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

Question:

(VMP/Cost-Benefit) The University of Connecticut study, Assessing the Effects of a Vegetation Management Standard on Distribution Grid Outage Rates (Exhibit CLP-VMP-3) suggests that Enhanced Tree Trimming ("ETT") improves reliability however, it did not find that increasing ETT consistently resulted in a greater reduction of outages, after accounting for storm severity.

a. Has the Company evaluated whether increasing ETT beyond the currently proposed level will continue to produce reliability benefits that justify the cost?
b. If yes to (a), provide all analyses, studies, cost-benefit evaluations, or other documentation supporting the Company's conclusion.
c. If no such evaluation has been performed, explain how the Company determined that the proposed level of ETT represents a cost-effective investment for ratepayers.

Response:

Yes, the Company has evaluated whether increasing ETT beyond the currently proposed level to continue to produce reliability benefits. With respect to the evaluation, the Company is relying on the referenced 2019 study, assessing the effects of a vegetation management standard on distribution grid outage rates, (provided in Exhibit CLP-VMP-3), as well as the University of Connecticut 2022 Study, A Statistical Framework for Evaluating the Effectiveness of Vegetation Management in Reducing Power Outages Caused during Storms in Distribution Networks (refer to Exhibit CLP-VMP-4).

The results from the 2022 study demonstrated that, “enhanced vegetation management is particularly helpful in reducing trouble spots for lower severity storms, with reductions between 45.8% and 63.8%, and substantially reduces trouble spots during the most severe events when vegetation management is particularly comprehensive, demonstrating a 37.3% reduction when compared with circuits with little to no enhanced tree trimming.” (Exhibit CLP-VMP-4, at 15).

The reliability improvements were observed in individual storm events as well as in annual totals. The University of Connecticut 2022 study further elaborates that, “when compared with previous studies in the effectiveness of vegetation management activities, this analysis provides a better understanding of how more rigorous vegetation management standards (applying ETT) help reduce outages at an individual event level, for both the more frequent events and those less frequent, stronger storms, which may also occur more frequently in the future due to climate change.” (id.)

However, the Company is observing diminishing system impact from Customer Focus Enhanced Tree Trimming ("ETT"), as only lower priority laterals are available for prescription under the current capitalization structure required in PURA Docket No. 17-10-46. Previous ETT work completed on circuit backbones between 1998 to 2003, and large customer count laterals from 2004 until the ETT project was sunset in 2020 (PURA Docket No. 17-10-46), did not allow for previously completed zones to be readdressed if full clearance was limited by permissions. In addition, the November 25, 2020 ruling in PURA Docket No. 17-10-46 on Motion No. 53 declined the Company's request to provide additional rate recovery for ETT post-2020 and directed the Company to seek permission to recover such "system resiliency program costs in its next rate case proceeding".

For this proceeding, the Company's redesigned Reliability Tree Work ("RTW") program will allow the Company to address the locations 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 tree-related outages on the system (please refer to page 39 of Exhibit CLP-VMP-2). By targeting the zones with overhang that serve the highest number of customers through the RTW program, risk will be mitigated.

Please refer to Exhibit CLP-VMP-1 on page 30-31, summarized on page 19 of Exhibit CLP-VMP-2, where the Company proposes the RTW program. The RTW program will be key in preventing vegetation outages from outside zone overhanging limb fall-in and inside zone tree fall-in on high priority line segments with the goal of achieving clearance of 10 ft of vegetation from ground to sky where permission allows.

Please refer to pages 49-51 of Exhibit CLP-VMP-1 which is also summarized on page 11 of Exhibit CLP-VMP-2. The Company selected 21 circuit zones with high System Average Interruption Duration Index (SAIDI) for targeted vegetation management in 2023. The table and summary table on page 50 of Exhibit CLP-VMP-1 below shows pre- and post-treatment customer reliability (CMI and CI) for circuit zones that received targeted vegetation management. This targeted vegetation management included seeking to remove within 10 feet of the outermost conductor and all overhanging vegetation. On average, the segments where targeted vegetation management was performed experienced a 94% reliability improvement demonstrating a benefit for these circuits associated with removal of overhang, trees that are too close to the distribution system, and removal of high-risk trees.