Date Filed: November 16, 2026

**Witness: John P. Dipaola-Tromba, Sean D. Redding and Jenna M. Turner**
**Request from: Public Utilities Regulatory Authority**

**Question:**

(VEGETATION MANAGEMENT) Explain whether the Company has conducted any analysis showing any historical cost savings (i.e., avoided costs associated with reduced customer outages or reduced storm damage). If so, provide the analysis.

**Response:**

The Company has not conducted an analysis in reference to the impact of Vegetation Management on historical cost savings or avoided costs associated with reduced customer outages or reduced storm damage. Please refer to the Company's response to RSR-089[i] for an explanation on how cost savings and avoided costs cannot be fully realized without the elimination of all risk through the removal of all fall-zone hazards

**Prior Referenced Response**

[i] RSR-089 Question:

(VEGETATION MANAGEMENT) Ex. VMP-3, pp. 7-8. Using the percent decreases in outages described in exhibit VMP-3 pages 7-8, provide an analysis showing cost savings that could be reasonably anticipated from the proposed vegetation management program. Provide all assumptions used in the analysis.

RSR-089 Response:

In reference to Exhibit CLP-VMP-3, at pages 7-8, the University of Connecticut ("UCONN") performed aggregated grid-cell analyses on the impact of enhanced tree trimming ("ETT") on electric distribution system reliability (i.e. decreases in outages), specifically pertaining to 144 storms that occurred during years 2005-2017. The results allowed UCONN to "estimate that the impact of ETT on outage occurrence could be quantified as a 16% to 48% reduction in outage frequency (36% to 63% for thunderstorms, 13%-52% for extratropical storms, not shown)." The approach utilized in this study did not take into account the variability of storm intensity.

The proposed program component specifically supported by the UCONN studies presented in Exhibits CLP-VMP-3 and CLP-VMP-4 is Reliability Tree Work ("RTW"). The Company anticipates that the RTW program will prioritize and target overhanging vegetation on approximately 100 miles of the electric distribution system per year, which equates to 0.6% of the 16,500+ miles of primary overhead conductors. The prioritized backbone and lateral zones, isolating device to isolating device, may or may not experience a storm impact following treatment of the RTW specification. Without elimination of risk through the removal of *all* trees in the fall-zone, the Company cannot realize the full potential in avoided costs or cost savings.

Although historical outage data is a useful input when prioritizing backbone and lateral zones for reliability tree work projects, the historical outage data is not a projection of future impacts to the electric distribution system and reliability improvements do not always correlate with cost savings or avoided costs on the entire electric distribution system due to the variability of storm intensity and inability to project where and when a storm may impact the system.

However, the Company's redesigned RTW program will allow the Company to address the locations, where property owner consent and Tree Warden permit allow, on scheduled circuits where overhang and ETT clearances were not previously achieved on the portion of those circuits that serve the most customers and are highly susceptible to tree-related outages, particularly in relation to circuit backbones that were addressed through the ETT program over 20 years ago. The RTW program will encompass trimming of overhanging branches, as overhanging branches that break and fall on the power lines account for approximately 24% of the non-storm tree-related outages on the system (please refer to Exhibit CLP-VMP-2, page 39). By targeting prioritized zones with overhang that serve the highest number of customers through the RTW program, risk to the electric distribution system will be mitigated.