Date Filed: September 17, 2026

Witness: Lavelle A. Freeman and Elli Ntakou
Request from: Office of Education, Outreach, and Enforcement

Question:

(VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-ELP-1, p. 64. Please explain how the Company calculates Storm-CEMI.

Response:

The Company did not calculate Storm CEMI. The recurrence analysis supporting the targeted resiliency plan was performed using Storm DEMI, Devices Experiencing Multiple Interruptions, for the four-year period January 1, 2022, through December 31, 2025. Storm DEMI is an asset-based measure: for each protective device, and by extension the zone that device serves, it is the count of discrete sustained storm outage events recorded at that device over the study period. DEMI was used because the plan's unit of work is a physical line segment rather than a customer, so recurrence must be measured at the asset being replaced. It also identifies where failures occur rather than their downstream consequence, and it avoids the density bias a customer-weighted recurrence measure would introduce. Customer impact is captured separately through the All-In SAIDI ranking applied alongside the DEMI screen. The top 100 zones by Storm DEMI are provided in the Company's response to EOE-150[i]. That response reports event totals for both the requested 2018 through 2025 period and the 2022 through 2025 period, the latter being the period used in the analysis supporting the Resiliency Plan.

Storm events for this purpose comprise both major storm event days and minor storm event days, with each calendar day assigned to one mutually exclusive category so that no event is counted twice. "Minor storm event" is an internal operational classification the Company uses for planning purposes: a day that is not a major storm event day and on which the distribution system recorded more than 100 sustained outage events. It is not an index defined in IEEE Standard 1366 and is not used in the Company's regulatory reliability reporting. It corresponds to the same set of days the Company has already described in this proceeding, the approximately 35 to 45 days each year that carry a significant contribution to annual customer-minutes of interruption. The Storm DEMI analysis was prepared solely to support capital project selection under the Resiliency Plan and does not modify or otherwise affect the SAIDI, SAIFI, CAIDI, or CEMI values the Company reports to PURA.

Prior Referenced Response:

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[i] EOE-150 Question:

(VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-ELP-1, p. 64. Please provide a list of the 100 highest Storm-CEMI from 2018 through 2025, individually.

EOE-150 Response:

As explained in the Company's response to EOE-149[i], the Company did not calculate Storm CEMI. The recurrence analysis supporting the targeted resiliency plan was performed using Storm DEMI, Devices Experiencing Multiple Interruptions, which is an asset-based count of discrete sustained storm outage events recorded at each protective device and the zone that device serves. The Company has interpreted this request as seeking the top 100 zones ranked on that basis and responds accordingly.

Please refer to EOE-150, Attachment 1, which provides the top 100 zones by Storm DEMI. For each zone, the attachment reports event totals for the requested period of 2018 through 2025 as well as for the period of 2022 through 2025. The four-year 2022 through 2025 totals are the basis for the analysis supporting the Resiliency Plan, because that window is long enough for a repeat-failure pattern to be meaningful while remaining representative of vegetation and asset conditions present on the system today rather than conditions since remediated. Both periods are provided so that the Authority can review the longer history alongside the data actually used.