

**Public Service of New Hampshire d/b/a Eversource Energy**  
**Docket No. DE 21-020**

**Date Request Received: 06/03/2021**

**Date of Response: 06/17/2021**

**Request No. NECTA 2-001**

**Page 1 of 1**

**Request from: New England Cable and Telecommunications**

**Witness: Lee G. Lajoie, Sarah Davis**

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**Request:**

The response to NECTA TS 1-002 states “[t]he goal at the close of the transaction is to ensure that all of Consolidated Communications’ jointly and solely owned poles containing Eversource electric facilities are transferred to Eversource.” Please explain how this goal can be achieved in the absence of the list requested in NECTA Data Request TS 1-002.

**Response:**

As explained during the Technical Session held on May 13, 2021, the Joint Petitioners seek to ensure that all utility poles owned on whole or in part by Consolidated Communications in Eversource’s electric services territory in New Hampshire to which Eversource has attached its electric facilities are transferred to Eversource at the closing. This ensures that there is no confusion in the field among the Joint Petitioners’ contractors or employees as to which company owns any specific utility pole or utility pole run. A list is not necessary to achieve this goal – at the closing of the transaction, Eversource will own every pole to which it is attached in its service territory. Rather than revert to a specific list to verify which party owns specific poles, the Joint Petitioners’ contractors and employees only need to look at the top of the pole for electric facilities. If there are no electric facilities on a utility pole (or utility pole run), then Consolidated Communications owns that asset(s). Conversely, if there are electric facilities on a utility pole (or utility pole run), then Eversource owns that asset(s). Reverting to a list to identify which utility poles are (or are not) owned by Eversource only creates yet another administrative requirement for the Joint Petitioners’ Engineers and Field Operations Teams that would unnecessarily consume some amount of time.

REDACTED

Public Service of New Hampshire d/b/a Eversource Energy  
Docket No. DE 21-020

Date Request Received: 06/03/2021

Date of Response: 06/17/2021

Request No. NECTA 2-002

Page 1 of 1

Request from: New England Cable and Telecommunications

Witness: Douglas P. Horton, Erica L. Menard, Sarah Davis

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**Request:**

Please refer to the response to NECTA TS 1-004(h), and identify the difference between the amount of Consolidated's depreciation associated with the transferred assets based on "the accounting useful lives" and the depreciation amount "if regulatorily-approved depreciation rates were used."

**Response:**

As stated in the Joint Petitioners' previous responses to various data requests, Consolidated Communications does not maintain its books and records based upon regulatory accounting principles. For purposes of responding to this data request, please see confidential Attachment NECTA 2-002. The hypothetical regulated depreciation rate on the Transferred Poles fluctuates between [REDACTED] annually versus the GAAP accounting estimated depreciation of [REDACTED] annually as indicated in response to NECTA data request 2-004.

Consistent with Puc 203.08(d), the Joint Petitioners states that they have a good faith basis for confidential treatment of the material provided in this response and will file an appropriate motion for confidential treatment prior to the commencement of hearings in this matter.



REDACTED

**Public Service of New Hampshire d/b/a Eversource Energy**  
**Docket No. DE 21-020**

**Date Request Received: 06/29/2021**

**Date of Response: 07/14/2021**

**Request No. NECTA 3-003**

**Page 1 of 1**

**Request from: New England Cable and Telecommunications**

**Witness: Douglas P. Horton, Erica L. Menard**

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**Request:**

With regard to the average remaining life assumption used in the pole purchase model:

- (a) Please provide the basis and derivation of that average remaining life assumption number;
- (b) If not provided in response to 3-03 (a) above, please state whether that average remaining life assumption was based on Consolidated's data, Eversource's data, or a combination of the two companies.
- (c) Please provide the most current average remaining life figure for account 364 identified by Eversource to the New Hampshire Public Utilities Commission for regulatory purposes.

**Response:**

- a. As stated in the response to NECTA 1-031, the average remaining life was calculated as follows:

Average Life of a Pole x Net Book Value / Gross Book Value

40 years x 68% = 27.3 years

The 68% ratio of Net Book Value to Gross Book Value is derived from Consolidated's records as of March 31, 2019 as provided in the response to Staff 1-031.

Net Book Value = \$ [REDACTED]

Gross Book Value = \$ [REDACTED]

- b. Please see the response to part a.
- c. The most current average remaining life figure for account 364 provided to the New Hampshire Public Utilities Commission for regulatory purposes was filed in the PSNH Distribution rate case, Docket No. DE 19-057 in the Final Revenue Requirement filed on 1/22/2021. As of December 31, 2018 the average remaining life for account 364 was 43.7 years.

Consistent with Puc 203.08(d), the Joint Petitioners states that they have a good faith basis for confidential treatment of the material provided in this response and will file an appropriate motion for confidential treatment prior to the commencement of hearings in this matter.

DE 21-020

**Public Service Company of New Hampshire d/b/a Eversource Energy  
And  
Consolidated Communications of Northern New England Company, LLC  
d/b/a Consolidated Communications**

**Joint Petition to Approve Pole Asset Transfer**

**Consolidated Communications Technical Session Data Request  
To NECTA**

Date Request Received: 2/8/22  
Request No. 1

Date of Response: 2/14/22  
Witness: Patricia D. Kravtin

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**Request:** Referring to Attachment PDK-1, provide the names of the clients associated with the matters listed for 2016 through 2021.

**Response:** The information presented below is taken from pages 6 and 7 of Attachment PDK-1. Client names have been added here for each matter.

**Record of Prior Testimony**

**2021**

Before the **Commonwealth of Kentucky Public Service Commission**, *Regulations Regarding Access and Attachments to Utility Poles and Facilities*; 807 KAR 5:015, Oral Testimony, July 29, 2021. **Client:** Charter Communications.

Before the **United States District Court Western District of New York**, ExteNet Systems Inc., Plaintiff, vs. City of Rochester, New York, Defendant, Civil Action No. 6:20-cv-7129, Expert Report submitted August 12, 2021. **Client:** Extenet Systems.

**2020**

Before the **Georgia Public Service Commission**, *In Re: Generic Proceeding to Implement House Bill 244*, Docket No. 43453, Pre-filed Direct Testimony submitted October 23, 2020, Rebuttal Testimony submitted November 9, 2020, Cross-examination, November 19, 2020. **Client:** Georgia Cable Association.

Before the **Public Utilities Commission of the State of California**, in *Southern California Edison 2021 General Rate Case (U 338-E)*, Docket No. A. 19-08-013 (Filed August 30, 2019), Pre-filed Direct Testimony submitted May 5, 2020. **Client:** Conterra Networks.

**2019**

Before the **Public Utilities Commission of Ohio**, *In the Matter of the Application of the Filing by Ohio Edison Company, The Cleveland Electric Illuminating Company, and the Toledo Edison Company, of a Grid Modernization Plan, of an Application for Approval of a Distribution Platform Modernization Plan, to Implement Matters Relating to the Tax Cuts and Jobs Act of 2017, and for Approval of a Tariff Change*, Case Nos. 16-481-EL-UNC, Case No. 17-2436-EL-UNC, Case No. 18-1604-EL-UNC, and Case No. 18-1656-EL-ATA, adopted and accepted into evidence, February 6, 2019. **Client:** Ohio Cable Telecommunications Association.

**2018**

Before the **Public Utilities Commission of the State of California**, in *California Cable & Telecommunications Association, Complainant v. San Diego Gas & Electric Company (U902E) Defendant*, Case No. C.17-11-002 (Filed November 6, 2017), Pre-filed Direct Testimony submitted November 21, 2018, Rebuttal submitted December 28, 2018, Cross-examination January 8, 2019. **Client:** California Cable & Telecommunications Association.

Before the **Public Utilities Commission of Ohio**, *In the Matter of the Application of the Commission's Investigation of the Financial Impact of the Tax Cuts and Jobs Act of 2017 on Regulated Ohio Utility Companies*, Case No. 18-47-AU-COI, filed June 29, 2018. **Client:** Ohio Cable Telecommunications Association.

Before the **Louisiana Public Service Commission**, *in Re: Complaint and Petition for Declaratory Ruling on Proper Formula for the Pole Attachment Rental Rate Under Louisiana Public Service Commission Order Dated September 4, 2014*, Docket No. U-34688, Affidavit submitted March 27, 2018. **Client:** Louisiana Cable & Television Association.

Before the **Connecticut Department of Public Utility Control**, *in Re: In the Matter of the Application of The Connecticut Light and Power Company d/b/a Eversource Energy, to Amend its Rate Schedule*, Dkt. No. 17-10-46, Direct Prefiled January 26, 2018. **Client:** New England Cable and Telecommunications Association.

## **2017**

Before the **North Carolina Public Utility Commission**, *in Blue Ridge Electric Membership Corporation, Complainant v. Charter Communications Properties LLC, Respondent*, Docket No. EC-23, SUB 50, Responsive Pre-filed October 30, 2017; Cross-examination November 8, 2017, December 18, 2017. **Client:** Charter Communications.

Before the **Kentucky Public Service Commission**, *In the Matter of: Electronic Application of Kentucky Power Company for (1) A General Adjustment of its Rates for Electric Service; (2) An Order Approving its 2017 Environmental Compliance Plan; (3) An Order Approving its Tariffs and Riders; (4) An Order Approving Accounting Practices to Establish Regulatory Assets and Liabilities, and (5) An Order Granting All Other Required Approvals and Relief*, Case No. 2017-00179, Direct Testimony submitted on behalf of The Kentucky Cable Telecommunications Association, October 3, 2017. **Client:** The Kentucky Cable Telecommunications Association.

Before the **North Carolina Public Utility Commission**, *in Re: In the Matter of Time Warner Cable Southeast LLC, Complainant v. Carteret-Craven Electric Membership Corporation, Respondent*, Docket No. EC-55, SUB 70, Direct Pre-filed May 30, 2017; Rebuttal Pre-filed June 15, 2017; Cross-examination June 20, 2017. **Client:** Time Warner Cable Southeast.

Before the **North Carolina Public Utility Commission**, *in Re: In the Matter of Time Warner Cable Southeast LLC, Complainant v. Jones-Onslow Electric Membership Corporation, Respondent*, Docket No. EC-43, SUB 88, Direct Pre-filed May 30, 2017; Rebuttal Pre-filed June 15, 2017; Cross-examination June 20, 2017. **Client:** Time Warner Cable Southeast.

Before the **North Carolina Public Utility Commission**, *in Re: In the Matter of Time Warner Cable Southeast LLC, Complainant v. Surry-Yadkin Electric Membership Corporation, Respondent*, Docket No. EC-49, SUB 55, Direct Pre-filed May 30, 2017; Rebuttal Pre-filed June 15, 2017; Cross-examination June 20, 2017. **Client:** Time Warner Cable Southeast.

Before the **North Carolina Public Utility Commission**, *in Re: In the Matter of Union Electric Membership Corporation, Complainant v. Time Warner Cable Southeast LLC, Respondent*, Docket No. EC-39, SUB 44, Responsive Pre-filed June 15, 2017; Cross-examination June 20, 2017. **Client:** Time Warner Cable Southeast.

## **2016**

Before the **State of Connecticut Department of Public Utility Control**, *in Re: In the Matter of the Application of The United Illuminating Company to Increase Its Rates and Charges*, Docket No. 16-06-04, filed September 9, 2016. **Client:** New England Cable and Telecommunications Association.

Before the **United States District Court, District of Maryland**, *Zayo Group, LLC, et al., Plaintiffs v. Mayor and City of Council of Baltimore, et al., Defendants*, Civil No. 16-cv-592, Declaration filed March 30, 2016; Cross-ex. May 17, 2016. **Client:** Zayo Group, LLC et al.