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Witness: Christopher E. Colorio, David L. Gladey, Jeffrey Richard, John P. Dipaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(Poles) When a storm or other event causes a massive service outage situation, with poles and utility wires downed, please elaborate on Eversource's role with respect to communications providers in those situations.

a. Do those communications providers get billed for certain aspects of Eversource's work attributable to such a provider or providers?
b. Please explain Eversource's methodology in such cases.
c. Please provide a listing, current as of the filing of the response to this interrogatory, of any such outstanding unpaid invoices by communications provider and date, including the amount of each invoice.

Response:

During a storm or other event resulting in widespread service outages, Eversource's primary responsibility is the safe and timely restoration of electric service. Where utility poles are damaged and require replacement, Eversource coordinates, as necessary, with Frontier/Verizon regarding the replacement of jointly owned poles. Following pole replacement, communications providers are responsible for transferring their facilities to the replacement pole in accordance with the applicable joint-use processes. The ILEC, in its role as custodian of the communications space, is responsible for coordination associated with communications facilities occupying that space.

a. Eversource does not bill communications attachers for Eversource's storm restoration work or for the setting of replacement poles necessitated by a storm or other outage event. Where Eversource sets a pole for which Frontier/Verizon has cost responsibility under the applicable joint-line agreement, the associated costs are identified and reconciled with Frontier/Verizon pursuant to the applicable joint-line billing process.

b. Eversource's methodology is to identify pole replacement work performed during restoration and, where applicable, allocate and reconcile costs between Eversource and Frontier/Verizon, in accordance with the applicable joint-line billing procedures. Eversource does not allocate such pole replacement costs among individual communications attachers. Coordination of communications facilities and transfers following replacement of a pole is administered through the applicable communications space custodian processes.

c. Eversource does not issue invoices to individual communications providers for storm-related pole replacement or electric restoration work of the type described above. Accordingly, Eversource has no outstanding unpaid invoices to communications providers responsive to this request as of the date of this response.