Date Filed: September 23, 2026

Witness: Leanne M. Landry, Jeffrey Richard and Jeffrey D. Turano
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-1 at pp. 70-71. Describe in detail the Company's implementation of procedures to identify and track billable and non-billable make ready costs. A complete response will explain the tracking process, when it began, and provide all Company documentation/procedures related to tracking billable and non-billable make ready costs.

Response:

Consistent with the directives set forth in PURA's final decision in Docket No. 19-01-52RE01, on May 11, 2022, the Company implemented procedures to identify and track billable and non-billable make ready costs associated with pole attachment work. As described in Exhibit CLP-ADDITIONS-1, these procedures included implementation of a billable/non-billable determination matrix (provided in RRU-002, Attachment 1), standardized documentation requirements, and tracking of billable and non-billable determinations within the Company's systems.

The determination of whether make ready work is billable or non-billable is made during the engineering survey and review process using the Company's billable/non-billable matrix. Based on that determination, a work order is created for the required make ready work and designated as billable or non-billable. The work order information is subsequently interfaced with Alden One, which is used to manage pole attachment applications and related make ready activities. Costs associated with the work are charged to the applicable work order and recorded in accordance with the Company's accounting practices and applicable FERC accounting requirements.

Documentation maintained as part of this process includes the Company's billable/non-billable determination matrix (provided in RRU-002, Attachment 1), work order records, Alden One application records, and supporting documentation maintained for the applicable make ready work.