data collected during the most recent annual inspection.

NECTA-016 Response:

a. The Company performs its routine and annual pole inspection to its custodial wooden poles following a 15-year inspection cycle which ended in 2025. This cycle ensured that every custodial pole across 157 towns in Connecticut was inspected at least once within the time frame. Approximately 29,000 to 32,000 poles were inspected using the 15-year cycle.

In 2025, the Company reviewed its wood-pole inspection standards and decided to shorten the inspection cycle from 15 years to 10 years. By adopting a more frequent inspection schedule, the Company aims to evaluate each custodial pole every 10 years, allowing issues to be identified earlier and addressing them more proactively. Under the revised 10-year cycle, approximately 41,000 to 42,500 poles will be inspected starting in 2026 and moving forward.

The inspection process is based on the age of the pole. A visual inspection is completed for poles with less than 20 years of service. For poles with more than 20 years in service the inspection will include a visual, sound and bore, resistograph testing also known as IML testing, and the application of preservatives "treatment" required to maintain the structural integrity of the pole, and ensure continuous serviceability until the subsequent inspection interval.

The number of poles replaced each year due to age, structural deterioration, damage, or end-of-life conditions varies based on the number of rejected poles identified through the annual pole inspection program. Poles classified as "Rejects" cannot remain in service because their remaining strength has fallen below 67% of their original strength or because they exhibit structural or mechanical damage that compromises safe operation. These poles are scheduled for replacement within one year of identification.

Poles classified as "Priority Rejects" represent the most critical conditions and cannot remain in service because their remaining strength has fallen below 25% of their original strength and/or they exhibit severe structural or mechanical deterioration that presents an immediate public safety risk and reliability. Priority Reject poles are made safe within 48 hours of identification and are replaced as soon as practicable.

Poles classified as "Leaning" are poles that are susceptible to failure and may pose risks to public safety and electric system reliability. Leaning poles occur when soil disturbances, loading from pole attachments, or other external forces alter the pole's original alignment. These conditions are commonly caused by soil saturation and moisture accumulation, excessive structural loading, vehicle impacts, severe weather, or storm-related damage. Depending on the severity of the condition, findings from the pole inspection process

are communicated to the Company on a daily, weekly, or immediate basis to ensure appropriate corrective actions are taken.

Currently, GeoForce Utility Technologies is the contractor responsible for performing all pole inspections throughout Connecticut during the 2024-2026 period. The selection of pole inspection contractors follows a competitive bidding process, with the successful bidder typically awarded a three-year inspection cycle contract.

b. Please refer to NECTA-009[i] for the data collected during the most recent pole inspection.