Date Filed: October 13, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: Public Utilities Regulatory Authority

Question:

(MAKE READY) Application, Ex. CLP-REVREQ-4. Explain the following regarding the worksheet "Non-Billable Reason" for work labeled "Prior to 5/11/22" under the "Non-Billable Reason" Column:

a. Define what "Prior to 5/11/22" means in this worksheet and whether this indicates that work was done prior to May 11, 2022; and
b. Describe the billable and non-billable cost allocation standards in place prior to May 11, 2022.

Response:

a. The designation "Prior to 5/11/22" in the worksheet "Non-Billable Reason" identifies pole attachment applications that were received before May 11, 2022, the date the final decision in Docket No. 19-01-52RE01 was issued. The decision required the Company to track and categorize non-billable make ready work, and the Company implemented the tracking requirements as of that date. Therefore, "Prior to 5/11/22" refers to the application receipt date and does not necessarily indicate when the associated make ready work was performed.

b. Prior to May 11, 2022, the Company utilized the same billable and non-billable cost allocation standards used after that date to determine whether make ready work was billable or non-billable. The issuance of the final decision in Docket No. 19-01-52RE01 did not change the underlying standards used to make that determination.

   The primary change resulting from the decision was the requirement for the Company to track and categorize non-billable reason classifications, as reflected in the worksheet "Non-Billable Reason". Prior to May 11, 2022, the Company did not separately track non-billable work using those classifications.