Date Filed: August 21, 2026

Witness: Leanne M. Landry and John G. Griffin
Request from: Office of Education, Outreach, and Enforcement

Question:

(CAPITALIZATION) Refer to Exhibit CLP-STORM-1, p. 82. The Company's PFT references a shift in the 2024-2025 costs as driven by "refinements to capitalization practices." Explain the specific improvements and provide supporting documentation and calculations, if applicable.

Response:

For the reasons explained in EOE-028[i], the references to "capitalization practices" and "improvements in the Frontier Settlement billing process" are inadvertently out of place in this statement in the testimony.

It is correct that the Company endeavors to maintain its capitalization method in a manner that correctly reflects cost accounting principles and to refine that process when there is opportunity to do so. For example, hourly labor rates are updated annually based on the contractual hourly wage changes for the represented workforce. Contractor rates are also reviewed periodically and adjusted, when applicable. The unit estimates are also reviewed periodically to ensure they are in line with current engineering design estimates.

Additionally, in 2024, the Company implemented a Robotic Process Automation (RPA) to automate the monthly capitalization process. This process was time-consuming and involved running several queries from the General Ledger and combining them all in the Microsoft Excel model. The output of this automated process is checked and reviewed by financial analysts but many of the heavy, time-consuming steps are performed by the RPA.

Prior Referenced Response:

[i] EOE-028 Question:
(FRONTIER) Refer to Exhibit CLP-STORM-1, p. 82. The Company's PFT references a shift in the 2024-2025 costs as driven by "improvements in the Frontier Settlement billing process." Explain the specific improvements and provide supporting documentation and calculations, if applicable.

EOE-028 Response:
The referenced statement is intended to explain the reason that the proportion of external crew costs and direct internal labor costs has "shifted" in relation to the 2024-2025 storms, as compared to the 2018 to 2023 storms recently reviewed by PURA in Docket No. 25-12-13. By "shifted," the testimony indicates that the proportion of direct internal labor

costs have increased, while the proportion of external crew costs have decreased. This is primarily the result of the Company's efforts to increase its internal crew counts over the period 2018-2023, so that the storm events occurring in the years 2024 and 2025 are reflecting higher internal crew hours and, conversely, reduced reliance on external crews, as compared to storm events in the 2018-2023 timeframe. In this context, the references to "capitalization practices" and "improvements in the Frontier Settlement billing process" are inadvertently out of place.

Another, less impactful factor changing the proportions of cost categories in relation to the 2024-2025 storms as compared to the 2018-2023 storms, is that certain costs within the category of "Other Outside Contractors" have increased, specifically the cost of rental equipment, lodging and fuel – all of which are affected by cumulative inflation over the years 2018-2025. As costs in this category have increased, it represents a larger percentage of total cost than in the prior storm events (2018-2023), slightly diminishing the proportions of other cost categories.

It is correct that Eversource has improved its billing process with Frontier. Specifically, Frontier and CL&P have agreed to identify a single point of contact and email and/or mailing address for all communications and invoices related to pole related billing matters, including costs, expenses and/or charges to be billed and owing by either party for joint line billing work, non-storm vegetation management work, and storm vegetation management work. However, these improvements did not impact the shift in proportions of internal and external crew costs.