



New England Cable & Telecommunications Association, Inc.
121 Loring Ave • Suite 340 • Salem, MA 01970
Tel: 781.843.3418

New England Cable & Telecommunications Association, Inc.

August 23, 2021

Samantha L. Brigham
Supervisor – Operations Support
PO Box 330
Manchester, NH 03105

Re: Eversource Pole Attachment Rates for 2021

Dear Ms. Brigham:

By letter dated June 2, 2021, the New England Cable and Telecommunications Association, Inc. (“NECTA”) requested information regarding how Eversource calculated its pole rates for 2021 and supporting documents. In that letter, NECTA reserved the right to contest the new 2021 rates on behalf of its member companies. Based on review of Eversource’s response dated July 16, 2021, NECTA hereby disputes the increased 2021 pole rates.¹

Before formally contesting the 2021 pole rates at the New Hampshire Public Utilities Commission, NECTA would like to attempt to resolve its concerns informally. NECTA is prepared to discuss a resolution of the 2021 pole rates at your convenience.²

Payment by any NECTA member of an invoice from Eversource with the higher 2021 rates does not constitute acceptance of the higher rate.³

Thank you for your cooperation in this matter, and please feel free to contact me with any questions.

Sincerely

David Soutter
dsoutter@necta.info

¹ The 2021 rates of \$13.50, \$6.75, and \$4.50 for attachments on solely owned, jointly owned and tri-owned poles, respectively represent a significant increase (approx. 9.2%) from the prior annual per attachment rates of \$12.38, \$6.19, and \$4.13.

² Preliminarily, NECTA has identified the rate of return, and the treatment of ADIT under the TCJA as two areas of dispute. Average pole height, the treatment of appurtenances, and the average number of attachments per pole are some of the additional issues for inquiry.

³ NECTA understands that Comcast has paid Eversource’s invoice for pole attachments for the first half of 2021 in full at the higher 2021 rates which are disputed by NECTA and Comcast.