Date Filed: October 05, 2026

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

**Question:**

Exhibit CLP-ADDITIONS-12 shows the planned Basic Business line item for emergent equipment replacement rising from $46 million in the 2019 plan (p. 44) to $71 million in the 2025 plan (p. 166). Provide the planned and actual amount for this line item for each year 2017 through 2025, explain the increase and provide the analysis supporting the 2025 amount. Reconcile the increase with the statement in Exhibit CLP-TSP-3 at p. 55 that "As proactive asset health investment increases in future years, emergent work is anticipated to decrease."

**Response:**

CLP-ADDITIONS-12 provides an overview of the annual capital investment plan from 2017 through 2025 at the CT Electric Operations organizational level.

The Company has experienced increases in the cost of material and labor in the category of Emergent Equipment Replacement because these are *unplanned* events that have to be addressed on a reactive basis. 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 Equipment Replacement category.

Examples of the factors affecting this cost category include vegetation-initiated overhead events, pole and line damages 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. As presented in OCC-586, Attachment 1, Emergent Equipment Failures are projected to decrease $8M a year in 2030 and 2031 associated with proactive substation-related infrastructure investments.

A consistently applied proactive investment plan will have the benefit of reducing Emergent Equipment Replacement over a multi-year term. A theory of a relatively more proactive investment plan is that it will address infrastructure conditions before there is a system failure.