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October 2, 2026

VIA E-FILING[1]

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Connecticut Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 26-05-10: Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules

Dear Secretary Gaudiosi:

Enclosed please find the Fifth Set of Interrogatories of the New England Connectivity and Telecommunications Association ("NECTA") directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource") in the above-captioned docket.

Please feel free to contact the undersigned should you have any questions.

I certify that a copy hereof has been sent to all participants of record as reflected on the Authority's service list as of this date. A copy has also been filed with the Authority as an electronic web filing and is complete.

Very truly yours,

David W. Bogan

Enclosure
CC: Service List

[1] Pursuant to the Undocketed Motion to Temporarily Suspend Filing Paper Copies (Jun. 19, 2020), this filing is being submitted by electronic copy only, with a paper copy to delivered or mailed according to a subsequent determination by the Authority.

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	:	Docket No. 26-05-10
	:	October 2, 2026

NEW ENGLAND CONNECTIVITY AND TELECOMMUNICATIONS ASSOCIATION'S FIFTH SET OF FOLLOW-UP INTERROGATORIES REGARDING MAKE-READY COSTS AND COST ALLOCATION

The New England Connectivity and Telecommunications Association ("NECTA") hereby requests responses from The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or the "Company") to the following follow-up interrogatories regarding make-ready costs and non-billable cost allocations in the above-captioned proceeding by **October 16, 2026**.

INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (*e.g.*, documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify, or correct your responses to each of these interrogatories and production throughout until a final decision in adopted by the Authority in this Docket.

INTERROGATORIES

NECTA-116 Refer to Workpaper C-3.1, p 2 of 2, Line 29 "Rent from Electric Property + Re + Pole Att" and NECTA-083 Attachment 1.

a. For the component labeled "Pole" in NECTA-083, Attachment 1, separately identify pole attachment rental revenue, overlash revenue, application and survey fees, make-ready payments, unauthorized attachment or nonconforming construction charges, and any other included revenue. State whether any of these amounts are recorded elsewhere in the Company's revenue requirement.
b. For pole attachment rental revenue, provide the assumed number of pole attachments, applicable rates, and resulting revenue, separately by cable, telecommunications, municipal, wireless, and other attacher categories; and, within each category, by solely owned and jointly owned poles.
c. Provide the calculations and assumptions used to project pole attachment rental revenue for the TY Pro Forma and Rate Year 1, including projected attachment units, rates, rate-effective dates, billing

timing, and any changes in customer or attachment mix. Explain why the "Pole" amount remains $10.365 million in the TY Pro Forma and increases by only $72,000 to $10.437 million in Rate Year 1. Identify how the pole attachment rates proposed in this proceeding are reflected in that projection. Provide the underlying schedules and workpapers in native electronic format, with formulas intact where available.

NECTA-117 If PURA directs the Company to apply a unified pole attachment rate using the Telecom Formula:

a. Quantify the change in projected pole attachment rental revenue relative to the Company's filing. Provide all supporting calculations.
b. Will Eversource amend its rate case filing to lower its proposed electric service rates to reflect the change in pole attachment rental revenue? If so, please explain what changes would be made to the Company's filing, and explain when and through what filing the Company would implement the filing revision.

NECTA-118 Refer to NECTA-059 Attachment 1. For each of the following retirement-unit categories reported under Utility Account 364310—"INSULATOR, PIN/POST," "INSULATOR, STRING," "POLE PLATFORM," "POLE TOP FRAMING," "TRANSFORMER, OVERHEAD < 500 KVA," and "XFMR, INST OVERHEAD < 500 KVA"—please provide the following as of December 31, 2025:

a. Identify and describe each compatible-unit code whose costs are included in the category. For each code, provide its description, physical components, function, quantity, and gross book cost, and reconcile the compatible-unit costs to the category's book cost in NECTA-059, Attachment 1. Explain any costs that cannot be identified by compatible-unit code.
b. Identify the accumulated depreciation and accumulated deferred income taxes attributable to each category and calculate its net book cost. If these balances are not maintained by retirement-unit category, explain why.

NECTA-119 Refer to NECTA-059 Attachment 1, which reports $63,608,379 in Account 106010, "Completed Construction Not Classified," as of December 31, 2025. Please provide:

a. A work-order-level schedule reconciling to the $63,608,379 balance. For each work order, identify its number, description, balance, work type, expected FERC utility account and retirement-unit category upon unitization, and the dates it was placed in service and posted to Account 106010.
b. Identify each work order involving the installation or replacement of a pole, and state whether the pole was physically installed and in service as of December 31, 2025.
c. Identify each work order subsequently unitized, including the unitization date, final FERC utility account, retirement-unit category,

number of poles posted to the continuing property records, and any change from its December 31, 2025 balance. Reconcile these subsequent postings to the work orders provided in subpart (a).

NECTA-120 For each year nonbillable make ready costs were deferred, and for each FERC expense account and subaccount initially charged with costs included in the nonbillable make-ready regulatory asset:

a. Identify the gross amount charged, the amount credited to the expense account when the cost was deferred, and the net amount remaining, if any, in the FERC Form 1 expense balance. Identify the regulatory-asset account debited and provide the supporting journal entries.
b. Identify any amount of those costs included in an input to the pole attachment rate calculation after deferral. Reconcile the 2025 nonbillable make-ready charges and deferral credits in Account 593 and its subaccounts to the $163,740,608 Account 593 input in Exhibit CLP-RATES-2.14.

NECTA-121 Refer to NECTA-054(h). The Company deducted $802,869 per year from nonbillable make-ready costs for 2023 through 2025 to account for recovery in base distribution rates, but made no deduction for 2022.

a. Please explain why no deduction was made for 2022.
b. Explain whether the Company recovered any nonbillable make-ready costs through base distribution rates during that year. If it did, quantify the amount applicable to the period for which 2022 costs were deferred and provide a revised calculation of the proposed regulatory asset reflecting that amount.

NECTA-122 For all poles replaced for which Eversource is seeking amortization of non-billable O&M costs in Exhibit CLP REVREQ-4, please

a. confirm that third-party attachers transferred their attachments to the replacement pole at their cost;
b. discuss whether a municipal attachment can be the cause of a pole being non-compliant; and
c. provide the number of poles replaced associated with the non-billable O&M costs in Exhibit CLP REVREQ-4 that had municipal attachments.

NECTA-123 Referencing the Written Exceptions of the Connecticut Light and Power Company d/b/a Eversource Energy dated April 25, 2022, in Docket No. 19-01-52RE01, please discuss whether, under Eversource's proposal, existing or prospective municipal attachers would be allocated a share of non-billable make ready costs when a pole replacement is required.

NECTA-124 Please provide Eversource's filings for all pole rate changes pursuant to the pole rate settlement approved by PURA in Docket 17-10-46.

NECTA-125 For each pole that was replaced for which non-billable O&M costs have been recorded to the deferred asset for Third Party Pole Make Ready Work, please:

a. indicate the age of the pole and whether it was fully depreciated;
b. for the subset of poles that were overloaded, discuss whether Eversource reviewed the loading for specific communications strands and, if it did, identify the overloaded strands and the associated pole.

NECTA-126 The Joint Testimony of the Revenue Requirements Panel at p. 66 states that the costs recorded to the deferred asset for Third Party Pole Make Ready are associated with the cost of performing non-billable pole make ready work not recovered in base distribution rates. Please:

a. discuss whether this statement means that the costs recorded to the deferred asset are the costs for years in which the non-billable third party pole make ready costs exceeded the costs for such work in the basic distribution rates set in Docket 17-10-46;

b. provide the amount of non-billable third party pole make ready costs "embedded" in basic distribution rates in Docket 17-10-46 or another PURA decision thereafter;

c. discuss whether the non-billable third-party pole make ready costs recorded in the deferred asset were included as costs in the calculation of pole attachment rates, and provide the amount of the non-billable costs, broken down by FERC account included in the calculation of pole rates for each calendar year since the last rate case in 17-10-46 in which there has been a difference in treatment of such non-billable costs between basic distribution rates and pole rates;

d. discuss whether Eversource has reduced the amount recorded in the deferred asset for third party make ready costs for any revenues received or that will be received through pole rent that includes the non-billable cost in the setting of the pole rate.

NECTA-127 Please discuss whether the pole custodian is still responsible for guying as provided in the Make Ready Decision in Docket 07-02-13 dated April 30, 2008, at p. 13.

[Signature Page Follows]

Respectfully submitted,

THE NEW ENGLAND CONNECTIVITY AND TELECOMMUNICATIONS ASSOCIATION



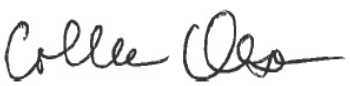
By: _____

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CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at Hartford, Connecticut this 2nd day of October, 2026.



By: _____
Colleen Olsen
Commissioner of the Superior Court