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Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Reference Exhibit CLP REV-REQ-4. When tracking non-billable make-ready costs, explain how the Company identifies and attributes all pole capital and maintenance work required to be performed by Eversource in its ordinary course of business to its own service requirements.

Response:

The Company identifies and attributes non-billable make-ready costs through its established work management and work order processes. Work orders are created based on the specific project or work type being performed, with defined scopes that distinguish whether the work is customer-driven, make-ready activities (billable or non-billable), capital improvement, etc. from work required by the Company to meet its own service, safety, reliability, and operational obligations.

During project development, engineering personnel review the required work and assign activities to the appropriate work order based on the nature and purpose of the work. Work that is necessary to accommodate a third-party attachment request is tracked separately from work that would be performed by the Company in the ordinary course of business to maintain, replace, or enhance its electric distribution infrastructure.

The Company's work order structure, estimating process, and project oversight practices are designed to ensure that only work directly related to the applicable project scope is charged to that work order. Throughout project execution, the scope of work is monitored and managed to minimize scope creep and to ensure that Company-initiated capital or maintenance activities are appropriately identified and attributed to separate work orders. This approach helps maintain the integrity of cost tracking and supports the accurate allocation of make-ready costs between attachers and the Company's own service requirements.

As a result, non-billable make-ready costs are identified through the Company's project scoping, engineering review, and work order management processes, which are intended to segregate work performed for Company operational needs from work performed in support of attachment-related make-ready activities.