Date Filed: September 28, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: New England Connectivity and Telecommunications Association

Question:

(Pole Management & SPA) Refer to Exhibit CLP-ADDITIONS-1 pp. 63-64, discussing the Pole Integrity Program. Provide the following information:

a. All documents comprising the Pole Integrity Program;
b. The date that the Pole Integrity Program commenced;
c. The number, height and class of poles that have been replaced under the Pole Integrity Program each year (indicating the number of jointly-owned and the number of solely-owned poles);
d. The number of poles that have been reinforced under the Pole Integrity Program each year, indicating the number of jointly-owned and the number of solely-owned poles.
e. For each year of the Pole Integrity Program, provide the total capital and overhead and maintenance expenditure.
f. For each year of the Pole Integrity Program, provide the capital and overhead and maintenance spent on (i) replacement poles, and (ii) crossarms.
g. Regarding the "new standards to help identify pole replacements," (i) provide all such standards, (ii) describe when the new standards were incorporated by the Company, (iii) explain how the Company decided upon the new standards, and (iv) define the term "reject poles."
h. Explain how the Company has applied pole loading criteria that exceed NESC Grade B construction and whether such standards apply to the pole or to the facilities attached to the pole, or both.
i. List the height, class, location and pole number of all poles installed under the Company's Pole Integrity Program.

Response:

a. The Company has provided to the Authority all documents in regard to its Pole Integrity Program in the following dockets: 12-07-06RE01, 17-10-46, 14-05-06 and 23-01-03

b. The Company received approval of its long-term System Resiliency Program in PURA Docket 12-07-06RE01 in 2015. The Company's Pole Integrity Program commenced in 2015.

c. Please refer to Table 1, which summarizes the number of poles replaced under the Pole Integrity Program by pole class and height. In this context, the term "replaced" denotes the replacement of an existing reject lower-class pole (e.g., Class 3 through Class 7) with a higher-capacity pole, generally Class 2 or above (e.g., Class 1, H1, H2, or H9), consistent with the Company's pole standards and system resiliency objectives.

Table 1. Poles replaced under Pole Integrity 2015-2025

		2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Class	1	20	20	11	17	23	35	30	76	406	85	70
	2	621	762	358	387	834	767	508	554	424	301	824
	4	0	0	1	0	0	0	0	0	0	0	0
	H1	0	0	1	0	0	0	0	0	8	0	10
	H2	0	0	1	0	0	0	1	0	2	1	1
	H3	0	0	0	0	0	0	0	0	0	0	1
	H9	0	0	0	0	0	0	0	0	0	0	3
	Total	**641**	**782**	**372**	**404**	**857**	**802**	**539**	**630**	**840**	**387**	**909**
Height	18	0	0	0	4	17	1	0	0	0	0	1
	30	0	5	0	1	0	0	0	0	0	0	0
	35	91	217	57	99	228	187	125	51	92	101	193
	40	425	454	257	208	469	420	330	343	387	200	480
	45	125	102	56	84	138	176	78	223	330	78	215
	50	1	4	1	7	3	16	6	13	23	6	9
	55	0	0	1	0	2	1	0	0	8	2	2
	60	0	0	0	1	0	1	0	0	0	0	2
	65	0	0	0	0	0	0	0	0	0	0	3
	75	0	0	0	0	0	0	0	0	0	0	4
		641	**782**	**372**	404	**857**	**802**	**539**	**630**	**840**	**387**	**909**
	Jointly	559	741	354	328	717	710	461	574	768	344	763
	Solely	82	41	18	76	140	92	78	56	72	43	147
		641	**782**	**372**	**404**	**857**	**802**	**539**	**630**	**840**	**387**	**909**

d. From 2015 through 2020, the Company reinforced 269 custodial wood poles as part of its ongoing Pole Integrity program. In 2021, the Company adopted a revised asset management strategy that shifted its focus from pole reinforcement to proactive pole replacement. This change was driven by the Company’s determination that replacing aging poles with stronger, more resilient class 2 poles provides greater long-term reliability and resilience. As a result, only 1 custodial pole was reinforced in 2021, bringing the total number of reinforced custodial wood poles to 270 during the 2015 to 2021 period.

e. Please refer to NECTA-015, Attachment 1, which provides a summary of the associated Capital and O&M expenditures per year.

f. Please refer to NECTA-015, Attachment 1, subitem (e), which provides a summary of the associated Capital and O&M expenditures. The Company does not separately track or allocate costs between poles and crossarms, as these expenditures are recorded and managed as part of the overall project scope.

The cost to replace a pole involves the replacement of a crossarm as applicable. The Company does not separate the cost in the replacement of poles and crossarms.

g. The Company's updated pole inspection standard was implemented on January 7, 2025. The Company routinely reviews and evaluates its engineering and maintenance standards to ensure that its practices remain aligned with current industry requirements and emerging best practices. As part of this process, Company representatives participate in industry conferences and technical forums sponsored by the American National Standards Institute (ANSI) and engage with peer utilities to gain insight into evolving technical, operational, and material-related issues. Based on these evaluations and industry benchmarking efforts, the Company periodically updates its standards and procedures to incorporate the best applicable practices and enhance system reliability and asset management. The Company's current pole replacement standard is provided in NECTA-015, Attachment 2. Please refer to Section. 4 for the definition of a normal reject pole.

h. Grade B construction is applied in locations where a pole failure could present an elevated risk to public safety, critical infrastructure, or service reliability. Grade B construction is applicable to Pole class size and guying requirements. When determining the appropriate pole class, the Company evaluates several factors, including the number and type of attachments supported by the pole. The Company's Grade B construction standards meet or exceed the requirements of the National Electrical Safety Code (NESC) and are typically applied at highway and railroad crossings, where enhanced structural performance is warranted. For all other applications, the Company's standard construction practice is generally based on NESC Grade C requirements.

i. Please refer to NECTA-015, Attachment 3 for the list of poles replaced under the pole integrity program. In this context, the term "replaced" denotes the replacement of an existing lower-class pole (e.g., Class 3 through Class 7) with a higher-capacity pole, generally Class 2 or above (e.g., Class 2, Class 1, H1, H2, …), consistent with the Company's pole standards and system resiliency objectives.