Date Filed: October 06, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

Frontier Reimbursements. Does the Company bill Frontier for blue sky vegetation management work? If not, explain why not. If so, provide the amounts billed and the amounts collected for blue sky work for each year 2021, 2022, 2023, 2024, 2025, as well as the amounts included in the test year and rate year.

Response:

Please refer to Exhibit CLP-VMP-1, page 12, at lines 4-7: "*Under the Joint Operating Agreement with Frontier, Frontier is required to contribute 15% of the annual vegetation management expense amount. Consequently, Frontier's contribution for 2027 will increase to approximately $13.5 million, annually, based on an overall program cost of approximately $90 million."*

Please refer to EOE-026, Attachment 1 CONFIDENTIAL, which covers the Joint Line Agreement and Intercompany Operating Procedures.

Please refer to the Company's response to RRU-005[i], part c, which provides the annual O&M expense reimbursements from 2017-2025.

Prior Referenced Response:

[i] RRU-005 Question:

(PFAFF-Vegetation Management) Application, Ex. CLP-VMP-1 (Prefiled Testimony of Vegetation Management Panel). Refer to page 11 and 12, including the statement, "Under the Joint Operating Agreement with Frontier, Frontier is required to contribute 15% of the annual vegetation management expense amount."

a. Provide the Joint Operating Agreement with Frontier, as well as any predecessor Joint Operating Agreements with Frontier that address vegetation management costs.
b. Does the Joint Operating Agreement require Frontier to contribute 15% of the annual vegetation management capitalized amount? If not, explain why there is asymmetric treatment for expensed and capitalized amounts.
c. Quantify the annual contributions from Frontier for 2017 through 2025.
d. Were the quantified amounts in subpart (c) applied against capitalized vegetation management costs?

RRU-005 Response:

a. Please refer to EOE-026, Attachment 1 CONFIDENTIAL, that covers the Joint Line Agreement and Intercompany Operating Procedures for years 2017-2025.

b. All non-capital Operations and Maintenance ("O&M") costs are allocated pursuant to the confidential settlement and amendment agreement filed as EOE-026, Attachment 1 CONFIDENTIAL. In accordance with the confidential settlement and amendment agreement, Frontier is not required to reimburse the Company for 15% of annual Vegetation Management capitalized costs.

c. The annual O&M expense reimbursements from 2017 through 2025 are below:

Year	**Frontier Vegetation Management O&M Expense Reimbursement**
2017	$4,500,000
2018	$4,500,000
2019	$4,500,000
2020	$4,500,000
2021	$4,500,000
2022	$5,100,000
2023	$5,037,750
2024	$5,100,000
2025	$4,365,000

d. The quantified amounts in subpart (c) were not applied against capitalized vegetation management costs.