Date Filed: October 06, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding, Jenna Turner, Christopher E. Colorio, Mark P. Baldwin, Lavelle A. Freeman and Elli Ntakou
Request from: ALLCO

Question:

The response to ALLCO-045 produced the requested analyses but did not answer the interrogatory's final subparts. (a) Identify each recommendation contained in ALLCO-045, Attachment 1, ALLCO-045, Attachment 2, (the September 2, 2021, Quanta Technology review), and the University of Connecticut studies referenced in the response that the Company has not implemented, and state the reason it was not implemented and the estimated cost of implementation. (b) State whether any portion of the storm costs for which recovery is sought in this docket arose on circuits, line segments, or assets that, before the storm at issue, (i) fell within the higher tree-exposure bands of bare-conductor construction analyzed in Attachment 1, (ii) had been identified through the Storm DEMI recurrence screen described in the response, or (iii) had been identified in any analysis as candidates for hardening, reconductoring, undergrounding, or enhanced vegetation management — identifying each such circuit or asset and the associated storm cost. (c) If the Company contends it cannot perform that identification, produce the data from which it can be performed: the circuit or line-segment identifiers associated with the storm costs compiled in the STORM-ACCT exhibits, by storm event, and the segment-level construction-type and tree-exposure classification underlying Attachment 1.

Response:

a. The Company responds as follows with respect to each requested analysis.

   Please refer to ALLCO-045, Attachment 1, for a performance analysis that compares observed failure rates by construction type and tree exposure. It contains no recommendations, and accordingly there are no unimplemented recommendations associated with it.

   The Quanta review contained in ALLCO-045, Attachment 2, is a benchmarking and industry-practice review. It compares Eversource's reliability performance against the IEEE PES Distribution Reliability Working Group benchmark, summarizes industry resilience frameworks and mitigation categories, and describes Eversource's then-existing resiliency programs alongside corresponding industry practices. It does not contain a recommendations section, a gap analysis, or cost estimates for any proposed action.

The review does observe, at Slide 14, that the Company's distribution reliability analysis and project prioritization could be enhanced through the use of predictive reliability modeling providing a quantitative basis for estimating expected benefits, targeting investments to poor-performing areas, and prioritizing improvement projects. The Company has implemented that approach to formulate the storm resilience plan proposed as part of the Targeted System Performance Plan. The All-In predicted SAIDI methodology, the Storm DEMI recurrence screen, and the customer-minute and value-of-lost-load benefit quantification supporting the Resiliency Plan together provide a quantitative, data-driven basis for estimating expected benefits and ranking candidate projects by predicted customer impact. The Company also implemented the avoided-interruption valuation approach described at Slide 21 through its Interruption Cost Estimate Calculator analysis.

The Company notes that its 2022 System Resilience Plan ($800 million) was constructed to align with the general guidelines of the Quanta Technology review. The $150M storm resilience plan submitted as part of the Targeted System Performance Plan is a more focused program, founded on the same principles as the Quanta report tailored to the Eversource system and data to create a lower cost plan that meaningfully and cost effectively promotes resilience.

The enhanced structural and electrical design standards described at Slide 24 of the review document standards the Company had already adopted as of the date of the review. They are not recommendations directed to the Company.

b. No.

With respect to subpart (i), the analysis produced as ALLCO-045, Attachment 1, was prepared in March 2026. It did not exist before any storm for which costs are sought.

With respect to subpart (ii), the Storm DEMI recurrence screen was first produced in March 2026, following completion of the zone-level vegetation risk classification. It likewise did not exist before any storm for which costs are sought.

c. The condition stated in subpart (c) is not present. The Company has performed the identification requested in subpart (b) and has answered it and therefore does not contend that it cannot do so.

The Company further states, for PURA's information, that the data described in subpart (c) does not exist in the form requested. Storm costs are recorded by storm event, not by circuit or line segment, and the Company does not maintain circuit or line-segment identifiers associated with storm costs.