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.