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.