Date Filed: August 21, 2026

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

Question:

(VMP-Branches) Referring to Exhibit CLP-VMP-1, page 7 and 9. Based on the Company's statement that hazard trees cause 76% of customer outages:

a. Please provide all research and/or justification for focusing on trimming branches that are encroaching into conductors and removing overhanging branches.
b. Would a greater focus on hazard trees instead of trimming branches produce better grid reliability? Please provide all research the Company has conducted on this subject.

Response:

The Company does not state that hazard trees cause 76% of customer outages. Rather, the Company's statement is that hazard trees are responsible for 76% of tree-failure related customer outages.

Please refer to exhibit CLP-VMP-1, at page 7 at lines 11-15: *Hazard trees are a major focus of the VMP because hazard trees constitute only a small percent of the overall Connecticut tree population but are responsible for approximately 76% of tree failure-related customer outages experienced across the operating year.*

Please refer to the response to OCC-244[i] and CLP-VMP-2, at page 7. Tree-failure related interruptions are approximately **56%** (686/1,229 outages investigations) of the tree-related customer outages on blue sky or non-storm days. The remaining **44%** of tree-related outages are comprised of:

- Inside Zone Limb Grow-in (5%)
- Inside Zone Broken Limb Fall-in (1%)
- Inside Zone Overhang Limb Fall-in (10%)
- Outside Zone Broken Limb Fall-in (14%)
- Outside Zoen Overhang Limb Fall-in (14%)

Please refer to CLP-VMP-2, at pages 18-20 for the justification of how each proposed program (e.g. Scheduled Maintenance Trimming, Reliability Tree Work, and Reliability Tree Removals) may prevent tree-related outages and the associated percentage of tree-related outages that may be attributed to each program.

A greater focus on hazard and risk trees instead of trimming would not produce better reliability. The relatively low proportion of Inside Zone Limb Grow-in outages (5%) is due to the Company maintaining the approximately 16,000-mile roadside distribution system through tree trimming programs on a targeted four-year cycle. Please refer to CLP-VMP-2 at page 14. The terrestrial LiDAR pilot results highlight Connecticut's roadside forest exposure and demonstrate that by year three of the cycle, post-maintenance, 74.92% of the segments had vegetation encroachment within the trim zone and 70.55% of the segments had vegetation overhang. The company cannot solely focus on hazard and risk tree removals because over time a reduction in trimming would result in more outages as vegetation grows into contact with the distribution system and would become more expensive to remediate on a reactive "trim as needed" basis. Rather, the Company needs to trim every mile on the four-year cycle with a reinstituted mid-cycle program to proactively maintain the safety and reliability of the distribution system.

Prior Referenced Response:

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[i] OCC-244 Question:
(VMP) Referring to Exhibit CLP-VMP-1, page 7. Provide support for the claim hazard trees are responsible for approximately 76% of tree failure-related customer outages experienced across the operating year.

OCC-244 Response:
From January 6, 2023 through April 20, 2026, the Company's Connecticut licensed and trained Arborists performed 1,229 outage investigations pertaining to customer interruptions on blue sky or non-storm days. Of the 1,229 outage investigations, 686 were caused by whole-tree failure and, of that number, a total of 522 (76%) of these instances were determined to be caused by hazard trees.