Date Filed: October 06, 2026

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

Question:

(MS24E) Please refer to Exhibit ACCT-2(CLP-5A-04)(MS24E), p. 8-44. These invoices contain repeated references to removing dead trees a week or more after the dates of event MS24E, but do not indicate the dead tree was affecting the line (and power had been restored). Please provide all written guidance governing and explain all rationale regarding assigning the costs of this work to MS24E rather than routine vegetation management.

Response:

Please refer to the Company's response to OCC-842[i], which describes the multiple pathways that post-storm tree work may be found by and submitted to the Company, how the post-storm tree work is organized and completed, and how the Company Arborists oversee and verify that the post-storm tree work is correctly charged to the right storm event.

The Arborist's approval is the documentation that the trees were properly charged to the MS24E storm event. The term "removal" does not belong to scheduled work, rather it refers to the action of removing an entire tree including those compromised by storms. Dead trees can be categorized as storm damaged in the same ways that live trees are. 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. Dead trees are prone to damage during storm events such as high winds, snow, ice, and rain due to their deceased structural strength as they decay. One example may be 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.

Prior Referenced Response:

[i] OCC-842 Question:

(STORM)

a. Does the Company limit vegetation management work performed after storms solely to work caused by the storm?
b. If yes to a, please describe how the Company verifies that all trees cut by the vegetation management company had storm damage (for example, if a tree was touching the line, how does the Company verify if this was caused by storm damage or growth?).

OCC-842 Response:

Yes, the Company limits post-storm vegetation management work to damage caused by the storm.

Please refer to OCC-842, Attachment 1, for a copy of the Company's response to EOE-201 in Docket No. 25-12-13.