Date Filed: September 28, 2026

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

Question:

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

a. Identify the specific criteria, policies, or guidelines used to determine which party or parties bear the cost of correcting a pre-existing condition or violation discovered during a field survey.
b. Explain whether any portion of the cost of correcting a pre-existing condition or violation is billed to or recovered from the existing attacher(s) whose facilities caused or contributed to the condition or violation. If not, explain why not.
c. Explain whether any portion of the cost of correcting a pre-existing condition or violation is billed to or recovered from the new attacher whose application triggered the field survey that identified the condition. If so, describe the circumstances under which such costs are billed to the new attacher.
d. For costs classified as non-billable that are borne by Eversource, identify the FERC account(s) to which such costs are booked, whether the costs are included in the deferred regulatory asset for non-billable make-ready, and from which rates (pole attachment rates, base distribution rates, or other rates) the Company seeks or has obtained recovery.
e. Identify and produce all written policies, procedures, decision matrices, or similar documentation governing the allocation of non-billable make-ready costs among the new attacher, existing attachers, and Eversource.

Response:

a. Eversource allocates make ready costs in accordance with its pole attachment billing practices, applicable agreements, and the nature of the work identified during engineering review and field survey. Where corrective work is classified as non-billable make ready, the costs are not charged to the new attacher.

b. When the Company determines that a pre-existing condition or violation is attributable to a specific existing attacher's facilities, the Company may seek recovery of associated corrective costs from the responsible attacher through available contractual or other cost recovery mechanisms. If the Company does not seek recovery from the existing attacher, including circumstances where the responsible attacher cannot be identified, the cost is not allocated to the new attacher.

c. No. Consistent with the Company's make ready billing practices, costs associated with correcting pre-existing conditions that are classified as non-billable make ready are not allocated to, billed to, or recovered from the new attacher whose application triggered the field survey that identified the condition.

d. The FERC accounts that the Make Ready, non-billable O&M costs are charged to are shown in Exhibit CLP-REVREQ-4, Col (F) through Col (Z). The total supported in this exhibit is included in the deferred asset, presented in Exhibit CLP-REVREQ-2, Sch. B-6.2, line 16. The Company is seeking recovery of the deferred asset through base distribution rates in this proceeding.

e. Refer to the Company's Make Ready Billing Matrix, previously produced in response to RRU-002 Attachment 1. Other than the Make Ready Billable Matrix and applicable Pole Attachment Agreement provisions addressing recovery from attachers in appropriate circumstances, the Company is not aware of any written policies, procedures, decision matrices, or similar documentation that specifically govern the assignment of responsibility for non-billable make ready costs among the new attacher, existing attachers, and Eversource.

Please note that on September 9, 2026, PURA issued a ruling on the Company's Motion No. 044 in Docket No. 19-01-52RE01, PURA Investigation of Developments in the Third-Party Pole Attachment Process – Make Ready, granting the opening of a new docket to, among other things, investigate modifications to the current cost allocation methodologies.