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September 25, 2026

VIA E-FILING[1]

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Connecticut Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 26-05-10: Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules

Dear Secretary Gaudiosi:

Enclosed please find the Fourth Set of Interrogatories of the New England Connectivity and Telecommunications Association ("NECTA") directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource") in the above-captioned docket.

Please feel free to contact the undersigned should you have any questions.

I certify that a copy hereof has been sent to all participants of record as reflected on the Authority's service list as of this date. A copy has also been filed with the Authority as an electronic web filing and is complete.

Very truly yours,

David W. Bogan

Enclosure
CC: Service List

[1] Pursuant to the Undocketed Motion to Temporarily Suspend Filing Paper Copies (Jun. 19, 2020), this filing is being submitted by electronic copy only, with a paper copy to delivered or mailed according to a subsequent determination by the Authority.

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	:	Docket No. 26-05-10
	:	September 25, 2026

NEW ENGLAND CONNECTIVITY AND TELECOMMUNICATIONS ASSOCIATION'S FOLLOW-UP INTERROGATORIES REGARDING MAKE-READY COSTS AND COST ALLOCATION

The New England Connectivity and Telecommunications Association ("NECTA") hereby requests responses from The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or the "Company") to the following follow-up interrogatories regarding make-ready costs and non-billable cost allocations in the above-captioned proceeding by **October 9, 2026**.

INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (*e.g.*, documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify, or correct your responses to each of these interrogatories and production throughout until a final decision in adopted by the Authority in this Docket.

INTERROGATORIES

NECTA-106. For all poles replaced for which Eversource is seeking amortization of non-billable O&M costs in Exhibit CLP REVREQ-4, please confirm that third-party attachers transferred their attachments to the replacement pole at their cost. If not. Identify the exceptions and state who bore the transfer costs, the amounts involved, and whether any such amounts are included in the proposed amortization.

NECTA-107. Please provide the following: (a) discuss whether a municipal attachment can cause a pole to be in violation or non-compliant with relevant pole standards, (b) provide the number of poles replaced associated with the non-billable O&M costs in Exhibit CLP REVREQ-4 that had one or more municipal attachments before replacement.

NECTA-108. Reference the Written Exceptions of the Connecticut Light and Power Company d/b/a Eversource Energy dated April 25, 2022, in Docket No. 19-01-52RE01, please discuss whether, under Eversource's proposal, existing or prospective

municipal attachers would be allocated a share of non-billable make ready costs when a pole replacement is required.

NECTA-109. Please provide all Eversource filings for all pole attachment rate changes pursuant to the pole attachment settlement agreement approved by PURA in Docket 17-10-46.

NECTA-110. For each pole that was replaced for which non-billable O&M costs have been recorded to the deferred asset for Third Party Pole Make Ready Work, please (a) indicate the age of the pole and whether it was fully depreciated, (b) for the subset of poles that were overloaded, discuss whether Eversource reviewed the loading for specific communications strands and, if it did, identify the overloaded strands and the associated pole.

NECTA-111. Please discuss whether approval of Eversource's proposed amortization of the costs in the deferred asset for Third Party Pole Make Ready would reduce Eversource's regulatory risk even to a small degree.

NECTA-112. Reference the Joint Testimony of the Revenue Requirements Panel (Brendan O'Brien and Garrett Murray) at 44, which states that the costs recorded to the deferred asset for Third Party Pole Make Ready are associated with the cost of performing non-billable pole make ready pole work not recovered in base distribution rates. Please provide the following:

a) Explain how Eversource determines which non-billable third-party make-ready costs are recorded in the deferred asset. In particular, does the asset contain only costs exceeding an amount included in base distribution rates set in Docket 17-10-46, or does it contain all such costs incurred?
b) Identify the annual amount of non-billable third party pole make ready costs included in base distribution rates established in Docket 17-10-46 or any subsequent PURA decision. Identify the decision and supporting calculation for each amount.
c) (i) For each year beginning in 2018, identify the FERC account or accounts to which non-billable third-party make-ready costs were booked and the amounts booked to each account. (ii) For each year, identify whether any of these amounts are included in the inputs used to calculate pole attachment rental rates, and if so, which amounts.
d) Explain whether Eversource has credited or reduced the amount recorded in the non-billable third-party make-ready deferred asset to account for any pole attachment rental revenue. If so, provide the amount and calculation by year. If not, explain why no credit or reduction was made.

NECTA-113. Please discuss whether the pole custodian is still responsible for guying as provided in the Make Ready Decision in Docket 07-02-13 dated April 30, 2008, at p. 13.

NECTA-114. Provide the continuing property records relied upon by the Company to manage its distribution poles. Specifically, provide records related to pole plant including,

if available, the number of poles grouped by size. A complete response will provide an updated summary output of account 364 Poles and Appurtenances from the Company's plant accounting records, similar to what the Company provided in response to Q-NETCA-013 in Docket No. 17-10-46.

NECTA-115. Information Request NECTA-8 requests a complete inventory of Eversource's pole fleet in Connecticut, along with all information about each of the poles retained by the Company. Please ensure that the pole inventory information provided identifies poles with: (i) CATV pole attachments, (ii) telecommunications attachments, and (iii) both types of attachments.

Respectfully submitted,

THE NEW ENGLAND CONNECTIVITY AND TELECOMMUNICATIONS ASSOCIATION



By: _____

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(860) 275-0187

CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at Hartford, Connecticut this 25th day of September, 2026.



By: _____
Colleen Olsen
Commissioner of the Superior Court