Date Filed: August 24, 2026

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

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 29. Provide support for the claim: "Eight years is too long and therefore it becomes more cost efficient to transition to a system where the full circuit is trimmed every four years."

Response:

Please refer to Exhibit CLP-VMP-1, at 28, ln 14 through page 30, ln 4. This section of the testimony discusses the cost efficiencies that could be achieved by transitioning Scheduled Maintenance Trimming ("SMT") to full circuit trimming rather than targeted trimming and, more specifically, the comparison of cycle trimming costs and condition-based trimming costs derived from the analysis of terrestrial LiDAR collection.

In this context, when performing maintenance trimming on a condition basis, the volume of segments that would be at the highest encroachment risk level by year eight exceeds the cost of performing full circuit trimming on a four-year cycle.

Please refer to Exhibit CLP-VMP-2, at 34 for the demonstration of cycle-based, condition-based, and selective condition-based trimming mileage and costs for years one through eight.