Date Filed: August 13, 2026

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

Question:

(Poles) Please reference Exhibit CLP-REVREQ-4 (Make-Ready Pole Work). Please confirm if any of the Third Party Pole Make Ready costs in Column D that are deemed to have a nonbillable reason such as "correct pre-existing condition/violation" in Column E are caused by temporary attachments.

Response:

When determining make-ready work based on the field surveys, Eversource's responsibility lies within the power space clearance in meeting NESC criteria. Temporary attachments on jointly owned poles are placed within the communications space and fall under the responsibility of the ILEC. As a result, the ILEC is responsible for any field surveys in the communications space to verify NESC clearance. During the concurrence step of the third-party attachment process, Eversource and the ILEC concur on the required make-ready work. However, since temporary attachments on jointly poles are managed and surveyed by the ILEC, Eversource does not determine if a violation is a result of a temporary attachment. Therefore, Eversource is unable to attribute any non-billable make-ready cost to temporary attachers.

For solely-owned Eversource poles, temporary attachments to the pole are reviewed by Eversource. The Company is not aware of any non-billable work as a result of temporary attachments to solely-owned Eversource poles.

Eversource and UI jointly filed a motion to re-open Docket No. 19-01-52RE01 to reevaluate, among other things, the cost allocation policy for non-billable make ready work. See Docket No. 19-01-52RE01, Motion No. 044, at 3-5 (Apr. 22, 2026).