Date Filed: October 06, 2026

**Witness: Leanne M. Landry and Jeffrey D. Turano**
**Request from: Office of Consumer Counsel**

**Question:**

On the Annual Projects Pre 2022 tab of Exhibit CLP-ADDITIONS-4, the 2017 and 2019 Line Reliability annual programs report actual cost 231.89 percent and 233.24 percent above estimate (lines 53 and 95), and the 2019 Emergent Line annual program reports 51.87 percent above estimate (line 90). For each, state how the estimate was set, explain the variance, and how the overrun was authorized.

**Response:**

Line Reliability and Emergent Line annual programs, and all annuals programs in general, are estimated based upon historical trends. As estimates, the Company always retains a level of flexibility in the budget process to address contingencies that inevitably occur during the year. Actual circumstances for Line Reliability annual programs in 2017 and 2019 and Emergent Line annual programs in 2019 exceeded historical trends used for the estimate.

Regarding Line Reliability, the Company's Western region experienced an increase in reliability work in those years. The work in this area arose from the Company's experience in larger storms that happened in this area in this timeframe.

In addition, the Company has experienced increases in the number of customer outage events on the overhead, underground and network system caused by factors other than Major Storm events, which is accounted for within the Emergent Line category. Examples of the factors affecting this cost category include vegetation-initiated overhead events, pole and line damage and associated events due to motor vehicle accidents, unplanned asset failures, residential direct-buried cable failures; underground cable or switchgear events, and network events. Many of these events are the result of weather patterns that occur on the system without rising to the level of a catastrophic event. For example, the Company is experiencing more numerous "minor" weather events during the year caused by frequent wind events during blue sky or grey sky days that cause damage to the system.