Date Filed: September 23, 2026

Witness: Edward A. Davis, Marisa B. Paruta and Kimberly R. Parsons
Request from: New England Connectivity and Telecommunications Association

Question:

(FERC Accounts) Please explain whether the Company or any of its affiliates could provide from any of its records or databases a breakdown of pole appurtenance fixture investments in Account 364 at any level of disaggregation or time period, and if so, describe.

Response:

No. The Company does not track investment in appurtenances as separately identifiable items and therefore cannot specifically include all appurtenances that are pole-related (e.g., anchors and guys) and specifically exclude all appurtenances that are non pole-related (e.g., brackets and crossarms) from the third party pole attachment calculation.

The Company therefore relies on the FCC 15% appurtenance presumption in order to calculate its pole attachment rates.