Date Filed: September 17, 2026

**Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner**
**Request from: Office of Education, Outreach, and Enforcement**

**Question:**

(VEGETATION MANAGEMENT PROGRAM) Explain why the Company relies on external vendors in lieu of hiring employees responsible for actual tree trimming and tree removals.

**Response:**

The Company contracts for tree work because qualified vendors provide specialized vegetation management and forestry services that are outside the Company's core business of electrical line construction, operation, and maintenance. These vendors bring specialized skills, training, certifications, equipment, and industry expertise that are specifically designed for vegetation management activities. While performing this work internally would require the Company to procure and maintain dedicated tree crews, specialized equipment, facilities, and support functions, contracting with qualified vendors allows the Company to leverage an established industry workforce focused on this specialized field. In addition, the vegetation and forestry industry is highly competitive and relies on specialized tools, training, and operational practices. Utilizing qualified contractors is a common approach across the utility industry, enabling access to experienced resources and scalable staffing. During larger storm events, these vendors also provide access to additional crew resources that support restoration efforts and help expedite service recovery for customers.