Date Filed: October 05, 2026

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

**Question:**

Across the Key Investment pages of Exhibit CLP-ADDITIONS-12, resiliency work: right-of-way lines, pole integrity, smart switches and substation security, appears under Regulatory Commitments in the 2019 through 2022 plan books and under Reliability from 2023. State when the reclassification was made and why, and provide this work on a consistent basis for each year 2017 through 2025. Substation security no longer appears in that line item from 2023; state where it is now reported.

**Response:**

System Resiliency was approved in Docket No. 17-10-46, for the years 2018, 2019, and 2020 with recovery through the capital tracker (ESI). Since recovery of System Resiliency ended until potential recovery in the next distribution rate case, it was removed from the Regulatory Commitments category. The reclassification was made in 2023 as there is continued work needed in these program areas.

Please refer to OCC-786, Attachment 1, for the right-of-way lines, pole integrity, smart switches, and substation security categories from 2017-2025.

Substation Security for distribution, essentially ended as a "program" in 2023 as a majority of the work under the program was completed. While there are no significant planned investments in substation security, any capital spending on new or emergent distribution substation security work would be reflected under the Substation Reliability category.