STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

Docket No. 26-05-10

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY
D/B/A EVERSOURCE ENERGY
TO AMEND ITS RATE SCHEDULES

JOINT REBUTTAL TESTIMONY OF

JOHN P. DIPAOLA-TROMBA, SEAN D. REDDING, AND JENNA TURNER

Vegetation Management Panel Rebuttal

On behalf of

The Connecticut Light and Power Company
d/b/a Eversource Energy

November 18, 2026

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I. INTRODUCTION

Q. Please state the names of the witnesses on the Vegetation Management Panel.

A. The Vegetation Management Rebuttal Panel is comprised of John P. DiPaola-Tromba, Sean D. Redding, and Jenna Turner. We are providing this rebuttal testimony on behalf of The Connecticut Power and Light Company d/b/a Eversource Energy ("CL&P," "Eversource," or the "Company").

Q. Have the members of the Vegetation Management Panel previously submitted testimony in this proceeding?

A. Yes. On July 14, 2026, we co-sponsored direct, pre-filed testimony submitted to the Public Utilities Regulatory Authority ("PURA") on behalf of CL&P in support of its application for approval of amended rate schedules. That testimony was marked Exhibit CLP-VMP-1.

Q. What is the purpose of this panel's joint rebuttal testimony?

A. On October 21, 2026, the parties and intervenors in this proceeding filed testimony in accordance with the procedural schedule. Our joint rebuttal testimony addresses the

claims and recommendations put forward by the Office of Consumer Counsel ("OCC") in relation to the Company's proposed vegetation management program ("VMP").[1]

Q. Are you presenting any exhibits as part of your rebuttal testimony?

A. Yes. We are presenting the following exhibits with our rebuttal testimony:

Exhibit	Purpose/Description
CLP-VMP-REBUTTAL-1	Joint Rebuttal Testimony of the Vegetation Management Panel
CLP-VMP-REBUTTAL-2	Presentation to the CL&P Board for Authorization of Contract Commitments

Q. How is your testimony organized?

A. Our testimony is organized into the following sections:

- Section I is the introduction;
- Section II responds to OCC's claims and recommendations on the Company's proposed VMP; and
- Section III is the conclusion.

II. RESPONSE TO OCC ON THE COMPANY'S VMP.

Q. Please summarize the OCC's claims and recommendations that are the subject of your rebuttal testimony.

A. John Defever, the OCC's witness from Larkin & Associates, PLLC, contests the Company's proposed $76.139 million VMP cost, which he characterizes as an increase of approximately $50.830 million over the test year, although this is not correct

[1] The Company does not respond to every issue raised in the intervenor testimonies. Silence on any issue should not be construed as agreement on any issue.

(Defever Testimony at 33).[2] He contends that the Company has not sufficiently justified its proposed level of expense given that "costs declined from 2023-2025," and that the Company has allegedly "budgeted a further decrease in 2026" – which is also not a correct characterization (id. at 35).[3] Mr. Defever further claims the Company has not provided adequate supporting documentation for the increased program costs or the proposed shift from partially capitalizing vegetation management costs to expensing all such expenditures (id. at 35-37). He also claims that the Company has not accounted for potential storm restoration savings resulting from increased vegetation management (id. at 34). As a result, Mr. Defever recommends limiting rate year vegetation management costs to the 2025 capitalized and expensed amounts ($60,560), less Frontier's 15% share of expensed amounts, while rejecting the Company's proposal to eliminate the capitalization of VMP work on a going forward basis (id. at 37).

Mr. Defever asserts that his recommendation would reduce the rate year "expense" level by $50.939 million in the cost of service, which is factually correct. However, in practice, his recommendations would have the effect of reducing overall VMP spending by only $16 million, while committing customers to pay the revenue

[2] For this proposition, Mr. Defever cites to Schedule C-3.31 of the Company's SFRs. However, Schedule C-3.31 is an Operating Income Schedule that does not include capitalized amounts spent in the test year on vegetation-management expense. The Company's total VMP spending in the test year was approximately $60 million, constituting an increase in VMP spending of only about $16 million, net of Frontier's responsibility.

[3] The "budgeted" reduction shown in Mr. Defever's testimony (on page 35) for 2026 is a function of the fact that the Company is changing the nature of its VMP work, eliminating work that may be capitalized. In fact, his table shows that the budgeted *expense* for VMP work in 2026 is *increased* from 2025 by over $1.3 million, which also has the effect of increasing the contribution owed by Frontier as an offset to 2026 program costs.

requirement (including depreciation expense, income taxes, property taxes and a rate of return) on vegetation management work that the Company does not view as cost-efficient or operationally beneficial to the system at this point.

Q. What is your response to Mr. Defever's argument that PURA should hold VMP spending at 2025 levels because spending declined between 2023 and 2025?

A. The purpose of a Test Year is to establish a reasonable approximation of a utility's future operating expenses. Mr. Defever's recommendations expressly limit the Company to the VMP activities and expenditures that took place in 2025, rather than aligning with changes in the VMP program that the Company needs to make to achieve a higher level of cost efficiency and operational effectiveness going forward. Utilities are permitted to adjust Test Year expenses for known and measurable changes affecting costs and revenues in the period that rates will be in effect. Mr. Defever's recommendations entirely overlook the change in VMP work that the Company is recommending that it needs to make for the next VMP term, 2027 through 2030.

In making his recommendations, Mr. Defever places considerable weight on the fact that vegetation management expenditures lowered between 2023 and 2025, positing that the Company should be held to 2025 spending levels because the Company's requested rate year increase "is not known and measurable" (Defever Testimony at 37). However, the Company's historical expenditures do not reflect the *nature* of the vegetation-management work that is required to maintain a safe and reliable electric distribution system during the PBMRP term, which includes a four-year stay-out

commitment. Vegetation management needs on the electric distribution system have *not* declined and are not declining. The table presented in Mr. Defever's testimony shows that the Company's decline in VMP expenditures over the years 2023 to 2025 was primarily in relation to capitalized work – reflecting the fact that the type of work that the Company is conducting is shifting away from the strategies that have been utilized over the past 10 years to push back vegetation from the trim zone. Now that this work is done, the Company's focus is shifting to strategies that will maintain the trim zone in a cost efficient and effective manner.

More specifically, the proposed 2027 VMP budget reflects changes in program scope, timing and methodology that are not captured by simply carrying forward 2025 actual expenditures. Specifically, the following programs reflect changes from 2025 Test Year and the expenditures that follow from the test-year VMP work, driving the need for the proposed 2027 budget:

- **Roadside Schedule Maintenance**: The Company's 2027 VMP (and proposed increase in the program budget) reflects the estimated cost of a four-year scheduled maintenance cycle using updated contractor costs. The proposed plan shifts away from field assessment and prioritization for trim work to a system that will maintain entire circuits at once. This approach is driven by the results of a Light Detection and Ranging ("LiDAR") pilot showing high levels of vegetation encroachment three years after trimming on circuits. The budget was developed using cost-per-mile estimates anticipating contractor rate increases. Actual costs are now validated by the Company's request for proposals ("RFP") process for 2027 to 2030 vegetation management work, as discussed further herein.

- **Risk Tree Removal ("RTR")**: The Company's 2027 budget transfers funds previously allocated to Enhanced Tree Removal ("ETR"), which was capitalizable work, to the planned RTR work, which is expense work.

- **Reliability Tree Work ("RTW"):** The Company's 2027 budget transfers funds previously allocated to Reliability Tree Removals ("REL"), which was capitalizable work, to the planned RTW work, which is expense work.

- **Distribution Rights-of-Way ("D ROW")**: The Company's 2027 budget transfers funds previously allocated to Customer Focus Enhanced Tree Trimming ("ETT"), which was capitalizable work, to a distribution ROW cycle for side trimming and brush control, including maintenance ETT where the ETT specification was achieved. This is expense work.

- **Emergency**: This is a planned budget to cover blue-sky emergency tree contractor call-outs for outage and non-outage tree OMS events. Although the proposed 2027 budget exceeds 2025 actual expenditures, the budget has remained steady at $2,000,000 for several years. Emergency program spending is highly weather dependent and the budget must account for years with greater emergency response needs.

- **Vines**: The budget was increased to allow two years of backbone circuit miles to be treated instead of one. Circuit backbones that are not due for Mid-Cycle or scheduled maintenance will be treated for vines each year, ensuring that all backbone miles are covered annually.

- **Emergent Work**: The budget was increased to support the volume of customer and tree warden inquiries regarding dead and declining trees, as well as in anticipation of increased tree stress and mortality due to beech leaf disease and spotted lanternfly.

- **Mid-Cycle**: This historic program is being funded again based on the results of the LiDAR analysis, which shows encroachment across the system that should be addressed sooner due to consent limitations and varying tree growth rates. The program will support hot-spot trimming across approximately 1,000 to 1,200 miles of backbone each year.

- **CT DOT Program**: The program is moving from capital to expense and has increased due to projected increases in contractor costs.

- **LiDAR**: This new remote sensing program will facilitate annual ground-based LiDAR collection on the upcoming year's scheduled maintenance circuits, as well as on off-cycle backbone miles for Mid-Cycle and RTW prioritization. This program was added following a successful ground-based LiDAR pilot that demonstrated that a data-driven approach can improve VMP prioritization.

- **Other**: The budget was increased to support Energy Saving Trees Arbor Day locations, right-tree and right-place education, transformer enclosure maintenance and other smaller programs.

(Exhs. RSR-016; OCC-102).

As these examples demonstrate, Mr. Defever's comparison of the Company's proposed expenditures to historical spending does not account for the underlying changes in the scope, timing and operating model of the VMP. His comparison is therefore not apples-to-apples and does not establish that 2025 actual expenditures are an appropriate level of funding for the program proposed for the PBMRP term.

In summary, Mr. Defever does not demonstrate or even suggest that the Company's 2025 expenditure level is sufficient to meet its future vegetation management requirements, nor does he account for the potential long-term consequences to system reliability and safety of holding the Company's spending at 2025 levels. Instead, he substitutes a historical spending figure for an analysis of the Company's actual operating requirements and proposed VMP. Ratemaking is not simply a matter of carrying forward amounts expended in the Test Year. Those amounts must be adjusted for known and measurable changes so that they reflect an appropriate and sufficient level of funding for the period during which rates will be in effect.

Q. What is your response to Mr. Defever's claim that PURA should hold VMP spending at 2025 levels because the Company has not provided cost documentation supporting increased vendor costs?

A. The Company recognizes the importance of supporting its proposed vegetation management expense with appropriate documentation. As the Company has discussed

at length in testimony and discovery responses, it is entering a new four-year cycle, with costs subject to the results of a competitive solicitation that the Company commenced earlier this year (see, Exhs. CLP-VMP-1, at 6, 11, 39; OCC-840; RSR-022; EOE-145). As of this date, the Company has concluded its competitive solicitation and has received approval from the CL&P Board of Directors to execute the new contracts. The Company is pleased to report that the program pricing obtained through the RFP solicitation initially came in slightly higher than what the Company had estimated for the purposes of its initial filing on July 14, 2026; however, the Company was able to negotiate those proposals down to align with the pricing that the Company has estimated for PURA's approval. With this pricing, the Company expects the cost of the program to align with the Company's proposal in this case, subject to modest variations up or down to follow the work, as allowed by the new contracts. Exhibit CLP-VMP-REBUTTAL-2 provides a copy of the presentation made to the CL&P Board of Directors supporting contract execution. The Company expects to spend the next few weeks finalizing the new contracts with the program vendors and will submit the new contracts to the record as soon as the contracts are executed.

Q. Would you provide some background on the scope of the RFP process?

A. Yes. Eversource commenced a competitive solicitation for VMP contractor services in early 2026, inviting the participation of eleven vendors performing tree work across New England. The Company included a total 16,650 overhead distribution miles in the 4-year cycle bid scope and circuit maps were provided for the 2027 and 2028

scheduled maintenance plan for contractor review. Pricing was requested for all four years. All eleven vendors submitted bid proposals to the Company and ten vendors were awarded contracts, with five contractors receiving full-service Area Work Center (AWC) awards. Second-round pricing negotiations lowered roadside maintenance costs by 5.3% ($9.9M).

- For cost control purposes, bids were required to include unit-cost-per-mile pricing for scheduled maintenance miles, as well as rates for time, equipment and materials for emergent work and unit tree removal costs based on diameters of trees. An effort was also made to achieve an outcome where multiple vendors would be available to the Company to provide vegetation-management coverage during weather events. Each contractor's ability to obtain significant outsource storm crew resources was considered in the RFP evaluation. Lastly, all vegetation-management work was planned and bid under two scenarios: (1) the VMP funding level requested from PURA; and (2) a scaled down program scope should PURA decline to approve the Company's VMP plan, as proposed.

At the conclusion of the process, the Company selected vendors and allocated work to each vendor based on a comprehensive evaluation of commercial pricing, operational capabilities, workforce availability, safety performance, storm response capabilities, and overall ability to support the Company's long-term reliability objectives. The competitive process included multiple rounds of negotiations and resulted in significant cost savings through best and final pricing submissions while maintaining operational

capability and service quality. The allocation of work across the selected vendors is shown in Exhibit CLP-VMP-REBUTTAL-2, at slide 8 of the presentation to the Board of Directors.

Q. How do you respond to Mr. Defever's claim that the Company has not adequately justified its "request to expense all vegetation management costs? (Defever Testimony at 36).

A. Mr. Defever claims that PURA should reject the Company's plan to move away from the capitalization of vegetation-management work but does not cite any specific deficiencies in the Company's rationale or explain why the proposed treatment would be inappropriate, claiming only that the Company did not submit "sufficient documentation" of this decision (Defever Testimony at 36-37). However, the Company has thoroughly substantiated the reasons for its change in VMP strategy with the framework of that decision documented in testimony and discovery.

By way of background, in Docket No. 17-10-46, PURA approved a rate settlement that resolved the Company's base distribution rate request (the "2018 Rate Settlement"). The 2018 Rate Settlement established two funding mechanisms for VMP: (1) annual recovery of $29.8 million for VMP expenses; and (2) separate recovery of ETT costs as capital investment.

The capital treatment of ETT was based on the significant, one-time system improvements achieved by standardizing eight-foot clearances along thousands of miles of backbone circuits and laterals across the Company's Connecticut service territory. In that regard, this program was not designed, nor intended, to be permanent

vegetation-management strategy, given that once the clearances are achieved – maintenance of those clearances is that objective. As the Company completed the major ETT work, the incremental benefits of further program extension were diminishing, as fully expected with the design of the program. The Company's current vegetation management needs now center on ongoing maintenance of those clearances, addressing previously inaccessible areas and targeting ongoing reliability concerns tied to vegetation. For example, newer equipment enables the Company to reach tree canopies that could not be addressed during the initial ETT efforts.

The Company's planned changes to the VMP also eliminate inefficiencies stemming from the need to maintain separate capital and O&M vegetation management activities. Currently, the Company may require separate crews to perform maintenance and tree removal in the same areas, resulting in redundant mobilizations. By treating the VMP as a unified program, the same crews can efficiently perform work as they progress along a circuit, reducing unnecessary repeat visits and duplicative traffic control costs.

In short, the Company's vegetation management work has shifted from large-scale, one-time system improvements to ongoing maintenance and targeted reliability efforts, dictating the expense treatment in compliance with applicable accounting standards. The Company cannot simply choose to capitalize or expense the cost of the work it is performing. The VMP team is informed by the Company's accounting team that the accounting follows the nature of the work performed on the system and this is what is

driving the change from capitalization to expense treatment. Mr. Defever does not account for that fact with his recommendations.

Q. How do you respond to Mr. Defever's argument that the Company has not demonstrated that increased vegetation management spending will produce storm restoration savings?

A. At least three factors make it difficult, if not impossible, to quantify the direct relationship between vegetation management spending and storm restoration savings. First, the unpredictable frequency timing, and severity of future weather events make it difficult to estimate how much vegetation management will reduce storm restoration costs (Exh. OCC-378). Second, the primary benefit of vegetation management is preventing damage that never occurs, which leaves no direct record of avoided tree-related outages from which to quantify that counter-factual. Third, other reliability initiatives, such as pole replacements, equipment upgrades, and system hardening also contribute to storm restoration cost reductions, making it difficult for the Company to isolate the impact of its vegetation management activities.

Although the Company cannot assign a precise dollar value to future savings, the reliability benefits of vegetation management are demonstrable and the Company has provided record evidence of those benefits (Exh. OCC-378). Specifically, the Company has provided two studies from the University of Connecticut demonstrating that enhanced vegetation management produces meaningful reductions in tree-related outages, including reductions of up to 63.8 percent during lower-severity storms and 37.3 percent during the most severe events studied (Exhs. OCC-099; OCC-102;

ALLCO-045; CLP-VMP-3; CLP-VMP-4). In addition, the Company's own experience demonstrates the effectiveness of targeted vegetation management, with treated circuit segments experiencing an average 94 percent improvement in reliability (Exhs. OCC-099; CLP-VMP-1, at 49-51; CLP-VMP-2, at 11).

The Company's proposed investments build on the demonstrated benefits outlined in the UConn studies and its own operational experience. The VMP prioritizes areas with the highest outage risk, addresses overhanging vegetation on circuits serving the most customers, and eliminates hazard and risk trees (Exh. RSR-027). Collectively, these actions will enhance reliability during ***both*** storms and blue-sky conditions while reducing public safety risks associated with tree failure (Exh. OCC-378). Therefore, the benefits of the VMP extend beyond the limited scope of storm-related savings emphasized by Mr. Defever. Moreover, the absence of a precise forecast for avoided storm restoration costs does not mean that customer benefits are absent as Mr. Defever suggests.

Q. How do you respond to questions about whether the Company is appropriately hiring 21 employees for the VMP?

A. The Company has addressed this question in response to its response to OCC-333 and EOE-420. In response to OCC-333, the Company explained that, of the 21 positions, eight of the new full-time equivalents (or "FTEs") actually equate to 16 *existing* employees, who currently split their time 50/50 between operating and maintenance ("O&M") expense work and capital work, and who will shift to work 100% on expense

work for the proposed VMP, if approved, producing the equivalent of eight incremental employees working on the O&M program. A total of 12 resources would be converted from contracted resources to internal resources of which the Company's proposed vegetation management expenses in Exhibit CLP-REVREQ-2, Work Paper C-3.31 reflect the reduction in outside contractor services. Only one resource would actually be new. Accordingly, the Company will not be adding 21 new Vegetation Management positions. The Company's response to RRU-047, Attachment 1, shows the allocation of the 21 Vegetation Management positions that represent the 8 full-time equivalents; 12 contractor conversions; and one incremental resource.

In addition, the reduction of 12 outside contractor positions is not directly reflected in Schedule WP C-3.31, as it is already included as a factor within the proposed Rate Year 1 (Ending 6/30/2028) column. However, the reduction to outside contractor services is $1,466,600. The conversion of contract resources to internal resources would result in a reduction of 12 Eocene vendors.

Lastly, with respect to a benefit-cost analysis on the impacts of these changes, please first note that the transition from capital to O&M expense for 50% of the time of the 16 vegetation-management FTEs, produces the equivalent of 8 incremental employees, aligning with the proposed Vegetation Management Program ("VMP"), which is then a ***net zero change*** for the program budget.

Second, the conversion of 12 contracted resources to internal employees produces a cost reduction of $446,600 from $1,466,600 to $1,020,000.

Third, the one incremental FTE would add oversight at the newly re-established Waterbury Area Work Center ("AWC"). This AWC currently has two FTEs that provide oversight for the Waterbury AWC, while also overseeing their own AWCs (Cheshire and Newtown). The benefits directly tied to this position are the ability to handle coordination with municipalities, tree wardens, and customers and a single point of contact for internal and external stakeholder concerns.

Consequently, the 21 Vegetation Management positions are comprised of 8 full-time equivalents at a net zero cost change; 12 contractor conversions at a net savings of approximately $446,600, and one incremental resource that is needed at the Waterbury AWC in any event – and all of these changes are contingent on the approval of the VMP, as proposed.

III. CONCLUSION

Q. Does this conclude your rebuttal testimony?

A. Yes, subject to reserving the Company's right to respond to additional issues raised in discovery or at hearings.