Date Filed: October 28, 2026

Witness: Jared A. Lawrence
Request from: Office of Consumer Counsel

Question:

(AMI METERS)

a. Do the AMI meters that the Company intends to install have a battery and/or batter back up?
b. Do the AMI meters the Company intends to install need to be reset if the power goes out?

Response:

a. Yes, the AMI meters have an internal battery in order for the device to keep track of time during instances where it is not connected to the network for time synchronization. The battery is also utilized when storing the internal meter data to memory during a power outage.

b. Once power is restored to AMI meters, they automatically resume normal operation including booting up, connecting to the network, and energy measurement. No manual intervention is required to restore or reset AMI meters after a power outage.

Date Filed: October 28, 2026

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

Question:

(Vegetation Management) Contrary to the response to OCC-245, in which the Company attributed declining tree health in part to meteorological and biotic factors—including hurricanes and other tropical storms—the Company's response to OCC-661, identifies specific storms and tropical storms but identifies no hurricanes, and does not relate any of this information to declining tree health that impacted electrical supply. Please relate the information provided in OCC-245, and OCC-661, to the Company's assertion that trees are in declining health and that an increasing number of trees are in declining health. The response should provide evidence of the impact of these meteorological events and storms on tree health, rather than merely documenting that such storms occurred.

Response:

Referring to the Company's response to OCC-245[i], the Company introduced impacts to trees in Connecticut over the past several years, including meteorological and biotic factors. The Company should have been clearer in the length of time presented, including the past several decades, and the specific and compounding impacts resulting from biotic and meteorological factors.

Referring to OCC-661[ii], the Office of Consumer Counsel specifically inquired, "Did a Hurricane impact CL&Ps service territory during the Test Year or the four years prior to the Test Year?" Therefore, the Company responded with the indirect impacts from remnants of tropical systems experienced during the requested timeframe.

Please refer to the Company's response to RSR-028[iii], which details biotic factors and resulting impacts to and the declining health of the Connecticut roadside forest specifically in reference, but not limited to, the Emerald Ash Borer, Spongy Moth, Spotted Lantern Fly, and Beech Leaf Disease, over the last 15 years.

In reference to the "Company's assertion that trees are in declining health and that an increasing number of trees are in declining health," please refer to OCC-972, Attachment 1, where the Connecticut Agricultural Experimental Station ("CAES") summarizes Connecticut forest health in 2025. Specifically on page 2, the CAES *"documented 240,732 acres of new damage in the 2025 aerial survey, nearly three times as much as last year*," and reiterate that (emphasis added), "*like in 2024, we note that the acreage reported through the aerial detection survey is likely to greatly*

underestimate the true extent of damage, particularly for certain agents." On page 2, the CAES expands on the damage causing agents (please refer to Table 1):

Table 1

DAMAGE CAUSING AGENT	ACRES
Beech Leaf Disease	158,717
Spongy Moth	45,414
White Pine Needle Disease	9,955
Winter Moth	9,551
Hemlock Woolly Adelgid	7,643
Emerald Ash Borer	6,353
Argyrotaenia spp.	955
Flooding – High Water	71
Fall Cankerworm	12
Unknown	2,061
TOTAL	240,732

The CAES further expands on the impacts of Spongy Moth, Beech Leaf Disease, Emerald Ash Borer, Elm Zigzag Sawflys, Hemlock Wooly Adelgid, Winter Moth, White Pine Needle Disease, Oak Wilt (not confirmed in CT), Southern Pine Beetle, Sugar Maple early leaf drop, Drought, and Spotted Lantern Fly on Connecticut forest health throughout the 2025 Forest Health Highlights report.

Please refer to OCC-972, Attachment 2, on page 4 (emphasis added): *We observed a substantial increase in tree mortality attributed to insects that accounts for the majority of the overall increase in tree mortality from 2009 to 2024 in northeastern USA forests. An increase in insect-caused tree mortality is consistent with substantial biomass losses from insect invasions previously identified in the region (Fei et al. 2019), including from hemlock woolly adelgid (Adelges tsugae) and emerald ash borer (Agrilus planipennis). However, tree mortality is typically the result of multiple interacting stressors, and other factors may contribute to elevated tree mortality in the region including drought and extreme weather events, effects of forest fragmentation and growth of the wildland–urban interface (Sonti et al. 2023), competition from invasive plants (Golivets et al. 2019), and emerging threats such as beech leaf disease (Reed et al. 2022).*

Furthermore, on page 4 (emphasis added), "*Unfortunately, the areas where we identified high and increasing rates of tree biomass loss from natural mortality, largely in the Mid-Atlantic region and southern New England, also face acute tree regeneration challenges that threaten forest recovery.*" Table A1, on page 6, demonstrates that Connecticut experienced one of the highest rates of aboveground biomass loss from adult trees due to natural mortality (all; 2.297 Mg ha^{-1} yr^{-1}) and insects (1.257 Mg ha^{-1} yr^{-1}) among states in the Northeastern United States during 2018-

2024. On page 4, the authors reported that **22% of mortality was due to insects**, **13% to weather**, and **9% to disease** in terms of biomass loss (across all subplot measurements).

Referring to the impact of meteorological events and storms on tree health, there is substantial supporting evidence from scientific literature. Please refer to Table 2, for a summary of meteorological events, potential tree damage, and the long-term risks associated:

Table 2

Meteorological Event	Potential Tree Damage	Long-Term Risk
Wind events (hurricanes, tropical storms, microbursts, thunderstorms, etc.)	Cracked branches, damaged limbs, stem fractures, root-plate movement, and crown damage	Delayed limb or whole-tree failure
Ice storms	Branch, limb, and crown loading, bent stems, branch splitting, and canopy loss	Continued structural defects and future breakage
Heavy wet snow	Broken leaders, branch fractures, damaged canopy	Weak branch structure and secondary failure
Extreme rainfall, saturate soil, and flooding	Reduced root anchorage, soil movement, uprooting, reduction in root gas exchange	Root damage, increased susceptibility to windthrow
Drought and extreme heat	Reduced growth, hydraulic stress, root mortality, dieback	Declining vitality
Repeated storms	Cumulative and compounding structural injury and canopy loss	Progressive decline and additional failure potential

All referenced meteorological events, potential tree damage, and associated long-term risks introduce stress at the tree- and forest-level that increase wounding, decay, susceptibility to pests and diseases, and ultimately a decline in tree and forest health.

Please refer to OCC-972, Attachment 3, for a global review on the resilience of temperate forests to extreme precipitation and wind events, including drought (4.1.1; pages 10-11), waterlogging (4.1.2; pages 11-12), extreme wind (4.2; pages 12-13), compounding impacts of drought and wind disturbance (4.3.1; page 13), and the compounding impacts of waterlogging and wind disturbance (4.3.2; pages 13-14).

Please refer to OCC-972, Attachment 4, where the University of Kentucky introduces in the Plant Pathology Fact Sheet (PPFS-OR-W-01) that (emphasis added) "*wood decay leads to loss of tree vigor and vitality, resulting in decline, dieback, and structural failure. Wounds play an important part in this process since they are the primary point of entry for wood decay pathogens,*" on page

1, and indicates **insect injury** and **severe weather** are among the factors that cause wounds to trees, on page 2. The fact sheet expands on the responses of the tree to wounding and decay on page 3 (emphasis added): "*Wounded trees do not technically "heal" since they are not capable of repair or replacement of damaged tissues. Instead, trees close over their damaged tissues with wound wood/callus tissue (Figure 6). Trees also wall-off (compartmentalize) injuries by producing chemical and physical barriers to pathogens. Organisms that are able to overcome these protective barriers can then colonize and invade wounded tissues. Among the most aggressive of these organisms are the wood decay fungi.*" The ability of trees to compartmentalize decay is impacted by the tree species, type of pathogen or disease, the tree age, size and shape of the wound, location of the wound, tree vigor, tree vitality, and the season; however, "*The rate of formation of wound wood /callus is often an indicator of relative tree vigor, but it is not necessarily indicative of tree resistance to the internal spread of decay. Extensive internal decay may exist behind a completely closed wound.*" The fact sheet further elaborates on types of wood decay diseases, on page 4, and indications of decay, on page 5. Meteorological events cause wounds in trees and in turn may lead to "*weakened wood that is highly susceptibility to wind or other storm damage*" (referenced on page 5).

Please refer to OCC-972, Attachment 5, where the United States Department of Agriculture ("USDA") Northern Research Station ("NRS") provides an overview of wood decay in living and dead trees, including those wounded by storm damage. On page 8, the NRS indicates that "*storm injury causing broken tops and branches leads to the slow progress of decay in exposed wood*," referencing figure 3a (image of stem decay resulting from a broken top in sugar maple) on page 8. Th NRS presents a descriptive overview of the basic concepts of tree decay and host-pathogen interactions on pages 15-19. The NRS indicates on page 18 that "*crown loss due to ice storm injury or insect defoliation may reduce tree vitality, increasing the chances of root infection*," referencing figure 7g (mycelium of an *Armillaria* root-rot fungus spreading into the stem of birch after crown loss due to an ice storm) on page 19.

Prior Referenced Responses:

[i] OCC-245 Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 8. Provide support for the claim Company has experienced declining tree health in Connecticut over the past several years.

OCC-245 Response:

Please refer to exhibit CLP-VMP-1, page 47, at lines 10-20. The trees in Connecticut have been impacted by many meteorological and biotic factors over the last several years. These issues include repeated droughts, polar vortexes, bombogenesis, Nor'easters, microbursts, tornados, tropical storms, hurricanes, the Emerald Ash Borer ("EAB"), Spongy Moth, spotted lantern fly, and beech leaf disease. EAB infestation is of particular concern given the manner in which it affects ash trees, the fact that there is no "cure" after the infestation, and the 100 percent mortality and

failure rate of infested ash trees. Trees may be treated with pesticide before infestation, but it must be done annually, and the amount of pesticide is dependent on the size of the tree. Few tree owners have made the decision to proactively treat trees. The residual effect of these influential factors are more trees that are standing dead or in declining health along the roadside forest and within reach of the Company's lines.

[ii] OCC-661 Question:

Referring to OCC-245, Interrogatory Response. Did a Hurricane impact CL&Ps service territory during the Test Year or the four years prior to the Test Year?

OCC-661 Response:

The Company's CL&P service territory did not experience any hurricanes during the Test Year or within four years of the Test Year.

However, CT did experience indirect impacts from remnants of tropical systems during the Test Year and the four years prior.

2021
Tropical Storm Elsa (MS21G011/MS21H011/MN21F011)
- **July 9, 2021**
- Brought heavy rain, flooding, washed-out roads, power outages, and localized wind damage across Connecticut.

Hurricane Henri (MS21K011)
- **August 22-23, 2021**
- Made landfall in Rhode Island as a tropical storm and directly impacted Connecticut with heavy rain, flooding, coastal flooding, power outages, and wind damage. FEMA issued an emergency declaration for Connecticut.

Remnants of Hurricane Ida (MN21K011)
- **September 1-2, 2021**
- Produced historic flash flooding across Connecticut. The state's first Flash Flood Emergency was issued for portions of Fairfield and New Haven Counties.

2022
Remnants of Hurricane Nicole (MS22H011)
- **November 11-12, 2022**
- Produced widespread rain, gusty winds (locally over 40-50 mph), and scattered power outage concerns across Connecticut.

2023
Hurricane Lee (MS23G011)
- **September 15-17, 2023**
- Stayed offshore, but Connecticut experienced rough surf, coastal impacts, and gusty winds due to Lee's large circulation.

2024
Remnants of Tropical Storm/Hurricane Debby (MS24J0011)
- **August 9-10, 2024**

- One of the more significant tropical-related events of the year for Connecticut. Produced heavy rain, flooding concerns, strong winds, and even tornado watch conditions in parts of the state.

[iii] RSR-028 Question:

(VEGETATION MANAGEMENT) Exhibit CLP-VMP-1, p. 48. Provide additional information on occurrences, frequency, and other information on infestations and diseases affecting vegetation since at least 2018.

RSR-028 Response:

Referring to Exhibit CMP-VMP-1, on page 48, the Company explains that it has worked with the Connecticut Agriculture Experimental Station ("CAES") to receive updated information on the locations and spread of disease and insect infestations, specifically in reference, but not limited to, the Emerald Ash Borer, Spongy Moth, Spotted Lantern Fly, and Beech Leaf Disease. The long-term residual effect of the above factors are more trees that are standing dead or in declining health along the roadside forest and within reach of the Company's electric distribution system.
Please refer to the CAES website repository for all press releases regarding reported disease and insect infestations in Connecticut from 1997 through 2026.

CAES Press Releases

Please see a list of press releases concerning Emerald Ash Borer, Spongy Moth, Spotted Lantern Fly, and Beech Leaf Disease below. Included parenthetically are the description, distribution map, and activity associated with each pest and disease.
Emerald Ash Borer (Agrilus planipennis)

July 20, 2012-- Emerald Ash Borer Found in Prospect and Naugatuck, Connecticut February 26, 2013-- Emerald Ash Borer Found in Three Additional New Haven County... May 20, 2013--Emerald Ash Borer Found in Hamden, Connecticut
May 29, 2013-- Parasitoid Wasp Released in Connecticut for Biocontrol of the Emerald Ash Borer July 28, 2013-- Emerald Ash Borer Found in Fairfield County: Sherman
August 9, 2013-- Emerald Ash Borer Found in Two New Counties in Connecticut, Hartford... July 16, 2014-- Emerald Ash Borer Distribution Expanding in Connecticut
November 12, 2014-- Connecticut Agricultural Experiment Station to Hold Public Hearing...

Spongy Moth (Lymantria dispar)
June 23, 2015--Gypsy Moth 2015 Outbreak
June 13, 2016--Gypsy Moth 2016 Outbreak May be Over Natural Fungus Causing Widespread... March 23, 2017--CAES and DEEP Anticipate Another Spring of Heavy Gypsy Moth Defoliation... Tuesday, June 29, 2021--Gypsy Moth 2021 Outbreak in Northwest Connecticut Causes...
Monday, May 16, 2022--CAES and DEEP Anticipate Heavy Spongy Moth Defoliation...

Spotted Lantern Fly (Lycorma delicatula)

Monday, October 22, 2018--CAES Announces the Finding of Spotted Lanternfly in Farmington... Tuesday, October 15, 2019--Spotted Lanternfly CT
Monday, September 21, 2020--CAES Announces the Finding of Spotted Lanternfly in West... Thursday, October 15, 2020--CAES Announces the Finding of a Spotted Lanternfly Population... Monday, July 19, 2021--CAES Announces the Finding of a Spotted Lanternfly in Norwalk...

Thursday, July 29, 2021--CAES Announces The Finding of Spotted Lanternfly in Fairfield... Monday, January 3, 2022--CAES Announces Renewal of the Spotted Lanternfly Quarantine... Monday, January 9, 2023--CAES Announces Renewal of the Spotted Lanternfly Quarantine... Wednesday, January 3, 2024--CAES Announces Renewal of the Spotted Lanternfly Quarantine... Tuesday, December 18, 2024--CAES Announces Renewal of the Spotted Lanternfly Quarantine... Monday, December 9, 2024--CAES Scientists Develop a New Method to Identify Odorants... Wednesday, January 9, 2026--CAES Announces Renewal of the Spotted Lanternfly Quarantine...

Beech Leaf Disease (Beech Leaf Disease)

Thursday, October 17, 2019--Beech Leaf Disease
Wednesday, June 3, 2020--CAES Announces First Report of Beech Leaf Disease in Hamden... Thursday, June 10, 2021--Beech Leaf Disease Now Widespread in Connecticut
Monday, June 6, 2022--Connecticut's Beech Trees Severely Impacted by Beech Leaf Disease...
Friday, September 1, 2023--CAES Scientists Release Updated Bulletin on Management...

Date Filed: October 28, 2026

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

Question:

(Vegetation Management) Please provide any evidence that the use of LiDAR, as opposed to arborist field assessments, has resulted or is expected to result in improved electric-system reliability, reduced vegetation-related outages, or more efficient vegetation management.

Response:

Please refer to the Company's response to OCC-104[i], that provides an overview of LiDAR in comparison to LiDAR alternatives (i.e. Arborist field assessments).

Arborist field assessments are effective but are time- and labor-intensive, qualitative, and limited in the ability to identify risk across the electric distribution system. LiDAR supplements Arborist field assessments by providing a quantitative inventory of vegetation risk across the entire system. The LiDAR dataset provides the Company with a granular three-dimensional representation of conductor location, vegetation height and crown dimensions, horizontal and vertical clearance distances, and potential fall-in trees inside and outside of the Utility Protection zone. Once analyzed, the LiDAR dataset enables utilities to prioritize and direct valuable field resources to locations that pose the greatest threat to reliability, resulting in more efficient vegetation management and reducing the likelihood of vegetation-related outages.

There is a growing body of research and industry implementation demonstrating that LiDAR-based vegetation management improves risk identification and prioritization, which can translate into fewer vegetation-related outages and more efficient allocation of vegetation management resources.

Please refer to OCC-973, Attachment 1, for a Utility Arboriculture Association white paper on "The Use of LiDAR in Distribution and Transmission Vegetation Management." The white paper is a summary of the experience gathered from "*45 utility vegetation managers from throughout North America. The managers that participated had over 700 years of combined experience in the electric utility industry. They represented 31 companies and together manage the vegetation on over 1,000,000 miles of distribution lines and transmission corridors that provide electricity to over 53,000,000 customers.*"

The white paper discusses benefits of LiDAR on page 1, including, "*The volume and accuracy of the data resulting from the survey cannot be obtained from other inventory methodologies… The*

data obtained permitted better assessment of clearances in areas such as canyon crossings where ground and aerial patrols provided less definitive results… LiDAR provided exact identification and location of high risk off-ROW trees increasing efficiencies in the field… Users identified other benefits experienced as being the ability to limit work to very specific sites where it is needed; added precision and valuable data to work specification; better definition and reclamation of the ROW edge; the ability to share data with other entities (e.g., municipal utilities, parks, etc.) and improved communications with landowners."

Please refer to OCC-973, Attachment 2, for "A Study of [Utility Vegetation Management] Planning and Implementation with a LiDAR Information Matrix". The study found that LiDAR can lead to improved work planning and scheduling, more efficient field inspections, and better prioritization of vegetation risks. On pages 4-5, the author found that short- and long-term vegetation management work planning and scheduling can be improved by transforming LiDAR datasets into actionable field information. This is reiterated on page 7, "*The results of the study indicated that only the most salient and discrete xyz coordinate points of vegetation captured in a LIDAR scan are needed by a ground inspector to adequately schedule and plan work. The filtering criteria for feature coded LIDAR data determine what ground inspectors target during inspections… The inspector is essential to the process in that he/she is able to assess the condition of the vegetation and can prioritize the work with the added knowledge obtained from the ground.*"

The author continues that, "*LIDAR measurements are vital to a field forester's understanding of distances from trees to conductors and the geometric possibilities of trees that may place energized conductors within the target areas of tree failure… Other measurements, such as crown size, canopy size, and risk tree identifiers, and the measurements gained from technologies such as LIDAR, will soon become as important as DBH. The abilities of the inspector are limited by some paradigms of visual assessment. The future of ROW inspection will most likely transform the process to a more measurements-based activity. The precision and accuracy of LIDAR and similar technologies will be a driver of this change. LIDAR data management and electronic communication of complex data in the field will continue to provide many opportunities to improve transmission vegetation management… This deliverable package outlined above will facilitate efficient identification of tree locations, while providing a database that can be used in long term planning... The ground inspection process proved to be a critical component of LIDAR supported vegetation management, because professional foresters could successfully apply LIDAR measurements to locate and code-tag target trees to aid LIDAR information transfer to line clearance crews. Additionally, inspection foresters could provide a thorough understanding of site characteristics and tree inventory in terms of species, structure, health, maturity, environmental impact, tree failure risk, and prioritized prescription.*"

Please refer to OCC-973, Attachment 3, on page 7, where the University of Connecticut found that integrating LiDAR-derived tree exposure data improved outage-prediction model performance up to 5-13% compared with simpler models. The authors further note that LiDAR (ProxPix) data has

"*application to other research topics such as prioritizing areas for vegetation management near utilities and providing data on potential tree threats to roads, railways, or other infrastructure networks.*"

The Company expects LiDAR to improve efficiency of vegetation management and reduce vegetation-related outages when combined with other programs of the VMP. Please refer to Exhibit CLP-VMP-1, on pages 34-36, at lines 14-5, for ways that the Company proposes to utilize LiDAR data, specifically "*the Company plans to use LiDAR for vegetation management to evaluate branch encroachments across the upcoming year's scheduled maintenance circuits. The processing and classification of the LiDAR data is translated to segment level encroachment risk based on a composite evaluation of encroachment based on our specifications along the segment. The segment level risk can then be evaluated by zone, isolating device to isolating device, and the customer and outage impact so work can be prioritized and sequenced to optimize trimming for reliability. Additionally, the LiDAR processed data can be ingested into work management software to assist with planning, scheduling and issuing work out contractor tree crews. There is also potential for the LiDAR to be used for contracting scheduled maintenance, providing data to contactors to identify specifically where work is needed and volumetric measures of vegetation to be trimmed.*"

The processed LiDAR data will enable the Company to prioritize and optimize the annual roadside scheduled maintenance circuits based on the vegetation encroachment risk across the electrical distribution system without regional biases in tree density and overhang. LiDAR will also enable the Company to optimize and prioritize high-risk encroachment zones for the renewed Midcycle program where a specification clearance limitation was imposed during scheduled maintenance, whether by a property owner, tree owner, or the tree warden with respect to getting the specification clearance.

Prior Referenced Response:

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[i] OCC-104 Question:

(VMP/LiDAR). The company is proposing to institute LiDAR, presented as a new program component, which will cost $950,000 (Exhibit CLP-VMP-2 page 25 of 29). What is the alternative to LiDAR and the cost? Provide analysis on the pros and cons of using LiDAR.

OCC-104 Response:

Please refer to pages 13-14, of Exhibit CLP-VMP-2, summarizing a ground-based LiDAR pilot performed by the Company in 2025 at a cost of $153 per mile. LiDAR is an effective and accurate method of assessing vegetation conditions along heavily forested electric distribution systems. As discussed on pages 33-34, of Exhibit CMP-VMP-1, the processing and classification of the LiDAR data is translated to segment level encroachment risk based on a composite evaluation of encroachment based on the VMP specifications along the segment. The segment level risk

can then be evaluated by zone, isolating device to isolating device, and the customer and outage impact, so work can be prioritized and sequenced to optimize trimming for reliability.

Additionally, the LiDAR processed data can be ingested into work management software to assist with planning, scheduling, and issuing work out to contractor tree crews. There is also potential for the LiDAR to be used for contracting scheduled maintenance, providing data to contactors to identify specifically where work is needed and volumetric measures of vegetation to be trimmed. This could also assist with pricing and line-of-sight decisions on what needs to be trimmed. One aspect of LiDAR that could be perceived as a "con" is that risk tree evaluation may be limited by obstructions (e.g., trees closer to the terrestrial pulsed-laser scan); however, this will be mitigated separately through the VMP's Risk Tree Removal ("RTR") program.

The alternatives to LiDAR include (1) satellite remote sensing, (2) Arborist field assessment, and (3) no encroachment assessment.

1. Satellite remote sensing: The Company performed a satellite remote sensing pilot at a cost of $376 per mile. The encroachment assessment was not accurate (<60%) and is limited by GIS and canopy overhang. The tree health risk was also not accurate (<50%) and included false positives and negatives in the data.

2. Arborist field assessment: The Company utilized the Vegetation Management team of CT licensed Arborists to perform encroachment assessments in 2025 at a cost of $117 per mile. The cost to perform this manual assessment was similar to LiDAR but with less granularity available in the assessment data. While field assessment data can be utilized for point-in-time decision making, the lack of granularity does not allow the Company to quantify the associated volumetric workload that may assist with more precise VMP budgeting and generate more competitive pricing from contractors. Unlike LiDAR point cloud data, the manual field assessment data is not digestible by work management software and does not allow the Company to prioritize and sequence work precisely to optimize trimming for electric system reliability. Less granularity also does not allow the Company to hold maintenance contractors accountable to the vegetation conditions prior to maintenance trimming that can be compared post-maintenance trimming cycle.

3. No encroachment assessment: The Company recognizes that there is also the option to not perform any assessment at a cost of $0 per mile; however, the true cost of not assessing the vegetation conditions on the system is the potential impact to reliability that may occur by not assessing encroachment and fall in risks to the electric system.

Date Filed: October 30, 2026

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

Question:

(Vegetation Management) Please provide the results of any comparison the Company has performed between LiDAR assessments and arborist field assessments, including the number and type of vegetation conditions identified by each method and any material differences in the resulting work plans.

Response:

Please refer to the Company's response to OCC-104[i] that provides an overview of LiDAR in comparison to LiDAR alternatives (e.g. Arborist field assessments), including the associated cost per mile.

The LiDAR pilot and Arborist field assessments are not directly comparable.

The LiDAR pilot was established to determine the viability of terrestrial LiDAR in Connecticut, obtain quantitative data to assess vegetation conditions along the heavily forested electric distribution system, and directly compare the efficacy and associated costs of condition-based and cycle-based maintenance programs. The quantitative data obtained through the LiDAR pilot captured fall-in risk and exact vertical and horizontal vegetation encroachment distanced from the conductors that were then analyzed systematically on a work unit level and assigned a risk level based on specification clearances. Please refer to Exhibit CLP-CMP-2, on page 14, for a summarized LiDAR pilot analysis demonstrating that of the scanned miles (approximately 4,000) 88.16% presented fall-in risk, 70.55% presented vegetation overhang, and 74.92% presented vegetation encroachment within the trim zone. The LiDAR pilot was not utilized to determine or structure the 2026 work plan; however, multiple condition-based scenarios were developed. Please refer to Exhibit CLP-VMP-2, on page 34, for condition-based scenarios developed using the LiDAR pilot data.

The Arborist field assessments were utilized to determine relative zone-level, isolating device to isolating device, prioritization on selected 2026 laterals (approximately 1,620 miles). The zone-level prioritization was a qualitative assessment of the vegetation encroachment and overhead conditions across the entire zone. Fall-in risk was not evaluated at the time of assessment. Of the assessed zone mileage, 38.43% was low priority, 36.01% was medium priority, and 25.56% was higher priority.

Prior Referenced Response:

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[i] OCC-104 Question:

(VMP/LiDAR). The company is proposing to institute LiDAR, presented as a new program component, which will cost $950,000 (Exhibit CLP-VMP-2 page 25 of 29).

What is the alternative to LiDAR and the cost? Provide analysis on the pros and cons of using LiDAR.

OCC-104 Response:

Please refer to pages 13-14 of Exhibit CLP-VMP-2, summarizing a ground-based LiDAR pilot performed by the Company in 2025 at a cost of $153 per mile. LiDAR is an effective and accurate method of assessing vegetation conditions along heavily forested electric distribution systems. As discussed on pages 33-34 of Exhibit CMP-VMP-1, the processing and classification of the LiDAR data is translated to segment level encroachment risk based on a composite evaluation of encroachment based on the VMP specifications along the segment. The segment level risk can then be evaluated by zone, isolating device to isolating device, and the customer and outage impact, so work can be prioritized and sequenced to optimize trimming for reliability.

Additionally, the LiDAR processed data can be ingested into work management software to assist with planning, scheduling, and issuing work out to contractor tree crews. There is also potential for the LiDAR to be used for contracting scheduled maintenance, providing data to contactors to identify specifically where work is needed and volumetric measures of vegetation to be trimmed. This could also assist with pricing and line-of-sight decisions on what needs to be trimmed. One aspect of LiDAR that could be perceived as a "con" is that risk tree evaluation may be limited by obstructions (e.g., trees closer to the terrestrial pulsed-laser scan); however, this will be mitigated separately through the VMP's Risk Tree Removal ("RTR") program.

The alternatives to LiDAR include (1) satellite remote sensing, (2) Arborist field assessment, and (3) no encroachment assessment.

1. Satellite remote sensing: The Company performed a satellite remote sensing pilot at a cost of $376 per mile. The encroachment assessment was not accurate (<60%) and is limited by GIS and canopy overhang. The tree health risk was also not accurate (<50%) and included false positives and negatives in the data.

2. Arborist field assessment: The Company utilized the Vegetation Management team of CT licensed Arborists to perform encroachment assessments in 2025 at a cost of $117 per mile. The cost to perform this manual assessment was similar to LiDAR but with less granularity available in the assessment data. While field assessment data can be utilized for point-in-time decision making, the lack of granularity does not allow the Company to quantify the associated volumetric workload that may assist with more precise VMP budgeting and generate more competitive pricing from contractors. Unlike LiDAR point cloud data, the manual field assessment data is not digestible by work management software and does not allow the Company to prioritize and sequence work precisely to optimize trimming for electric system reliability. Less granularity also does not allow the Company to hold maintenance contractors accountable to the vegetation conditions prior to maintenance trimming that can be compared post-maintenance trimming cycle.

3. No encroachment assessment: The Company recognizes that there is also the option to not perform any assessment at a cost of $0 per mile; however, the true cost of not assessing the vegetation conditions on the

system is the potential impact to reliability that may occur by not assessing encroachment and fall in risks to the electric system.

Date Filed: October 28, 2026

Witness: David L. Gladey and Steven Lamontagne
Request from: Office of Consumer Counsel

Question:

(UNDERGROUNDING) Has the Company investigated the costs of undergrounding power lines? If yes, please provide the most recent estimates obtained and indicate when these estimates were obtained.

Response:

Underground lines (UG) are far more expensive than installing overhead lines (OH) because of the many aspects involved in their constructions. Trenching to install conduits, vaults and a duct bank is not an easy process; it consists of the entire "upheaval" and rebuild of the area including the road, sidewalks, parking areas, and driveways.

In addition, trees may need to be removed. Many other underground utilities including sewer, water, communication, and gas lines may need to be relocated to install the conduit and vaults. Real estate easements may be required to be able to place equipment on or under customers property, for all the facilities. Along with the construction of the new facilities, the existing lines and equipment must also be removed. Lastly, undergrounding of overhead lines involves a cost to the customer since home and business service entrance equipment must also be converted. The Company's construction standard is open wire OH construction.

The Company's most recent study for new construction was completed in year 2022 resulting in the following:

- The average cost to underground single phase laterals is $1.5M / mile.
- The average cost to underground three phase laterals is $3.2M / mile.
- The average cost to underground three phase backbone is $8.24M / mile.
- The cost estimate to replace an overhead line with an underground line ranges from $1 million in a rural, single phase, lateral area to $14 million in a densely populated downtown backbone area with an average of $3.8 million per mile.

Date Filed: November 02, 2026

Witness: Mark P. Baldwin, Christopher E. Colorio, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:
(Storm MN25K – Meals) The following pertains to the response provided as part of OCC-879.

a. How did the Company identify the clerical error in the meal reimbursement calculations for lines 110 and 1352?
b. Considering the response to subpart (a), explain how the Company is comfortable that there are no other clerical errors related to the remaining meal expenses in the 'Labor by Empl. Title' tab for storm MN25K? If there are clerical errors within the remaining expenses, identify and report them.

Response:

a. The Company identified the errors through a review of the hours worked and a verification of meal allowances earned based on those hours. The applicable contract language is located in EOE-259 Attachment 3, page 50, Section 15, which outlines the meal allowance provisions for union employees working extended hours.

   The errors identified in response to OCC-879[i] were related to the classification of Meal-Day/Minor versus Meal-Evening/Major meal allowances. Following its review, the Company determined that the employees were entitled to receive meal compensation. However, the incorrect meal type and corresponding amount were entered based on the time at which the meal was earned. As a result, the issue was not whether a meal allowance was warranted (it was), but rather whether the allowance was coded and paid under the correct meal category.

b. To resolve any further questions in relation to meal expenses, the Company will conduct an additional review and supplement this response with the findings.

Prior Referenced Response:

[i] OCC-879 Question:

(Storm MN25K Meals) Refer to Exhibit ACCT-2 (CLP-13) (MN25K) CONFIDENTIAL, Labor by Empl. Title tab. Provide documentation to support the following Meals. As part of the response, provide relevant calculations, citations, invoices, or other supporting documents.

a. Row 110, Chief/Top Line Mechanic, $150
b. Row 497, Response Specialist – Line, $60
c. Row 1352, Reliability Shift Electrician, $40
d. Row 1898, Line Mechanic, $190
e. Row 3858, Garage Mechanic, $20

OCC-879 Response:

Referring to Exhibit ACCT-2 (CLP-13) (MN25K), Labor by Empl. Title Tab.

- Please refer to OCC-879, Attachment 1 CONFIDENTIAL, regarding summary and location of supporting calculations of meals reimbursed.

- Please refer to OCC-879, Attachment 2 CONFIDENTIAL, regarding meal reimbursement calculations.

Please refer to the Company's response to EOE-259i for a supporting justification on meal reimbursements to union employees. Additionally, please refer to EOE-259, Attachment 3, page 50, Section 15, regarding meal allowance provisions applicable to union employees working extended hours.

Upon further review in drafting this response, the Company identified that there was a clerical error in the dollar amount charged for line 110 in the amount of $10 and line 1352 in the amount of $10. The Company will supplement line 110 to reflect the total amount of $140 and line 1352 to reflect the total amount of $30.

Date Filed: November 02, 2026

Witness: Mark P. Baldwin, Christopher E. Colorio, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

(Storms - P-Cards) The following pertains to the response provided as part of OCC-880.

a. Given the purchase on line 198 was considered to be inappropriately charged to MN25K, consider the purchase on line 251, Wood-N-Tap, Meals, $71. Explain if this purchase should be considered a storm related purchase or not given this purchase has a different cost center (2BB).

b. Considering the response to subpart (a), do each of the 14 storm events have a specific cost center code assigned to them and if so, can you identify the cost center codes for each storm?

Response:

a. Referring to ACCT-2(CLP-13)(MN25K), P-Card tab, line 251, the Wood-N-Tap Transaction was appropriately charged to the storm.

   Please refer to OCC-977 Attachment 1, for the receipt supporting this charge. The work order, not the cost center, determines if the charges are considered a storm purchase. Accordingly, the cost center code assigned to the transaction identified on Line 198 was not considered in the Company's evaluation of the charge. The Company's determination to exclude the charge was based on a review of the underlying documentation and the nature of the expense, rather than the cost center code to which the transaction was assigned.

b. No, each of the 14 storms does not have a specific cost center code. The only unique accounting for each event is the field work order. The Wood-N-Tap P-Card transaction was charged to the field work order MN25K011, which categorizes the charge as related to the February 14, 2024, storm event.

Date Filed: November 05, 2026

Witness: Mark P. Baldwin, Christopher E. Colorio, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:
(Storm MN25K – Employee Expense Reimbursement) The following pertains to the responses provided as part of OCC-881 and respective costs.

a. What factors were considered in determining the costs on line 74, 140, and 424 of the 'Empl. Expense&Other' tab of Exhibit ACCT-2 (CLP-13) (MN25K) CONFIDENTIAL to not be associated with the storm event?

b. Considering the response to subpart (a) above and the response in OCC-881 regarding supervisor review through the Workforce system, how is the Company comfortable that the remaining costs within this tab of the exhibit are truly related to storm MN25K given 60% of the costs selected as part of OCC-881 were considered costs not associated with the event?

c. Provide documentation to support the remaining employee expenses within the 'Empl. Expense&Other' tab of the exhibit. As part of the response, provide a description of the purchase, relevant invoices, and other supporting documentation demonstrating the necessity and applicability to the MN25K event. If a particular cost is not associated with the event, identify the cost and provide a reason.

Response:

a. The determination of whether costs were attributable to the storm event was based on a review of the receipts and items purchased. That review confirmed that the costs were properly attributable to the storm and were necessitated to carry out work functions and clean-up work on the system after all customers were restored. However, to limit the items subject to debate in this docket, the Company elected to remove the costs for purposes of answering OCC-881.

b. Yes. The Company is "comfortable that the remaining costs within this tab are truly related to storm MN25K." Based on the Company's review of cost items for OCC-881,[i] the Company expanded its review beyond the OCC-881 sample and evaluated 100% of the transactions included within the population. The review considered information provided on the receipt, the nature of the goods or services purchased and the relationship of the expenditure to storm response and restoration activities associated with storm MN25K. As a result of this thorough review, the Company was able to validate that all of the costs charged to storm MN25K were "truly related to storm MN25K." However, the Company has similarly decided to remove a total of $3,180 of the costs correctly charged to storm MN25K to limit the items subject to

debate in this docket, which includes the $1,710 of costs referenced in OCC-881. This amount of $3,180 is the only population requiring adjustment.

c. Please refer to OCC-978, Attachment 1 CONFIDENTIAL, for a summary of purchases and a description of the transactions included in the review. Please also refer to OCC-978, Attachment 2 CONFIDENTIAL, for copies of all receipts directly associated with the storm event and OCC-978, Attachment 3 CONFIDENTIAL, for the related Workforce expenses.

With respect to receipt requirements, please refer to the Company's response to OCC-881, which outlines the Company's policy regarding purchases under $25. Consistent with that policy, receipts are not required for transactions below the established threshold. The Company relied on the available supporting documentation, transaction descriptions, and additional review procedures performed as part of its comprehensive evaluation of the storm-related cost population to validate these expenses.

Although properly attributable to the storm event and incurred for work associated with the storm event, the Company has elected to remove the following costs totaling $1,470 from this event:

- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 155 in the amount of $821.
- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 208 in the amount of $8.
- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 219 in the amount of $9.
- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 241 in the amount of $80.
- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to reflect line 254 in the amount of $174.
- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 295 in the amount of $22.
- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 332 in the amount of $44.
- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to reflect line 352 in the amount of $25.

- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 378 in the amount of $21.

- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 421 in the amount of $25.

- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 427 in the amount of $287.

Prior Referenced Response

[i] OCC-881 Question:

(Storm MN25K – Employee Expense Reimbursement) Refer to Exhibit ACCT-2 (CLP-13) (MN25K) CONFIDENTIAL, 'Empl. Expense&Other' tab. Provide documentation to support the following employee expenses. As part of the response, provide a description of the purchase, relevant invoices, and other supporting documents demonstrating the necessity and applicability to the MN25K event.

a. Row 59, Meals – Employee Reimbursement, $140
b. Row 74, Employee Reimbursement, $638
c. Row 140, Meals – Employee Reimbursement, $200
d. Row 426, Travel, $273
e. Row 424, Meals – Employee Reimbursement, $872

OCC-881 Response:

Referring to Exhibit ACCT-2 (CLP-13) (MN25K), Empl. Expense & Other. Please refer to OCC-881 Attachment 1, for a summary of purchases and descriptions of transactions. In addition, please refer to OCC-881 Attachment 2, for all receipts directly associated with this event.

Please note that line 29 includes one miscellaneous expense in the amount of $24. Pursuant to the Company's Employee Expense Policy, receipts are not required for individual expenses below $25.00. This threshold reflects the Company's determination that the administrative burden associated with collecting, reviewing, and retaining receipts for nominal-value transactions exceeds the corresponding control benefit.

To mitigate the risk of circumvention through multiple small-dollar submissions, all de minimis expenses must be submitted through the Workforce system rather than Workday. The Workforce system provides centralized tracking, requires supervisory review and approval contemporaneous with the expense submission, and facilitates monitoring for unusual or potentially duplicative expense patterns.

The expenses identified above were submitted in accordance with the applicable provisions of the Employee Expense Policy and were reviewed and approved by the employees' supervisors through the Workforce system. As part of that approval process, the supervisors confirmed that the expenses were incurred in connection with storm restoration activities. Accordingly, these expenses represent properly incurred storm-related costs and are eligible for recovery

Upon further review in drafting this response, the Company determined that the cost for the following lines are not associated with the event:

- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 74 in the amount of $638.
- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to remove line 140 in the amount of $200.
- The Company will supplement Exhibit ACCT-2 (CLP-13) (MN25K), to reflect line 424 in the amount of $872.

Date Filed: November 02, 2026

Witness: John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

(STORM EVENT DOCUMENTATION) On August 14, 2026, the Company responded to Interrogatory EOE-30 stating that it "will supplement the remaining spreadsheets for the remaining 13 storm events included in the request." Please provide any available supplements created to date and provide an update on the progress of whatever supplements remain (including a projected finish date).

Response:

Please refer to the Company's response to EOE-30-SP01[i], for the requested information.

Prior Referenced Response

[i] EOE-30-SP01 Question:

(STORM EVENT DOCUMENTATION) For each catastrophic storm event included in the Company's storm request, provide an unlocked Excel spreadsheet detailing the total number of billable hours for each external line crew. Specifically include the breakdown of hours split between work, standby, and mobilization/demobilization. Additionally, identify the total dollar amount billed for each category, summarize the total number of hours per category, and cite the supporting documentation.

EOE-030-SP01 Supplemental Response:

Please reference EOE-030-SP01 Attachment 1, for a summary of hours and costs associated with external line crew support for spreadsheets for the 14 storm events included in the request.

Original Response:

The Company does not track or account for the billable hours in the manner requested in this interrogatory. In order to respond to this request, the Company must perform a manual exercise to identify each billable hour by work or standby time for each individual invoice by storm. The Company is currently working through this exercise for each storm. Please reference EOE-030, Attachment 1, for a summary of hours and costs associated with external line crew support for MS24A011. The Company will supplement the remaining spreadsheets for the remaining 13 storm events included in the request.

Date Filed: October 28, 2026

Witness: Jared A. Lawrence and Timothy W. McGrath
Request from: Office of Consumer Counsel

Question:

(CUSTOMER CALLS) Please refer to the Correspondence filed on October 15, 2026, by customer Murray Renshaw. Please provide all calls from this customer to the Company made from January 1, 2026, to the present, including calls in which the customer attempted to pay their bill.

Response:

Please refer to OCC-980, Attachment 01 CONFIDENTIAL through OCC-980, Attachment 12 CONFIDENTIAL in support of the calls made by the customer to The Connecticut Light and Power Company d/b/a Eversource Energy. These calls reflect the customer's interactions with Customer Service Representatives ("CSRs") since January 2026.

Please note, OCC-980, Attachment 09 CONFIDENTIAL, contains the call in which the customer made a payment through a CSR.

The Company further explains that the recording identified as OCC-980, Attachment 09 CONFIDENTIAL, is the call from October 14, 2026, and is related to the customer's commercial account. Because the Company charges a fee for payments made by phone on commercial accounts, a payment-processing fee was assessed during that transaction.

Date Filed: October 28, 2026

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

Question:

(MS24E- Dead Trees) Please refer to the Response to OCC-841. Please provide all evidence and/or substantiation that the dead trees in question in OCC-841 became "storm damaged vegetation when the storm either cause[d] the tree to die or create[d] a situation where a previously dead tree that was not a problem prior to the storm [became] a risk that need[ed] to be remediated."

Response:

Dead trees can be storm damaged in the same ways that live trees can be storm damaged. A standing dead tree may suddenly become more likely to cause an outage due to damage sustained during a storm. Dead trees may fail but do not cause an immediate outage just as live trees may fail and not cause an immediate outage. An example is a dead tree that breaks at the base during the storm and leans out towards the overhead lines while being held up in another smaller tree. The broken dead tree is likely to fail completely and impact the overhead lines in the following days or weeks. A dead tree may be suddenly altered by storm damage and now has a looming risk of failing and causing equipment damage, customer interruptions, or a public safety threat. Therefore, a "dead tree" becomes storm damaged vegetation when the storm either causes the tree to die or creates a situation where a previously dead tree that was not a problem prior to the storm becomes a risk that needs to be remediated. These charges are not related to any planned vegetation management activity as the work was done in response to the storm event causing the dead trees to be a threat to the Company's system or public safety.

Date Filed: November 02, 2026

Witness: Mark P. Baldwin, Christopher E. Colorio, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

(MS24E) Please refer to the Responses to OCC-871 and 872. Please confirm this vendor's crews are paid for their time eating breakfast before they begin working at a job site. Cite to applicable contract provisions in the record.

Response:

The contractor's crews are compensated beginning at the commencement of their scheduled work shift, which may include time during which crews consume breakfast prior to proceeding to their first assigned work location.

Emergency restoration operations require crews to perform various preparatory activities prior to beginning work at an assigned job site. These activities include, but are not limited to, conducting safety briefings, performing U.S. Department of Transportation (DOT) mandated pre-trip vehicle inspections, replenishing materials and supplies, and receiving work assignments. Crews may also consume meals during this period. The sequence in which these activities are completed may vary depending on operational circumstances and restoration priorities.

As provided in OCC-044, Attachment 1 CONFIDENTIAL, page 4529, Exhibit A Pricing Schedule, working rates are payable from the commencement of applicable Emergency Response Work through the termination of such Emergency Response Work.

Emergency restoration activities are not limited to the physical execution of an individual work ticket. Numerous activities occur throughout a normal work shift that may not be directly attributable to a specific work ticket but are necessary to support crew readiness, employee safety, and efficient restoration operations.

Accordingly, the Company considers the time at issue compensable as part of the contractor's established work shift, consistent with the applicable contractual provisions. The consumption of breakfast is not considered a separately billable activity, but rather an incidental activity that may occur during an otherwise compensable period of Emergency Response Work.

Date Filed: October 30, 2026

Witness: Patrick M. Quinn
Request from: Office of Consumer Counsel

Question:

(Company Vehicles) Please refer to the Response to OCC-754, Attachment 1, shows only four levels of executives with assigned vehicles, but the response states that Field Operations Supervisors "may be assigned Company vehicles and authorized to retain those vehicles outside normal working hours" and then listed four other categories of employees that may be assigned a vehicle.

a. For 2023, 2024, and 2025, please indicate what employees were assigned vehicles. If the vehicle assignments were temporary, please indicate the dates of the assignments.

b. The Response indicates that Field Operations Supervisors "are not permitted to use Company vehicles for personal errands in vehicle." Does this restriction apply to all other categories of workers indicated in the response?

c. If workers are not permitted to use Company vehicles for personal use, please explain how the Company ensures vehicles assigned to an employee and/or driven home are not used for personal use.

Response:

a. Apart from the executive vehicles identified in OCC-754, Attachment 1, the Company generally does not assign vehicles on a permanent one-to-one basis to individual employees. Rather, Company vehicles are generally assigned to departments, work centers, and cost centers and are utilized by employees based on operational needs.

   Pursuant to Company policy, employees in certain job classifications may be authorized to retain company vehicles temporarily (on an unassigned basis) outside of normal working hours to support operational requirements, including supervisory responsibilities, on-call duties, operational readiness, emergency response, and storm restoration activities. These classifications include:

   - Field Operations Supervisors
   - Test Department employees, while on call
   - Work Center Electricians, while on call

- Other employees temporarily authorized based on operational need, such as emergency response, severe weather, storm restoration, or business continuity requirements.

Because employees falling into these job classifications are not assigned to specific vehicles, there is no list of vehicle assignments. The Company maintains a decentralized fleet-management model, where routine vehicle use and temporary take-home authorizations are administered with direct oversight at the local work center level and are not centralized as assigned vehicles.

b. Yes. This restriction applies to all employees operating (unassigned) Company vehicles, including those identified in the response to OCC-754. Pursuant to Company policy, Company vehicles are provided for business purposes and are not intended for personal use.

c. The Company maintains strict policies governing the use of Company vehicles and authorizes employees to use vehicles outside normal working hours only for specific business-related purposes, such as supervisory responsibilities, on-call duties, operational readiness, emergency response, storm restoration activities, and other approved operational requirements. Leadership of the local area-work centers are charged with supervising the use of vehicles and adherence to applicable requirements and policies.

More specifically, compliance with Company vehicle-use requirements is supported through:

- Written vehicle-use policies and employee requirements;
- Management approval processes for employees that are authorized to use vehicles outside normal working hours;
- Supervisory oversight at the local operating level, coupled with time-reporting practices that require employees authorized to use Company vehicles to annotate that on their weekly timesheet.
- Fleet-management and telematics systems provide visibility into vehicle utilization and driver activity, including processes that require operators to identify themselves while logging into a vehicle and investigation of potential policy violations and implementation of corrective action.

Through these policies and operational controls, the Company maintains oversight of vehicle utilization and compliance with its vehicle-use requirements, consistent with the Company's decentralized fleet-management model with vehicle assignment and monitoring directly administered by local operational leadership. Fleet-management and telematics systems provide visibility into vehicle utilization and driver activity, and employees authorized to use Company vehicles outside normal working hours are expected

to use those vehicles in accordance with Company policy and approved business purposes. Potential instances of non-compliance are subject to review and corrective action, as appropriate.