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September 14, 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 Second 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
	:	September 14, 2026

NEW ENGLAND CONNECTIVITY AND TELECOMMUNICATIONS ASSOCIATION'S 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 **September 28, 2026**. These interrogatories are directed to specific data and information contained in the Company's response to OCC-150 and its Attachments 3, 5, 7, and 9, which identify unpaid and past-due make-ready/true-up amounts and OCC-179 and OCC-190.

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

Unrecovered Attachment Costs

NECTA-88. (Unrecovered Attachment Costs – Owed Annual Fees) Referring to the Company's response to OCC-150 and the summary table therein: For each year (2021–2025), state how the Company calculated the "Total of Owed Annual Fees" amounts ($729,641.20 for 2021; $465,539.21 for 2022; $3,257,642.33 for 2023; $2,060,876.67 for 2024; and $339,865.60 for 2025), including whether the amounts reflect annual pole attachment rental fees, application fees, survey fees, overlash fees, unauthorized attachment fees, or some other category of charges, and

specifically state whether the "Total of Owed Annual Fees" amounts represent: (a) unpaid annual pole attachment rental fees only, (b) a combination of annual rental fees and other recurring charges, (c) a combination of annual rental fees and non-recurring fees or penalties, or (d) something else.

NECTA-89. **(Unrecovered Attachment Costs – Owed Annual Fees)** For each NECTA member identified in OCC-150, Attachments 1 (2021) (Charter, Comcast), 2 (2022) (Charter, Cox, Comcast), 4 (2023) (Breezeline, Cablevision, Charter, Cox, Comcast), 6 (2024) (Breezeline, Charter, Comcast, Cox), and 8 (2025) (Cox Cogeco, Charter, Comcast), identify the specific type(s) of charges included in the "Owed Annual Fees" amount for that attacher. If more than one type of charge is included for any attacher, provide a breakdown by charge type.

NECTA-90. **(Unrecovered Attachment Costs – Make Ready True Ups)** Referring to the Company's response to OCC-150 and the summary table therein: For each year (2022–2025), state how the Company calculated the "Total of Owed Make Ready/True Ups" amounts ($97,776.25 for 2022; $236,150.61 for 2023; $106,461.37 for 2024; and $1,156,888.67 for 2025), including whether the amounts reflect initial estimates, revised estimates, actual costs, or adjustments, and specifically state whether the "Total of Owed Make Ready/True Ups" amounts represent: (a) unpaid estimated make-ready charges, (b) true-up amounts following completion of make-ready work, (c) a combination of estimates and true-ups, or (d) something else.

NECTA-91. **(Unrecovered Attachment Costs – Make Ready True Ups)** For each line item attributable to Comcast Cable or Cox Communications in OCC-150 Attachments 5 (2023) (Comcast) and 9 (2025) (Cox, Comcast), state how the Company determined the "Last Billed Amount" and to the extent not already part of the Company's answer, identify whether the "Last Billed Amount" represents (a) an initial estimated make-ready cost, (b) a true-up adjustment following completion of make-ready work, (c) a final invoice for completed work, or (d) some other charge. If the amount includes a true-up component, identify the original estimated amount and the basis for the adjustment.

NECTA-92. **(Unrecovered Attachment Costs – Make Ready True Ups)** For each line item attributable to Comcast Cable or Cox Communications in OCC-150 Attachments 5 (Comcast) and 9 (Cox, Comcast), identify all cost categories or line items incorporated into the amount, including but not limited to:

a. labor (internal and contractor)

b. materials

c. engineering and design

d. field survey

e. overhead

f. contractor fees

g. tree trimming/vegetation management

h. pole replacement costs

i. any other cost component

Provide a breakdown by cost category for each line item.

NECTA-93. **(Unrecovered Attachment Costs – Make Ready True Ups)** For each line item attributable to Comcast Cable or Cox Communications in OCC-150 Attachments 5 (Comcast) and 9 (Cox, Comcast), identify all documents, records, data sources, work orders, and database entries that support the make-ready amount, including but not limited to:

a. the associated work order number(s)

b. invoices from third-party contractors

c. internal cost tracking records

d. correspondence with the attacher regarding the charge

Past Due Make Ready

NECTA-94. **(Make-Ready Costs – Comcast)** Referring to OCC-150, Attachment 5 (2023 Owed Make Ready True Ups), Comcast Cable is listed with one entry for $1,866.91 (Last Bill Date: 3/20/2023). Provide the following:

a. Identify the specific make-ready work, including the pole number(s) and location(s), associated with this charge.

b. State whether the make-ready work has been fully completed, partially completed, or not yet commenced. If partially completed, identify what work remains outstanding.

NECTA-95. **(Make-Ready Costs – Comcast)** Referring to OCC-150, Attachment 9 (2025 Owed Make Ready True Ups), Comcast Cable is listed with numerous entries totaling a substantial portion of the $1,156,888.67 total, with bill dates in October and November 2025 and amounts ranging from $63.39 to $33,167.76. For each Comcast Cable line item in Attachment 9:

a. Identify the specific make-ready work, including the pole number(s) and location(s), associated with each charge.

b. Has the make-ready work been fully completed, partially completed, or not yet commenced?

c. For each entry, provide the associated work order number.

NECTA-96. **(Make-Ready Costs – Comcast)** For each Comcast Cable entry in OCC-150, Attachments 5 and 9, state whether the charge is associated with make-ready work that was classified as billable pursuant to the Company's billable/non-billable determination process described in Exhibit CLP-ADDITIONS-1 at pp. 69–71. If any charge relates to an NESC non-compliance condition identified in OCC-190, Attachment 1, identify the corresponding work order number.

NECTA-97. **(Make-Ready Costs – Cox)** Referring to OCC-150, Attachment 9 (2025 Owed Make Ready True Ups), Cox Communications is listed with one entry for $10,662.32 (Last Bill Date: 11/21/2025). Provide the following:

a. Identify the specific make-ready work, including the pole number(s) and location(s), associated with this charge.

b. Identify all cost components included in the $10,662.32 amount.

c. State whether the make-ready work has been fully completed, partially completed, or not yet commenced.

d. Provide the associated work order number.

NECTA-99. **(Make-Ready Costs – Cox)** For each Cox entry in OCC-150, Attachment 9, state whether the charge is associated with make-ready work that was classified as billable pursuant to the Company's billable/non-billable determination process described in Exhibit CLP-ADDITIONS-1 at pp. 69–71. If any charge relates to an NESC non-compliance condition identified in OCC-190, Attachment 1, identify the corresponding work order number.

Non-Billable Make-Ready Cost Allocation

NECTA-99. **(Non-Billable Cost Allocation – General)** Referring to the Company's response to OCC-179 and Exhibit CLP-REVREQ-4 (Make-Ready Pole Work), the Company identified seven categories of non-billable make-ready reason codes. For each of the following non-billable reason codes: state the total dollar amount of costs incurred by the Company in each year from 2022 through 2025 and identify the FERC accounts to which the costs were assigned and the amounts assigned to each account:

a. Make Ready – Correct pre-existing condition/violation – Clearance

b. Make Ready – Correct pre-existing condition/violation – Loading

c. Pole Replacement – Actions to Address Pole Clearance (pre-existing condition/violation)

d. Pole Replacement – Actions to Address Defective Pole (pre-existing condition/violation)

e. Pole Replacement – Actions to Address Pole Loading (pre-existing condition/violation)

f. Pole Replacement – Actions to Address Make Ready at Adjacent Pole (5 foot rule)

g. Other

NECTA-100. (Non-Billable Cost Allocation – Pole Replacements) Referring to the Company's response to OCC-179, four of the seven non-billable reason codes involve pole replacements (Pole Clearance, Defective Pole, Pole Loading, and Make-Ready at Adjacent Pole (5 foot rule)). For pole replacements classified as non-billable in each year from 2022 through 2025, provide the following:

a. The total number of pole replacements and the total cost, broken down by reason code.

b. For each pole replacement, state whether the replaced pole would have been scheduled for replacement under the Company's Pole Integrity Program or Right of Way Program absent the third-party attachment application.

c. To the extent not answered in response to NECTA-099, identify the FERC accounts to which the costs were assigned and the amounts assigned to each account.

NECTA-101. (Non-Billable Cost Allocation – Allocation Among Parties) For each instance of non-billable make-ready work identified in Exhibit CLP-REVREQ-4 and referenced in the Company's response to OCC-179, describe in detail how the Company allocated or assigned the costs associated with each non-billable reason code among (a) the new attacher whose application triggered the field survey, (b) existing attachers whose facilities are already on the pole, and (c) Eversource as the pole owner. A complete response will:

a. Identify the specific criteria, policies, or guidelines used to determine which party or parties bear the cost of correcting a pre-existing condition or violation discovered during a field survey.

b. Explain whether any portion of the cost of correcting a pre-existing condition or violation is billed to or recovered from the existing attacher(s) whose facilities caused or contributed to the condition or violation. If not, explain why not.

c. Explain whether any portion of the cost of correcting a pre-existing condition or violation is billed to or recovered from the new attacher whose application

triggered the field survey that identified the condition. If so, describe the circumstances under which such costs are billed to the new attacher.

d. For costs classified as non-billable that are borne by Eversource, identify the FERC account(s) to which such costs are booked, whether the costs are included in the deferred regulatory asset for non-billable make-ready, and from which rates (pole attachment rates, base distribution rates, or other rates) the Company seeks or has obtained recovery.

e. Identify and produce all written policies, procedures, decision matrices, or similar documentation governing the allocation of non-billable make-ready costs among the new attacher, existing attachers, and Eversource.

NECTA-102. (Non-Billable Cost Allocation – Pole Replacement Cost Sharing) When a pole replacement is classified as non-billable under any of the pole-replacement reason codes identified in OCC-179 (Pole Clearance, Defective Pole, Pole Loading, or Adjacent Pole / 5 Foot Rule), provide the following:

a. State whether any portion of the capital cost of the replacement pole is allocated to or recovered from the new attacher, existing attachers, or the joint pole owner. If so, describe the allocation methodology and the amounts.

b. When a replacement pole is taller or of a higher class than the pole it replaces, explain how the incremental cost attributable to the increased height or class is allocated. State whether the new attacher is charged for any portion of the incremental cost.

c. For jointly owned poles, explain how the cost of a non-billable pole replacement is shared between Eversource and the joint pole owner, and identify the reimbursement amounts, if any, received from the joint owner for each such replacement in each year from 2022 through 2025.

NECTA-103. (Non-Billable Cost Allocation – Existing Attacher Responsibility) Referring to the Company's response to OCC-179 and OCC-190 (subpart e), when a pre-existing NESC violation or non-compliant condition is attributable to a specific existing attacher's facilities:

a. Does the Company seek to recover any portion of the cost of correcting the violation from the existing attacher that caused it? If so, describe the process, including the contractual or regulatory basis for such recovery and the amounts recovered in each year from 2022 through 2025.

b. If the Company does not seek recovery from the existing attacher that caused the violation, explain whether the cost is instead (i) absorbed by Eversource and included in the non-billable make-ready regulatory asset, (ii) allocated to the new attacher, or (iii) treated in some other manner.

c. For each year from 2022 through 2025, state the number of instances in which a pre-existing violation was attributable to a specific existing attacher and the total dollar amount of make-ready costs incurred to correct those violations. Of those amounts, identify (i) the amount recovered from the existing attacher, (ii) the amount classified as non-billable and absorbed by the Company, and (iii) any amount billed to the new attacher.

Respectfully submitted,

THE NEW ENGLAND CONNECTIVITY AND TELECOMMUNICATIONS ASSOCIATION



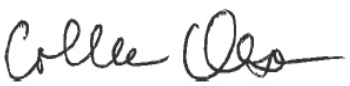
By: _____

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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 14th day of September, 2026.



By: _____
Colleen Olsen
Commissioner of the Superior Court