Date Filed: November 16, 2026

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

Question:

(NEW VEGETATION POSITIONS) Refer to Schedule WPC-3.31 and Response to OCC-333. The Company's response to OCC-333 discusses the increase in Vegetation Management positions and reference WPC-3.31 for "the reduction in outside contractor services." Explain where the specific WPC-3.31 reduction is included and provide documentation to support both the nature and amount of the corresponding reduction. Additionally, identify the specific vendor or vendors for whom the reduction would apply. Finally, provide any analysis performed, to include a benefit-cost analysis, demonstrating the impact of hiring the additional 21 Vegetation Management positions.

Response:

Referring to the Company's response to OCC-333,[i] "of the twenty-one (21), eight (8) of the FTEs are the result of 16 employees who currently split their time 50%/50% between O&M and capital work shifting to solely working on the proposed combined O&M program, if approved, result[ing] in the equivalent of ***8 incremental employees*** working on the O&M program; ***twelve (12) resources would be converted from contracted resources to internal resources*** of which the Company's proposed vegetation management expenses in Exhibit CLP-REVREQ-2, Work Paper C-3.31 reflect the reduction in outside contractor services; and ***one (1) resource would be truly incremental***" (emphasis added). Accordingly, the Company will not be adding 21 new Vegetation Management positions. Please refer to RRU-047, Attachment 1, for the allocation of the 21 Vegetation Management positions that represent the 8 full-time equivalents; 12 contractor conversions; and one incremental resource.

The reduction of 12 outside contractor positions is not directly reflected in Schedule WP C-3.31, as it is already included as a factor within the proposed Rate Year 1 (Ending 6/30/2028) column. However, the reduction to outside contractor services is $1,466,600. The conversion of contract resources to internal resources would result in a reduction of 12 Eocene vendors.

Referring to a benefit-cost analysis on the impacts of these changes, please first note that the transition from capital to O&M expense for 50% of the time of the 16 vegetation-management FTEs, produces the equivalent of 8 incremental employees, aligning with the proposed Vegetation Management Program ("VMP"), which is then a ***net zero change*** for the program budget.

Second, the conversion of 12 contracted resources to internal employees produces a cost reduction of $446,600 from $1,466,600 to $1,020,000.

Third, the one incremental FTE would add oversight at the newly re-established Waterbury Area Work Center ("AWC"). This AWC currently has two FTEs that provide oversight for the Waterbury AWC, while also overseeing their own AWCs (Cheshire and Newtown). The benefits directly tied to this position are the ability to handle coordination with municipalities, tree wardens, and customers and a single point of contact for internal and external stakeholder concerns.

Consequently, the 21 Vegetation Management positions are comprised of 8 full-time equivalents at a net zero cost change; 12 contractor conversions at a net savings of approximately $446,600, and one incremental resource that is needed at the Waterbury AWC in any event – and all of these changes are contingent on the approval of the VMP, as proposed.

Prior Referenced Response:

---

[i] OCC-333 Question:

Payroll. For each of the new positions that the Company is requesting recovery of in the rate year, state whether the hiring of the positions are conditioned on their approval in this case.

OCC-333 Response:

The Company is providing an update for the Full Time Equivalent ("FTE") counts included in the request for recovery in the rate year in this response as OCC-333, Attachment 1 (note that this is an update of Exhibit CLP-REVREQ-2, Work Paper C-3.5, page 3). The Company will update the payroll expense and other affected costs as part of its next cost of service update.

The number of FTEs included in the original filing was fifty-eight (58). This number was a preliminary number and included FTEs contemplated in the Advancing the Grid plan that is above and beyond the Targeted System Plan ("TSP") requested for review and approval in this application. The updated number of incremental FTEs to be included in the rate year of the Company's cost of service is forty-one (41).

Included in the forty-one (41) full-time positions are twenty-one (21) in Vegetation Management, five (5) Power Quality positions, two (2) in Distribution Planning & Forecasting and one (1) Asset Health, these are contingent on PURA's approval in this case. In addition, for Grid Modernization there are seven (7) for Control Room Operations, three (3) for Data Innovation, and two (2) for Field Communications that the Company will consider hiring based on business needs and changing requirements as necessary, but most likely not all requested.

The Vegetation Management positions allow the Company the opportunity to improve the system's reliability and improve cost-efficiency by transitioning more work in-house to restructure vegetation management performance for the benefit of our customers. While the twenty-one (21) Vegetation Management positions appear to be incremental, in reality there is only 1 incremental resource. Of the twenty-one (21), eight (8) of the FTEs are the result of 16 employees who currently split their time 50%/50% between O&M and capital work shifting to solely working on the proposed combined O&M program, if approved, results in the equivalent of 8 incremental employees working on the

O&M program; twelve (12) resources would be converted from contracted resources to internal resources of which the Company's proposed vegetation management expenses in Exhibit CLP-REVREQ-2, Work Paper C-3.31 reflect the reduction in outside contractor services; and one (1) resource would be truly incremental.

The Grid Modernization positions are needed to support large-scale distributed energy resource ("DER") integration and clean-energy advancement; develop and deploy advanced tools and analytics for integrated distribution system planning and grid modernization; and drive increased innovation and application of GenAI, LLM and machine learning capabilities.

The Company is also providing as OCC-333, Attachment 2, which is a corrected Exhibit CLP-TSP-3, page 43 of 149 that has been updated with the corrected number of FTEs in the parenthesis in the text boxes on the right.