Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Referring to Exhibit CLP-STORM-1 at 41. The Company states that it "does not apply a specific formula" to correlate forecast damage locations to crew quantity. Please explain the method used to translate expected damage into crew requirements, including the role of professional judgment.

Response:

The Company does not use a formula to "correlate" forecast damage locations to crew quantity because this implies that the Company has access to a forecast of damage locations that is sufficiently predictive of the actual damage locations that will occur within the context of any given weather system for the Company to rely on the "correlation" outcome, which is not the case. The Company's experience and expertise is that the damage prediction models are not sufficiently accurate to cause the Company to rely conclusively on those predictions for crew sourcing. For example, an issue for the damage prediction models is that damage occurs on a localized basis, whereas Connecticut has not historically hosted weather stations in a sufficient number of locations to provide localized historical weather data that could be used by damage prediction models to potentially refine the output of the models. Methodologically, the damage prediction models do not yet have a level of reliability and accuracy to form a substantial or primary basis of crew sourcing.

As stormy conditions are approaching the Eversource distribution system, the Company's analytical exercise therefore is to gather, study and evaluate the approaching weather conditions and associated forecasts and to align those forecasts with an event level in the Event Level Matrix. At each event level, there is a correlation between the number of trouble spots and a range of resource needs for that particular weather impact. The Event Level Matrix is founded on key operational assumptions, including the number of available internal and affiliate crews typically available, typical restoration work durations and expected crew productivity during extended storm operations. As event severity increases, the response organization and resource commitments scale accordingly, including the addition of external mutual assistance and contractor resources as needed. Once the actual extent of the damage is known in terms of the nature and scope of the damage, then the Company can scale its crew resources to "correlate" with the number of known trouble spots and other necessary response actions.

The ERP Event Level Matrix serves as the foundational planning tool, while the Incident Management Team ("IMT") applies operational experience and expertise to evaluate weather

forecasts, system conditions, damage information, resource availability, regional and operational constraints. Based on this collective experience and situational awareness, the IMT refines the resource plan and determines the appropriate staging locations, crew allocations, and staffing strategy necessary to support safe and efficient restoration efforts.