Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 9. How does the Company measure wind "turbulence" and "torque" impact on trees?

Response:

The Company does not specifically measure wind "turbulence" or "torque" impact on trees. Wind turbulence creates rapidly changing forces on a tree, causing it to bend, sway, and respond to wind from multiple directions rather than from a single direction. Torsion, or twisting forces, occur when wind loads are unevenly distributed across the tree, creating twisting stress in the branches, branch unions, and the trunk. These dynamic bending and torsional forces may increase existing defects such as cracks, branch unions, or root defects. Tree failure is commonly the result of several forces acting on the tree or tree part at once including wind speed, wind turbulence, bending forces, and torque which combined with any tree defects influence the likelihood of failure.