Date Filed: September 23, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(Model Inputs & Assumptions) Refer to Exhibit CLP-Rates-2.14, Pole Attachment Rate Calculations. Explain the basis for the following inputs, including whether the input is a rebuttable presumption or based on Company data, and provide all supporting documents and work papers:

a. Space Occupied = 1 (p. 1 of 7)
b. Usable Space = 16 (p. 1 of 7)
c. Unusable Space = 24 (p. 2 of 7)
d. Number of attaching entities (Non-Urban) = 3 (p. 2 of 7)
e. Number of attaching entities (Urban) = 5 (p. 2 of 7)
f. Pole Height = 40 (p. 2 of 7)
g. Urban Conversion Factor = 66% (p. 2 of 7)
h. Non-Urban Conversion Factor = 44% (p. 2 of 7)
i. Appurtenance Factor = 15% (p. 3 of 7)
j. Long Term Debt Capitalization Ratios and Embedded Cost (p. 6 of 7, Cells C10:D10)
k. Preferred Stock Capitalization Ratios and Embedded Cost (p. 6 of 7, Cells C11:D11)
l. Common Equity Capitalization Ratios and Embedded Cost (p. 6 of 7, Cells C12:D12)
m. Total Units (Poles) (p. 7 of 7, Cells C11:C14)
n. Total Cost (Poles) (p. 7 of 7, Cells D11:D14)

Response:

The figures shown in the Company's pole attachment rate calculations are governed by the Settlement Agreement between the "Settling Parties": Eversource, NECTA and the NECTA Operators (Atlantic Broadband CT, Cablevision of Litchfield, LLC, Charter Communications Operating, LLC, Comcast of Connecticut, Inc. and CoxCom LLC). The Settlement Agreement was filed on February 15, 2018 in Docket No. 17-10-46 and approved by PURA on April 18, 2018.

a. In the CATV and Telecom pole attachment rate calculations, the Space Occupied by the third party attacher is presumed to be one foot. This is an FCC rebuttable presumption.

b. In the CATV pole attachment rate calculation, the Usable Space of 16 feet is a figure agreed upon by the Settling Parties (Eversource, NECTA and NECTA Operators) in Docket No. 17-10-46. This figure was calculated by subtracting 24 feet of unusable space (an FCC presumption) from a pole height of 40 feet, which was also a figure agreed upon by the Settling Parties.

c. In the Telecom pole attachment rate calculations, the Unusable Space is presumed to be 24 feet. This is an FCC rebuttable presumption.

d. In the Non-Urban Telecom pole attachment rate calculation, the average number of attaching entities is presumed to be 3. This is an FCC rebuttable presumption.

e. In the Urban Telecom pole attachment rate calculation, the average number of attaching entities is presumed to be 5. This is an FCC rebuttable presumption.

f. In the Telecom pole attachment rate calculations, the Pole Height of 40 feet is a figure that Settling Parties in Docket No. 17-10-46.

g. In the Urban Telecom pole attachment rate calculation, the Urban Conversion Factor is 66% and is taken directly from the FCC's urban telecom pole attachment rate calculation.

h. In the Non-Urban Telecom pole attachment rate calculation, the Non-Urban Conversion Factor is 44% and is taken directly from the FCC's non-urban telecom pole attachment rate calculation.

i. In the CATV and Telecom pole attachment rate calculations, the Appurtenance Factor is presumed to be 15%. This is an FCC rebuttable presumption.

j. The Long Term Debt capitalization ratio and embedded cost reflect the figures allowed by PURA in Rate Year 3 of Eversource's prior rate case Docket No. 17-10-46.

k. The Preferred Stock capitalization ratio and embedded cost reflect the figures allowed by PURA in Rate Year 3 of Eversource's prior rate case Docket No. 17-10-46.

l. The Common Equity capitalization ratio and embedded cost reflect the figures allowed by PURA in Rate Year 3 of Eversource's prior rate case Docket No. 17-10-46.

m. Total Units (Poles) reflects the total number of poles recorded to the Company's plant accounting system (for the categories shown) as of December 31, 2025.

n. Total Cost (Poles) reflects the total cost of poles recorded to the Company's plant accounting system (for the categories shown) as of December 31, 2025.

Date Filed: September 23, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(Model Inputs & Assumptions) Regarding pole attachment rental rate formula inputs used in Exhibit CLP-Rates 2.14, did the Company examine any records or files, including but not limited to AldenOne, in determining its proposed inputs (e.g., number of attaching entities, pole height, etc.)? If so, identify those inputs and provide the data relied upon.

Response:

No. The Company did not propose any changes to the pole attachment rental rate formula inputs used in Exhibit CLP-Rates 2.14. The inputs are the same as those agreed upon in the Settlement Agreement between Eversource, NECTA and the NECTA operators that was approved by PURA in Docket No. 17-10-46.

Date Filed: September 23, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(Model Inputs & Assumptions) Did the Company include municipal, State of Connecticut, or other government agency-owned attachments that occupy space on solely owned or jointly owned poles in its presumption of the number of attaching entities (urban and non-urban)?

Response:

The Company utilized the FCC rebuttable presumptions for the number of attaching entities in urban (5 attachers) and non-urban (3 attachers) areas.

Please see the following excerpt from FCC Docket No. 01-170 as to how these averages were created:

> 71. Based on the expanded record, we establish presumptive average numbers of attaching entities in a non-urbanized (less than 50,000 population) area to be three (3) attaching entities, based on information presented in the record and the expectation that on a pole or in a conduit, for instance, there would be electric, telephone and cable attachers. It is estimated that cable systems now provide access to cable television services to over 97% of all households with a television. Electric power and telephone service is even more universal. The record supports a presumptive average of three attaching entities in non-urbanized areas.
>
> 72. In an urbanized area that is more densely populated (50,000 or higher population), more developed commercially than a non-urbanized area, and in which we expect both residential and business commercial competition to flourish, we set a presumptive average number of attaching entities at five (5) to reflect the inclusion of, but not limited to, the following possible attaching entities: electric, telephone, cable, competitive telecommunications service providers and governmental agencies. Advanced telecommunications capability is being deployed throughout the country. As noted above, competitive services are increasing. The record supports a presumptive average number of five attachers in urbanized areas.

Date Filed: September 23, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(Model Inputs & Assumptions) Refer to Exhibit CLP-Rates-2.14, Pole Attachment Rate Calculations, p. 5 of 7, Note A. Provide all supporting documentation, work papers, calculations and assumptions used to develop the $933,329,049 adjustment related to the Tax Cuts and Jobs Act.

Response:

As explained in footnote A, the adjustment related to the Tax Cuts & Jobs Act ("TCJA") in the amount of $933,329,049, can be found in the Company's 2025 FERC Form 1 filing on Page 278, Line 10, Column F. Please refer to NECTA-004, Attachment 1, for the page from the FERC Form 1 that shows the amount of Excess Accumulated Deferred Income Taxes ("EDIT") related to the TCJA.

Date Filed: September 23, 2026

Witness: Marisa B. Paruta
Request from: New England Connectivity and Telecommunications Association

Question:

(Model Inputs & Assumptions) Refer to Exhibit CLP-Rates-2.14, Pole Attachment Rate Calculations, p. 5 of 7, Line 24. Provide the derivation and source documents supporting the depreciation rate applied to gross pole investment in the pole rate formula.

Response:

Please refer to NECTA-005, Attachment 1, line 24, Utility Account 364, Poles, Towers and Fixtures, for the source document supporting the depreciation rate applied to gross pole investment in the pole rate formula. This source document, which is a schedule of the Company's current plant utility accounts and applicable depreciation rates, is the original Attachment 4 of the Settlement Agreement (as described in Section 6(a)) of the Company's last base distribution rate case, as approved by PURA in Docket No. 17-10-46 on April 18, 2018.

Date Filed: September 23, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(Model Inputs & Assumptions) Refer to Exhibit CLP-Rates-2.14, Pole Attachment Rate Calculations, p. 3 of 7. Provide the following:

a. Identify and provide the appurtenance factor utilized in pole attachment rental rate formulas by each electric utility affiliate of Connecticut Light and Power Company.
b. For the appurtenance factors identified in subpart (a) above, describe how the factor was determined and provide supporting documentation.

Response:

Eversource Energy Service Company's other electric distribution companies utilize the 15% appurtenance factor (rebuttable presumption) as established by the New Hampshire Public Utilities Commission ("PUC") and the Massachusetts Department of Public Utilities ("DPU") / Department of Telecommunications and Cable ("DTC") when calculating pole attachment rates in those jurisdictions.

Date Filed: September 23, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: New England Connectivity and Telecommunications Association

Question:

(Model Inputs & Assumptions) Provide the most recent rate of return approved for the Company by PURA. A complete response will identify the relevant docket number, order, and date associated with the approved rate of return.

Response:

The Final Decision in Docket No. 17-10.46, dated April 18, 2018, at page 19, authorized a rate of return of 7.09%.

Please see the screenshot below showing the authorized return as filed in Appendix A, Attachment 6, to the Final Decision.

Calendar Year 2020	Weight	Embedded Cost	Calendar Year 2020 Weighted Cost
Long-Term Debt	45.38%	4.64%	2.11%
Preferred Stock	1.62%	4.75%	0.08%
Common Equity	53.00%	9.25%	4.90%
Total Capital	100.00%		7.09%

Date Filed: September 28, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from:

Question:

(Pole Data) Provide a complete inventory of Eversource's pole fleet in Connecticut, along with all information about each of the poles retained by the Company. A complete response will include, but is not limited to:

a. total pole count,
b. solely versus jointly owned poles,
c. joint owners,
d. pole height,
e. wood versus other material,
f. age,
g. pole ID number,
h. class,
i. number of attachers,
j. date placed/removed,
k. city, and
l. notes.

Response:

The following responses were generated out of the Company's pole fleet in Connecticut according to its Geographic Information System (GIS), with the exception of NECTA-008, Attachment 1, which was generated out of AldenOne. Because AldenOne and GIS use different data sources and maintain different types of information, pole fleet counts may not exactly match. In addition, the Company provided pole data in FERC Utility Account 364 (Poles, Towers, and Fixtures) from plant accounting's Continuing Property Records (CPR) in NECTA-059, Attachment 1, which provides the pole counts used in the third party pole attachment rental rate calculation and includes only those poles that are unitized, classified, and recorded to FERC Account 101010 (Utility Plant in Service). Because the CPR also includes poles not yet unitized in FERC Account 106010 (Completed Construction not Classified), and poles in FERC Account 107 (Construction Work in Progress) not yet functionalized to FERC Utility Account 364, the pole counts in GIS will not tie due to timing of recognition in the CPR.

a. The total pole count in the Company's pole fleet in Connecticut is 730,325 poles.

b. The number of solely owned poles is 94,686, compared to 635,639 poles that are jointly owned with Verizon.

c. Please refer to the Company's response to subpart (b), above.

d. Please refer to Table 1, showing the height of the Company's pole fleet.

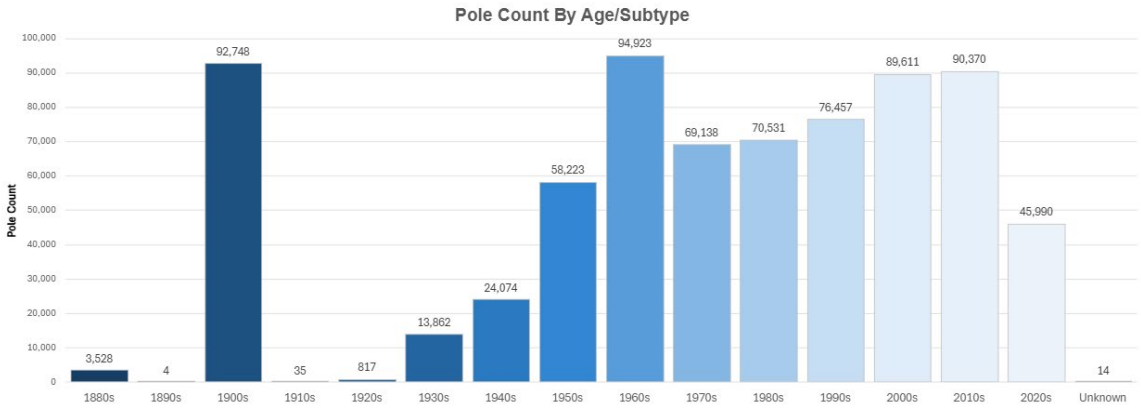
Table 1

Pole Height	Pole Count	Pole Height	Pole Count	Pole Height	Pole Count	Pole Height	Pole Count
(blank)	18,787	17 ft.	74	35 ft.	259,730	70 ft.	44
10 ft.	109	18 ft.	5,215	40 ft.	290,229	75 ft.	46
11 ft.	64	20 ft.	1,517	45 ft.	83,744	80 ft.	39
12 ft.	1,003	21 ft.	36	50 ft.	10,909	85 ft.	31
13 ft.	2	25 ft.	4,151	55 ft.	895	90 ft.	23
14 ft.	703	27 ft.	3	60 ft.	324	95 ft.	21
15 ft.	185	30 ft.	52,284	65 ft.	134	100 ft.	23
						Grand Total	**730,325**

e. The total number of wood power poles is 705,400, compared to 24,925 poles built with other materials.

f. Please refer to Chart 1, showing the age of the Company's pole fleet.

Chart 1



g. Please refer to NECTA-008, Attachment 1, showing the Company's pole ID numbers.

h. Please refer to Table 2, showing the Company's pole fleet by pole class.

Table 2

Pole by Pole Class	
Pole Class	**Pole Count**
1	20,609
2	158,367
3	114,353
4	136,468
5	34,554
6	2,187
7	1,956
9	333
A	2
H1	477
H2	185
H3	28
Unknown	260,806

i. Please refer to NECTA-008, Attachment 1, for the number of attachers.

j. Please refer to Table 3, for the Company's pole fleet date placed in service.

Table 3

Pole Fleet in Service Dates			
Decade	Pole Count	Decade	Pole Count
1880s	3,528	1960s	94,923
1890s	4	1970s	69,138
1900s	92,748	1980s	70,531
1910s	35	1990s	76,457
1920s	817	2000s	89,611
1930s	13,862	2010s	90,370
1940s	24,074	2020s	45,990
1950s	58,223	Unknown	14

k. Please refer to NECTA-008, Attachment 1, for the city.

l. Notes are not reflected in our GIS system of record.

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Data) Regarding the last field inventory of Company distribution poles conducted by or on behalf of the Company, provide a complete copy of the results of the field inventory, including:

a. The date the field inventory was conducted;
b. The universe of poles surveyed;
c. The percentage of total poles;
d. The type of information collected about each pole;
e. The height of each surveyed pole;
f. The average height of all surveyed poles;
g. Age of each pole;
h. The number of attachments, other than Eversource facilities, on each pole.

Response:

The Company is providing a copy of the results of its 2025 pole inspection program. The field inventory includes inspection results for approximately 32,894 custodial poles located across 9 of Connecticut's 157 towns, based on a 15-year inspection cycle. Effectively in 2026, the Company transitioned to a 10-year inspection cycle to evaluate each pole every 10 years, allowing issues to be identified earlier and addressing them more proactively. The Company expects to evaluate 40,000 to 42,000 poles, or 10% of its custodial wooden pole population.

a. Please refer to NECTA-009, Attachment 1, tab named "Results", showing the dates that the inventory was conducted. Usually, the Pole inspection process starts in mid-April and ends towards the end of October.

b. In 2025, the Company inspected 32,894 custodial poles.

c. In 2025, the Company inspected 7.8% of the Company's wooden pole population based on a 15 year-inspection cycle.

d. Please refer to NECTA-009, Attachment 1, tab named "results" showing all the information collected from each pole inspected in 2025.

e. Please refer to NECTA-009, Attachment 2, for the height and age of each pole inspected in 2025. The height is shown in column “u”, and the age of each pole is shown in column “T “of each town where custodial poles were inspected.

f. Please refer to NECTA-009, Attachment 2, tab “2025 Pole Inspection General Information”, showing the average height for all custodial poles inspected in 2025. The average height is 37.7 ft.

g. Please refer to subpart (e), above.

h. Please refer to NECTA-008, Attachment 1, for the number of attachments on each custodial pole. NECTA-008, Attachment 1 will be provided on September 30, 2026, due to an extension being requested. The Company does not collect attachment information during the pole inspection process.

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Data) Referring to Exhibit CLP-ELP-1 at pp. 42-43, what is the basis for the statement that "Most of the wood-pole fleet comprises legacy poles that fail to meet current strength standard."?

a. Identify and provide a copy of current pole strength standards, and all prior pole strength standards used by Eversource since 1990.
b. Identify and provide all studies, surveys, assumptions, etc. that are relied upon as support.
c. Has the Company identified a complete list of legacy wood-poles that fail to meet strength standards? If so, provide the list.

Response:

The basis for the statement that "Most of the wood-pole fleet comprises legacy poles that fail to meet current strength standard." is in reference to the Company's current minimum pole class requirements when setting new poles. The statement does not refer to any pole testing performed under the pole integrity program.

The original statement indicated 76% of the distribution poles did not meet the current minimum pole class standard. Since then, the Company has completed a deeper review of its asset records and identified that 37% distribution poles do not have a verified class rating in company records and were identified as not meeting the Company's current minimum pole class requirement. Please refer to the following breakdown:

- 39% of distribution poles do not meet The Company's current minimum pole class standard
- 37% of distribution poles do not have a verified class rating in our asset records
- 24% of distribution poles meet The Company's current minimum pole class standard

a. Refer to NECTA-010, Attachment 1, Pole Class Size, for The Company's current standards related to minimum pole class requirements from the Distribution System Engineering Manual.

b. The minimum pole class requirements were established based on industry knowledge to ensure all new construction was built to a higher resiliency standard to minimize the impacts of major storm events on the system.

c. The Company's pole integrity program is the basis for determining if poles no longer have sufficient strength to remain in-service. Please refer to the Company's response to information request NECTA-016[i] for the Company's pole inspection process.

Prior Referenced Response:

[i] NECTA-016 Question:

(Pole Management & SPA) Refer to Exhibit CLP-ADDITIONS-1 at p. 64 ("Replacements are based on annual inspections"). Provide the following:

a. Describe the Company's annual inspection process, including the number of poles inspected each year, the data collected during the inspection, the criteria used to determine the integrity of the pole, who performs the inspections, and how the information collected during the inspections is used.
b. Provide all data collected during the most recent annual inspection.

NECTA-016 Response:

a. The Company performs its routine and annual pole inspection to its custodial wooden poles following a 15-year inspection cycle which ended in 2025. This cycle ensured that every custodial pole across 157 towns in Connecticut was inspected at least once within the time frame. Approximately 29,000 to 32,000 poles were inspected using the 15-year cycle.

In 2025, the Company reviewed its wood-pole inspection standards and decided to shorten the inspection cycle from 15 years to 10 years. By adopting a more frequent inspection schedule, the Company aims to evaluate each custodial pole every 10 years, allowing issues to be identified earlier and addressing them more proactively. Under the revised 10-year cycle, approximately 41,000 to 42,500 poles will be inspected starting in 2026 and moving forward.

The inspection process is based on the age of the pole. A visual inspection is completed for poles with less than 20 years of service. For poles with more than 20 years in service the inspection will include a visual, sound and bore, resistograph testing also known as IML testing, and the application of preservatives "treatment" required to maintain the structural integrity of the pole, and ensure continuous serviceability until the subsequent inspection interval.

The number of poles replaced each year due to age, structural deterioration, damage, or end-of-life conditions varies based on the number of rejected poles identified through the annual pole inspection program. Poles classified as "Rejects" cannot remain in service because their remaining strength has fallen below 67% of their original strength or because they exhibit structural or mechanical damage that compromises safe operation. These poles are scheduled for replacement within one year of identification.

Poles classified as "Priority Rejects" represent the most critical conditions and cannot remain in service because their remaining strength has fallen below 25% of their original strength and/or they exhibit severe structural or mechanical deterioration that presents an immediate public safety risk and reliability. Priority Reject poles are made safe within 48 hours of identification and are replaced as soon as practicable.

Poles classified as "Leaning" are poles that are susceptible to failure and may pose risks to public safety and electric system reliability. Leaning poles occur when soil disturbances, loading from pole attachments, or other external forces alter the pole's original alignment. These conditions are commonly caused by soil saturation and moisture accumulation, excessive structural loading, vehicle impacts, severe weather, or storm-related damage. Depending on the severity of the condition, findings from the pole inspection process are communicated to the Company on a daily, weekly, or immediate basis to ensure appropriate corrective actions are taken.

Currently, GeoForce Utility Technologies is the contractor responsible for performing all pole inspections throughout Connecticut during the 2024-2026 period. The selection of pole inspection contractors follows a competitive bidding process, with the successful bidder typically awarded a three-year inspection cycle contract.

b. Please refer to NECTA-009[i] for the data collected during the most recent pole inspection.

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Data) Refer to Exhibit CLP-TSP-1, p. 27. Provide all supporting studies and documentation for the statement that "approximately 76% of the wood-pole fleet are legacy poles that do not meet current strength standards."

Response:

The following statement "approximately 76% of the wood-pole fleet are legacy poles that do not meet current strength standards." is in reference to The Company's current minimum pole class requirements when setting new poles. The statement does not refer to any pole testing performed under the pole integrity program.

Please refer to NECTA-010, Attachment 1, for the Company's current standards related to minimum pole class requirements from the Distribution System Engineering Manual.

Date Filed: September 23, 2026

Witness: David L. Gladey, Jeffrey Richard, Edward A. Davis and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Data) Refer to The Connecticut Light & Power dba Eversource Energy Usable Space Study as filed on August 14, 2017 in Docket 14-05-06. Has the Company updated this study or conducted a new, more recent Usable Space Study since 2017? If so, please provide a complete copy of the study and all documents, inputs and assumptions identified or relied upon in the preparation of the Usable Space Study.

Response:

The Company has not updated this study or conducted a new, more recent Usable Space Study since 2017.

Date Filed: September 23, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Data) Explain the process the Company undertakes to add a new or replacement pole to the pole count for purposes of calculating the pole attachment rate, including the timing of any pole count changes.

Response:

Poles are recorded into the Company's plant accounting Continuing Property Records (CPR) as a matter of conducting normal operations, as they are classified into the appropriate retirement unit categories. Please refer to the Company's response to NECTA-075[i] for a discussion on the standard FERC account and CPR procedures on recognition and designation of plant assets. The Company utilizes pole data from the CPR as of a point in time for purposes of calculating the pole attachment rate. The Company does not adjust its plant accounting CPR to record poles for the express purpose of calculating the pole attachment rate.

Prior Referenced Response:

[i] NECTA-075 Question:

(FERC Accounts) Select a 2025 Work Order and provide a discussion and timeline for the assignment of costs to the different FERC accounts beginning with the opening of the Work Order and the initial incurrence of costs to the closing of the Work Order. As part of this response, please indicate whether all costs are held in Account 365 until the Work Order is closed, or are costs assigned based on when proper account designation is determined.

NECTA-075 Response:

Work order 80364832 was initiated in July 2025 for the replacement of a recloser and recloser control. The Operations department wrote this new work order in the Company's work management system, ensuring the correct work order type was established based on the type of work being performed. The estimates were then entered for the work order by selecting the Compatible Units (assets) planned to be installed and removed, which created the FERC Split. The combination of the Work Order Type and FERC Split chosen for work order 80364832 determined the correct Utility Accounts were utilized and ensured the appropriate allocation of charges between FERC accounts 107010 (Construction Work in Progress) and 108030 (Cost of Removal). The work order was set to "open" status in July 2025, work began, and capital expenditures were charged to FERC accounts 107010 and 108030. While in FERC account 107, the capital expenditures are appropriately not disseminated at the Utility Account (365 - Overhead Conductors and Devices) level in the Company's plant asset records.

When the installed assets were deemed "used and useful" later in July 2025, the Operations department moved the work order to "in-service" status and the capital expenditures in FERC account 107 were moved to FERC account 106 (Completed Construction not Classified), while the charges in FERC account 108030 remained unchanged. At that time, the assets placed in service began to depreciate in their assigned Utility Account (365), while the Operations department continued to work on finalizing all costs to the work order. In December 2025, after all invoices were received, drawings were finalized, the pre-requisites/tasks in the work management system were completed, final costs appropriately flow through the FERC Split, the work order was closed/posted to the CPR (Continuing Property Records). Once this work order was closed, the final costs of the asset in FERC account 106 were moved to FERC account 101010 (Plant in Service) and unitized/posted to the CPR with their specific retirement units in Utility Account 365 based on final costs. The final cost of removal in FERC account 108030 was then moved to FERC account 108010 (Accumulated Provision for Depreciation).

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Data) Reference Exhibit CLP-TSP-2, pp. 2, 18. Provide the following:

a. Identify the average height of the 561,179 poles in the Connecticut System that are Class 3 or lower.

b. Identify the average height of the 179,419 poles in the Connecticut System, that are Class 2 or higher.

c. Identify the date on which the Company updated its standard to require a minimum of Class 2 pole for new installations.

Response:

a. The average height of the 561,163 poles identified in Exhibit CLP-TSP-2, pages 2, and 18, for Class 3 or lower poles in the Connecticut System is 36.4 ft. Any minor variance from prior filings reflects refinements made during a subsequent review of the Connecticut System pole population, which led to adjustments in the population analysis and corresponding average height calculations.

b. The average height of the 179,054 poles identified in Exhibit CLP-TSP-2, pages 2, and 18, for Class 2 or higher poles in the Connecticut System is 42.01 ft. Any minor variance from prior filings reflects refinements made during a subsequent review of the Connecticut System pole population, which led to adjustments in the population analysis and corresponding average height calculations.

c. The Company first updated its Storm Resiliency Standard in June 2016 to require a minimum 45-foot Class 2 pole for three-phase applications and a minimum 40-foot Class 2 pole for single-phase applications. However, implementation of this standard did not occur until the Company received approval from the Authority pursuant to PURA Docket 17-10-46 “Settlement Agreement”, which was signed on January 11, 2018. Please note that other pole owners in Connecticut are not required to abide by Company’ standard and continue installing class 3 and lower poles.

Date Filed: September 28, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Refer to Exhibit CLP-ADDITIONS-1 pp. 63-64, discussing the Pole Integrity Program. Provide the following information:

a. All documents comprising the Pole Integrity Program;
b. The date that the Pole Integrity Program commenced;
c. The number, height and class of poles that have been replaced under the Pole Integrity Program each year (indicating the number of jointly-owned and the number of solely-owned poles);
d. The number of poles that have been reinforced under the Pole Integrity Program each year, indicating the number of jointly-owned and the number of solely-owned poles.
e. For each year of the Pole Integrity Program, provide the total capital and overhead and maintenance expenditure.
f. For each year of the Pole Integrity Program, provide the capital and overhead and maintenance spent on (i) replacement poles, and (ii) crossarms.
g. Regarding the "new standards to help identify pole replacements," (i) provide all such standards, (ii) describe when the new standards were incorporated by the Company, (iii) explain how the Company decided upon the new standards, and (iv) define the term "reject poles."
h. Explain how the Company has applied pole loading criteria that exceed NESC Grade B construction and whether such standards apply to the pole or to the facilities attached to the pole, or both.
i. List the height, class, location and pole number of all poles installed under the Company's Pole Integrity Program.

Response:

a. The Company has provided to the Authority all documents in regard to its Pole Integrity Program in the following dockets: 12-07-06RE01, 17-10-46, 14-05-06 and 23-01-03

b. The Company received approval of its long-term System Resiliency Program in PURA Docket 12-07-06RE01 in 2015. The Company's Pole Integrity Program commenced in 2015.

c. Please refer to Table 1, which summarizes the number of poles replaced under the Pole Integrity Program by pole class and height. In this context, the term "replaced" denotes the replacement of an existing reject lower-class pole (e.g., Class 3 through Class 7) with a higher-capacity pole, generally Class 2 or above (e.g., Class 1, H1, H2, or H9), consistent with the Company's pole standards and system resiliency objectives.

Table 1. Poles replaced under Pole Integrity 2015-2025

		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Class	1	20	20	11	17	23	35	30	76	406	85	70
	2	621	762	358	387	834	767	508	554	424	301	824
	4	0	0	1	0	0	0	0	0	0	0	0
	H1	0	0	1	0	0	0	0	0	8	0	10
	H2	0	0	1	0	0	0	1	0	2	1	1
	H3	0	0	0	0	0	0	0	0	0	0	1
	H9	0	0	0	0	0	0	0	0	0	0	3
	Total	**641**	**782**	**372**	**404**	**857**	**802**	**539**	**630**	**840**	**387**	**909**
Height	18	0	0	0	4	17	1	0	0	0	0	1
	30	0	5	0	1	0	0	0	0	0	0	0
	35	91	217	57	99	228	187	125	51	92	101	193
	40	425	454	257	208	469	420	330	343	387	200	480
	45	125	102	56	84	138	176	78	223	330	78	215
	50	1	4	1	7	3	16	6	13	23	6	9
	55	0	0	1	0	2	1	0	0	8	2	2
	60	0	0	0	1	0	1	0	0	0	0	2
	65	0	0	0	0	0	0	0	0	0	0	3
	75	0	0	0	0	0	0	0	0	0	0	4
		641	**782**	**372**	404	**857**	**802**	**539**	**630**	**840**	**387**	**909**
	Jointly	559	741	354	328	717	710	461	574	768	344	763
	Solely	82	41	18	76	140	92	78	56	72	43	147
		641	**782**	**372**	**404**	**857**	**802**	**539**	**630**	**840**	**387**	**909**

d. From 2015 through 2020, the Company reinforced 269 custodial wood poles as part of its ongoing Pole Integrity program. In 2021, the Company adopted a revised asset management strategy that shifted its focus from pole reinforcement to proactive pole replacement. This change was driven by the Company’s determination that replacing aging poles with stronger, more resilient class 2 poles provides greater long-term reliability and resilience. As a result, only 1 custodial pole was reinforced in 2021, bringing the total number of reinforced custodial wood poles to 270 during the 2015 to 2021 period.

e. Please refer to NECTA-015, Attachment 1, which provides a summary of the associated Capital and O&M expenditures per year.

f. Please refer to NECTA-015, Attachment 1, subitem (e), which provides a summary of the associated Capital and O&M expenditures. The Company does not separately track or allocate costs between poles and crossarms, as these expenditures are recorded and managed as part of the overall project scope.

The cost to replace a pole involves the replacement of a crossarm as applicable. The Company does not separate the cost in the replacement of poles and crossarms.

g. The Company's updated pole inspection standard was implemented on January 7, 2025. The Company routinely reviews and evaluates its engineering and maintenance standards to ensure that its practices remain aligned with current industry requirements and emerging best practices. As part of this process, Company representatives participate in industry conferences and technical forums sponsored by the American National Standards Institute (ANSI) and engage with peer utilities to gain insight into evolving technical, operational, and material-related issues. Based on these evaluations and industry benchmarking efforts, the Company periodically updates its standards and procedures to incorporate the best applicable practices and enhance system reliability and asset management. The Company's current pole replacement standard is provided in NECTA-015, Attachment 2. Please refer to Section. 4 for the definition of a normal reject pole.

h. Grade B construction is applied in locations where a pole failure could present an elevated risk to public safety, critical infrastructure, or service reliability. Grade B construction is applicable to Pole class size and guying requirements. When determining the appropriate pole class, the Company evaluates several factors, including the number and type of attachments supported by the pole. The Company's Grade B construction standards meet or exceed the requirements of the National Electrical Safety Code (NESC) and are typically applied at highway and railroad crossings, where enhanced structural performance is warranted. For all other applications, the Company's standard construction practice is generally based on NESC Grade C requirements.

i. Please refer to NECTA-015, Attachment 3 for the list of poles replaced under the pole integrity program. In this context, the term "replaced" denotes the replacement of an existing lower-class pole (e.g., Class 3 through Class 7) with a higher-capacity pole, generally Class 2 or above (e.g., Class 2, Class 1, H1, H2, …), consistent with the Company's pole standards and system resiliency objectives.

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Refer to Exhibit CLP-ADDITIONS-1 at p. 64 ("Replacements are based on annual inspections"). Provide the following:

a. Describe the Company's annual inspection process, including the number of poles inspected each year, the data collected during the inspection, the criteria used to determine the integrity of the pole, who performs the inspections, and how the information collected during the inspections is used.
b. Provide all data collected during the most recent annual inspection.

Response:

a. The Company performs its routine and annual pole inspection to its custodial wooden poles following a 15-year inspection cycle which ended in 2025. This cycle ensured that every custodial pole across 157 towns in Connecticut was inspected at least once within the time frame. Approximately 29,000 to 32,000 poles were inspected using the 15-year cycle.

   In 2025, the Company reviewed its wood-pole inspection standards and decided to shorten the inspection cycle from 15 years to 10 years. By adopting a more frequent inspection schedule, the Company aims to evaluate each custodial pole every 10 years, allowing issues to be identified earlier and addressing them more proactively. Under the revised 10-year cycle, approximately 41,000 to 42,500 poles will be inspected starting in 2026 and moving forward.

   The inspection process is based on the age of the pole. A visual inspection is completed for poles with less than 20 years of service. For poles with more than 20 years in service the inspection will include a visual, sound and bore, resistograph testing also known as IML testing, and the application of preservatives "treatment" required to maintain the structural integrity of the pole, and ensure continuous serviceability until the subsequent inspection interval.

   The number of poles replaced each year due to age, structural deterioration, damage, or end-of-life conditions varies based on the number of rejected poles identified through the annual pole inspection program. Poles classified as "Rejects" cannot remain in service

because their remaining strength has fallen below 67% of their original strength or because they exhibit structural or mechanical damage that compromises safe operation. These poles are scheduled for replacement within one year of identification.

Poles classified as "Priority Rejects" represent the most critical conditions and cannot remain in service because their remaining strength has fallen below 25% of their original strength and/or they exhibit severe structural or mechanical deterioration that presents an immediate public safety risk and reliability. Priority Reject poles are made safe within 48 hours of identification and are replaced as soon as practicable.

Poles classified as "Leaning" are poles that are susceptible to failure and may pose risks to public safety and electric system reliability. Leaning poles occur when soil disturbances, loading from pole attachments, or other external forces alter the pole's original alignment. These conditions are commonly caused by soil saturation and moisture accumulation, excessive structural loading, vehicle impacts, severe weather, or storm-related damage. Depending on the severity of the condition, findings from the pole inspection process are communicated to the Company on a daily, weekly, or immediate basis to ensure appropriate corrective actions are taken.

Currently, GeoForce Utility Technologies is the contractor responsible for performing all pole inspections throughout Connecticut during the 2024-2026 period. The selection of pole inspection contractors follows a competitive bidding process, with the successful bidder typically awarded a three-year inspection cycle contract.

b. Please refer to NECTA-009[i] for the data collected during the most recent pole inspection.

Prior Referenced Response:

[i] NECTA-009 Question:

(Pole Data) Regarding the last field inventory of Company distribution poles conducted by or on behalf of the Company, provide a complete copy of the results of the field inventory, including:

a. The date the field inventory was conducted;
b. The universe of poles surveyed;
c. The percentage of total poles;
d. The type of information collected about each pole;
e. The height of each surveyed pole;
f. The average height of all surveyed poles;
g. Age of each pole;
h. The number of attachments, other than Eversource facilities, on each pole.

NECTA-009 Response:

The Company is providing a copy of the results of its 2025 pole inspection program. The field inventory includes inspection results for approximately 32,894 custodial poles located across 9 of Connecticut's 157 towns, based on a 15-year inspection cycle. Effectively in 2026, the Company transitioned to a 10-year inspection cycle to evaluate each pole every 10 years, allowing issues to be identified earlier and addressing them more proactively. The Company expects to evaluate 40,000 to 42,000 poles, or 10% of its custodial wooden pole population.

a. Please refer to NECTA-009, Attachment 1, tab named "Results", showing the dates that the inventory was conducted. Usually, the Pole inspection process starts in mid-April and ends towards the end of October.

b. In 2025, the Company inspected 32,894 custodial poles

c. In 2025, the Company inspected 7.8% of the Company's wooden pole population based on a 15 year-inspection cycle.

d. Please refer to NECTA-009, Attachment 1, tab named "results" showing all the information collected from each pole inspected in 2025.

e. Please refer to NECTA-009, Attachment 2, for the height and age of each pole inspected in 2025. The height is shown in column "u", and the age of each pole is shown in column "T "of each town where custodial poles were inspected.

f. Please refer to NECTA-009, Attachment 2, tab "2025 Pole Inspection General Information", showing the average height for all custodial poles inspected in 2025. The average height is 37.7 ft.

g. Please refer to subpart (e), above.

h. Please refer to NECTA-008, Attachment 1, for the number of attachments on each custodial pole. NECTA-008 Attachment 1 will be provided on September 30, 2026, due to an extension being requested. The Company does not collect attachment information during the pole inspection process.

Date Filed: September 28, 2026

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

Question:

(Pole Management & SPA) Refer to Exhibit CLP-ADDITIONS-1 at p. 64, discussing the Right of Way Program. Provide the following:

a. All documents comprising the Right of Way Program.
b. The date that the Right of Way Program commenced.
c. The number, height and class of poles that have been replaced under the Right of Way Program each year (indicating the number of jointly-owned and the number of solely-owned poles).
d. For each year of the Right of Way Program, provide the total capital and overhead and maintenance expenditures.
e. For each year of the Right of Way Program, provide the capital and overhead and maintenance spent on (i) replacement poles, and (ii) crossarms.
f. List the height, class, location and pole number of all poles installed under the Company's Right of Way Program.

Response:

a. The Company has provided the Authority with all documents regarding its Right of Way (ROW) Program in the following Dockets: 17-10-46, 14-05-06, and 23-01-03

b. The Company received approval of its extended System Resiliency Plan including its ROW program in Docket 17-10-46 in 2017.

c. Please refer to Table 1, for the number of poles that have been installed under the Right of Way Program

TABLE 1. Poles replaced under the ROW Program

		2017	2018	2019	2020	2021	2022	2023	2024	2025
Class	1	27	2			89	257	285	251	44
	2	36		11		169	90	24	7	2
	4									
	H1	5				3	23	9	12	7
	H2	3	4					10		
	H3					7	1		3	
	H9		2			3	1			

		2017	2018	2019	2020	2021	2022	2023	2024	2025
Height ft.	18			1		8	2			
	30									
	35	5		1		7	10	1	3	1
	40	10		2		64	84	48	19	1
	45	40	2	5		138	136	169	147	18
	50	14		1		38	118	91	93	27
	55	1		1		5	12	19	3	4
	60	1	1			2	9		5	2
	65		3			5			1	
	70					2			2	
	75		2				1			
	80					2				

		2017	2018	2019	2020	2021	2022	2023	2024	2025
	Jointly	41	1			38	124	39	58	3
	Solely	30	7	11		233	248	289	215	50

d. Please refer to NECTA-017, Attachment 1, for the capital and overhead and maintenance expenditures.

e. The cost to replace a pole involves the replacement of a crossarm. The Company does not separate the cost in the replacement of poles and crossarms.

f. Please refer to NECTA-017, Attachment 2, for the list of poles by height, class and location that were replaced under the ROW program.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Refer to Exhibit CLP-ADDITIONS-1, at pp. 66-67. Provide all methods and procedures documents and process flow diagrams related to the Single Pole Administration′s oversight and management of third party attachments.

Response:

The Company is providing the following documents in response to this request:

- NECTA-018, Attachment 1 CONFIDENTIAL: TD-038, Revision 3, "Administration of Third-Party Attachments to Eversource CT Poles, effective 03/21/2024

- NECTA-018, Attachment 2: Alden One Third-Party Attachment Workflow Process Diagram

Please refer to NECTA-018, Attachment 1 CONFIDENTIAL, and NECTA-018, Attachment 2. These documents describe the Single Pole Administration′s responsibilities and workflow for processing third-party pole attachment applications, administering applicable attachment agreements, coordinating and tracking make-ready activities, issuing and tracking applicable invoices and payments, maintaining attachment records, monitoring application status, and monitoring compliance with applicable regulatory requirements and timelines.

The Single Pole Administration′s role with respect to field surveys, engineering determinations, and construction activities is limited to administrative coordination, and workflow and status management. The underlying technical review, engineering determinations, and field work are performed by the responsible engineering, operations, contractor or joint pole owner organizations, as applicable.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Refer to Exhibit CLP-ADDITIONS-1 at p. 67.
Identify the PURA directives regarding pole attachments referred to on line 4.

Response:

Exhibit CLP-ADDITIONS-1, at page 67, states, "Consistent with PURA's directives regarding pole attachments, the Company utilizes Alden Systems, a joint use utility pole management platform."

The PURA directives referenced in the testimony are PURA's October 8, 2014, Decision in Docket No. 11-03-07[1], and its November 27, 2019, Decision in Docket No. 11-03-07RE02[2]. The 2014 Decision designated the EDCs as Single Pole Administrators in their respective service territories and established the use of the NOTIFY system, or a comparable common pole management system, for pole attachment licensing, administration, tracking and notifications. The 2019 Decision addressed the continued utilization and standardization of the existing pole attachment management system.

Alden Systems' Alden One platform is the successor to the NOTIFY system and is the platform currently used by the Company to administer and track third-party pole attachment applications and associated make ready activities in accordance with these directives.

[1] https://www.dpuc.state.ct.us/dockhistpost2000.nsf/8e6fc37a54110e3e852576190052b64d/6c03866a8be3eb9b8525829c0076a777?OpenDocument

[2] https://www.dpuc.state.ct.us/dockhistpost2000.nsf/8e6fc37a54110e3e852576190052b64d/ee7714694f9f42c98525868f00623fe3?OpenDocument

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Provide all technical documentation maintained by the Company about the Alden One Software used in the Single Pole Administration process.

Response:

Please refer to the following attachments listed below for the requested documentation:

- NECTA-020, Attachment 1, for Alden One Data Solution Design.
- NECTA-020, Attachment 2, for ETL Analysis Maximo to Alden One to Maximo instructions.
- NECTA-020, Attachment 3 CONFIDENTIAL, Alden One Data Load for CT – Technical Design Document.
- NECTA-020, Attachment 4, GIS ArcFM – Alden One Integration.
- NECTA-020, Attachment 5, Maximo to Alden One Interface Anlaysis.
- NECTA-020, Attachment 6, Key Design Decision MX Alden One MD Pole Work Details, Pole Work Status Updates 2/20/2023.

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Provide all technical documentation maintained by the Company about the PoleForman Software used in the Single Pole Administration process.

Response:

Please refer to NECTA-021, Attachment 1 CONFIDENTIAL, for the document Eversource uses for PoleForeman **DSEM 06.715 - PoleForeman Guidelines**. This document provides applications details of when to use the PoleForeman line design program as well as pre-run scenarios of common pole top construction types. The formal training of how to use the software comes directly from the company who created Poleforeman, ikeGPS.

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Provide all technical documentation maintained by the Company about the IML tool (Resistograph) used in the Pole Integrity Program.

Response:

There are two documents that the Company maintains related to the IML tool.

The first is the work method document. Please refer to NECTA-022, Attachment 1 CONFIDENTIAL, WMS 08.14 - Wood Pole Inspection Using the IML Inspection Drill, which details the drill setup, operation, testing methods, maintenance, and exporting of the data from the tool.

The second document, NECTA-022, Attachment 2 CONFIDENTIAL, WMS 08.15 - Distribution Wood Pole Inspection, Testing, and Restoration Requirements, makes reference to the IML tester in a couple sections, but this work method document outlines the full testing process of our distribution wood poles. More specifically, it covers the steps to test, inspect, and treat and/or replace, Eversource owned and jointly owned wood poles on public or private property.

Date Filed: September 28, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Identify all electronic databases used by the Company to track or monitor its fixed network assets, and provide a detailed description of the information pertaining to bare poles and appurtenances accessible and/or potentially retrievable from these databases.

Response:

The primary electronic database used by the Company to track and monitor our fixed network assets is our GIS system, ESRI 10.8.1 (ArcGIS). Please refer to NECTA-023, Attachment 1, for a list of pole attributes that could be retrieved, if available, from our GIS system.

AldenOne is the primary database for the third-party attachment process. AldenOne is updated based on the information from the GIS system.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) From January 2021 to the current date, identify and produce copies of agreements governing Eversource joint-ownership of poles. A complete response will (i) identify the specific language in such pole agreements that pertains to: Eversource's ownership interests in the pole, including but not limited to the specific percentage parity relationship between the Company and any other pole owner, (ii) identify the reimbursement amount between owners for installing poles, (iii) identify the areas where Eversource manages and maintains jointly owned poles and where the joint owner(s) manage and maintain jointly owned poles, and (iv) identify how Eversource and joint owner(s) reimburse each other for pole management and maintenance and the reimbursement amounts.

Response:

The Company did not enter into any new joint-ownership agreements between January 2021 and the current date. Please refer to NECTA-024, Attachment 1, for the Joint Line Agreement between CL&P and The Southern New England Telephone Company, which is owned and controlled by Verizon, and NECTA-024, Attachment 2, for the Agreement between CL&P and Verizon, which is the successor to The New York Telephone Company. These agreements have been previously submitted in Docket No. 14-05-06.

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Describe and produce all instructions, guidelines or policies related to pole setting depth.

Response:

The following documents provide instructions and guidelines related to pole setting depth:

- NECTA-025, Attachment 1 - DTR 05.041 – Wood Pole Setting
- NECTA-025, Attachment 2 CONFIDENTIAL - DTR 05.316 - Pole Selection Guide

Eversource sets distribution wood poles in accordance with ANSI O5.1 recommended setting depths, generally following the guideline of approximately 10% of pole length plus 2 feet. Where design conditions warrant additional embedment, the Eversource's Design Engineering teams will specify the required setting depth within the construction design.

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:

(Pole Management & SPA) Provide the total pole application and pole survey fees paid by third party attachers each year for the past five years.

Response:

Please refer to the Company's response to OCC-163[i] for total pole application and survey fees for each year 2021 through 2025.

Prior References Response:

[i] OCC-163 Question:

(Poles) In its role as Single Pole Administrator:

a. Please provide data explaining whether and how much pole attachment fees collected offset the cost of pole management, by year, in 2021, 2022, 2023, 2024, and 2025.

b. Please also specify how much cost of pole management was not offset by attachment fees for each of those years, and why the whole cost was not fully offset, as applicable.

OCC-163 Response:

a.

	2021	**2022**	**2023**	**2024**	**2025**
Annual SPA Costs	$ 4,413,900	$ 5,495,014	$ 7,835,668	$ 7,765,348	$ 5,573,314
Annual SPA Survey and application fees	$(1,357,377)	$(4,794,254)	$(5,215,802)	$(6,810,455)	$(1,337,125)
Total Net SPA Costs	**$ 3,056,523**	**$ 700,760**	**$ 2,619,866**	**$ 954,893**	**$ 4,236,189**

b. As PURA has previously stated, application and survey fees are not designed to offset all SPA costs. See Docket No. 19-01-52RE01, May 11, 2022, Final Decision ("Docket No. 19-01-52RE01 Decision") at 34. PURA last increased pole owner survey fees in the Docket No. 19-01-52RE01 Decision. See id. at 38 (PURA "reviewed the record evidence and will direct the pole owners to increase the per pole survey fee from $50 to $125."). PURA declined to increase the application fee at that time. See id. PURA set the new $125 survey fee amount based on data provided by The United Illuminating Company ("UI"). See id. The record evidence in Docket No. 19-01-52RE01

demonstrates that this increased survey fee amount was not enough to offset Eversource's SPA costs. See id. at 36, Table 11. Eversource and UI jointly filed a motion to re-open Docket No. 19-01-52RE01 to reevaluate, among other things, survey fees. See Docket No. 19-01-52RE01, Motion No. 044, at 2 (Apr. 22, 2026).

Date Filed: September 23, 2026

Witness: David L. Gladey, Steven Lamontagne and Marisa B. Paruta
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Describe with specificity the company's process or procedure, and timing for entering information concerning pole height, class, and cost for each purchased pole into the company's records. A complete response will (a) identify each type of company record containing information on pole height(s), and (b) provide any records or database reflecting a breakdown of pole heights in 5-foot increments.

Response:

(a) The Company maintains its information on pole heights in the CPR (Continuing Property Records). Please refer to the response in NECTA-075[i], for the process, procedure and timing for entering asset information into the company's records.

(b) Please refer to NECTA-059, Attachment 1, for the company's CPR records of FERC Account 364, Poles, Towers, and Equipment, reflecting a breakdown of pole heights based on the unit of property.

Prior Referenced Response:

[i] NECTA-075 Question:

(FERC Accounts) Select a 2025 Work Order and provide a discussion and timeline for the assignment of costs to the different FERC accounts beginning with the opening of the Work Order and the initial incurrence of costs to the closing of the Work Order. As part of this response, please indicate whether all costs are held in Account 365 until the Work Order is closed, or are costs assigned based on when proper account designation is determined.

NECTA-075 Response:

Work order 80364832 was initiated in July 2025 for the replacement of a recloser and recloser control. The Operations department wrote this new work order in the Company's work management system, ensuring the correct work order type was established based on the type of work being performed. The estimates were then entered for the work order by selecting the Compatible Units (assets) planned to be installed and removed, which created the FERC Split. The combination of the Work Order Type and FERC Split chosen for work order 80364832 determined the correct Utility Accounts were utilized and ensured the appropriate allocation of charges between FERC accounts 107010 (Construction Work in Progress) and 108030 (Cost of Removal). The work order was set to "open" status in July 2025, work began, and capital expenditures were charged to FERC accounts 107010 and 108030. While in FERC

account 107, the capital expenditures are appropriately not disseminated at the Utility Account (365 - Overhead Conductors and Devices) level in the Company's plant asset records.

When the installed assets were deemed "used and useful" later in July 2025, the Operations department moved the work order to "in-service" status and the capital expenditures in FERC account 107 were moved to FERC account 106 (Completed Construction not Classified), while the charges in FERC account 108030 remained unchanged. At that time, the assets placed in service began to depreciate in their assigned Utility Account (365), while the Operations department continued to work on finalizing all costs to the work order. In December 2025, after all invoices were received, drawings were finalized, the pre-requisites/tasks in the work management system were completed, final costs appropriately flow through the FERC Split, the work order was closed/posted to the CPR (Continuing Property Records). Once this work order was closed, the final costs of the asset in FERC account 106 were moved to FERC account 101010 (Plant in Service) and unitized/posted to the CPR with their specific retirement units in Utility Account 365 based on final costs. The final cost of removal in FERC account 108030 was then moved to FERC account 108010 (Accumulated Provision for Depreciation).

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Reference Exhibit CLP-TSP-1, pp. 57-58. Provide a copy of Eversource's updated construction pole standards. A complete response will identify all updates made in 2025, and explain how those updates better align with industry standards.

Response:

The referenced update is incorporated in the Eversource Maintenance Plan document, provided at NECTA-028, Attachment 1 CONFIDENTIAL, EMP 5.61- Distribution and Sub-Transmission Wood Poles. Section 4 within this document reflects the change of moving the frequency of inspection intervals from 15 years to 10 years. This particular EMP makes reference to NECTA-028, Attachment 2 CONFIDENTIAL, WMS 08.15 - Distribution Wood Pole Inspection, Testing, and Restoration Requirements, which also was revised in the 2025 updates to reflect the new inspection and testing requirements. WMS 08.15 details the full testing process of our distribution wood poles (refer to the Company's response to NECTA-022[i]).

Eversource has reviewed its practices across all of its operating regions with respect to pole testing frequency along with industry feedback through various user groups and determined a standard 10-year pole inspection frequency provides a more proactive assessment of a poles structural condition versus 15 years to minimize catastrophic pole failures that could impact public safety. Therefore, in 2025, the decision to decrease the wood pole inspection frequency for distribution operations from 15 years to 10 years was implemented. The new testing methodology has also demonstrated an increased inspection failure rate of wood poles as the Company is now able to see the location of the pole decay and actual remaining strength to meet NESC code requirements. The shorter inspection cycle provides more timely information on changes in pole condition, allowing deteriorated or structurally compromised poles to be identified and addressed earlier to address risk of a public or system safety concern.

Eversource updated its testing methodology to using a data driven quantifiable testing methodology by moving to industry technology that adopts a resistive measurement through an IML Resi-Drill in place of non-quantifiable traditional sounding and boring methods because it provides a data driven versus human objective assessment of internal wood deterioration and can identify conditions that may not be apparent through visual inspection or sounding alone. Together, the more frequent inspection cycle and improved testing technology represent a more proactive, data-informed approach to pole management and are consistent with the electric utility

industry's movement toward enhanced asset inspection, diagnostic testing, and risk-based asset management.

Prior Referenced Response:

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[i] NECTA-022 Question:

(Pole Management & SPA) Provide all technical documentation maintained by the Company about the IML tool (Resistograph) used in the Pole Integrity Program.

NECTA-022 Response:

There are two documents that the Company maintains related to the IML tool:

The first is the work method document. Please refer to NECTA-022, Attachment 1 CONFIDENTIAL, WMS 08.14 - Wood Pole Inspection Using the IML Inspection Drill, which details the drill setup, operation, testing methods, maintenance, and exporting of the data from the tool.

The second document, NECTA-022, Attachment 2 CONFIDENTIAL, WMS 08.15 - Distribution Wood Pole Inspection, Testing, and Restoration Requirements, makes reference to the IML tester in a couple sections, but this work method document outlines the full testing process of our distribution wood poles. More specifically, it covers the steps to test, inspect, and treat and/or replace, Eversource owned and jointly owned wood poles on public or private property.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Each year for the past five years, provide the number of poles installed by the Company and the corresponding total investment amount broken down by those installed (i) at the initiation of Eversource for its own network purposes, (ii) to replace deteriorated or structurally unsound poles, (iii) in response to storm or environmental damage, and (iv) in response to third-party pole attachment applications.

Response:

The Company does not track pole plant investments and units in the categories called out in this question in the Company's plant accounting Continuing Property Records (CPR). To be responsive to this question, the Company took the total unitized pole plant additions and associated pole counts for each year from the Company's CPR and prepared the table below.

	(i). Own Network Purposes		(ii). Replace Deteriorated Poles		(iii). Storm Support		(iv). Third-Party Attachments		Total Investment ($ millions)
Year	Poles	Investment ($)	Poles	Investment ($)	Poles	Investment ($)	Poles	Investment ($)	
2021	7170	N/A	535	N/A	813	N/A	671	N/A	$ 26.9
2022	11472	N/A	638	N/A	364	N/A	417	N/A	$ 34.4
2023	9566	N/A	867	N/A	330	N/A	380	N/A	$ 43.4
2024	4619	N/A	388	N/A	320	N/A	237	N/A	$ 20.4
2025	12457	N/A	895	N/A	292	N/A	228	N/A	$ 48.4

Parts (ii), (iii) and (iv) align with our internal tracking based on pole units completed in the Company's Work Management System. Part (i) reflects the total pole counts from CPR less the internal tracking of (ii), (iii) and (iv) to calculate the pole counts in part (i).

The value of the total unitized plant additions are captured in the total investment column, in millions of dollars, which reflects the total value of the unitized pole plant additions to FERC Account 101010 (Plant in Service) for each year and encompasses all poles installed across these four categories.

Date Filed: September 24, 2026

Witness: David L. Gladey, Jeffrey Richard, Brendan J. O'Brien and Garrett J. Murray
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Provide a full breakdown of all costs associated with Eversource's status as a single pole administrator, including the date(s) the costs were incurred, and all workpapers. Is the Company seeking recovery of these costs in Docket No. 26-05-10? If so, identify the relevant schedules/work papers.

Response:

Pursuant to Order No. 10 in Docket 11-03-07, the Company is required to file its annual Single Pole Administration (SPA) costs with PURA on an annual basis. Specifically, Order No. 10 requires the SPA to report its annual SPA costs and any annual SPA costs proposed to be recovered in a future rate case.

The Company's most recent filing submitted March 31, 2026, reports SPA costs incurred during calendar year 2025. The filing identifies the total net annual SPA costs of $4,236,189 and includes a breakdown of those costs by category, including contractor labor, software, internal labor, overhead, reimbursables, and other costs. Please refer to NECTA-034, Attachment 10.

The annual SPA O&M costs are recovered in the Company's Exhibit CLP-REVREQ-2, Schedule C-3.16, with the exception of internal labor costs which is recovered in Schedule C-3.5 of Exhibit CLP-REVREQ-2.

Date Filed: September 24, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Identify annual AldenOne related costs for each year from 2017 through 2025 and provide supporting documentation, including journal entries and invoices.

Response:

Please refer to NECTA-031, Attachment 1, for a summary of the Alden One expenses for 2017-2025. Please refer to NECTA-031, Attachment 2 CONFIDENTIAL, for supporting invoices and journal entries.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Provide annual expenses paid to Alden Systems (as is described at p.67 of Exhibit CLP-ADDITIONS-1) for each year from 2017 through 2025 and provide supporting documentation, including journal entries and invoices. Please also describe where such expenses are booked and from which rates they are recovered.

Response:

Please refer to the Company's response to NECTA-031[i] for the annual expenses paid to Alden Systems from 2017-2025, along with the journal entries and invoices. These expenses are recorded to FERC 580000.

These expenses were included in the Company's revenue requirement filed in the Company's last rate case in Docket No. 17-10-46 and were allocated to all distribution rates in the allocated Cost-of-Service study using the distribution operation labor allocator LABOR_O.

Since these expenses are not found in any of the FERC accounts that are used to calculate the annual pole attachment rental rate, NECTA's members are not paying towards covering these expenses. Therefore, pole attachers are being subsidized by electric distribution rate payers.

Prior Referenced Response:

[i] NECTA-031 Question:

(Pole Management & SPA) Identify annual AldenOne related costs for each year from 2017 through 2025 and provide supporting documentation, including journal entries and invoices.

NECTA-031 Response:

Please refer to NECTA-031, Attachment 1, for a summary of the Alden One expenses for 2017-2025. Please refer to NECTA-031, Attachment 2, for supporting invoices and journal entries.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:
(Pole Management & SPA) Please identify the number of applications driving AldenOne costs for each year from 2017-2025 and identify the proportion of those applications that are related to telecommunications carriers, cable providers, state agencies, municipalities and other entities.

Response:

For each year from 2017 through 2026, the Company's Alden One costs were not calculated or determined based on the number of pole attachment applications processed through the platform or the type of entity submitting an application. Rather, the Company's Alden One pricing was based on the number of poles managed within its Connecticut service territory.

Accordingly, the number of applications processed during those years did not drive the Company's Alden One costs, and the requested proportions attributable to telecommunications carriers, cable providers, state agencies, municipalities, and other entities are not applicable. Although applications submitted by these entities are processed through Alden One, neither the volume nor the applicant category composition of those applications affects the Company's Alden One charges.

Date Filed: September 24, 2026

Witness: David L. Gladey, Jeffrey Richard, Brendan J. O'Brien and Garrett J. Murray
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Provide annual expenses paid to the Single Pole Administration ("SPA") organization for purposes of joint use utility pole management (as is described at p.66 of Exhibit CLP-ADDITIONS-1) for each year from 2017 through 2025 and provide supporting documentation, including journal entries and invoices. Please also describe where such expenses are booked and from which rates they are recovered.

Response:

Single Pole Administration (SPA) is an internal Company organization and is not a separate entity to which the Company makes payments. The Company understands this request as seeking the annual costs incurred by the Company to perform its designated SPA functions described at p.66 of Exhibit CLP-ADDITIONS-1.

Pursuant to Order No. 10 in Docket No. 11-03-07, the Company reports its annual SPA costs to PURA. The annual SPA costs incurred from 2017 through 2025 are summarized in NECTA-034, Attachment 1 – Docket 11-03-07 Filing Summary and are supported by copies of the Annual Filings in NECTA-034, Attachment 2 through NECTA-034, Attachment 10.

The annual SPA cost schedules separately identify the applicable operation and maintenance (O&M) and capital cost components, including contractor labor, survey and design costs, SPA services, software costs, internal labor, overhead costs and other applicable costs. The schedules also identify reimbursements (application and survey fees) collected, which are reflected as offsets in determining the applicable net annual SPA costs. Accordingly, such reimbursements are not expenses paid to SPA, rather, they reduce the costs attributable to the administration of the SPA function.

Refer to the Company's response to NECTA-030[i] for where the costs are reflected in the cost of service.

Prior Referenced Response:

[i] NECTA-030 Question:

(Pole Management & SPA) Provide a full breakdown of all costs associated with Eversource's status as a single pole administrator, including the date(s) the costs were incurred, and all workpapers. Is the Company seeking recovery of these costs in Docket No. 26-05-10? If so, identify the relevant schedules/work papers.

NECTA-030 Response:

Pursuant to Order No. 10 in Docket 11-03-07, the Company is required to file its annual Single Pole Administration (SPA) costs with PURA on an annual basis. Specifically, Order No. 10 requires the SPA to report its annual SPA costs and any annual SPA costs proposed to be recovered in a future rate case.

The Company's most recent filing submitted March 31, 2026, reports SPA costs incurred during calendar year 2025. The filing identifies the total net annual SPA costs of $4,236,189 and includes a breakdown of those costs by category, including contractor labor, software, internal labor, overhead, reimbursables, and other costs. Please refer to NECTA-030 Attachment 1.

The annual SPA O&M costs are recovered in the Company's Exhibit CLP-REVREQ-2, Schedule C-3.16, with the exception of internal labor costs which is recovered in Schedule C-3.5 of Exhibit CLP-REVREQ-2.

Date Filed: September 23, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray and Timothy J. Griffin
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Please confirm that Regulatory Assets appear as entries in the FERC Form 1 for accounting purposes regardless of whether they have been approved for inclusion in rates.

Response:

Regulatory deferred debits for Pole Make Ready costs are included on FERC Form 1 page 233 Miscellaneous Deferred Debits, Exhibit CLP-REVREQ-2, Schedule H-1.0 page 72, line 14.

The December 31, 2025, balance reported on FERC Form 1 page 233 Miscellaneous Deferred Debits, Exhibit CLP-REVREQ-2, Schedule H-1.0 page 72, line 14 of $15,484,268 is different than the balance included for recovery and shown on Exhibit CLP-REVREQ-2, Schedule B-6.2 Deferred Assets line 16 column B of $16,581,000. The change in deferral balance is primarily driven by the inadvertent inclusion of billable work orders prior to calendar year 2026 that were adjusted out of the Test Year balance in preparation of Schedule B-6.2.

Date Filed: September 24, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray and Timothy J. Griffin
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Reference Exhibit CL&P REVREQ-2, Schedule B 6.2 (Deferred Assets), please indicate where the balances at 12/31/2025 for each of the deferred assets on lines 15 – 25 appear in the FERC Form 1 for 2025.

Response:

Please refer to NECTA-036, Attachment 1, for additional information regarding where each deferred asset included within Exhibit CL&P REVREQ-2, Schedule B 6.2 is presented within the FERC Form 1 for 2025.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Select one solely-owned pole for which the Company recently received a pole attachment application that required Make Ready Work. Provide the following information: (i) all information retained within Alden One related to the attachment request, (ii) application, (iii) proof of payment of the application and pole survey fees, (iv) completeness and compliance checks performed by the Company and its third party contractors, (v) field study results (vi) measures needed to accommodate the attachment, (vii) PoleForeman output, (viii) the Make Ready solution, (ix) make ready work estimate, (x) estimate acceptance and proof of payment, (xi) details related to work completion and close-out.

Response:

For purposes of this response, the Company selected Pole Attachment Application No. 1958946. This application was submitted by Comcast, concerning a proposed attachment to eight (8) solely owned poles located in Bristol, CT, which required make ready work.

(i) All information retained within Alden One related to the attachment request:
- Applicant: Comcast
- Application No. 1958946 (Parent Conversation)
- Power Survey conversation No. 1987334 (Child conversation)
- Make Ready conversation pole #12530 No. 2035688
- Make Ready conversation pole #12529 No. 2035689
- Make Ready conversation pole #12532 No. 2035690
- Town: Bristol
- Number of poles included in the application: 8
- Application documentation submitted with the application
  - Strand map (Please refer to NECTA-037, Attachment 1)
  - Tension and loading file (Please refer to NECTA-037, Attachment 2)
  - Please refer to NECTA-037, Attachment 3 Structure Access Request
  - Please refer to NECTA-037, Attachment 4– Pole Data Sheet – Connecticut

(ii) Application:
- Alden One Application Number: 1958946.

Applications are submitted electronically through Alden One.

(iii) Proof of payment of the application and pole survey fees:
The Company records indicate that the payment associated with the application and pole survey fees was received from Comcast on February 2, 2026.

- Check number: 9000002822
- Amount $1,150.00
    - Application Fee: $150.00
    - Survey and engineering fee: $1,000.00

(iv) Completeness and compliance checks performed by the Company and its third-party contractors:
The initial application is reviewed by SPA for completeness. Upon vendor work order preparation and submission, Distribution Engineering performs a design review prior to approval. Upon work order approval, SPA reviews the application for invoicing and construction readiness.

(v) Field study results:
Please refer to NECTA-037, Attachment 5, 1958946 Field Results.pdf

(vi) Measures needed to accommodate the attachment:
Please refer to NECTA-037, Attachment 6, 1958946 Power Make Ready .pdf

(vii) PoleForeman output:
Please refer to NECTA-037, Attachment 7, 1958946 PoleForeman Output.pdf

(viii) Make Ready solution:
Please refer to NECTA-037, Attachment 6, 1958946 Power Make Ready .pdf

(ix) Make ready work estimate:
Engineering review of application 1958946 determined that Make Ready work was required on three (3) of the eight (8) poles included in the application. The Company developed a Make Ready estimate for the work required and provided the estimate to Comcast for review, acceptance and payment. Please refer to NECTA-037, Attachment 8, for the Make Ready Estimate invoice and NECTA-037, Attachment 6, for the Make Ready work details.

(x) Estimate acceptance and proof of payment:
Pursuant to the Pole Attachment Agreement, the attacher is required to pay the Make Ready estimate and is afforded a specified period to dispute the estimate. If the attacher submits payment and does not dispute the estimate within the applicable timeframe, the

Company treats the payment as acceptance of the estimate. Upon receipt, the payment is applied to the associated work order and through an interface, the Alden One conversation is updated and allows the project to proceed to the construction phase.

(xi) Details related to work completion and close-out:
Work was completed on 7/1/26 and is currently in the close-out process.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Select one jointly-owned pole for which the Company recently received a pole attachment application that required Make Ready Work. Provide the following information: (i) all information retained within Alden One related to the attachment request, (ii) application, (iii) proof of payment of the application and pole survey fees by the attacher, (iv) proof of remittance of fees to joint owner by the Company, (v) completeness and compliance checks performed by the Company and its third party contractors, (vi) field study results, (vii) information related to joint owner's evaluation of the communications space, (viii) measures needed to accommodate the attachment, (ix) PoleForeman output,(x) information related to coordination with the joint pole owner in developing the make ready solution, (xi) the Make Ready solution, (xii) make ready work estimate, (xiii) estimate acceptance and proof of payment to both pole owners, (xiv) details related to work completion and close-out.

Response:

For purposes of this response, the Company selected Pole Attachment Application No. 1906851. This application was submitted by New Cingular Wireless, concerning a proposed attachment to one (1) jointly owned pole located in Danbury, CT, which required make ready work.

(i) All information retained within Alden One related to the attachment request:
- Applicant: New Cingular Wireless
- Application No. 1906851 (Parent Conversation)
- Power Survey conversation No. 1923366 (Child Conversation)
- Make Ready conversation pole #869 No. 2028565
- Town: Danbury
- Number of poles included in the application: 1
- Application documentation submitted with the application:
  - Elevation & Key Plan, and Equipment Details (Please refer to NECTA-038, Attachment 1)
  - Please refer to NECTA-038, Attachment 2, Structure Access Request
  - Please refer to NECTA-038, Attachment 3 – Pole Data Sheet – Connecticut

(ii) Application:
- Alden One Application Number: 1906851

Applications are submitted electronically through Alden One.

(iii) Proof of payment of the application and pole survey fees by the attacher:
The Company records indicate that the payment associated with the application and pole survey fees was received from New Cingular Wireless on August 20, 2025.

- Check number: 0023
- Amount: $600.00
    - Application Fee: $150.00
    - Survey and Engineering fee: $50.00
    - Frontier application, survey and engineering fee: $400.00

(iv) Proof of remittance of fees to joint owner by the Company:
The Company records indicate that the $400 fee collected on behalf of Frontier from New Cingular Wireless was remitted to Frontier on October 13, 2025, as part of the Company's monthly consolidated remittance.

- Check number: 82051
- Total check amount: $76,075.00
- Amount remitted for this application: $400.00
- Payment clearing date: 10/15/25
- Bank reference number: 051000015711531

(v) Completeness and compliance checks performed by the Company and its third party contractors:
The initial application is reviewed by SPA for completeness. Upon vendor work order preparation and submission, Distribution Engineering performs a design review prior to approval. Once an approved work order has been prepared SPA reviews the application for invoicing and construction readiness.

(vi) Field study results:
Please refer to NECTA-038, Attachment 4, 1906851 Field Result

(vii) Information related to joint owner's evaluation of the communications space:
The joint owner advised that there was insufficient space to accommodate the attachment under existing conditions.

(viii) Measures needed to accommodate the attachment:
Replace 40' pole with 45' pole.

(ix) PoleForeman output:
Please refer to NECTA-038, Attachment 5, PoleForeman Pole 869

(x) Information related to coordination with the joint pole owner in developing the make ready solution:
Please refer to NECTA-038, Attachment 6, Final 1906851 ES FTR MR Notes (Concurrence)

(xi) The Make Ready solution:
Replace 40' pole with 45' pole.

(xii) Make ready work estimate:

Engineering review of application 1906851 determined that Make Ready work was required on (1) pole included in the application. The Company developed a make ready estimate for the required work and provided the estimate to New Cingular Wireless for review, acceptance, and payment. Please refer to NECTA-038, Attachment 7, for the Make Ready Estimate invoice and please refer to NECTA-038, Attachment 8, for the Make Ready work details.

(xiii) Estimate acceptance and proof of payment to both pole owners:
Pursuant to the Pole Attachment Agreement, the attacher is required to pay the Make Ready estimate and is afforded a specified period to dispute the estimate. If the attacher submits payment and does not dispute the estimate within the applicable timeframe, the Company treats the payment as acceptance of the estimate. Upon receipt, the payment is applied to the associated work order and through an interface, the Alden One conversation is updated.

Because the pole is jointly owned, Frontier separately administers make ready work attributable to Frontier. Eversource does not receive Frontier's make ready payment or maintain Frontier's underlying payment records. When Frontier records receipt of its payment in Alden One, the Frontier payment requirement is reflected as satisfied. However, for this specific application, Frontier's Make Ready work was non-billable.

The attacher was required to pay only Eversource's make ready estimate because Frontier classified its make ready work as non-billable. Once Eversource's payment was received, the project was eligible to advance to the construction phase. Accordingly, proof of payment to Frontier is not applicable.

(xiv) Details related to work completion and close-out:
Work was completed on 7/6/26 and is currently in the close-out process.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-1 at p. 69. Provide all Company documentation, manuals, training materials, policy documents, methods and procedures, or similar documentation used to determine whether make ready work is billable or non-billable.

Response:

The SPA Make Ready Billable Matrix is the document used by the Company to determine whether make ready work associated with third party attachments is classified as billable or non-billable. The matrix reflects the criteria and decision-making framework applied in making such determinations. The matrix was previously provided as RRU-002, Attachment 1.

Following a reasonable inquiry, the Company is not aware of any additional manuals, training materials, policy documents, methods, procedures, or similar documentation specifically addressing or governing billable versus non-billable make ready determinations.

To the extent that Company personnel consult engineering standards, survey requirements, construction specifications, safety requirements, or NESC standards in evaluating field conditions, such documents provide general engineering and compliance guidance and do not independently establish whether make ready work is billable or non-billable. The Company's billable/non-billable determinations are governed by the attached matrix.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-1 at pp. 67-71. Describe the following:

a. At what point in the Single Pole Administration process is the attacher informed that make ready work is required or not?
b. At what point in the Single Pole Administration process is the attacher informed that make ready work is billable or non-billable?
c. When informed that make ready work is billable, does an attacher have an opportunity to challenge the billable determination and, if so, how?

Response:

a. The attacher is informed that make ready work is required when the SPA engineering review is complete and the application status is updated in Alden. Alden notifies the applicant of the status change and indicates that make ready work is required.

b. The attacher is informed whether make ready work is billable or non-billable when the application status is updated in Alden following completion of the SPA engineering review. For billable make ready work, the applicant receives an invoice, and the application status reflects that make ready payment is required. For non-billable make ready work, no invoice is issued and the application proceeds to the next phase of the process with the make ready work identified in Alden.

c. Yes. Pursuant to the PURA-approved form of Pole Attachment Agreement, an attacher receiving a make ready invoice may dispute the charges associated with the make ready work. The Agreement requires the attacher to pay the invoiced amount and provides that the attacher may dispute the amount within ninety (90) days after payment by submitting written notice with any supporting documentation identifying the disputed amount. The parties then work together to resolve the dispute. If the dispute cannot be resolved through normal business discussions, the Agreement together with Appendix C to PURA's May 11, 2022, Decision in Docket No. 19-01-52RE01 provide a dispute resolution process that includes executive-level negotiations and, if necessary, submission of the dispute to PURA.

Date Filed: September 23, 2026

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

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-1 at p. 69 ("The Company documents the basis for clarifying such work as billable or non-billable.")

a. List and explain each and every reason used by the Company to find make ready work billable, and for each reason describe how make ready costs are treated and recorded.
b. List and explain each and every reason used by the Company to find make ready work non-billable, and for each reason describe how make ready costs are treated and recorded.

Response:

a. The Company determines whether make-ready work is billable by applying the billable/non-billable matrix provided in NECTA-043 Attachment 1. The matrix identifies the circumstances under which make-ready work is the responsibility of the attaching entity and therefore classified as billable.

   When a work order is created, Company personnel and, where applicable, vendors apply the appropriate sub-work type based on the nature of the work and the billable/non-billable matrix. The selected sub-work type identifies the work as billable. Costs associated with the make-ready work are charged to the applicable work order and recorded in accordance with the Company's accounting practices and applicable FERC accounting requirements. The costs remain attributable to the work order through completion of the project, at which time the Company ensures all billable costs have been charged to the appropriate party. Such billable costs are offset to the applicable make-ready work order.

b. The Company determines whether make-ready work is non-billable by applying the billable/non-billable matrix provided in NECTA-043, Attachment 1. The matrix identifies the circumstances under which make-ready work is not the responsibility of the attaching entity and therefore classified as non-billable.

   When a work order is created, Company personnel select the appropriate sub-work type based on the nature of the work and the billable/non-billable matrix. The selected sub-work type identifies the work as non-billable. Costs associated with the make-ready work

are charged to the applicable work order and recorded in accordance with the Company's accounting practices and applicable FERC accounting requirements. The costs remain attributable to the work order through completion of the project. For non-billable make ready costs that are not capitalized, these costs are recorded to FERC Account 186MRC the Non-Billable Make Ready Deferred Regulatory Asset, only to the extent that such incremental annual costs incurred exceed the annual make-ready costs included in base distribution rates, as approved in the Company's last base distribution rate case settlement in Docket No. 17-10-46. For non-billable make ready work that qualifies as a capital investment, these costs are recorded to FERC Account 107, Construction Work in Progress, while the work is being performed. At the time the assets are placed in service, those costs are moved to FERC Account 106, Completed Construction Not Classified, and later to FERC Account 101, Electric Plant In Service, once the asset costs are fully unitized and functionalized.

Date Filed: September 23, 2026

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

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-1 at pp. 70-71. Describe in detail the Company's implementation of procedures to identify and track billable and non-billable make ready costs. A complete response will explain the tracking process, when it began, and provide all Company documentation/procedures related to tracking billable and non-billable make ready costs.

Response:

Consistent with the directives set forth in PURA's final decision in Docket No. 19-01-52RE01, on May 11, 2022, the Company implemented procedures to identify and track billable and non-billable make ready costs associated with pole attachment work. As described in Exhibit CLP-ADDITIONS-1, these procedures included implementation of a billable/non-billable determination matrix (provided in RRU-002, Attachment 1), standardized documentation requirements, and tracking of billable and non-billable determinations within the Company's systems.

The determination of whether make ready work is billable or non-billable is made during the engineering survey and review process using the Company's billable/non-billable matrix. Based on that determination, a work order is created for the required make ready work and designated as billable or non-billable. The work order information is subsequently interfaced with Alden One, which is used to manage pole attachment applications and related make ready activities. Costs associated with the work are charged to the applicable work order and recorded in accordance with the Company's accounting practices and applicable FERC accounting requirements.

Documentation maintained as part of this process includes the Company's billable/non-billable determination matrix (provided in RRU-002, Attachment 1), work order records, Alden One application records, and supporting documentation maintained for the applicable make ready work.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Reference Exhibit CLP REVREQ-1.
Provide the billable/non-billable determination matrix discussed on page 71.

Response:

Please refer to RRU-002, Attachment 1, for the requested information.

Date Filed: September 24, 2026

Witness: David L. Gladey, Jeffrey Richard, Craig Dikeman and Matthew J. Correia
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-1 at pp. 72-73. Identify the third-party contractors the Company uses for make ready work, and provide (i) copies of the contracts between the Company and the contractors and (ii) all instructions, guidelines, and training materials related to contractors performing make ready work.

Response:

The Company currently uses D&D Power and Asplundh Construction to conduct all Make Ready line work. Riggs Distler & Company and Elecnor Hawkeye also have a contract and were utilized during the current contract period.

Please refer to NECTA-044, Attachment 1, for a listing of third party Make Ready contractors. Please refer to NECTA-044, Attachment 2 CONFIDENTIAL, for third party Make Ready contracts.

The contractors identified above are fully qualified line contractors employing personnel represented by Local 42 and are responsible for ensuring that their employees are appropriately trained and qualified to perform the work. The Company provides work orders that identify the specific scope and location of the Make Ready work to be completed and expects contractors to perform such work in accordance with applicable Company construction standards and requirements.

The Company does not provide formal training materials to these contractors. Contractor personnel are expected to possess the requisite qualifications, certifications, and training necessary to perform line work safely and in compliance with applicable industry standards, regulatory requirements, and Company specifications.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-1 at pp. 73-74. Provide the results of the three most recent Company assessments and ratings of the sampled work orders and sampled make ready capital work outsourced to third party contractors.

Response:

Refer to NECTA-045, Attachment 1 CONFIDENTIAL (Scorecard 26406205), NECTA-045, Attachment 2 CONFIDENTIAL (Scorecard 27104945) and NECTA-045, Attachment 3 CONFIDENTIAL (Scorecard 27295888) for the requested information.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-1 at p. 74. Define the term "non-SPA pole owners".

Response:

The term "non-SPA pole owners" refers to entities that own or jointly own utility poles but do not serve as the designated Single Pole Administrator and that may receive services or benefits from the SPA's administration of pole-attachment applications. The referenced directive concerns the allocation of an appropriate proportionate share of the SPA's all-in costs to those pole owners, as well as to attachers.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-1 at p.75. Provide the following information:

a. List and identify all instances where municipalities and CDOT failed to utilize the AldenOne application process and attached without permission/notice. A complete response will identify each pole by pole number.
b. Are unauthorized attachments considered within the Company's determination of whether make ready costs are billable or non-billable and, if so, how?

Response:

a. The Company cannot track instances where municipalities and CDOT failed to utilize AldenOne (i.e., the system of record) and attach without notifying the Company. To answer this question, Eversource would need to hire a vendor to conduct an unauthorized attachment audit of the Company's poles in its service territory.

b. The PURA-approved form of Pole Attachment Agreement requires Licensees to submit a pole attachment application for all unauthorized attachments. Consequently, any such make-ready costs are billable to the Licensee.

Date Filed: September 23, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Reference Exhibit CLP-REVREQ-1, pp. 44-46. Reconcile the statement that "the Company has not included any pole make-ready costs within base distribution rates in this proceeding…" (p. 46) with PURA's statement in Docket No. 19-01-52RE01 that "EDCs received some level of recovery in base distribution rates to perform non-billable make-ready work…" A complete response will explain the steps taken by the Company to ensure that there is no double-recovery of non-billable make-ready costs in base rates versus in the deferred regulatory asset for non-billable make-ready costs.

Response:

As noted in Exhibit CLP-REVREQ-1 at 44, lines 12 through 15, the Company states "The costs recorded to this deferred asset are associated with the costs of performing non-billable make-ready pole work **not recovered in base distribution rates** [emphasis added] to meet established standards, as approved in Docket No. 19-01-52RE01…" Further, in Late File Exhibit-01 in Docket No. 19-01-52RE01, the Company notes there is $803 thousand recovered in base distribution rates, annually, that are netted against cumulative non-billable make-ready costs. Therefore, providing assurance that the Company is not double-recovering non-billable make-ready costs in base distribution rates. Refer to Exhibit CLP-REVREQ-4 (Make Ready Pole Work), line 7548 in tab "Non-Billable Reason" for the Removal of 2023-2025 Amounts in Distribution Rates totaling $2.4 million.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Reference Exhibit CLP REV-REQ-4. When tracking non-billable make-ready costs, explain how the Company identifies and attributes all pole capital and maintenance work required to be performed by Eversource in its ordinary course of business to its own service requirements.

Response:

The Company identifies and attributes non-billable make-ready costs through its established work management and work order processes. Work orders are created based on the specific project or work type being performed, with defined scopes that distinguish whether the work is customer-driven, make-ready activities (billable or non-billable), capital improvement, etc. from work required by the Company to meet its own service, safety, reliability, and operational obligations.

During project development, engineering personnel review the required work and assign activities to the appropriate work order based on the nature and purpose of the work. Work that is necessary to accommodate a third-party attachment request is tracked separately from work that would be performed by the Company in the ordinary course of business to maintain, replace, or enhance its electric distribution infrastructure.

The Company's work order structure, estimating process, and project oversight practices are designed to ensure that only work directly related to the applicable project scope is charged to that work order. Throughout project execution, the scope of work is monitored and managed to minimize scope creep and to ensure that Company-initiated capital or maintenance activities are appropriately identified and attributed to separate work orders. This approach helps maintain the integrity of cost tracking and supports the accurate allocation of make-ready costs between attachers and the Company's own service requirements.

As a result, non-billable make-ready costs are identified through the Company's project scoping, engineering review, and work order management processes, which are intended to segregate work performed for Company operational needs from work performed in support of attachment-related make-ready activities.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Each year for the past five years, identify and quantify all pole capital and maintenance work that the Company identified and performed at the time an attachment was made that was attributed to the Company's own service requirements (instead of third party attachers) because the work was needed in the ordinary course of business.

Response:

Please refer to the response for NECTA-049[i] for a description of how the Company identifies the type of work to be performed. The Company does not base the need for work to be completed to facilitate its capital plan based on where and when an attachment request is made.

Prior Referenced Response:

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[i] NECTA-049 Question:

(Make Ready Work & Related Costs) Reference Exhibit CLP REV-REQ-4. When tracking non-billable make-ready costs, explain how the Company identifies and attributes all pole capital and maintenance work required to be performed by Eversource in its ordinary course of business to its own service requirements.

NECTA-049 Response:

The Company identifies and attributes non-billable make-ready costs through its established work management and work order processes. Work orders are created based on the specific project or work type being performed, with defined scopes that distinguish whether the work is customer-driven, make-ready activities (billable or non-billable), capital improvement, etc. from work required by the Company to meet its own service, safety, reliability, and operational obligations.

During project development, engineering personnel review the required work and assign activities to the appropriate work order based on the nature and purpose of the work. Work that is necessary to accommodate a third-party attachment request is tracked separately from work that would be performed by the Company in the ordinary course of business to maintain, replace, or enhance its electric distribution infrastructure.

The Company's work order structure, estimating process, and project oversight practices are designed to ensure that only work directly related to the applicable project scope is charged to that work order. Throughout project execution, the scope of work is monitored and managed to minimize scope creep and to ensure that Company-initiated capital or maintenance activities are appropriately identified and attributed to separate work orders. This approach helps

maintain the integrity of cost tracking and supports the accurate allocation of make-ready costs between attachers and the Company's own service requirements.

As a result, non-billable make-ready costs are identified through the Company's project scoping, engineering review, and work order management processes, which are intended to segregate work performed for Company operational needs from work performed in support of attachment-related make-ready activities.

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.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Each year for the past five years, provide the average make-ready work interval (from application to close-out) separately for solely-owned poles and jointly-owned poles.

Response:

The table below provides the average number of days between receipt of a completed application (including payment of applicable application fees) and issuance of the license for power only solely owned poles and jointly owned poles.

	Average Days Application to License	
Year	Soley Owned	Jointly Owned
2021	163	529
2022	185	370
2023	99	229
2024	155	241
2025	110	170

The Company notes that these intervals represent the total elapsed time between receipt of a completed application and issuance of a license, not solely the duration of make ready construction activities. As a result, the reported intervals encompass multiple stages of the pole attachment process, including application review, survey and engineering activities, telecommunication survey and engineering for jointly owned poles, coordination and concurrence among pole owners, make ready billing, receipt of make ready payment by Eversource, Frontier, or both as applicable, make ready construction, and final licensing.

Accordingly, the reported intervals are influenced by numerous factors, many of which are outside of Eversource's control and vary significantly by project.

These factors include, but are not limited to:

- Delays in payment by requesting attachers or other parties
- Delays associated with third party attachers completing required transfer or make ready work
- Coordination requirements among multiple entities on jointly owned pole lines
- Delays in obtaining permits, municipal approvals or traffic control requirements
- Customer driven schedule changes or project modifications
- Contractor availability and scheduling constraints
- Weather events, emergency restoration activities, and other unforeseen field conditions
- Delays associated with obtaining access to private property or rights-of-way
- Disputes regarding responsibility for make ready work or associated costs

Because these and other factors can materially affect the time between application and licensing, without reflecting Eversource's own performance, any calculated average would be skewed and potentially misleading.

Date Filed: September 23, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray and Timothy J. Griffin
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Reference Exhibit CLP REVREQ-2, Schedule B 6.2 (Deferred Assets), please discuss how the Accumulated Deferred Income Taxes for each deferred asset on lines 29 – 39 were determined, and show the calculation for deferred third party make ready pole work as an example.

Response:

Accumulated Deferred Income Taxes for each deferred asset on lines 29 – 39 of Exhibit CLP REVREQ-2, Schedule B-6.2 were determined by applying the statutory tax rate in effect during the rate year, or 27.5175%, to the 12/31/2025 balance. Using the deferred pole make ready 12/31/2025 balance of $16,581,000 as an example, the calculation is as follows: $16,581,000 multiplied by (1 - 27.5175%, or 72.4825%) tax rate to come to the after-tax amount of $12,018,000 as seen on line 44 of Schedule B-6.2.

Date Filed: September 23, 2026

Witness: David L. Gladey, Jeffrey Richard, Brendan J. O'Brien, Timothy J. Griffin and Garrett J. Murray
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Reference Exhibit CLP REVREQ-4 (Third Party Pole Make Ready Costs). Provide the following:

a. Line 7552, Notes, indicates that Eversource began maintaining detailed records of both billable and non-billable make costs consistent with Order No. 15 in the Final Decision in 19-01-52 RE01. Please confirm that the figure of $16,580,868 includes only non-billable costs.
b. Discuss whether (i) the non-compliance issues that led to the costs incurred by the company as shown in this exhibit were discovered by the company as a result of a new attacher requesting to attach, (ii) for each pole in the exhibit, the company has a record of when the last attacher attached to the pole and when the pole was last inspected.
c. Confirm that the headings for columns F through Y are the FERC accounts to which the third party pole make ready costs were assigned;
d. Provide a description of the subaccounts for Accounts 593 and 594.
e. Discuss why all the costs are in O&M accounts and there are no costs in capital accounts at page 41 of Exhibit CLP REVREQ-1.
f. For entries indicating "Pole replacement – Pole defective", explain why if the pole is already defective, it would not be the company's or the joint pole owner's responsibility to replace the pole.
g. With reference to line 7030 which explains that Frontier will set a new 40-foot class 2 pole and remove the 35-foot class 4 pole, explain *D&D*Conv and discuss how the capital costs associated with the pole replacement were treated in the FERC Form 1.
h. Provide an allocation of the amount of $16,580,868 into calendars years, meaning the portion allocable to each year starting with 2017 and ending with 2025 and indicate where the allocations appear in the FERC Form 1 for those years.
i. Explain line 7548, the removal of 2023-2025 Amounts in Distribution Rates of $2,408,607. Explain how that amount was added to distribution rates since the last rate case in Docket 17-10-46.

Response:

a. Confirmed. The amount of $16,580,868 shown on line 7552 includes only non-billable third party make ready costs. As noted in Exhibit CLP-REVREQ-4, Eversource began maintaining detailed records of both billable and non-billable make ready costs consistent with the Docket 10-01-52RE01 Decision. The amount reflected in this exhibit represents costs that were classified as non-billable and therefore were not invoiced to attaching entities.

b. (i) The non-compliance conditions reflected in Exhibit CLP-REVREQ-4 were identified during the engineering phase associated with attachment requests.
(ii) Eversource maintains records related to pole inspections and attachment activity. The availability of records identifying the most recent attachment date and inspection date varies based on the specific pole and historical record availability.

c. Yes, columns F through Y are the FERC accounts to which the third party pole make ready costs were assigned.

d. Below is a description of the subaccounts for FERC 593 and 594.

593000 – Distribution Maintenance of Overhead Lines
593010 – Poles and Fixtures
593020 – Overhead Construction Transfer
593040 – Overhead Corrective Maintenance Repairs
593050 – Overhead Service Maintenance Repairs
593100 – Tree Trimming Vegetation Control
594000 – Distribution Maintenance of Underground Lines
594010 – Underground Conduit Maintenance
594020 – Manhole Regulating
594030 – Underground Corrective and Emergent Maintenance
594260 – Maintenance of Manholes

e. In Docket No. 19-01-52RE01, PURA directed the Company to defer incremental non-billable make-ready costs (see Docket No. 19-01-52RE01 Final Decision dated May 11, 2022 at page 45). Consistent with this directive, the Company deferred incremental non-billable O&M make-ready costs to a regulatory asset which is being sought for recovery in this rate amendment application as supported by Exhibit CLP-REVREQ-4. The capital costs for non-billable third party market ready pole work is included for recovery in the Company's rate amendment application consistent with all other in-service capital and is supported in Exhibit CLP-ADDITIONS-9.

f. For entries indicating "Pole replacement – Pole defective", if the pole was found during survey to already be defective, it would be the Company's or the joint pole owner's responsibility to replace the pole.

g. With reference to Exhibit CLP REVREQ-4 (Third Party Make Ready Costs), line 7030, "D&D Conv" is part of the Field Work Order description. The entire Field Work Order description for this line is "*D&D*Conv. 1635692 - Make Ready Non" which is used internally to communicate the contractor assigned to the work order, the Alden One conversation number, the type of work and billing classification. Therefore, "D&D" refers to D&D Contractors, "Conv. 1635692" is the Alden One conversation number, "Make Ready Non" indicates this is for make ready work and is 'non' billable. The capital costs associated with the additions and retirements related to the pole replacement were included on lines 64, 65 and 67 of pages 204-207 in the Company's 2025 Ferc Form 1 filing.

h. The table below shows the $16,580,868 by year. The amounts are included in the FERC Form 1 under Electric Operation and Maintenance Expenses under their respective FERC account number (583, 584, 587, 590, 593, 594, 595, 596, and 598) by year.

Sum of Amount	Column Labels				
Row Labels	2022	2023	2024	2025	Subtotal
THIRD PARTY ATTACHMENTS	**1,048,267**	**4,148,604**	**6,249,705**	**7,542,899**	**18,989,475**
583000	(149,339)	(135,350)		2,317	(282,371)
583280	53,157	199,219	176,188	257,078	685,642
584000	341	8,409			8,750
587000	37,204	22,200	(45)	12	59,372
590000	443				443
593000	(61,381)	399,706	(1,389)	1,311	338,248
593010	30,426	22,543	7,503	218,671	279,143
593020	312,818	1,268,404	1,475,796	2,670,831	5,727,849
593040	295,280	1,110,966	2,340,879	1,270,292	5,017,418
593050	43,528	190,075	255,225	390,202	879,030
593100	309	147			457
594000	54,908	(114,528)	158	41	(59,421)
594010	1,885	1,115	5,461	2,745	11,206
594020	2,646	47			2,693
594030	157,859	726,613	505,831	957,953	2,348,257
594260	11,359	31,315	6,728	2,074	51,476
595000	(5,232)	(70,865)	29,746	66,753	20,401
596000	261,427	486,587	1,447,624	1,702,618	3,898,257
598000	628	1,999			2,628
Subtotal	1,048,267	4,148,604	6,249,705	7,542,899	18,989,475
Removal of Amounts in Distribution Rates		(802,869)	(802,869)	(802,869)	(2,408,607)
Total	1,048,267	3,345,735	5,446,836	6,740,030	16,580,868

i. Refer to the Company's response to NECTA-048[i] for the 2023-2025 amounts in distribution rates.

Prior Referenced Response:

[i] NECTA-048 Question:

(Make Ready Work & Related Costs) Reference Exhibit CLP-REVREQ-1, pp. 44-46. Reconcile the statement that "the Company has not included any pole make-ready costs within base distribution rates in this proceeding…" (p. 46) with PURA's statement in Docket No. 19-01-52RE01 that "EDCs received some level of recovery in base distribution rates to perform non-billable make-ready work…" A complete response will explain the steps taken by the Company to ensure that there is no double-recovery of non-billable make-ready costs in base rates versus in the deferred regulatory asset for non-billable make-ready costs.

NECTA-048 Response:

As noted in Exhibit CLP-REVREQ-1 at 44, lines 12 through 15, the Company states "The costs recorded to this deferred asset are associated with the costs of performing non-billable make-ready pole work **not recovered in base distribution rates** [emphasis added] to meet established standards, as approved in Docket No. 19-01-52RE01…" Further, in Late File Exhibit-01 in Docket No. 19-01-52RE01, the Company notes there is $803 thousand recovered in base distribution rates, annually, that are netted against cumulative non-billable make-ready costs. Therefore, providing assurance that the Company is not double-recovering non-billable make-ready costs in base distribution rates. Refer to Exhibit CLP-REVREQ-4 (Make Ready Pole Work), line 7548 in tab "Non-Billable Reason" for the Removal of 2023-2025 Amounts in Distribution Rates totaling $2.4 million.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-9. Define the following acronyms: (a) ASP, (b) AWC, (c) BC, (d) Conv, (e) D&D, (f) DSL, (g) DR, (h) HAWK, (i) JS, (j) KA, (l) OA, (m) SH, (n) TPA, (o) TW, (p) ZA, (q) 3PA.

Response:

Please refer to the listing below for the requested definitions of the acronyms noted in the request;

(a) ASP = Asplundh

(b) AWC = Area Work Center

(c) BC = Internal Employee Initials

(d) Conv = Conversation

(e) D&D = D&D Power

(f) DSL = Internal Employee Initials

(g) DR = Internal Employee Initials

(h) HAWK = Hawkeye (Elecnor Hawkeye)

(i) JS = Internal Employee Initials

(j) KA = Internal Employee Initials

(k) Missing

(l) OA = Internal Employee Initials

(m) SH = Internal Employee Initials

(n) TPA = Third Party Attacher/Third Party Attachment

(o) TW = Internal Employee Initials

(p) ZA = Internal Employee Initials

(q) 3PA = Third Party Attacher/Third Party Attachment

Date Filed: September 23, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Connectivity and Telecommunications Association

Question:

(Make Ready Work & Related Costs) Refer to Exhibit CLP-ADDITIONS-9. The phrase "Pole replacement -Pole defective" appears 106 times in this file. Provide the following:

a. Explain why in each of these cases the expenses related to pole replacement become a deferred regulatory expense,
b. Identify the account(s) to which the expenses are booked
c. Identify the proposed method of recovery for such costs.
d. Compare and contrast recovery of those costs with the recovery of costs associated with new pole placements needed to address expanded service coverage due to industrial, commercial and residential developments.

Response:

a. Capital expenditures related to pole replacements can be billable to the attachers or non-billable. When costs are not billable, and the costs are capitalizable (as is the case for a pole replacement and other make-ready work where the replaced property is a depreciable unit of property), those are treated as Company property and would become a capital asset/rate base. Non billable replacements are not deferred regulatory expenses but instead capital assets residing in FERC Account 106 (Completed Construction Not Classified) or FERC Account 101 (Electric Plant in Service (Major Only)).

b. Pole replacements are capital expenditures. Therefore, these are capital expenditures initially recorded as construction in FERC Account 107 (Construction work in progress—Electric) and moved to FERC Account 106 (Completed construction not classified—Electric (Major only)) once placed in service and FERC Account 101 once unitized.

c. Capital expenditures for assets placed in service, not reimbursed through make-ready billing submitted to attachers, are part of this rate case.

d. The recovery is the same as there are capital expenditures incurred for make-ready work that is not billable and would, in the ordinary course of business, be part of the company's pole replacement process.

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) Does the Company have access to data that can be arranged in the format of Exhibit CLP-Additions-9.xlsx but for billable make-ready work? If so, please provide a workbook with all such data for years 2022, 2023, 2024, 2025 and January 2026 through June 2026. In doing so, add a column of data to identify the applicable application fees and a second column to identify actual charges/fees billed to attachers.

Response:

Yes. The Company has access to available data regarding billable make ready work and has provided a workbook containing such data for the period May 11, 2022 through June 30, 2026, which encompasses data for years 2022, 2023, 2024, 2025 and January 2026-June 2026, reference NECTA-057 Attachment 1.

The workbook includes, among other fields:

- Frontier application fees
- Eversource (CL&P) application fees
- Eversource (CL&P) survey fees
- Make ready estimate amounts
- Actual charges billed to attachers, including true up costs
- Engineering comments associated with the underlying applications

The Company notes that the report is maintained on a pole level basis rather than an application-level basis. As a result, applications involving multiple poles may appear on multiple rows, and application-level fees and charges may be repeated across those rows. Accordingly, the data should not be aggregated by summing individual line items without accounting for duplicate application-level charges associated with multi-pole applications.

Date Filed: September 23, 2026

Witness: Marisa B. Paruta and Jeffrey D. Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Explain how Eversource accounts for make-ready payments for pole replacements from third-party attachers, including whether the investment for such poles is booked to FERC Account 364, and how salvage value is accounted for.

Response:

When a pole replacement work order is written, the responsible party creates the work order in the Company's work management system by selecting a specific work order type and enters 'estimates' into the work order by selecting Compatible Units, which are the assets that are expected to be installed and removed, which creates the FERC Split and the allocation of charges between the FERC Accounts. The combination of the work order type and Compatible Units determines the specific FERC Utility Accounts (typically 364 - Poles, Towers, and Fixtures, and 365 - Overhead Conductors and Devices, for pole replacement work) that the capital expenditures will be applied to when the work order is placed in-service. When the work is about to begin, the work order is approved, set to 'open' status, and can start receiving charges. These costs are allocated based on the FERC Split established, and records the capital expenditures to FERC Account 107010 (Construction Work in Progress) and estimated costs to remove retirement units to FERC Account 108030 (Cost of Removal). Any proceeds received from removed infrastructure that is sold for scrap, for example, is recorded to FERC Account 108040 (Salvage).

When make ready work is billed to the third-party attacher, the Company records a Receivable from the third party attacher, and an equal and offsetting credit to the specific work order written for that pole replacement, which is reflected as a credit in the work order. The credit is applied based on the FERC Split between FERC Accounts 107010 and 108030 based on the estimate established when the work order was written. Charges or credits are not disseminated at the FERC Utility Account levels in the Company's plant asset records while the work order is in 'open' status and in FERC Account 107010.

When the installed assets are deemed 'used and useful,' the work order is placed into 'in-service' status and the capital expenditures in FERC Account 107010 are moved to FERC Account 106 (Completed Construction not Classified), while charges in FERC Account 108030 remain unchanged. At this time, the assets placed in service begin to depreciate in their assigned Utility Account (364 or 365) while the Company continues to work on finalizing all costs to the work order.

After all invoices are received, all make ready billable amounts have been paid by third party attachers, drawings are finalized and the pre-requisites/tasks in the work management system are completed, and the final costs and credits appropriately flow through the FERC Split, the work order is closed/posted to the Continuing Property Records (CPR). Once the work order is closed, the final costs of the asset in FERC Account 106 are moved to FERC Account 101010 (Utility Plant in Service) and unitized/posted to the CPR with their specific retirement units in Utility Accounts 364 and 365 based on final costs. The final Cost of Removal in FERC Account 108030 is moved to FERC Account 108010 (Accumulated Provision for Depreciation – Cost of Removal). Any salvage proceeds in FERC Account 108040 are moved to FERC Account 108010 (Accumulated Provision for Depreciation – Salvage) upon final close.

Date Filed: September 23, 2026

Witness: Leanne M. Landry, Jeffrey D. Turano and Marisa B. Paruta
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Provide a description of any Subaccounts for FERC Account 364 maintained by the Company, and identify and produce all plant and accounting records pertaining to FERC account 364 pole plant investment that break out the specific classes of pole investment by the items listed in the FERC Account 364 instructions, including but not limited to any documents that identify the amount of investment in poles, crossarms, or other appurtenances affixed to the bare wood pole, or by subaccount maintained by the Company.

Response:

Please refer to NECTA-059, Attachment 1, for the plant records pertaining to FERC account 364 pole investment as of December 31, 2025. The specific classes of pole investment are recorded by retirement unit. The adjusting journal entry on line 28 entered as of December 31, 2025, totaling $1,065,950, provides for the estimated increase to the FERC Account 364 pole investments associated with the Frontier jointly owned poles. Under circumstances where Frontier performs the work to install / replace a jointly owned pole, the Company will reimburse Frontier for a portion of those incurred investment costs, in accordance with the joint owned pole agreement, and record its portion of the value of those jointly owned poles in FERC Account 364.

Date Filed: September 23, 2026

Witness: Leanne M. Landry, Jeffrey D. Turano and Marisa B. Paruta
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Provide a detailed accounting along with any records of the Company's expenditures, on an annual basis, for the most recent five-year period, for each of the delineated items listed in 1-19 in the FERC Account 364 instructions. If a detailed accounting is not available, provide information at the highest level of disaggregation tracked in the Company's records or databases.

Response:

Please refer to NECTA-060, Attachment 1, for a listing of capital additions associated with FERC account 364 by year. Note that the details provided are capital additions by year not capital expenditures as utility account information is not available until the associated work order and assets are put into service (via FERC account 101 - Electric plant in service (Major only)).

Date Filed: September 23, 2026

Witness: Ned W. Allis
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) For poles included in FERC Account 364, provide the average service life and the average remaining life.

Response:

Please refer to Exhibit CLP-DEPRECIATION-3, Part VI-4, Table 1, for the average service life and average remaining life for poles included in FERC Account 364.

Date Filed: September 23, 2026

Witness: Edward A. Davis, Marisa B. Paruta and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Provide a spreadsheet of FERC 364 Assets as of December 31, 2025, and that identifies the amount of "non-unitized" investment included in Account 364 for 2025. Identify the number of poles associated with pole investment, classified as non-unitized, and whether those poles were included in the calculation of the usable space and pole count inputs used to calculate the pole rate.

Response:

Please refer to the Company's response NECTA-059[i] and NECTA-059, Attachment 1, for a summary of FERC Utility Account 364 as of December 31, 2025, that identifies the amount of non-unitized investment included in FERC Account 106010 (Completed Construction not Classified). Poles that are not yet classified and are instead included as part of total non-unitized plant cannot be identified. The only pole counts used in the third-party pole attachment rental rate calculation are found in the following retirement unit ("RU") categories, which represent the poles that are unitized, classified, and recorded to FERC Account 101010 (Utility Plant in Service):

- POLE FO <= 35FT
- POLE FO > 35FT
- POLE JO <= 35FT
- POLE JO > 35FT

Prior Referenced Response:

[i] NECTA-059 Question:

(FERC Accounts) Provide a description of any Subaccounts for FERC Account 364 maintained by the Company, and identify and produce all plant and accounting records pertaining to FERC account 364 pole plant investment that break out the specific classes of pole investment by the items listed in the FERC Account 364 instructions, including but not limited to any documents that identify the amount of investment in poles, crossarms, or other appurtenances affixed to the bare wood pole, or by subaccount maintained by the Company.

NECTA-059 Response:

Please refer to NECTA-059, Attachment 1, for the plant records pertaining to FERC account 364 pole investment as of December 31, 2025. The specific classes of pole investment are recorded by retirement unit. The adjusting journal

entry on line 28 entered as of December 31, 2025, totaling $1,065,950, provides for the estimated increase to the FERC Account 364 pole investments associated with the Frontier jointly owned poles. Under circumstances where Frontier performs the work to install / replace a jointly owned pole, the Company will reimburse Frontier for a portion of those incurred investment costs, in accordance with the joint owned pole agreement, and record its portion of the value of those jointly owned poles in FERC Account 364.

Date Filed: September 29, 2026

Witness: Marisa B. Paruta and Jeffrey D. Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Provide the number of poles for which Eversource received reimbursement from joint-owners in each of the last five years and the amounts recovered from joint-owners for such replacements by year. Explain how such reimbursements are booked to Eversource FERC Account 364 and provide supporting documentation of any and all such accounting entries related to such reimbursement.

Response:

Please refer to Table 1, below, providing the number of poles for which the Company has received reimbursement from joint-owners and the associated amounts recovered from joint-owners for all joint-line billing costs charged to the joint owners, for the period from October 1, 2021 and through September 30, 2024:

Table 1

Year	# of Poles		Amount
2021	827	$	563,550
2022	3,723	$	2,669,575
2023	5,942	$	4,257,850
2024	3,228	$	2,524,775
2025		$	-
Total	**13,720**	**$**	**10,015,750**

Please note that the total reimbursements of $10,015,750 are recorded as a reduction to the underlying and applicable work orders that captured the associated costs incurred by the Company to perform the joint line work. The reimbursements will follow the work order FERC Account Split, in order to ensure the costs incurred by the Company are properly reduced by the reimbursements received by the joint owner.

In cases where the work was related to the physical replacement of a pole, the reimbursement is reflected in FERC Utility Account 364 as a reduction to the value of the retirement units (RU) called "POLE Jointly Owned <= 35FT" or "POLE Jointly Owned >35FT" at the time the Company recognizes the receivable recovered from the joint owners. Please refer to NECTA-063, Attachment 1, for supporting documentation of all work orders that were credited the reimbursements totaling $10,015,750. In the course of preparing this response, the Company

identified an amount of $5,064,100 as recorded to a work order that loaded the credit to various open capital work orders at the time the Company recorded the receivable. The Company is in the process of reviewing the underlying data and will supplement this response where necessary.

The Company is also currently working through the process to prepare the billing for reimbursements associated with the fourth quarter 2024 and for calendar year 2025, and will update the record for this proceeding as the effort progresses. This process involves numerous, intricate steps to: (1) compile all requisite data from the Company's systems; (2) compare the Company's data to pole data in the Alden system; (3) remove all data associated with reimbursements from insurance providers, customers, state road projects and other reimbursements unrelated to third-party attachers; (4) calibrate reconductoring and pole exchanges for system upgrades; and (5) compute the reimbursable amounts for billing. The Company expects this process to be concluded later this year.

Date Filed: September 23, 2026

Witness: Edward A. Davis, Marisa B. Paruta and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Please explain whether the Company or any of its affiliates could provide from any of its records or databases a breakdown of pole appurtenance fixture investments in Account 364 at any level of disaggregation or time period, and if so, describe.

Response:

No. The Company does not track investment in appurtenances as separately identifiable items and therefore cannot specifically include all appurtenances that are pole-related (e.g., anchors and guys) and specifically exclude all appurtenances that are non pole-related (e.g., brackets and crossarms) from the third party pole attachment calculation.

The Company therefore relies on the FCC 15% appurtenance presumption in order to calculate its pole attachment rates.

Date Filed: September 23, 2026

Witness: Edward A. Davis, Marisa B. Paruta and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Provide your total and annual appurtenance investment as a percentage of net pole investment, as of the most recent year available. A complete response will identify (i) the total FERC Account 364 investment amount from the FERC Form 1 and (ii) the percentage of that investment amount that comprises appurtenances. If relevant, identify percentages separately for pole-related appurtenances (those that benefit both pole owner and attaching entity) and non-pole-related appurtenances (those that benefit only the pole owner). A complete response will include all supporting documents, assumptions, and work papers, as well as a detailed explanation if any of the requested data cannot be provided.

Response:

Please refer to the Company's response to NECTA-064.[i] The Company cannot calculate its investment in appurtenances as a percentage of net pole investment.

Prior Referenced Response:

[i] NECTA-064 Question:

(FERC Accounts) Please explain whether the Company or any of its affiliates could provide from any of its records or databases a breakdown of pole appurtenance fixture investments in Account 364 at any level of disaggregation or time period, and if so, describe.

NECTA-064 Response:

No. The Company does not track investment in appurtenances as separately identifiable items and therefore cannot specifically include all appurtenances that are pole-related (e.g., anchors and guys) and specifically exclude all appurtenances that are non pole-related (e.g., brackets and crossarms) from the third party pole attachment calculation.

The Company therefore relies on the FCC 15% appurtenance presumption in order to calculate its pole attachment rates.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Provide the amount of make ready payments for tree trimming paid by third-party attachers in 2025. A complete response will:

a. Provide the amount of vegetation management payments due but not paid to the Company by any party in 2025.
b. Indicate whether all third-party payments for vegetation management are credited to Account 593, and if not, the amounts credited to other accounts, and to which accounts they are credited.
c. Describe in detail the Company's accounting treatment of payments by third party attachers for vegetation management, including whether payments are (i) treated as CWIP or CIAC and the associated Account(s), (ii) immediately credited to Account 593 or another account, or (iii) credited to Account 593 or another account only when the work order is closed.
d. Describe in detail how the Company determines the vegetation management costs to be charged to a third party attacher as an advance make ready payment.

Response:

a. There were no vegetation management payments due but not paid to the Company by any party in 2025.

b. Third-party payments are provided for all billable make ready work, not just vegetation management. Not all payments are credited to FERC account 593. Please refer to NECTA-077[i] for make ready payments by FERC account.

c. Payments by third party attachers for vegetation management and all billable make ready work follows the accounting on the make ready work orders including the FERC accounts that the charges get applied to. The FERC accounting is applied as the payments are applied to the make ready work orders. Any payments applied to FERC 107010 would be considered CWIP. Please refer to NECTA-077 for make ready payments by FERC account.

d. Vegetation Management is evaluated as part of the make ready review process when a new attachment application has been received. If tree trimming or other vegetation maintenance is required to complete the requested attachment work, the work is included within the associated make ready work order.

Consistent with the Company's make ready billing practices, if the underlying make ready work is billable to the applicant, the associated vegetation maintenance work is also billable. Conversely, if the underlying make ready work is not billable, the associated vegetation management work is not billed to the applicant.

Prior Referenced Response:

[i] NECTA-077 Question:

(FERC Accounts) Provide the total make ready payments by third-party attachers that are captured in the Company's FERC Form 1 for 2025, with a breakdown of the FERC accounts where the payments appear, the associated amounts booked to each account, and the year the amounts were assigned to the accounts upon the closing of work orders.

NECTA-077 Response:

Please refer to the table below for make ready payments by third-party attachers by FERC account for 2025.

Sum of Amount	Column Labels
Row Labels	2025
THIRD PARTY ATTACHMENTS	(3,141,116)
107010	(1,587,642)
108030	(611,484)
583000	7
583280	(73,255)
587000	12
593000	100
593010	(18,717)
593020	(486,395)
593040	(48,468)
593050	(74,889)
594000	41
594010	(562)
594030	(81,211)
594260	(6,613)
595000	(18,468)
596000	(133,573)
Grand Total	(3,141,116)

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Explain how vegetation management costs are recovered from joint-owners and, separately, attachers. A complete response will explain how such reimbursements are booked to Eversource FERC Accounts and provide supporting documentation of any and all such accounting entries related to such reimbursement.

Response:

Vegetation management costs are recovered from the Company's joint pole owner, Frontier Communications Corporation (now Verizon), pursuant to the June 30, 2015 Settlement and Amendment Agreement between The Connecticut Light and Power Company d/b/a Eversource Energy and Frontier. Under that agreement, Frontier reimburses the Company annually for an amount equal to the lesser of: (i) 15% of the Company's PURA approved Annual Operations and Maintenance (O&M) vegetation management budget; or (ii) 15% of the Company's actual Annual O&M vegetation management expense. The reimbursement is invoiced through the Company's sundry billing process.

Third-party attachers are not billed through a separate vegetation management mechanism for vegetation-management work. When vegetation management work is required to accommodate a particular attachment request, the work is included in the associated make ready work order and billed, as applicable, in accordance with the Company's standard make ready billing practices.

The accounting treatment for third-party attacher make-ready payments, including any amounts associated with vegetation management work included in make ready projects, is reflected in the Company's FERC accounts as described in the Company's response to NECTA-077[i].

Prior Referenced Response:

[i] NECTA-077 Question:

(FERC Accounts) Provide the total make ready payments by third-party attachers that are captured in the Company's FERC Form 1 for 2025, with a breakdown of the FERC accounts where the payments appear, the associated amounts booked to each account, and the year the amounts were assigned to the accounts upon the closing of work orders.

NECTA-077 Response:

Please refer to the table below for make ready payments by third-party attachers by FERC account for 2025.

Sum of Amount	Column Labels
Row Labels	2025
THIRD PARTY ATTACHMENTS	(3,141,116)
107010	(1,587,642)
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593040	(48,468)
593050	(74,889)
594000	41
594010	(562)
594030	(81,211)
594260	(6,613)
595000	(18,468)
596000	(133,573)
Grand Total	(3,141,116)

Date Filed: September 23, 2026

Witness: John P. Dipaola-Tromba, Brendan J. O'Brien, Garrett J. Murray, Sean D. Redding and Jenna M. Turner
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Each year for the past five years, provide the Company's vegetation management expenses and where they are recorded in the Company's book of account and in the corresponding FERC Form 1.

Response:

Please refer to Exhibit CLP-REVREQ-3 for past five years of the Company's vegetation management expenses.

The Company's vegetation management expenses are booked to FERC Account No. 593100 in which roll up to FERC Account No. 593, Maintenance of overhead lines, on the FERC Form 1.

Date Filed: September 23, 2026

Witness: John P. Dipaola-Tromba, Sean D. Redding, Jenna M. Turner, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Provide Eversource's policy on the accounting treatment of vegetation management costs, including capitalization vs. expense treatment.

Response:

Please refer to the NECTA-069, Attachment 1, for Accounting Policy Statement 8 which describes the accounting treatment of capitalization versus expense costs. In addition, certain vegetation management costs are, or have been historically, treated as capital based upon PURA precedent. See, e.g., Docket No. 17-10-46, April 18, 2018 Decision at Page 15 ("the Authority approves the Amended Settlement Agreement with respect to its provisions for future funding and tracking of ETT [enhanced tree trimming] and ETR [enhanced tree removal] capital expenditures."); Docket No. 17-10-46RE02, June 12, 2019 decision at Page 7 ("The Authority will monitor the Company's ETR program through the capital tracker mechanism authorized in the Rate Case Decision.")

Date Filed: September 23, 2026

Witness: Leanne M. Landry, John G. Griffin and Jeffrey D. Turano
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Each year for the past five years, provide a breakdown of the amounts in FERC Account 593 and discuss any reason for significant year-to-year variation in the amounts.

Response:

Please refer to the table below for a breakdown of the amounts in FERC Account 593 for the past five years.

FERC 593 $ Millions	2021	2022	2023	2024	2025
593000 - Distrib Main of Overhead Lines	$ 53.3	$ 58.4	$ 54.7	$ 44.6	62.90
593010 - Poles and Fixtures	$ -	$ 0.2	$ 0.3	$ 0.2	1.50
593020 - OH Constr Transfer	$ 4.0	$ 8.0	$ 8.5	$ 5.4	7.70
593040 - OH corrective maint repair	$ 2.0	$ 2.1	$ -	$ 5.4	3.60
593050 - OH Sec Service Maintenance Repair	$ 0.8	$ 1.7	$ 2.7	$ 1.6	2.10
593100 - Tree Trimming Vegetation Control	$ 38.8	$ 39.9	$ 34.2	$ 32.9	26.30
593140 - Area Storm Restoration	$ 33.7	$ 45.0	$ 63.0	$ 57.5	59.40
593150 - OH Enviromental Clean-up	$ 0.5	$ 0.3	$ 0.1	$ 0.4	0.20
Adj_593_F1 - To Allow Adjustments to 593 for FERC	$ 1.1	$ (1.1)	$ -	$ (0.1)	-
FERC 593 Total	$ 134.2	$ 154.5	$ 163.5	$ 147.9	$ 163.7

Please refer to the details below for a description of significant variations by year.

FERC 593
$ Millions

Year	Amount	Variation	
2021	$ 134.2		
2022	$ 154.5	$ 20.3	Increase driven by higher storm restoration expenses and storm reserve replenishment
2023	$ 163.5	$ 9.0	Increase driven by higher storm restoration expenses, partially offset by less enhanced tree trimming amortization, and bad debt reserve adjustments
2024	$ 147.9	$ (15.6)	Decrease driven by shift in charges from FERC 593 to FERC 583 and lower storm restoration expenses
2025	$ 163.7	$ 15.8	Increase driven by higher storm restoration expenses and storm reserve replenishment

Date Filed: September 23, 2026

Witness: Leanne M. Landry and John G. Griffin
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) With regard to the Account 593 expense reported in the 2025 FERC Form 1, explain whether any of the reported expense is subject to (either currently or requested) deferred or amortized recovery as a storm-related regulatory asset, and if so, please identify the amount and amortization/deferral period.

Response:

There are no expenses within FERC Account No. 593 related to expenses subject to deferred or amortized recovery as a storm-related regulatory asset.

Date Filed: September 23, 2026

Witness: Leanne M. Landry and John G. Griffin
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Please indicate whether any Deferred Storm Costs or Storm Related Reimbursements are included in Accounts 592 and 593 for 2025, and if so, the amount of each.

Response:

There are no deferred storm costs in FERC Account Nos. 592 or 593 for 2025. Customer contributions recovered through base distribution rates are recorded to FERC Account No. 593 and totaled $3 million for pre-staging event reserve accrual and $49.682 million for catastrophic storm reserve accrual.

Date Filed: September 23, 2026

Witness: Edward A. Davis, Marisa B. Paruta and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Provide the amounts booked for Accumulated Depreciation (Account 108) (Poles) and Depreciation (Poles) Related to Accounts 364, 365, and 369 each year for the past five years.

Response:

Please refer to NECTA-073, Attachment 1, for the requested information.

Date Filed: September 23, 2026

Witness: David L. Gladey, Jeffrey Richard and Marisa B. Paruta
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Select a 2025 Work Order involving a request by a third-party attacher (identity redacted) that includes pole replacements and tree trimming and describe in detail the accounting treatment including the assignment of costs to FERC account(s) and the timing of the assignment of costs starting with receipt of the third party's make ready payment.

Response:

Please refer to the Company's response to NECTA-058[i], which provides a detailed description of the accounting treatment for a request by a third-party attacher when there is a make-ready payment. In order to be further responsive to this question, the Company chose Work Order 23124642/attachment license 1893209 and corresponding accounting work order/field work order 80436797 as an example that includes pole replacements and tree trimming. The FERC accounts assigned to this work order were capital FERC accounts 107010 and 108030 and expense FERC accounts 593010 and 593040. Please refer to NECTA-074, Attachment 1, for the detail of costs including the make ready payments that were applied in March 2026 to reimbursement Cost Element A68 across the four FERC accounts noted above.

Prior Referenced Response:

[i] NECTA-058 Question:

(FERC Accounts) Explain how Eversource accounts for make-ready payments for pole replacements from third-party attachers, including whether the investment for such poles is booked to FERC Account 364, and how salvage value is accounted for.

NECTA-058 Response:

When a pole replacement work order is written, the responsible party creates the work order in the Company's work management system by selecting a specific work order type and enters 'estimates' into the work order by selecting Compatible Units, which are the assets that are expected to be installed and removed, which creates the FERC Split and the allocation of charges between the FERC Accounts. The combination of the work order type and Compatible Units determines the specific FERC Utility Accounts (typically 364 - Poles, Towers, and Fixtures, and 365 - Overhead Conductors and Devices, for pole replacement work) that the capital expenditures will be applied to when the work order is placed in-service. When the work is about to begin, the work order is approved, set to 'open' status, and can start receiving charges. These costs are allocated based on the FERC Split established, and records the capital expenditures to FERC Account 107010 (Construction Work in Progress) and estimated costs to remove retirement

units to FERC Account 108030 (Cost of Removal). Any proceeds received from removed infrastructure that is sold for scrap, for example, is recorded to FERC Account 108040 (Salvage).

When make ready work is billed to the third-party attacher, the Company records a Receivable from the third party attacher, and an equal and offsetting credit to the specific work order written for that pole replacement, which is reflected as a credit in the work order. The credit is applied based on the FERC Split between FERC Accounts 107010 and 108030 based on the estimate established when the work order was written. Charges or credits are not disseminated at the FERC Utility Account levels in the Company's plant asset records while the work order is in 'open' status and in FERC Account 107010.

When the installed assets are deemed 'used and useful,' the work order is placed into 'in-service' status and the capital expenditures in FERC Account 107010 are moved to FERC Account 106 (Completed Construction not Classified), while charges in FERC Account 108030 remain unchanged. At this time, the assets placed in service begin to depreciate in their assigned Utility Account (364 or 365) while the Company continues to work on finalizing all costs to the work order.

After all invoices are received, all make ready billable amounts have been paid by third party attachers, drawings are finalized and the pre-requisites/tasks in the work management system are completed, and the final costs and credits appropriately flow through the FERC Split, the work order is closed/posted to the Continuing Property Records (CPR). Once the work order is closed, the final costs of the asset in FERC Account 106 are moved to FERC Account 101010 (Utility Plant in Service) and unitized/posted to the CPR with their specific retirement units in Utility Accounts 364 and 365 based on final costs. The final Cost of Removal in FERC Account 108030 is moved to FERC Account 108010 (Accumulated Provision for Depreciation – Cost of Removal). Any salvage proceeds in FERC Account 108040 are moved to FERC Account 108010 (Accumulated Provision for Depreciation – Salvage) upon final close.

Date Filed: September 23, 2026

Witness: Leanne M. Landry, Jeffrey D. Turano and Marisa B. Paruta
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Select a 2025 Work Order and provide a discussion and timeline for the assignment of costs to the different FERC accounts beginning with the opening of the Work Order and the initial incurrence of costs to the closing of the Work Order. As part of this response, please indicate whether all costs are held in Account 365 until the Work Order is closed, or are costs assigned based on when proper account designation is determined.

Response:

For example, Work Order 80364832 was initiated in July 2025, for the replacement of a recloser and recloser control. The Operations department generated this new work order in the Company's work management system, ensuring the correct work order type was established based on the type of work being performed. The estimates were then entered for the work order by selecting the Compatible Units (assets) planned to be installed and removed, which created the FERC Split. The combination of the Work Order Type and FERC Split chosen for Work Order 80364832 ensured that the correct Utility Accounts were utilized, as well as determining the appropriate allocation of charges between FERC accounts 107010 (Construction Work in Progress) and 108030 (Cost of Removal). The work order was set to "open" status in July 2025; work commenced and capital expenditures were charged to FERC accounts 107010, and 108030. While in FERC Account 107, the capital expenditures are not disseminated at the Utility Account (365 - Overhead Conductors and Devices) level in the Company's plant asset records.

When the installed assets were deemed "used and useful" later in July 2025, the Operations department moved the work order to "in-service" status and the capital expenditures in FERC Account 107 were moved to FERC Account 106 (Completed Construction not Classified), while the charges in FERC Account 108030, remained unchanged. At that time, the assets placed in service began to depreciate in their assigned Utility Account (365), while the Operations department continued to work on finalizing all costs to the work order. In December 2025, after all invoices were received, drawings were finalized, the pre-requisites/tasks in the work management system were completed, final costs appropriately flow through the FERC Split, the work order was closed/posted to the CPR (Continuing Property Records). Once this work order was closed, the final costs of the plant additions in FERC Account 106 were moved to FERC Account 101010 (Plant in Service) and unitized/posted to the CPR with the specific retirement units in Utility Account 365 based on final costs. The final cost of removal in FERC Account 108030, was then moved to FERC Account 108010 (Accumulated Provision for Depreciation).

Date Filed: September 23, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Identify any outside source funding received by the Company in connection with replacing or repairing poles, including, but not limited to, in connection with storm restoration, and provide the amount of any such funding annually by source for the past five years.

Response:

Please refer to the table below for amounts of damage claim insurance reimbursements received for the past five years. The majority of damage claims relate to pole damage.

Damage Claim Reimbursements
2021-2025

Sum of Amount	Column Labels					
Row Labels	**2021**	**2022**	**2023**	**2024**	**2025**	**Grand Total**
INSURANCE CLAIM/KEEP COST-L4	$ (7,365,483)	$ (12,601,115)	$ (13,394,755)	$ (17,090,937)	$ (16,544,463)	$ (66,996,753)
Grand Total	**$ (7,365,483)**	**$ (12,601,115)**	**$ (13,394,755)**	**$ (17,090,937)**	**$ (16,544,463)**	**$ (66,996,753)**

Reimbursements are also received for other types of work (customer work, etc.), but pole work would only be a portion of that, if applicable, and reimbursements would not be specific to replacing or repairing poles.

Date Filed: September 23, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Provide the total make ready payments by third-party attachers that are captured in the Company's FERC Form 1 for 2025, with a breakdown of the FERC accounts where the payments appear, the associated amounts booked to each account, and the year the amounts were assigned to the accounts upon the closing of work orders.

Response:

Please refer to the table below for make ready payments by third-party attachers by FERC account for 2025.

Sum of Amount	Column Labels
Row Labels	2025
THIRD PARTY ATTACHMENTS	(3,141,116)
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593010	(18,717)
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593040	(48,468)
593050	(74,889)
594000	41
594010	(562)
594030	(81,211)
594260	(6,613)
595000	(18,468)
596000	(133,573)
Grand Total	(3,141,116)

Date Filed: September 23, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Describe in detail the accounting treatment of make ready payments to Eversource by third-party attachers, including identifying all FERC accounts to which portions of the payments might be assigned. As part of this response, also, discuss the accounting treatment, including timing of portions of make ready payments treated as CWIP or CIAC.

Response:

Make ready payments from third-party attachers are applied to the specific make ready work orders that the work is for. The payments will follow the FERC accounting on the work order whether it be capital, O&M, or a combination of the two. The payments are generally applied to the following FERC accounts, including FERC 107010, which is Construction Work in Progress.

- 107010 - Construction Work in Progress - CWIP
- 108030 - Accumulated Provision – Cost of Removal
- 583280 - CFI Credits – Overhead Line Transformers
- 593000 – Distribution Maintenance of Overhead Lines
- 593010 – Poles and Fixtures
- 593020 – Overhead Construction Transfer
- 593040 – Overhead Corrective Maintenance Repair
- 593050 – Overhead Service Maintenance Repair
- 594030 – Underground Corrective and Emergent Maintenance
- 594260 – Maintenance of Manholes
- 595000 – Distribution Maintenance of Line Transformers
- 596000 – Maintenance of Street Lighting

Date Filed: September 23, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Did the Company adjust any of the figures in the FERC Form 1 for 2025 in its calculation of pole attachment rates, i.e., any adjustment to Test Year figures? If so, identify each such adjustment, explain the reason for the adjustment, and provide source documentation for the change.

Response:

Yes. The Company adjusted the amount of Accumulated Deferred Income Taxes, specifically to Account 282, in order to negate the impact of the 2017 Tax Cuts and Jobs Act ("TCJA") on the CATV and Telecom pole attachment calculations. The Company started doing so at NECTA's request beginning with the 2019 pole attachment rate calculations.

The amount of the adjustment is shown in the calculation (Exhibit CLP-RATES-2.14, Page 5 of 7) and is described in Note A.

Date Filed: September 23, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Reference Exhibit CLP Capital Additions-9, Plant Additions 2017 – 2025. Confirm that the costs reflected in the exhibit were reflected in the FERC Form 1 for each year regardless of whether the costs were billable (net of attacher contribution) or nonbillable/non-reimbursable.

Response:

Total Third Party Pole Make Ready Investments as presented on page 149 of Exhibit CLP ADDITIONS-9 of $33,644,703 are also presented as a subset of total in-service additions on Exhibit CLP-ADDITIONS-5, page 260. The total Exhibit CLP-ADDITIONS-5 are then reconciled to the FERC Form 1 page 206, column C, line 104, by year from 2017 to 2025 via Exhibit CLP-ADDITIONS-3.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

Reference Exhibit CLP-RATES 3, pp. 162 and 174. Each year for the past five years, identify the number of entities that have paid any third party overlash fees and the total dollar amount of such payments. Provide the data separately by Wire-Based CATV Pole Attachment Tariff versus Wire-Based Telecom Pole Attachment Tariff.

Response:

As reflected in the PURA approved Pole Attachment Agreement, Article VIII, Section 3(b):

> b. The Third Party Overlash Fee will be assessed on a per Pole basis as set forth in the current schedule of rates in **Exhibit E**. This fee is paid to the Licensor by the Sub Licensee and is in addition to the Pole Attachment License Fee paid by the Licensee. Provided, however, notwithstanding the foregoing provisions in this paragraph or any other provision in this Agreement, (y) Licensor will not charge the Third Party Overlash Fee in **Exhibit E** when Licensee seeks to overlash another Attachment owned by Licensee or its Affiliate, as long as (i) Licensee complies with the Overlash requirements in Article IV and this Agreement, and (ii) the Licensor determines that the proposed Overlashing does not fall outside of the vertical space or footprint reserved for the Licensee's original Attachment; and (z) Licensor will charge the Third Party Overlash Fee in **Exhibit E** when Licensee seeks to overlash another Attachment owned, leased or controlled by an entity other than Licensee or its Affiliate.

The Agreement provides for a Third Party Overlash Fee to be assessed on a per-pole basis when a Licensee seeks to overlash an attachment owned, leased, or controlled by an entity other than the Licensee or its affiliate. However, the Agreement further provides in Article VIII, Section 3(b)(y) that no Third Party Overlash Fee will be charged when the Licensee overlashes its own attachment or that of an affiliate, provided the Licensee complies with the Agreement's overlash requirements and the overlash remains within the vertical space or footprint reserved for the original attachment.

Eversource has reviewed its records for the requested period and has identified no instances during the last five years in which a Third Party Overlash Fee was charged or collected under either the Wire-Based CATV Pole Attachment Tariff or the Wire-Based Telecom Pole Attachment Tariff. Accordingly, the number of entities paying Third Party Overlash Fees during the period was zero.

Date Filed: September 23, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

Reference Exhibit CLP-RATES 3, p. 162:

a. Provide all documentation, calculations, inputs and assumptions supporting the Third Party Overlash Fee.
b. Explain the basis for the increase in the Third Party Overlash Fee.
c. Explain the basis for the Third Party Overlash Fee, including when the Company assesses this charge.
d. Provide all documentation, calculations, inputs and assumptions supporting the Unauthorized Attachment/Overlash Fee.
e. Explain the basis for the increase in the Unauthorized Attachment/Overlash Fee.
f. Explain the basis for the Unauthorized Attachment/Overlash Fee, including when the Company assesses this charge.
g. Provide all documentation, calculations, inputs and assumptions supporting the Non-Conforming Construction/Shifting Fee.
h. Explain the basis for the increase in the Non-Conforming Construction/Shifting Fee.
i. Explain the basis for the Non-Conforming Construction/Shifting Fee, including when the Company assesses this charge.

Response:

Please refer to NECTA-084, Attachment 1 through NECTA-084, Attachment 4, for the CATV, Telecom and Municipal Third Party Pole Attachment Agreements. These documents contain language that defines the fees, when they apply and how they are assessed.

Please also refer to the DPUC's Final Decision (Dated June 30, 2010) in Docket No. 09-12-05 where the Department found that "these fees were established based on the estimated costs that CL&P expects to incur to perform specific pole attachment activities. The Department also finds that these fees are in accordance with fees being charged by other pole owners in Connecticut. The Department therefore finds the fees to be reasonable. Therefore, the fees are approved and will take effect July 1, 2010."

a. Please refer to the Company's response to NECTA-081[i].

b. The Third Party Overlash Fee is equal to the relevant pole attachment rate. As the CATV and Telecom pole attachment rates increase/decrease, the Third Party Overlash Fee increases/decreases as well.

c. Please refer to the Company's response to NECTA-081.

d. Please refer to the following:

- The Company's Pole Attachment Agreements.

- The DPUC's Final Decision (Dated June 30, 2010) in Docket No. 09-12-05, where the Unauthorized Attachment/Overlash Fee was defined as a one-time fee that is assessed per pole for each installation of equipment in which the attaching entity failed to seek prior approval. The fee is estimated on the cost associated with updating records and other administrative activities to ensure the Company's records reflect field conditions and as a penalty to induce compliance.

- Public Service Co. of Colorado v. F.C.C., 328 F.3d 675, 679-680 (May 16, 2003), in which the United States Court of Appeals for the District of Columbia Circuit, reviewed the terms of a Colorado utility pole owner's attachment agreement with a cable company and stated that the FCC's setting of an "unauthorized attachment" rate at five times the annual pole attachment rental rate plus interest, was not arbitrary or capricious.

e. The Unauthorized Attachment/Overlash Fee is set at five times the relevant pole attachment rate. As the CATV and Telecom pole attachment rates increase/decrease, the Unauthorized Attachment/Overlash Fee increases/decreases proportionately.

f. The Unauthorized Attachment/Overlash Fee is assessed whenever facilities are attached to Eversource poles without following the pole application process to gain access appropriately.

g. Please refer to the following:

- The Company's Pole Attachment Agreements.

- The DPUC's Final Decision (Dated June 30, 2010) in Docket No. 09-12-05, where the Non-Conforming/Shifting Fee is defined as a fee that is assessed per pole, per day for each installation of equipment that does not conform to applicable pole attachment requirements and also is assessed when a pole attacher fails to timely shift its equipment in compliance with the pole shifting time frame.

h. Consistent with the Unauthorized Attachment/Overlash Fee, the Non-Conforming Construction/Shifting Fee is set at five times the relevant pole attachment rate. As the CATV and Telecom pole attachment rates increase/decrease, the Non-Conforming Construction/Shifting Fee increases/decreases proportionately.

i. Please refer to the Company's pole attachment agreements. This fee is assessed when an attaching entity fails to perform rearrangement or shifting within the time period specified and/or fails to provide notice to the pole owner of completion within the time period specified. This fee applies on a daily basis, per rearrangement or shift location until notification from the attaching entity that the work has been completed.

Prior Referenced Response:

[i] NECTA-081 Question:

Reference Exhibit CLP-RATES 3, pp. 162 and 174. Each year for the past five years, identify the number of entities that have paid any third party overlash fees and the total dollar amount of such payments. Provide the data separately by Wire-Based CATV Pole Attachment Tariff versus Wire-Based Telecom Pole Attachment Tariff.

NECTA-081 Response:

As reflected in the PURA approved Pole Attachment Agreement, Article VIII, Section 3(b):

> b. The Third Party Overlash Fee will be assessed on a per Pole basis as set forth in the current schedule of rates in **Exhibit E**. This fee is paid to the Licensor by the Sub Licensee and is in addition to the Pole Attachment License Fee paid by the Licensee. Provided, however, notwithstanding the foregoing provisions in this paragraph or any other provision in this Agreement, (y) Licensor will not charge the Third Party Overlash Fee in **Exhibit E** when Licensee seeks to overlash another Attachment owned by Licensee or its Affiliate, as long as (i) Licensee complies with the Overlash requirements in Article IV and this Agreement, and (ii) the Licensor determines that the proposed Overlashing does not fall outside of the vertical space or footprint reserved for the Licensee's original Attachment; and (z) Licensor will charge the Third Party Overlash Fee in **Exhibit E** when Licensee seeks to overlash another Attachment owned, leased or controlled by an entity other than Licensee or its Affiliate.

The Agreement provides for a Third Party Overlash Fee to be assessed on a per-pole basis when a Licensee seeks to overlash an attachment owned, leased, or controlled by an entity other than the Licensee or its affiliate. However, the Agreement further provides in Article VIII, Section 3(b)(y) that no Third Party Overlash Fee will be charged when the Licensee overlashes its own attachment or that of an affiliate, provided the Licensee complies with the Agreement's overlash requirements and the overlash remains within the vertical space or footprint reserved for the original attachment.

Eversource has reviewed its records for the requested period and has identified no instances during the last five years in which a Third Party Overlash Fee was charged or collected under either the Wire-Based CATV Pole Attachment

Tariff or the Wire-Based Telecom Pole Attachment Tariff. Accordingly, the number of entities paying Third Party Overlash Fees during the period was zero.

Date Filed: September 23, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

Reference Workpaper C-3.1, p. 2 of 2, Line 29. Identify and list all components included within "Rent from Electric Property + Re + Pole Att."

Response:

Please refer to NECTA-083, Attachment 1, for the requested information.

Date Filed: September 23, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Connectivity and Telecommunications Association

Question:

Provide copies of the Company's standard Pole Attachment Agreement(s).

Response:

Please reference the Company's standard Pole Attachment Agreement templates as follows:

- NECTA-084, Attachment 1: Non-Municipal Wireline Agreement
- NECTA-084, Attachment 2: Non-Municipal Wireless Agreement
- NECTA-084, Attachment 3: Municipal Wireline Agreement
- NECTA-084, Attachment 4: Municipal Wireless Agreement

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

Provide a spreadsheet of Eversource poles by town, broken down by solely and jointly owned poles.

Response:

Please refer to NECTA-085, Attachment 1, for the requested information.

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

Pursuant to joint ownership agreements or other inter-company documents, please indicate whether there is a standard practice for the parties to install poles of a particular height (e.g., 40 foot or other height) and how long that practice has been in place.

Response:

Intercompany Operating Procedure ("IOP") 40.0, dated as of April 2013, requires that the standard pole height for joint poles will be forty (40) feet and that all joint poles shall be a minimum Class 2 size. Eversource interprets this IOP as a baseline. The Company installs poles based on its engineering standards as an electric distribution company, which meet or exceed the requirements of this IOP.

Date Filed: September 23, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

For each year 2021-2025, provide the number of solely owned and jointly owned poles and the joint owner(s) installed (a) by Eversource and (b) by joint owner(s) in Connecticut by height in 5-foot increments (e.g., 40-foot, 45-foot, etc.).

Response:

Please refer to NECTA-087, Attachment 1, for the requested information.