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 provide a real-world example of each type of non-billable reason code. Examples from the Exhibit include: Make Ready - Correct pre-existing condition/violation - Clearance; Make Ready - Correct pre-existing condition/violation - Loading; Pole replacement - Pole Clearance (pre-existing condition/violation); Pole replacement - Pole defective (pre-existing condition/violation).

Response:

Conditions identified during field surveys are reviewed by the Eversource Engineering Group to evaluate adherence to the safety standards that the Company complies with, including National Electric Safety Code (NESC) standards, in order to determine the make-ready work that is necessary to ensure safe and compliant attachment to poles. In addition, today's capabilities using newer pole loading analysis is applied to verify existing pole loading.

Please note that Eversource and UI have jointly filed a motion to re-open Docket No. 19-01-52RE01 to re-evaluate, 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).

Examples of "real world" conditions, include the following:

1. Make Ready Actions needed to correct pre-existing conditions and/or violations – Clearance
   - Correct existing NESC clearance violations prior to new attachment without the need for pole replacement.
   - Example – Insufficient clearance between existing communications attachments and power space as a result of secondary power causing NESC violation.

2. Make Ready - Correct pre-existing condition/violation – Loading
   - Correct existing pole loading condition prior to new attachment without the need for pole replacement.
   - Example – Existing pole loading condition determined using current industry standards and loading analysis that can be resolved with the additional guying.

3. Pole Replacement – Actions to Address Pole Clearance (pre-existing condition and/or violation)
   - Correct existing NESC clearance violation prior to new attachment when pre-existing violation cannot be corrected without a pole replacement.
   - Example – Insufficient clearance between existing communications attachments and power when insufficient space exists on the pole to correct the clearance violation without installing a taller pole.

4. Pole Replacement – Actions to Address Defective Pole (pre-existing condition and/or violation)
   - Replacement of an existing defective pole.
   - Example – Existing pole with split top requires replacement.

5. Pole Replacement - Actions to Address Pole Loading (pre-existing condition and/or violation)
   - Represents replacements of an existing pole when necessitated by a pole loading condition that cannot be resolved via additional guying or other means.
   - Example - Existing pole loading condition(s) at a location where rights for additional guying cannot be obtained. Pole loading conditions are resolved by replacement with a higher-class pole.

6. Pole Replacement - Actions to Address Make Ready at Adjacent Pole (5 foot rule)
   - Represents work necessitated by non-billable make-ready work at an adjacent pole.
   - Example - Non-billable pole replacement with a new pole of increased height may necessitate replacement of an adjacent pole due to excessive height differential (5 foot rule).

7. Other - Provide Comment
   - Represents work necessitated by non-billable make-ready work that is not a full pole replacement.
   - Example – Cracked crossarm was replaced with new crossarm.