Date Filed: October 05, 2026

Witness: Lavelle A. Freeman, Leanne M. Landry, Elli Ntakou and Jeffrey D. Turano
Request from: Office of Consumer Counsel

Question:

Refer to Exhibit CLP-TSP-3, at p. 7. There are no dedicated resiliency investment in the Sustained tier. Exhibit CLP-ADDITIONS-12, records system resiliency and expanded reliability spending in every year from 2019 through 2025, covering right-of-way lines, pole integrity, smart switches and substation security. Identify the storm resiliency work in the Targeted System Performance tier that was not already performed under those programs.

Response:

The system resiliency and expanded reliability programs recorded in Exhibit CLP-ADDITIONS-12, addressed individual components and functions on the existing system, including right-of-way lines, pole integrity, smart switches, and substation security. These programs were performed using a different approach than the storm resilience work proposed under the Targeted System Performance Plan. The programs in Exhibit CLP-ADDITIONS-12 were aimed at providing foundational resilience and reliability applicable to specific system components based on industry best practices, technology advances and Company standards.

The storm resiliency work included in the Targeted System Performance tier is designed from a different perspective that leverages a more proactive, holistic and longer-term approach that is informed by data analytics not historically available to the Company. Specifically, the storm resiliency work in the Targeted System Performance tier consists of full zone-level rebuilds starting in the zones with the highest potential for cost-effective resiliency improvement. These zones are identified using a data-driven methodological approach to identify at-risk zones based on historical performance, as well as predicted performance based on construction type, tree conditions, and customer impact.

In these zones, the Company will replace the existing bare-wire construction with spacer cable, an insulated-conductor design that can tolerate incidental tree contact, installed on current design standard poles. Therefore, rather than addressing individual components, this work is focused on replacing the complete bare wire overhead line spans in each targeted zone with a construction type that is more storm-resistant. This type of approach was not historically implemented for the programs identified in Exhibit CLP-ADDITIONS-12.