Date Filed: August 24, 2026

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

Question:

(VMP-Rights of Way) Referring to Exhibit CLP-VMP-1, page 30. Why did the Company exclude rights of way mileage?

Response:

The Company excluded Rights-of-Way mileage from total cycle mileage due to the exclusion of the Rights-of-Ways from the terrestrial LiDAR pilot and therefore exclusion from the condition-based mileage. Including the Rights-of-Way mileage in the total cycle mileage would not have been a direct comparison to the condition-based mileage.