Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Unrecovered Attachment Costs – Owed Annual Fees) Referring to the Company's response to OCC-150, and the summary table therein: For each year (2021–2025), state how the Company calculated the "Total of Owed Annual Fees" amounts ($729,641.20 for 2021; $465,539.21 for 2022; $3,257,642.33 for 2023; $2,060,876.67 for 2024; and $339,865.60 for 2025), including whether the amounts reflect annual pole attachment rental fees, application fees, survey fees, overlash fees, unauthorized attachment fees, or some other category of charges, and specifically state whether the "Total of Owed Annual Fees" amounts represent: (a) unpaid annual pole attachment rental fees only, (b) a combination of annual rental fees and other recurring charges, (c) a combination of annual rental fees and non-recurring fees or penalties, or (d) something else.

Response:

The Company calculates the 'Total of Owed Annual Fees' by the following formula:

Total of Owed Annual Fees = (# of Attachments X attachment rate) – Annual fees paid

The 'Total of Owed Annual Fees' for years 2021-2025 shown in the response to OCC-150[i], are only the unpaid annual pole attachment rental fees.

Prior Referenced Response:

[i] OCC-150 Question:

(Poles) Please provide the amount of unrecovered pole attachment costs that were billed to a specific attacher as of years' end in 2021, 2022, 2023, 2024, and 2025 listed by year on a per-attacher basis.

OCC-150 Response:

Please refer to Table 1 below:

Table 1. 2021 – 2025 Summary

	2021	2022	2023	2024	2025
Total of Owed Annual Fees	$ 729,641.20	$ 465,539.21	$ 3,257,642.33	$ 2,060,876.67	$ 339,865.60

Total of Owed Make Ready/True Ups	n/a	$ 97,776.25	$ 236,150.61	$ 106,461.37	$ 1,156,888.67
Total Owed at year end	$ 729,641.20	$ 563,315.46	$ 3,493,792.94	$ 2,167,338.04	$ 1,496,754.27

Also refer to the following Attachments:

- OCC-150, Attachment 1 – 2021 Owed Annual Fees
- OCC-150, Attachment 2 – 2022 Owed Annual Fees
- OCC-150, Attachment 3 – 2022 Owed Make Ready True Ups
- OCC-150, Attachment 4 – 2023 Owed Annual Fees
- OCC-150, Attachment 5 – 2023 Owed Make Ready True Ups
- OCC-150, Attachment 6 – 2024 Owed Annual Fees
- OCC-150, Attachment 7 – 2024 Owed Make Ready True Ups
- OCC-150, Attachment 8 – 2025 Owed Annual Fees
- OCC-150, Attachment 9 – 2025 Owed Make Ready True Ups

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Unrecovered Attachment Costs – Owed Annual Fees) For each NECTA member identified in OCC-150, Attachments 1 (2021) (Charter, Comcast), 2 (2022) (Charter, Cox, Comcast), 4 (2023) (Breezeline, Cablevision, Charter, Cox, Comcast), 6 (2024) (Breezeline, Charter, Comcast, Cox), and 8 (2025) (Cox Cogeco, Charter, Comcast), identify the specific type(s) of charges included in the "Owed Annual Fees" amount for that attacher. If more than one type of charge is included for any attacher, provide a breakdown by charge type.

Response:

Regarding the specific types of charges referenced in OCC-150, Attachment Numbers 1, 2, 4, 6, and 8, the amounts in the referenced attachments represent only unpaid annual pole attachment rental fees. There are no other fees included in the "Owed Annual Fees" amounts.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Unrecovered Attachment Costs – Make Ready True Ups) Referring to the Company's response to OCC-150, and the summary table therein: For each year (2022–2025), state how the Company calculated the "Total of Owed Make Ready/True Ups" amounts ($97,776.25 for 2022; $236,150.61 for 2023; $106,461.37 for 2024; and $1,156,888.67 for 2025), including whether the amounts reflect initial estimates, revised estimates, actual costs, or adjustments, and specifically state whether the "Total of Owed Make Ready/True Ups" amounts represent: (a) unpaid estimated make-ready charges, (b) true-up amounts following completion of make-ready work, (c) a combination of estimates and true-ups, or (d) something else.

Response:

The Company calculated 'Total of Owed Make Ready/True Up' by the following formula:
Total of Owed Make Ready/True Up = Total Paid – Actuals

If the sum to the equation above is positive, then a refund is issued. If the sum is negative, then a follow-up invoice is sent to the attachment company for payment based on actuals.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Unrecovered Attachment Costs – Make Ready True Ups) For each line item attributable to Comcast Cable or Cox Communications in OCC-150, Attachments 5 (2023) (Comcast), and 9 (2025) (Cox, Comcast), state how the Company determined the "Last Billed Amount" and to the extent not already part of the Company's answer, identify whether the "Last Billed Amount" represents (a) an initial estimated make-ready cost, (b) a true-up adjustment following completion of make-ready work, (c) a final invoice for completed work, or (d) some other charge. If the amount includes a true-up component, identify the original estimated amount and the basis for the adjustment.

Response:

Referring to OCC-150, Attachments 5, and 9, the amount identified in the 'Last Billed Amount' represents (b) a true-up adjustment following completion of work. The company calculates the true up by comparing the actual cost incurred with the amount previously estimated and billed. Where actual costs exceed the original estimate, the company invoices the attacher for the remaining balance. Where actual costs are less than the amount previously billed, the company issues the appropriate refund.

Accordingly, the Last billed amount reflects only the difference between the actual costs and the amount previously billed, it does not represent the total actual cost of the work.

The identified amounts represent true up invoices issued where actual make ready cost exceeded the amount originally estimated and billed. Each True up was calculated using the actual cost incurred, less the amount previously billed.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:
(Unrecovered Attachment Costs – Make Ready True Ups) For each line item attributable to Comcast Cable or Cox Communications in OCC-150 Attachments 5 (Comcast) and 9 (Cox, Comcast), identify all cost categories or line items incorporated into the amount, including but not limited to:

a. labor (internal and contractor)
b. materials
c. engineering and design
d. field survey
e. overhead
f. contractor fees
g. tree trimming/vegetation management
h. pole replacement costs
i. any other cost component

Provide a breakdown by cost category for each line item.

Response:

The amounts shown for Comcast Cable and Cox Communications in OCC-150, Attachment 5, and OCC-150, Attachment 9, are unpaid make ready true up invoices from a moment in time. The accounts receivable aging reports from which these balances were derived do not track or report costs by labor, materials, engineering, field survey, overhead, contractor fees, vegetation management, pole replacement, or other individual cost categories. The balances represent the total invoiced make ready true up amounts associated with the applicable projects.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Unrecovered Attachment Costs – Make Ready True Ups) For each line item attributable to Comcast Cable or Cox Communications in OCC-150 Attachments 5 (Comcast), and 9 (Cox, Comcast), identify all documents, records, data sources, work orders, and database entries that support the make-ready amount, including but not limited to:

a. the associated work order number(s)
b. invoices from third-party contractors
c. internal cost tracking records
d. correspondence with the attacher regarding the charge

Response:

Refer to OCC-150, Attachment 5, and OCC-150, Attachment 9, are accounts receivable aging reports from a moment in time and do not contain or track the underlying supporting documents for the listed make ready true up balances. Supporting documentation for a particular make ready charge, as applicable, may include work orders, contractor invoices, internal cost records, and correspondence related to the project and associated charges.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Make-Ready Costs – Comcast) Referring to OCC-150, Attachment 5 (2023 Owed Make Ready True Ups), Comcast Cable is listed with one entry for $1,866.91 (Last Bill Date: 3/20/2023). Provide the following:

a. Identify the specific make-ready work, including the pole number(s) and location(s), associated with this charge.

b. State whether the make-ready work has been fully completed, partially completed, or not yet commenced. If partially completed, identify what work remains outstanding.

Response:

a. The amount identified in OCC-150, Attachment 5, represents a make ready true up charge in a moment of time and is associated with a completed pole attachment project. The accounts receivable aging report does not identify the associated pole number(s) or location(s).

b. The make-ready work associated with the true up charge was fully completed prior to issuance of the invoice. The Company does not issue make ready true up invoices for work that is only partially completed.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Make-Ready Costs – Comcast) Referring to OCC-150, Attachment 9 (2025 Owed Make Ready True Ups), Comcast Cable is listed with numerous entries totaling a substantial portion of the $1,156,888.67 total, with bill dates in October and November 2025 and amounts ranging from $63.39 to $33,167.76. For each Comcast Cable line item in Attachment 9:

a. Identify the specific make-ready work, including the pole number(s) and location(s), associated with each charge.
b. Has the make-ready work been fully completed, partially completed, or not yet commenced?
c. For each entry, provide the associated work order number.

Response:

a. The Comcast Cable entries identified in OCC-150, Attachment 9, represent make ready true up charges in a moment of time associated with completed pole attachment projects. The accounts receivable aging report does not identify the associated pole number(s) or location(s). As of September 1st, 2026, the amount of Owed Make Ready True Ups owed by Comcast Cable is $557,547.99[1].

b. The make ready work associated with each true up charge was fully completed prior to issuance of the invoice. The Company does not issue make ready true up invoices for work that is only partially completed or not yet commenced.

c. The accounts receivable aging report does not identify or maintain associated work order numbers for the listed balances.

[1] The Company continues to receive payments for Make Ready True Ups that have not posted to our financial systems when this response was drafted.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Make-Ready Costs – Comcast) For each Comcast Cable entry in OCC-150, Attachments 5, and 9, state whether the charge is associated with make-ready work that was classified as billable pursuant to the Company's billable/non-billable determination process described in Exhibit CLP-ADDITIONS-1, at pp. 69–71. If any charge relates to an NESC non-compliance condition identified in OCC-190, Attachment 1, identify the corresponding work order number.

Response:

Yes, the Comcast Cable entries identified in OCC-150, Attachment 5, and OCC-150, Attachment 9, represent make ready true up charges in a moment of time and are associated with completed pole attachment projects. The associated make ready work was classified as billable pursuant to the Company's billable/non-billable determination process described in Exhibit CLP-ADDITIONS-1, at pp. 69-71.

Please refer to OCC-190, Attachment 1, for the Non-Compliance issue determination, including NESC non-compliance conditions, and the associated work order numbers.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:
(Make-Ready Costs – Cox) Referring to OCC-150, Attachment 9 (2025 Owed Make Ready True Ups), Cox Communications is listed with one entry for $10,662.32 (Last Bill Date: 11/21/2025). Provide the following:

a. Identify the specific make-ready work, including the pole number(s) and location(s), associated with this charge.
b. Identify all cost components included in the $10,662.32 amount.
c. State whether the make-ready work has been fully completed, partially completed, or not yet commenced.
d. Provide the associated work order number.

Response:

a. The billable make ready work associated with this true up charge to Cox Communications for the amount of $10,662.32 is listed in Alden One under the associated conversation number 1774643. The following table has been exported from Alden One and shows the Pole Owner(s), Power Pole Number, Address, City, Billable status, and Comments that identify the work to be done:

Conversation #: 1774643 Type: Power Survey Title #: ME2405						
OwnerName	**PoleTag**	**PowerNo**	**Address**	**City**	**_Billable**	**Comments**
CONNECTICUT LIGHT&POWER		T3	PRATT ST	Meriden	Y	Extend Sec. riser up to Sec. DE location. Pull slack in Sec. DE span to pole 3991 (replace hardware). Relocate plastic Sec. wire guard to streetlight location in span to pole 3991. Note: Power needs to make adjustments due to new attacher, no attacher currently on pole/span.
FRONTIER/CONNECTICUT LIGHT&POWER		3971	PRATT ST	Meriden	Y	Pull slack in Sec. DE span to pole 3991 (replace hardware). Note: Power needs to make adjustments due to new attacher, no attacher currently on pole/span.
FRONTIER/CONNECTICUT LIGHT&POWER		3991	PRATT ST	Meriden	Y	Raise DDE Sec. 6". Note: Power needs to make adjustments due to new attacher, no attacher currently on pole/span.

b. Cost components resulting in a balance due of $10,662.32.

Total Job Cost - FWO 80244434	**Total**
Material	$53.25
Labor/Equipment	$10,857.79
Allocations/Traffic Control	$1,743.49
Total Job Cost	**$12,654.53**
Customer Contribution	($1,992.21)
Outstanding Total	**$10,662.32**

c. The make-ready work associated with the true up charge was fully completed prior to issuance of the invoice. The Company does not issue make ready true up invoices for work that is only partially completed.

d. The associated Work Order Number is 19935086. Additionally, the corresponding FWO is 80244434, and the Alden One Conversation number is 1774643.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Make-Ready Costs – Cox) For each Cox entry in OCC-150, Attachment 9, state whether the charge is associated with make-ready work that was classified as billable pursuant to the Company's billable/non-billable determination process described in Exhibit CLP-ADDITIONS-1, at pp. 69–71. If any charge relates to an NESC non-compliance condition identified in OCC-190, Attachment 1, identify the corresponding work order number.

Response:

Yes, the make-ready work that is referenced in OCC-150 Attachment 9, is billable according to the billable/non-billable determination process.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Non-Billable Cost Allocation – General) Referring to the Company's response to OCC-179, and Exhibit CLP-REVREQ-4 (Make-Ready Pole Work), the Company identified seven categories of non-billable make-ready reason codes. For each of the following non-billable reason codes: state the total dollar amount of costs incurred by the Company in each year from 2022 through 2025 and identify the FERC accounts to which the costs were assigned and the amounts assigned to each account:

Make Ready – Correct pre-existing condition/violation – Clearance
Make Ready – Correct pre-existing condition/violation – Loading
Pole Replacement – Actions to Address Pole Clearance (pre-existing condition/violation)
Pole Replacement – Actions to Address Defective Pole (pre-existing condition/violation)
Pole Replacement – Actions to Address Pole Loading (pre-existing condition/violation)
Pole Replacement – Actions to Address Make Ready at Adjacent Pole (5 foot rule)
Other

Response:

The Company does not track costs by reason code. To be responsive to this question, the Company has broken Exhibit CLP-REVREQ-4, out by year, see Table 1 below. Within CLP-REVREQ-4, all the FERC accounts that have charges are identified across the header on page 1, and all Work Orders are tied to reason codes, starting on page 26, of CLP-REVREQ-4.

Table 1:

	Sum by Year of CLP-REVREQ-4				
	2022	**2023**	**2024**	**2025**	**Total**
Make Ready O&M Deferral by Year	$ 1,048,267	$ 3,345,735	$ 5,446,836	$ 6,740,030	$ 16,580,868

Date Filed: September 28, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Cable and Telecommunications Association Inc

Question:

(Non-Billable Cost Allocation − Pole Replacements) Referring to the Company's response to OCC-179, four of the seven non-billable reason codes involve pole replacements (Pole Clearance, Defective Pole, Pole Loading, and Make-Ready at Adjacent Pole (5 foot rule)). For pole replacements classified as non-billable in each year from 2022 through 2025, provide the following:

a. The total number of pole replacements and the total cost, broken down by reason code.
b. For each pole replacement, state whether the replaced pole would have been scheduled for replacement under the Company's Pole Integrity Program or Right of Way Program absent the third-party attachment application.
c. To the extent not answered in response to NECTA-099, identify the FERC accounts to which the costs were assigned and the amounts assigned to each account.

Response:

a. The Company does not track the quantity of pole replacements by reason code. To be responsive to this question, the Company has broken down the number of pole replacements classified as non-billable in response to third party make-ready, by year, in Table 1 below.

Table 1
Poles Replaced by Eversource

	2022	**2023**	**2024**	**2025**
# of Poles	388	300	163	177

b. Please refer to NECTA-016[i], for a description of the Company's annual pole inspection process. Please also refer to NECTA-049[ii], for an explanation of how the Company identifies all work. The Company is unable to determine whether or not a replaced pole due to a third-party application would have been replaced due to the Company's Pole Integrity or Right of Way Program because of the timing differences between a pole integrity review and when a third-party survey review occurs. There are a number of circumstances in a given year that would remove poles from the Pole Integrity inspection lists, including, but not limited to, storms, motor vehicle accidents, and new service

projects that make it difficult to determine if a pole would have been identified outside the make ready process.

c. Please refer to NECTA-99[iii].

Prior Referenced Responses:

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[i] NECTA-016 Question:

(Pole Management & SPA) Refer to Exhibit CLP-ADDITIONS-1, at p. 64 ("Replacements are based on annual inspections"). Provide the following:

a. Describe the Company's annual inspection process, including the number of poles inspected each year, the data collected during the inspection, the criteria used to determine the integrity of the pole, who performs the inspections, and how the information collected during the inspections is used.
b. Provide all data collected during the most recent annual inspection.

NECTA-016 Response:

a. The Company performs its routine and annual pole inspection to its custodial wooden poles following a 15-year inspection cycle which ended in 2025. This cycle ensured that every custodial pole across 157 towns in Connecticut was inspected at least once within the time frame. Approximately 29,000 to 32,000 poles were inspected using the 15-year cycle.

In 2025, the Company reviewed its wood-pole inspection standards and decided to shorten the inspection cycle from 15 years to 10 years. By adopting a more frequent inspection schedule, the Company aims to evaluate each custodial pole every 10 years, allowing issues to be identified earlier and addressing them more proactively. Under the revised 10-year cycle, approximately 41,000 to 42,500 poles will be inspected starting in 2026 and moving forward.

The inspection process is based on the age of the pole. A visual inspection is completed for poles with less than 20 years of service. For poles with more than 20 years in service the inspection will include a visual, sound and bore, resistograph testing also known as IML testing, and the application of preservatives "treatment" required to maintain the structural integrity of the pole, and ensure continuous serviceability until the subsequent inspection interval.

The number of poles replaced each year due to age, structural deterioration, damage, or end-of-life conditions varies based on the number of rejected poles identified through the annual pole inspection program. Poles classified as "Rejects" cannot remain in service because their remaining strength has fallen below 67% of their original strength or because they exhibit structural or mechanical damage that compromises safe operation. These poles are scheduled for replacement within one year of identification.

Poles classified as "Priority Rejects" represent the most critical conditions and cannot remain in service because their remaining strength has fallen below 25% of their original strength and/or they exhibit severe structural or mechanical deterioration that presents an immediate public safety risk and reliability. Priority Reject poles are made safe within 48 hours of identification and are replaced as soon as practicable.

Poles classified as "Leaning" are poles that are susceptible to failure and may pose risks to public safety and electric system reliability. Leaning poles occur when soil disturbances, loading from pole attachments, or other external forces alter the pole's original alignment. These conditions are commonly caused by soil saturation and moisture accumulation, excessive structural loading, vehicle impacts, severe weather, or storm-related damage. Depending on the severity of the condition, findings from the pole inspection process are communicated to the Company on a daily, weekly, or immediate basis to ensure appropriate corrective actions are taken.

Currently, GeoForce Utility Technologies is the contractor responsible for performing all pole inspections throughout Connecticut during the 2024-2026 period. The selection of pole inspection contractors follows a competitive bidding process, with the successful bidder typically awarded a three-year inspection cycle contract.

b. Please refer to NECTA-009[i] for the data collected during the most recent pole inspection.

[ii] NECTA-049 Question:

(Make Ready Work & Related Costs) Reference Exhibit CLP REV-REQ-4. When tracking non-billable make-ready costs, explain how the Company identifies and attributes all pole capital and maintenance work required to be performed by Eversource in its ordinary course of business to its own service requirements.

NECTA-049 Response:

The Company identifies and attributes non-billable make-ready costs through its established work management and work order processes. Work orders are created based on the specific project or work type being performed, with defined scopes that distinguish whether the work is customer-driven, make-ready activities (billable or non-billable), capital improvement, etc. from work required by the Company to meet its own service, safety, reliability, and operational obligations.

During project development, engineering personnel review the required work and assign activities to the appropriate work order based on the nature and purpose of the work. Work that is necessary to accommodate a third-party attachment request is tracked separately from work that would be performed by the Company in the ordinary course of business to maintain, replace, or enhance its electric distribution infrastructure.

The Company's work order structure, estimating process, and project oversight practices are designed to ensure that only work directly related to the applicable project scope is charged to that work order. Throughout project execution, the scope of work is monitored and managed to minimize scope creep and to ensure that Company-initiated capital or maintenance activities are appropriately identified and attributed to separate work orders. This approach helps maintain the integrity of cost tracking and supports the accurate allocation of make-ready costs between attachers and the Company's own service requirements.

As a result, non-billable make-ready costs are identified through the Company's project scoping, engineering review, and work order management processes, which are intended to segregate work performed for Company operational needs from work performed in support of attachment-related make-ready activities.

[iii] NECTA-099 Question:

(Non-Billable Cost Allocation – General) Referring to the Company's response to OCC-179, and Exhibit CLP-REVREQ-4 (Make-Ready Pole Work), the Company identified seven categories of non-billable make-ready reason codes. For each of the following non-billable reason codes: state the total dollar amount of costs incurred by the Company in each year from 2022 through 2025 and identify the FERC accounts to which the costs were assigned and the amounts assigned to each account:

a. Make Ready – Correct pre-existing condition/violation – Clearance
b. Make Ready – Correct pre-existing condition/violation – Loading
c. Pole Replacement – Actions to Address Pole Clearance (pre-existing condition/violation)Pole Replacement – Actions to Address Defective Pole (pre-existing condition/violation)
d. Pole Replacement – Actions to Address Pole Loading (pre-existing condition/violation)
e. Pole Replacement – Actions to Address Make Ready at Adjacent Pole (5 foot rule)
f. Other

NECTA-099 Response:

The Company does not track costs by reason code. To be responsive to this question, the Company has broken Exhibit CLP-REVREQ-4, out by year, see Table 1 below. Within CLP-REVREQ-4, all the FERC accounts that have charges are identified across the header on page 1, and all Work Orders are tied to reason codes, starting on page 26, of CLP-REVREQ-4.

Table 1:

Sum by Year of CLP-REVREQ-4

	2022	2023	2024	2025	Total
Make Ready O&M Deferral by Year	$ 1,048,267	$ 3,345,735	$ 5,446,836	$ 6,740,030	$ 16,580,868

Date Filed: September 28, 2026

Witness: David L. Gladey, Brendan J. O'Brien, Jeffrey D. Richard and Garrett J. Murray
Request from: New England Cable and Telecommunications Association Inc

Question:

(Non-Billable Cost Allocation – Allocation Among Parties) For each instance of non-billable make-ready work identified in Exhibit CLP-REVREQ-4 and referenced in the Company's response to OCC-179, describe in detail how the Company allocated or assigned the costs associated with each non-billable reason code among (a) the new attacher whose application triggered the field survey, (b) existing attachers whose facilities are already on the pole, and (c) Eversource as the pole owner. A complete response will:

a. Identify the specific criteria, policies, or guidelines used to determine which party or parties bear the cost of correcting a pre-existing condition or violation discovered during a field survey.
b. Explain whether any portion of the cost of correcting a pre-existing condition or violation is billed to or recovered from the existing attacher(s) whose facilities caused or contributed to the condition or violation. If not, explain why not.
c. Explain whether any portion of the cost of correcting a pre-existing condition or violation is billed to or recovered from the new attacher whose application triggered the field survey that identified the condition. If so, describe the circumstances under which such costs are billed to the new attacher.
d. For costs classified as non-billable that are borne by Eversource, identify the FERC account(s) to which such costs are booked, whether the costs are included in the deferred regulatory asset for non-billable make-ready, and from which rates (pole attachment rates, base distribution rates, or other rates) the Company seeks or has obtained recovery.
e. Identify and produce all written policies, procedures, decision matrices, or similar documentation governing the allocation of non-billable make-ready costs among the new attacher, existing attachers, and Eversource.

Response:

a. Eversource allocates make ready costs in accordance with its pole attachment billing practices, applicable agreements, and the nature of the work identified during engineering review and field survey. Where corrective work is classified as non-billable make ready, the costs are not charged to the new attacher.

b. When the Company determines that a pre-existing condition or violation is attributable to a specific existing attacher's facilities, the Company may seek recovery of associated corrective costs from the responsible attacher through available contractual or other cost recovery mechanisms. If the Company does not seek recovery from the existing attacher, including circumstances where the responsible attacher cannot be identified, the cost is not allocated to the new attacher.

c. No. Consistent with the Company's make ready billing practices, costs associated with correcting pre-existing conditions that are classified as non-billable make ready are not allocated to, billed to, or recovered from the new attacher whose application triggered the field survey that identified the condition.

d. The FERC accounts that the Make Ready, non-billable O&M costs are charged to are shown in Exhibit CLP-REVREQ-4, Col (F) through Col (Z). The total supported in this exhibit is included in the deferred asset, presented in Exhibit CLP-REVREQ-2, Sch. B-6.2, line 16. The Company is seeking recovery of the deferred asset through base distribution rates in this proceeding.

e. Refer to the Company's Make Ready Billing Matrix, previously produced in response to RRU-002 Attachment 1. Other than the Make Ready Billable Matrix and applicable Pole Attachment Agreement provisions addressing recovery from attachers in appropriate circumstances, the Company is not aware of any written policies, procedures, decision matrices, or similar documentation that specifically govern the assignment of responsibility for non-billable make ready costs among the new attacher, existing attachers, and Eversource.

Please note that on September 9, 2026, PURA issued a ruling on the Company's Motion No. 044 in Docket No. 19-01-52RE01, PURA Investigation of Developments in the Third-Party Pole Attachment Process – Make Ready, granting the opening of a new docket to, among other things, investigate modifications to the current cost allocation methodologies.

Date Filed: September 28, 2026

Witness: David L. Gladey and Jeffrey Richard
Request from: New England Cable and Telecommunications Association Inc

Question:

(Non-Billable Cost Allocation – Pole Replacement Cost Sharing) When a pole replacement is classified as non-billable under any of the pole-replacement reason codes identified in OCC-179 (Pole Clearance, Defective Pole, Pole Loading, or Adjacent Pole / 5 Foot Rule), provide the following:

a. State whether any portion of the capital cost of the replacement pole is allocated to or recovered from the new attacher, existing attachers, or the joint pole owner. If so, describe the allocation methodology and the amounts.
b. When a replacement pole is taller or of a higher class than the pole it replaces, explain how the incremental cost attributable to the increased height or class is allocated. State whether the new attacher is charged for any portion of the incremental cost.
c. For jointly owned poles, explain how the cost of a non-billable pole replacement is shared between Eversource and the joint pole owner, and identify the reimbursement amounts, if any, received from the joint owner for each such replacement in each year from 2022 through 2025.

Response:

a. For non-billable pole replacements, the Company initially incurs the full cost to replace the pole. The costs are not allocated to or recovered from the new attacher or existing attachers as the make-ready work did not qualify as a billable cost. For jointly owned poles, the Company's costs are subject to allocation and recovery from the joint pole owners, pursuant to the applicable Joint Ownership Agreement billing process, which determines the methodology and amounts charged to the joint pole owner. The Company does not maintain records identifying each amount allocated to or recovered from the joint pole owner by the pole replacement reason codes identified.

b. When a replacement pole is installed with a greater height or higher class than the pole it replaces, the Company does not separately track or allocate the incremental cost attributable solely to the increased height or class. The cost of the replacement pole is recorded as utility plant investment. The new attacher is not separately charged for any portion of the incremental cost attributable solely to the increased height or class. To the extent the replacement pole is jointly owned, cost allocation between pole owners occurs pursuant to the applicable Joint Ownership Agreement billing process.

c. For jointly owned poles, the Company initially incurs the full cost to replace the pole. The costs are subsequently allocated between pole owners pursuant to the applicable Joint Ownership Agreement billing process. The Company does not maintain records categorizing Joint Ownership Agreement billings as billable versus non-billable make ready costs by the pole replacement reason codes identified. Accordingly, the Company does not maintain records identifying reimbursement amounts received from the joint owner for each non-billable pole replacement. Information regarding amounts recovered through Joint Ownership Agreement billings is discussed in the Company's response to NECTA-063.

Date Filed: September 28, 2026

Witness: David L. Gladey, Jeffrey Richard, Leanne M. Landry and Jeffrey D. Turano
Request from: New England Cable and Telecommunications Association Inc

Question:

(Non-Billable Cost Allocation – Existing Attacher Responsibility) Referring to the Company's response to OCC-179, and OCC-190 (subpart e), when a pre-existing NESC violation or non-compliant condition is attributable to a specific existing attacher's facilities:

a. Does the Company seek to recover any portion of the cost of correcting the violation from the existing attacher that caused it? If so, describe the process, including the contractual or regulatory basis for such recovery and the amounts recovered in each year from 2022 through 2025.
b. If the Company does not seek recovery from the existing attacher that caused the violation, explain whether the cost is instead (i) absorbed by Eversource and included in the non-billable make-ready regulatory asset, (ii) allocated to the new attacher, or (iii) treated in some other manner.
c. For each year from 2022 through 2025, state the number of instances in which a pre-existing violation was attributable to a specific existing attacher and the total dollar amount of make-ready costs incurred to correct those violations. Of those amounts, identify (i) the amount recovered from the existing attacher, (ii) the amount classified as non-billable and absorbed by the Company, and (iii) any amount billed to the new attacher.

Response:

a. When the Company determines that a pre-existing NESC violation or other non-compliant condition is attributable to a specific existing attacher's facilities, the Company may seek recovery of costs associated with correcting that condition from the responsible attacher. Recovery may occur through direct billing, damage claim processes, or other appropriate cost recovery mechanisms, depending on the circumstances. The contractual basis for such recovery includes provisions of the applicable Pole Attachment Agreement that preserve the Company's rights to recover costs associated with non-compliance caused by the attacher. The Company does not maintain records that would permit identification of amounts recovered for the specific categories of violations described in the question for each year from 2022 through 2025.

b. If the Company does not seek recovery from the existing attacher(s), including circumstances where the Company is unable to identify the responsible attacher, the cost is not allocated to the new attacher. Consistent with the Company's Make Ready Billable

Matrix, provided in response to NECTA-043[i], costs associated with correcting pre-existing conditions that are not attributable to the requesting attacher are generally treated as non-billable make ready work unless they satisfy the Company's criteria for billable make ready. The Company is required to address NESC non-compliant conditions identified in the field, and associated costs are treated in accordance with the Company's applicable accounting and regulatory treatment for non-billable work.

c. The Company does not maintain records identifying, by year, all instances in which a pre-existing violation was attributable to a specific existing attacher together with the associated make ready costs, recoveries from existing attachers, non-billable cost treatment, and amounts billed to requesting attachers. Accordingly, the Company is unable to provide the information requested.

Lastly, please note that on September 9, 2026, PURA issued a ruling on the Company's Motion No. 044, in Docket No. 19-01-52RE01, PURA Investigation of Developments in the Third-Party Pole Attachment Process – Make Ready, granting the opening of a new docket to, among other things, investigate modifications to the current cost allocation methodologies.

Prior Referenced Response:

[i] NECTA-043 Question:

(Make Ready Work & Related Costs) Reference Exhibit CLP REVREQ-1. Provide the billable/non-billable determination matrix discussed on page 71.

NECTA-043 Response:

Please refer to RRU-002, Attachment 1, for the requested information.