Date Filed: November 23, 2026

Witness: John P. Dipaola-Tromba, Sean D. Redding, Jenna M. Turner, Leanne M. Landry and Jeffrey D. Turano
Request from: Office of Consumer Counsel

Question:

(CAPITAL ADDITIONS) Please refer to CLP-ADDITIONS-4 and Company's response to OCC-784, Att. 1. Kindly identify the PURA order that allows the Company to capitalize tree trimming, and tree work after 2020, and state the unit of property this work creates. If there is no order, please say so.

a. Please state the rule used to charge vegetation work to capital rather than O&M, and confirm that no capitalized tree cost is in Test Year O&M or in a storm cost request.

Response:

Please refer to OCC-1030, Attachment 1, on page 8, in Docket No. 17-10-46RE02, June 12, Final Decision, where it states that PURA "will continue to monitor the ongoing need to address roadside tree mortality, including the changing environmental conditions that led to the increase in tree mortality, and the Company's management of rising program costs. The Authority will monitor the Company's ETR program ***through the capital tracker mechanism*** authorized in the Rate Case Decision" (emphasis added), and further that, "[i]f the Company seeks to continue the ETR program beyond calendar year 2020 at a funding amount above that which was approved in the Rate Case Decision, prior approval from the Authority will be required."[1]

Please refer to OCC-363, Attachments 2-6, where the capitalized treatment of vegetation management Tree Removals, Customer Focused ETT, and CT DOT Program, were submitted as compliance for the years 2021-2025 through the Company's Electric Utility Line Maintenance Plan Dockets (Docket Nos. 20-12-44, 21-12-31, 22-12-01, and 23-08-09), pursuant to CT G.S. 16-32g and accepted by PURA.

Please refer to OCC-1030, Attachment 3, on page 6, where PURA reported in Docket No. 22-12-01, PURA 2023 Biennial Report to the General Assembly Concerning Its Review Of Each Electric Distribution Company's Vegetation Management Practices, February 15, 2024, Final Legislative

[1] Please refer to OCC-1030, Attachment 2, providing PURA's November 25, 2020, Docket No. 17-10-46 on Motion No. 53, which declined the Company's subsequent request for PURA to provide additional contemporaneous rate recovery for ETT and ETR post-2020 through the ESI rate. Instead, PURA directed the Company "to prudently operate and maintain a resilient electrical distribution system" and to seek permission to recover such "system resiliency program costs in its next rate case proceeding."

Report, that Tree Removals, Customer Focused ETT, and the CT DOT Program, were being treated as capital programs.

The Company confirms that no capitalized vegetation management cost is in the Test Year O&M expense or storm cost recovery request.

The referenced vegetation management costs are capitalized and associated with the overhead primary conductor as a betterment.