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Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Public Utilities Regulatory Authority

Question:

(VEGETATION MANAGEMENT) Exhibit CLP-VMP-1, p. 16. Has the Company performed a cost benefit analysis of the new vegetation program? If yes submit all relevant documentation.

Response:

Please refer to Exhibit CLP-VMP-1, on page 12, lines 3-13, showing the cost of the redesigned VMP, including the increased Frontier contribution, would be a net operating expense of $76 million for recovery through rates, as compared to the $65.1 million expended in the Test Year, which is roughly a 17 percent increase – and still less than total program costs that the Company has incurred in prior years. Please refer to the following Exhibits for additional information:

- Exhibit CLP-VMP-1, page 26, at line 5, through page 27, at line 7, which summarizes the key changes to the Vegetation Management Program ("VMP") to optimize the reliability impact associated with the dollars that will be spent on the program;

- Exhibit CLP-VMP-1, page 39, that outlines the Company's strategy for procurement of vegetation management services and describes how the multi-year contract approach manages cost while addressing long-term concerns with the utility vegetation management workforce;

- Exhibit CLP-VMP-1, page 40, at line 18, through page 41, at line 8, where the Company illustrates that traffic control is a driver of the cost increases, and on page 45, which discusses factors that PURA should consider in order to mitigate costs associated with the VMP; and

- Exhibit CLP-VMP-1, pages 46-51, in which the Company evaluates the benefits of expending customer funds on vegetation management.