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.