Date Filed: October 28, 2026

Witness: David L. Gladey, Steven Lamontagne and Edward A. Davis
Request from: New England Connectivity and Telecommunications Association

Question:

Refer to NECTA-008, p. 2 (GIS population of 730,325 poles, including 94,686 solely owned and 635,639 jointly owned poles), and Exhibit CLP-RATES-2.14, p. 7 of 7 (664,725 physical poles, comprising 76,993 solely owned and 587,732 jointly owned poles, converted to 370,859 equivalent poles).

a. Reconcile the 730,325 GIS poles to the 664,725 poles used in the rental-rate formula, quantifying every category that explains the 65,600-pole difference.
b. For each reconciling category, identify the count of solely owned and jointly owned poles, and explain the reason for exclusion from the pole count used in the pole attachment rate formula.
c. For each reconciling category, identify the poles that are physically installed and in service but omitted from the formula denominator.

Response:

The Company cannot perform the requested analysis. While the difference between the counts from the Company's GIS system and the Company's plant accounting system cannot be specifically accounted for and reconciled, there are several explanations as to why the figures are different.

The pole counts from the Company's Continuing Property Record ("CPR") for Account 364 – Poles, Towers & Fixtures are only the poles found within Account 101 - Utility Plant in Service. The count of any poles that have not yet been classified to Account 101 (i.e., are contained within Account 106) are not factored into the pole counts shown until the open work orders close.

The Company's GIS system includes all poles that exist in the Company's service territory. This count includes poles used to construct transformer platforms, stub poles, push brace poles, guy poles, streetlight poles, poles on private property, etc. The count of these types of poles may be found in Account 364 (with a different retirement unit than those shown in Exhibit CLP-RATES-2.14, p. 7 of 7) or the counts may be included in another account entirely, for example Account 371 or Account 373. The count of these poles should not be included for third party pole attachment rate calculation purposes.

Additionally, the two pole counts are from different time periods. The pole counts from the Company's CPR are as of December 31, 2025 while the GIS pole counts are from an extract that was performed in February 2026.

The Company would like to note that the CPR for Account 364 has historically been used as the source of the count of poles used to calculate the annual third party pole attachment rates.

The Company previously provided a similar explanation to NECTA in response to NECTA-059 in the Company's last rate case Docket No. 17-10-46.