

New England Cable & Telecommunications Association, Inc.

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New England Cable & Telecommunications Association, Inc.

December 2, 2021

Via Electronic Mail

Samantha L. Brigham
Supervisor – Operations Support
PO Box 330
Manchester, NH 03105
Samantha.brigham@eversource.com

Re: Eversource Pole Attachment Rates for 2022

Dear Ms. Brigham:

I am reaching out on behalf of the New England Cable and Telecommunications Association (NECTA). NECTA and its member companies Comcast, Charter Communications and Atlantic Broadband are in receipt of a November 3, 2021 notice from Eversource Energy (Eversource) d/b/a Public Service Company of New Hampshire (PSNH) for pole attachments fees and charges in New Hampshire. The notice states that annual attachment fees for 2022 will increase to \$14.17, \$7.09, and \$4.72 for attachments on solely owned, jointly owned and tri-owned poles, respectively. The 2022 annual attachment rates represent a significant increase of 14.2% over the 2020 rates¹, and a 5% increase over the 2021 annual attachment rates², which, as you know, are still in dispute.

On behalf of its members, NECTA hereby advises Eversource that NECTA is disputing the increase in pole attachment rates for 2022. Per the NECTA member companies' contracts with PSNH, this letter serves as notice of the fee dispute.

To help us understand the new rates, please provide a narrative description of how the rates were calculated, i.e. a description of the pole attachment formula and all inputs and assumptions used to calculate the new rates. In addition, please provide us with the underlying work papers, including any Excel spreadsheets or similar documents, supporting the rate calculations.

With the holidays coming up, please provide the above information by December 17, 2021. Once you have provided the relevant information, and NECTA has had a reasonable time to review, NECTA is prepared to

¹ The 2020 attachment rates were \$12.38, \$6.19, and \$4.13 for attachments on solely owned, jointly owned, and tri-owned poles, respectively.

² The 2021 attachment rates are currently \$13.50, \$6.75, and \$4.50 for attachments on solely owned, jointly owned, and tri-owned poles, respectively.

Exhibit 065 DE 21-020

discuss a resolution of the 2022 rates before formally contesting the rates at the New Hampshire Public Utilities Commission.

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

Sincerely

David Soutter dsoutter@necta.info