

RR-2: Refer to the Rebuttal Testimony of Sarah Davis and related Attachment SD-1:

The Commission is requesting Consolidated Communications of Northern New England Company, LLC d/b/a Consolidated Communications - NNE to demonstrate the changes made per revisions to the 2020 ARMIS Report. This should include a cover tab in Microsoft Excel with a step-by-step description of adjustments and changes in assumptions made to the prefiled testimony of Patricia Kravtin that was submitted in this docket (dated August 22, 2022), Attachment PDK-2, to arrive at Attachment SD-1. This can also include a table comparing the exact changes

Consolidated Communications' Response:

It is Consolidated's understanding that the Petitioners' witness Patricia Kravtin used data in the present Docket filed by Consolidated in Docket DE 21-020 when calculating her proposed pole attachment rate as submitted in her Prefiled Direct Testimony, dated August 22, 2022. Specifically, Ms. Kravtin used Consolidated's data from a hypothetical ARMIS filing as of December 31, 2020. In terms of the ARMIS data Consolidated filed in DE 21-020, that data reflected estimates in an attempt to comply with the Commission's order related to the filing.

For purposes of the present Docket and this response to Record Request #2, Consolidated pulled actual updated data from its accounting records, rolled forward the NH pole assets with additions and used the Commission approved regulatory depreciation rate of FairPoint Communications (annual depreciation rate of 5.8%). This is in the tab labeled "Depreciation", with the pole asset additions being in the tabs labeled by year of installation from the date of Consolidated's acquisition of FairPoint Communications (July 3, 2017) through December 31, 2020. Consolidated then used the results from the Depreciation tab, specifically column E, and carried the results over to the tab labeled "ARMIS Revised". Starting in row 37 of the Depreciation tab, Consolidated provided a comparison of the original ARMIS data (filed in DE 21-020) for Gross Investment in Poles and Accumulated Depreciation to the revised ARMIS data. Consolidated believes the differences are immaterial.

The Excel spreadsheet also includes a tab labeled "Pole Additions". This tab compares data previously provided by Consolidated (in column B) in response to one of the Petitioners' data requests to the data for pole asset additions pulled from Consolidated's accounting systems. Column C labeled "Updated Additions w/ Adjustments from CCI Pole Data" contains the corrected values for the NH pole asset additions with adjustments made for timing issues, such as late invoices, damage reimbursement or Exchange of Notices with the various NH electric utilities. The pole additions from this column were carried over to the tab labeled "Depreciation" and included in column E labeled "Regulatory Depreciation w/ Updated Additions and Adjustments from CCI Pole Data". Overall, the difference between Consolidated's initial response related to pole plant additions and the corrected data are immaterial as reflected in columns D and E of the "Pole Additions" tab.