Date Filed: September 23, 2026

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

Question:

(Make Ready Work & Related Costs) Reference Decision dated May 11, 2022 in Docket No. 19-01-52RE01, p. 45 ("The Authority will consider the recovery of reasonable and prudently-incurred non-billable make-ready costs in future rate case proceedings; although, such recovery may be balanced against the reasonable achievement of the timelines and faithful implementation of the strategies intended to alleviate the backlog of attachment applications, as approved in this Decision.") Provide the following:

a. On what date did the Company begin tracking its costs for performing non-billable make-ready work?
b. Identify the timelines referenced in the excerpt above.
c. Describe and provide supporting data regarding the Company's performance in achieving the timelines referenced in subpart (b) since the date identified in subpart (a).
d. Describe in detail each step taken by the Company to implement strategies to alleviate the backlog of attachment applications.
e. Each month since the date identified in subpart (a), provide:
   i. the number of pending attachment applications and their age;
   ii. the number of new attachment applications received that month.

Response:

a. The Company began tracking costs associated with non-billable make ready work on May 11, 2022, the date of PURA's Decision in Docket No. 19-01-52RE01. In that Decision, PURA stated that it would consider recovery of reasonable and prudently incurred non-billable make ready costs in future rate proceedings. Consistent with that directive, the Company began separately tracking such costs for future recovery.

b. The timelines referenced in the May 11, 2022 Decision are the PURA-established pole attachment processing and make ready completion intervals applicable to attachment applications, including application review, engineering and design activities, make ready notifications, payment processing, and completion of make ready work by pole owners and attaching entities. These timelines are intended to facilitate timely processing of attachment requests and reduce attachment application backlogs.

c. Since May 11, 2022, the Company has continued to process attachment applications and make ready work while managing a significant volume of pending applications and outstanding make ready obligations. During this period, the company receives new applications each month while also working through a substantial inventory of pending applications. As reflected in NECTA-051 Attachment 1, pending applications have increased from approximately 2,473 in May 2022 to approximately 4,995 as of September 2026.

   A substantial portion of pending applications are associated with overdue make ready work by third party attachers. As of September 1, 2026, approximately 33,972 poles remained assigned for make ready work, with the majority of them significantly past due. Eversource assigned make ready work accounts for approximately 2,071 poles, or approximately 6% of the total assigned poles.

   In addition, approximately 6,200 poles remain in SPA review where the Eversource review has been completed, but the joint pole owner review remains outstanding. The Company continues to work with attachers to address these aged applications and facilitate completion of required make ready work.

d. Since the issuance of the May 11, 2022 Decision, the Company has undertaken numerous measures intended to alleviate the attachment application backlog, including:

   - Continued administration of the Single Pole Administration (SPA) process
   - Ongoing review and processing of attachment applications
   - Engineering review and design activities to support attachment requests
   - Identification and tracking of overdue make ready assignments
   - Coordination with third party attachers regarding outstanding make ready obligations
   - Assignment and reassignment of make ready work among attachers as work progresses on individual poles
   - Monitoring and reporting of engineering phase and make ready phase overdue applications
   - Efforts to resolve aged SPA reviews and engineering reviews

- Continued engagement with attachers to address long-outstanding applications and facilitate completion of required pole work

The Company has also maintained reporting and tracking tools to identify aged applications, overdue make ready work, and engineering phase delays in order to prioritize resolution efforts and reduce overall backlog levels.

e. (i) Please refer to NECTA-051, Attachment 1, for new attachment applications received monthly.

(ii) Please refer to NECTA-051, Attachment 1, for the monthly pending application counts.

Application age information is provided in the detailed pending application listing included, which identifies open applications and associated days open as of the report date.

It's important to note that a substantial portion of pending applications are associated with overdue make ready work assigned to third party attachers. As of September 1, 2026, approximately 33,972 poles remained assigned for make ready work, with the majority significantly past due. Applications are not automatically cancelled solely because assigned make ready work is overdue, as the underlying attachment requests remain pending and may still be completed by the attacher. Eversource assigned make ready work accounts for approximately 2,071 poles, or approximately 6% of the total assigned poles.