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