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July 28, 2026

Via Electronic Filing

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
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*
Fiber AssetCo LLC d/b/a Zayo Motion to Intervene

Dear Mr. Gaudiosi:

Fiber AssetCo LLC d/b/a Zayo ("FiberCo") hereby files with the Public Utilities Regulatory Authority ("PURA" or "Authority") its Motion to Intervene pursuant to General Statutes § 4-177a(b) and Regulations of Connecticut State Agencies Section 16-1-18(a) in the above referenced proceeding.

Please contact the undersigned with any questions or concerns. Thank you for your consideration of this information.

Sincerely,

Mark J. Cook, Esq.
Counsel for Fiber AssetCo LLC d/b/a Zayo

cc: Service List
Enclosure

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
	:	JULY 28, 2026

MOTION OF FIBER ASSETCO LLC D/B/A ZAYO TO INTERVENE

Fiber AssetCo LLC, doing business as Zayo ("FiberCo") hereby petitions the Public Utilities Regulatory Authority ("PURA" or "Authority") to be designated an intervenor in the above referenced contested proceeding in accordance with General Statutes § 4-177a(b) and Section 16-1-18(a) of the Regulations of Connecticut State Agencies ("Conn. Agencies Regs.").

On May 20, 2026, The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource") submitted a notice of intent ("Notice of Intent") to file an application ("Application") with the Authority to amend its existing rate schedules.

On June 2, 2026, the Authority issued a Notice of Proceeding ("NOP") in the above-referenced docket.[1]

On July 14, 2026, Eversource filed its Application with the Authority for approval of amended rate schedules (the "Application"). The Application proposes, among other things, to amend pole attachment rental fees in Eversource's pole attachment tariffs.[2] The Application also addresses billable and non-billable make ready pole work.[3]

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[1] Docket No. 26-05-10, *Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules*, Notice of Proceeding, Jun. 2, 2026.
[2] Docket No. 26-05-10, Eversource Exhibit CLP-RATES-1, Jul. 14, 2026, p. 39; *see also* Docket No. 26-05-10, Eversource Exhibit CLP-RATES-2, Jul. 14, 2026.
[3] *See* Docket No. 26-05-10, Eversource Exhibit CLP-REVREQ-1, Jul. 14, 2026; *see also* Docket No. 26-05-10, Eversource Exhibit CLP-ADDITIONS-1, Jul. 14, 2026, pp.66-76; *see also* Docket No. 26-05-10, Eversource Exhibit CLP-REVREQ-4, Jul. 14, 2026; see also Docket No. 26-05-10, Eversource Exhibit CLP-ADDIITONS-9, Jul. 14, 2026.

FiberCo operates under a Certificate of Public Convenience and Necessity ("CPCN") granted by the Authority to operate as a reseller and facilities-based provider of telecommunications services.[4] FiberCo also holds all of its predecessor Crown Castle Fiber LLC's[5] ("Crown Castle") fiber network operations in Connecticut.[6]

As the owner and operator of an extensive fiber optic network hosted on thousands of Eversource solely-owned and Eversource jointly-owned utility poles throughout Eversource's service territory in Connecticut, FiberCo's interests will be directly and materially impacted by the Authority's consideration of the issues presented in this proceeding. Eversource's proposed Telecommunications annual pole attachment rental rate is greater than what FiberCo pays currently[7] and is significantly more than Eversource's proposed cable television ("CATV") annual pole attachment rental rate.[8] As a result, FiberCo has a vested interest to ensure the Telecommunications pole attachment rental rate proposed by Eversource in this instant docket comports with the Federal Communications Commission (FCC) Formula calculation for

[4] Docket No. 25-06-14, *Application of Fiber AssetCo, LLC for a Certificate of Public Convenience and Necessity*, Decision, Sep. 17, 2025.

[5] Crown Castle Fiber LLC's Certificate of Public Convenience and Necessity was originally issued to Consolidated Edison Communications Inc. ("CEC Inc.") by the PURA's decision dated April 18, 2001 in Docket No. 00-10-16, *Application of Consolidated Edison Communications, Inc. for a Certificate of Public Convenience and Necessity*. CEC Inc. merged with and into its sister company, Con Edison Communications, LLC ("CEC LLC") pursuant to the Notification *Pro Forma* Corporate Reorganization dated January 6, 2004, which notified the Authority of the transfer of assets including the authority to provide telecommunications services in Connecticut to CEC LLC. Thereafter, CEC LLC changed its name to RCN New York Communications, LLC ("RCN NY"). On April 9, 2010, RCN NY filed a Notification of Transfer of Control whereby RCN NY informed the Authority that it was acquired by Yankee Metro Parent, Inc. In November 2010, RCN NY changed its name to Sidera Networks, LLC ("Sidera"). On April 11, 2013, Sidera was acquired by LTS Buyer, LLC pursuant to the Notice of Consummation of Transfer of Control, Related Financing Transaction and Intra-Company Consolidation dated April 19, 2013. On April 23, 2015, Sidera informed the Authority of its name change to Lightower Fiber Networks II, LLC. ("LFN II") and by letter dated June 27, 2018, LFN II informed the PURA of its new name, Crown Castle Fiber LLC.

[6] See Docket No. 25-06-14, *Motion of Crown Castle Operating Company, Fiber Assetco LLC, Crown Castle Fiber LLC And Fiber Finco, LLC to Expand Docket to Include a Request to Approve Transfer of Indirect Control Of Fiber Assetco LLC to Fiber Finco, LLC*, Jun. 13, 2025, p. 3.

[7] *See* Docket No. 26-05-10, Eversource Exhibit CLP-RATES-3, Jul. 14, 2026, p. 174.

[8] *See Id*., p. 162.

Telecommunications pole attachment rates the Authority has adopted.[9] Accordingly, FiberCo's participation as an intervenor in this proceeding is in the interests of justice and will assist the Authority in this proceeding. FiberCo also has an interest in the way in which Eversource calculated its proposed average pole height in its Telecom Pole Attachment Formula.[10] Average pole height impacts the pole attachment rate calculation for telecommunications attachers uniquely.[11] As a result, FiberCo has a unique interest as a telecommunications attacher to ensure average pole height was determined correctly in this contested proceeding.[12] FiberCo also has a vested interest in the make ready pole work issues raised by Eversource in its Application.[13]

In support of this Motion, FiberCo states the following:

1. FiberCo was granted a CPCN in Docket No. 25-06-14, *Application of Fiber AssetCo, LLC for a Certificate of Public Convenience and Necessity* ("CPCN Decision").[14] In that CPCN Decision, the Authority authorized FiberCo to operate as a reseller and facilities-based provider of telecommunications services.[15] The majority of FiberCo's experienced management team come from FiberCo's predecessor Crown Castle which has been an active participant in the Connecticut telecommunications marketplace for several decades in issues involving fiber deployment in the public rights-of-way.

[9] *See* Docket No. 11-11-02, *Fiber Technologies Networks, L.L.C. for Authority Investigation of Rental Rates Charged to Telecommunications Providers by Pole Owners*, Decision, Sep. 12, 2012.
[10] *See* Docket No. 26-05-10, Eversource Exhibit CLP-RATES-2, Jul. 14, 2026, p. 204.
[11] Docket No. 22-08-08, *Application of The United Illuminating Company to Amend its Rate Schedule*, Decision, Aug. 25, 2023, pp. 262-263.
[12] General Statutes § 4-177a(b).
[13] *See* Docket No. 26-05-10, Eversource Exhibit CLP-REVREQ-1, Jul. 14, 2026; *see also* Docket No. 26-05-10, Eversource Exhibit CLP-ADDITIONS-1, Jul. 14, 2026, pp.66-76; *see also* Docket No. 26-05-10, Eversource Exhibit CLP-REVREQ-4, Jul. 14, 2026; see also Docket No. 26-05-10, Eversource Exhibit CLP-ADDIITONS-9, Jul. 14, 2026.
[14] Docket No. 25-06-14, Decision, Sep. 17, 2025.
[15] *Id*.

2. FiberCo's predecessor installed and FiberCo is operating thousands of miles of fiber optic cable on thousands of utility poles in the public rights-of-way throughout Connecticut and in particular in Eversource service territory. Today, FiberCo's fiber optic network operates on Eversource solely-owned and Eversource jointly-owned utility poles throughout major portions of Eversource service territory. FiberCo pays pole attachment license fees to Eversource for its fiber optic facilities attached to Eversource solely-owned and Eversource jointly-owned utility poles. Among the proposals in the Application is a methodology for calculating the Telecommunications pole attachment rental rate for pole attachments by telecommunications service providers, such as FiberCo. FiberCo has a vested interest to ensure the Telecommunications pole attachment rental rate calculation proposed by Eversource comports with the FCC Formula calculation for Telecommunications pole attachment rental rates the Authority has adopted.[16] Average pole height impacts the pole attachment rate calculation for telecommunications attachers uniquely.[17] FiberCo also has an interest in the way in which Eversource calculated its proposed average pole height in its Telecom Pole Attachment Formula.[18] As a result, FiberCo has a unique interest as a telecommunications attacher to ensure average pole height was determined correctly in this contested proceeding. FiberCo also has a vested interest in the make ready pole work issues raised by Eversource in its Application.[19] Accordingly, FiberCo's participation as an intervenor in this proceeding is in the interests of justice and will assist the Authority in this proceeding.

[16] *See* Docket No. 11-11-02, Decision, Sep. 12, 2012.
[17] Docket No. 22-08-08, *Application of The United Illuminating Company to Amend its Rate Schedule*, Decision, Aug. 25, 2023, pp. 262-263.
[18] *See* Docket No. 26-05-10, Eversource Exhibit CLP-RATES-2, Jul. 14, 2026, p. 204.
[19] *See* Docket No. 26-05-10, Eversource Exhibit CLP-REVREQ-1, Jul. 14, 2026; *see also* Docket No. 26-05-10, Eversource Exhibit CLP-ADDITIONS-1, Jul. 14, 2026, pp.66-76; *see also* Docket No. 26-05-10, Eversource Exhibit CLP-REVREQ-4, Jul. 14, 2026; see also Docket No. 26-05-10, Eversource Exhibit CLP-ADDITIONS-9, Jul. 14, 2026.

3. Most recently, FiberCo's predecessor Crown Castle actively participated as an intervenor in the past two The United Illuminating Company rate cases, Docket Nos. 22-08-08 and 24-10-04. FiberCo's predecessor Crown Castle also has been an active participant and contributor to Docket Nos. 19-01-52 and 19-01-52RE01, both of which are raised by Eversource in its Application.

FiberCo's interests will be directly and materially impacted when this Application is considered by the PURA in this proceeding. The interests of justice require FiberCo's full participation. FiberCo's full participation as an intervenor will assist in the PURA's review of the issues presented and will not impair the orderly conduct of the proceedings.

For the foregoing reasons and pursuant to General Statutes § 4-177a(b) and Conn. Agencies Regs. Section 16-1-18(a), FiberCo respectfully requests the right to participate fully in this proceeding as an intervenor, including filing interrogatories, receiving data and information filed by parties and other intervenors, cross-examining witnesses, filing briefs, presenting oral arguments, and participation in settlement discussions in this proceeding on the same dates and times as other parties and/or intervenors concerning any and all issues that may be presented in this proceeding.

FiberCo respectfully requests the following individuals be included on the service list and requests the appearance of such individual be entered in this proceeding:

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Respectfully submitted,

FIBER ASSETCO, LLC D/B/A ZAYO

By: _____

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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Intervene has been sent electronically this 28th day of July 2026, to all parties and participants of record on this proceeding's service list as of this date.

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Mark J. Cook, Esq.