Date Filed: August 20, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: Office of Consumer Counsel

Question:

(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. 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.

Response:

a. For jointly owned poles, Eversource does not conduct surveys of the communications gain. The Company uses third-party contractors to conduct surveys of the electric gain. Third-party contractors could conduct a single survey of both the electric gain and the communications gain provided that the resulting product is acceptable to both Eversource and the ILEC. PURA's January 15, 2020, Interim Decision in Docket No. 19-01-52 authorized attachers to conduct joint surveys, while declining to require the SPAs and the ILECs to conduct joint surveys. See Interim Decision at 4, n.4. PURA could investigate the possibility of conducting joint surveys, if and when PURA grants Eversource and UI's joint motion to re-open Docket No. 19-01-52RE01 to reevaluate, among other things, survey fees. See Docket No. 19-01-52RE01, Motion No. 044, at 2 (Apr. 22, 2026).

b. As stated in subpart(a), Eversource utilizes third party contractors to conduct pole surveys. Currently, Eversource does not have any internal staff that conduct pole surveys for third-party attachment applications. As far as the number of full-time employees ("FTEs") to perform surveys for both the electric and ILEC space, the number would be dependent on the number of applications received and the number of poles applied for. The volatility in this space is outside the control of the Company and makes the use of contractors the best path forward to completing the work in the timelines that are laid out by PURA and to be the most cost-effective. It gives Eversource the ability to have the contractors ramp up or

down based on volume of work. Eversource also operates in a way where it does not have any contractors on retainers for this work. Meaning, if the work increases, the contractors add resources, and if the work decreases the contractors will shift resources off of the program and the Company is not charged for any work.

c. Eversource utilizes contractors to perform the engineering and design work for third-party attachments. The volatility of this work makes it difficult to build an internal team that is solely responsible for the third-party attachment ("3PA") workload. Eversource utilizes contractors in a manner to enable the Company to handle the volatility of this work efficiently, while making sure that the Company's internal FTEs are available to handle other design priorities.

d. Similar to the engineering function, Eversource uses contractors to complete the majority of the construction for third party attachments. The volatility of the work makes it necessary to expand or contract the number of resources assigned to the project on a frequent basis. Using contractors frees up internal resources to focus on other priorities and allows the Company to scale up or down on an efficient basis.

e. When the creator of a communications space violation of the National Electric Safety Code (NESC) can be readily identified, Eversource, in its role as Single Pole Administrator (SPA), documents the reported condition, notifies the identified communications attacher as well as the ILEC, and tracks the matter through its administrative processes until the matter is resolved or otherwise addressed through the applicable process. Eversource's role as SPA is administrative and coordinative and does not include directing or scheduling an attacher's work or performing corrective field work on behalf of the attacher. Eversource has requested that PURA evaluate modifications to the existing make-ready cost allocation process in its joint motion to re-open Docket No. 19-01-52RE01. See Docket No. 19-01-52RE01, Motion No. 044, at 3-5 (Apr. 22, 2026).

f. Please refer to OCC-190, Attachment 1.

g. Yes, the statement remains true.

It is technically feasible for more than one wireless attachment to be installed on a utility pole; however, this is determined on a case-by-case basis. The pole must be designed with significant strength and height to meet the Company's standards, procedures and NESC requirements. Therefore, while multiple wireless attachments from a single provider are possible on a properly selected pole, they are not appropriate or feasible on every pole.

h. Please refer to OCC-190, Attachment 2, for the Compliance Order No. 5 filing. Refer to OCC-190, Attachment 2(a), for the tables in Excel.

i. Please refer to OCC-190, Attachment 3.

j. Please refer to OCC-190, Attachment 4. Please note that in Docket No. 19-01-52RE01, PURA Investigation of Developments in the Third-Party Pole Attachment Process Make Ready – Order No. 12 provides:

> *For new applications submitted on or after the issuance date of this Decision, the pole owners shall track more granular data to determine application processing costs, and engineering, survey, and make-ready design costs, as described in Section II.B.4. Attachment Application Fees. Records shall be retained for 10 years and made available to the Authority upon request.* ***Additionally, records shall be submitted quarterly until year-end 2023 and semi-annually thereafter. The quarterly filings shall be made starting on July 15, 2022 for April, May, and June 2022 costs, and continue every three months until calendar year-end 2023. Starting in 2024, semi-annually filings shall be made on February 15 and July 15, for July through December costs, and January through June costs, respectively.***

k. Please refer to Exhibit CLP-ADDITIONS-9 and Exhibit CLP-REVREQ-4, for the Third Party Pole Attachment Make Ready capital and O&M costs that are non-billable, the underlying reasons the costs were deemed non-billable, and the FERC accounts to which the costs are booked. Within Exhibit CLP-ADDITIONS-9, the capital costs are also identified by Funding Project, Work Order, Work Order Description, and In-Service Dates. Within Exhibit CLP-REVREQ-4, the O&M costs are also identified by each Vendor Invoice and Work Order. Additionally, the Company has provided invoice documentation for all of the non-billable O&M Third Party Pole Attachment Make Ready O&M costs within Exhibit CLP-REVREQ-4(A). For a narrative description of the process the Company uses to determine make ready work is non-billable, refer to Exhibit CLP-ADDITIONS-1, at pages 69-71.

l. Please refer to OCC-190, Attachment 5.