

1 must make in approving an asset transfer such as this one involves a question of what is reasonable
2 taking all interests into consideration, including those of NECTA.

3 **Q. What steps does NECTA believe the Commission should take regarding the**
4 **proposed pole transfer to protect the interests of pole attachers such as NECTA members?**

5 A. NECTA respectfully requests that if the Commission decides to approve the pole transfer,
6 it should require the following: 1) Upon transfer of the poles, Consolidated shall cease billing
7 NECTA members any amounts for their attachments to the transferred poles; 2) Post transfer,
8 Eversource shall bill NECTA members for the same number of attachments as that for which
9 Consolidated ceased billing for the transferred poles, adjusted for any new attachments made post
10 transfer; 3) ~~Eversource and Consolidated shall provide NECTA members with a report containing~~
11 ~~detailed backup data for their invoices showing changes resulting from changed pole ownership~~
12 **Unitil it merges records for currently owned and transferred poles, Eversource shall invoice**
13 **separately for pole interests it currently owns and for pole interests acquired from**
14 **Consolidated. Within thirty (30) days of the close of the transaction, Eversource and**
15 **Consolidated will provide a statement in the form indicated below to each NECTA member**
16 **showing the number of the member's attachments on jointly and solely owned transferred**
17 **poles. If a NECTA member receives separate invoices from Consolidated for different**
18 **Agreement Numbers, the statement will show the breakdown of transferred joint and solely**
19 **owned pole interests by Agreement;**

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1 **Statement of**
 2 **Consolidated Pole Interests Transferred to Eversource**
 3 **Matching of Consolidated and Eversource Billing Determinants**

4
 5 (for each NECTA member)

6
 7 **Eversource**

8 Pole Interests Acquired from Consolidated

9		<u>Sole Owned</u>		<u>Joint Owned</u>
10		X		Y

11
 12
 13 **Consolidated**

14 Pole Interests Transferred to Eversource

15		<u>Sole Owned</u>		<u>Joint Owned</u>
16				
17	Agreement A			
18	Agreement B			
19	Agreement C			
20	Agreement D			
21	Total	_____		_____
22		X		Y

23
 24 Eversource entries X and Y will match the totals X and Y for the Consolidated
 25 Agreements.
 26

27 4) ~~Consolidated shall cease billing a Joint Use charge for the transferred poles~~ **Consolidated shall**
 28 **cease billing for joint use poles in Eversource's territory following the transaction,** and
 29 Eversource shall not impose a Joint Use charge for any transferred pole or for any pole solely
 30 owned by Eversource; 5) ~~Eversource's and Consolidated's pole attachment invoices must be~~
 31 ~~prorated to reflect the date of the transfer~~ **Per Section 3.2 of the Settlement and Pole Asset**
 32 **Purchase Agreement, NECTA members' payments for annual pole attachment fees covering**
 33 **the invoicing time period in which Consolidated's poles are transferred to Eversource must**

1 **be apportioned between Eversource and Consolidated based upon the date of the transfer.**
2 **Eversource and Consolidated shall update Article III, Section 3.2 of their Settlement and**
3 **Pole Asset Purchase Agreement to change the 2021 dates specified therein to the comparable**
4 **2022 dates;** 6) All pole attachment licenses issued by Consolidated for the transferred poles must
5 be transferred to Eversource, both companies must maintain all documents relating to the
6 transferred licenses, and both companies must provide NECTA members with access to those
7 documents upon **reasonable** request; 7) Eversource shall adhere to the pole attachment licensing,
8 survey and makeready work timelines contained in the Commission’s pole attachment rules at Puc
9 1303.04 and 1303.12; 8) Eversource shall not impose a new application fee or make ready charge
10 upon pole attachment license applicants who had made those payments to Consolidated in
11 connection with applications for attachments to transferred poles that were solely owned by
12 Consolidated; and 9) Eversource and Consolidated shall follow the process set forth in Attachment
13 JGW-10 or a substantially similar process for pole attachment license applications pending at the
14 time of transfer for the transferred poles.

15 In addition, NECTA recommends that the Commission adopt the recommendations set
16 forth in Ms. Kravtin’s testimony relative to ensuring that the pole attachment rates for the
17 transferred poles are nondiscriminatory, just and reasonable.

18 **Q. Does this conclude your testimony?**

19 A. Yes.

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