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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