STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

Docket No. 26-05-10

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY
D/B/A EVERSOURCE ENERGY
TO AMEND ITS RATE SCHEDULES

JOINT DIRECT TESTIMONY OF

JOHN P. DIPAOLA-TROMBA, SEAN D. REDDING AND JENNA TURNER

Vegetation Management Program

On behalf of

The Connecticut Light and Power Company
d/b/a Eversource Energy

July 14, 2026

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JOHN DIPAOLA-TROMBA, SEAN REDDING AND JENNA TURNER

I. Introduction.

Q. Mr. DiPaola-Tromba, please state your name and business address.

A. My name is John DiPaola-Tromba. My business address is 56 Prospect Street, Hartford, Connecticut.

Q. By whom are you employed and in what capacity?

A. I am the Vice President of Asset Management and Process Improvement for Eversource Energy including The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P," "Eversource" or the "Company"). In my role, I am employed by Eversource Energy Service Company ("ESC") and I am testifying on behalf of CL&P in this proceeding.

Q. What are your principal responsibilities in this position?

A. In my role, I am responsible for the leadership and direction of the Eversource Asset Management, Process Improvement, Work Management and Vegetation Management departments within the shared-services engineering business unit, including asset management for transmission and substation assets, transmission and substation capital

project approvals, cost estimating for major projects, process improvement, configuration management and vegetation management.

Q. Please summarize your professional and educational background.

A. I earned a Bachelor of Science degree in Electrical Engineering, a Master of Engineering degree, and a Master of Business Administration from the University of Hartford in Hartford, Connecticut. I started with the Company in 2008 with experience in engineering and transmission business, including transmission and substation asset management, capital program planning, engineering, cost estimating, process improvement, work management systems, compliance and vegetation management. I have previously held several technical roles in engineering, asset management and compliance, including Engineer; Manager of Transmission Asset Management; Manager of Strategy and Performance; Manager of System Performance and Investment; and the Director of Transmission Business and Quality Assurance. Prior to my employment with the Company, I held several positions in construction.

Q. Have you previously testified before the Connecticut Public Utilities Regulatory Authority ("PURA")?

A. Yes, I have. I have testified before PURA in prior dockets including Docket No. 20-08-03 Investigation into Electric Distribution Companies' Preparation for and Response to Tropical Storm Isaias, final decision issued April 28, 2021; Docket No. 24-03-30, Investigation of the 2018-2021 Catastrophic Storm Costs Reported by The Connecticut Light and Power Company d/b/a Eversource Energy (closed January 6, 2026); and Docket No. 25-12-13, Application of the Connecticut Light and Power

Company d/b/a Eversource Energy for Order to Securitize 2018-2023 Catastrophic Storm Costs, which remains pending before PURA.

Q. Mr. Redding, please state your name and business address.

A. My name is Sean Redding. My business address is 107 Selden Street, Berlin, Connecticut.

Q. By whom are you employed and in what capacity?

A. I am employed by ESC as Director, Vegetation Management.

Q. What are your principal responsibilities in this position?

A. As Director, Vegetation Management for ESC, I am responsible for developing and implementing the Vegetation Management ("VM") programs conducted by the electric operating affiliates of Eversource Energy across its tri-state footprint, including budget oversight, vendor management, work-scope supervision and performance. In this role, I have responsibility to ensure that the entire VM organization functions as a coordinated, effective team meeting or exceeding the business unit's performance goals within the defined schedule and budget. I also am charged with setting the course for achievement of the goals of the VM organization and its employees. In this proceeding, I am testifying on behalf of CL&P.

Q. Please summarize your professional and educational background.

A. I received a degree in Forest Resources Management from the State University of New York College of Environmental Science and Forestry. I have worked at Eversource from 2003 to the present. Since 2023, I have served as the Director of Transmission &

Distribution Vegetation Management for the three electric distribution operating companies in the Eversource system, which includes CL&P in Connecticut. From 2009 to 2017, I held the role of Supervisor and then Manager of Distribution Vegetation Management for CL&P. In 2017, I was named the Manager of Transmission Vegetation Management for all Eversource operating transmission companies and served in that position until being named Director of Transmission & Distribution Vegetation Management for all Eversource operating companies in 2023.

Q. Have you previously testified before PURA?

A. Yes, I have testified before PURA in several dockets, including most recently, Docket No. 21-09-37, which is an appeal by Eversource pursuant to Conn. Gen. Stat. § 23-65(f) of the Darien Tree Warden's Denial of a Permit to Remove Trees in the vicinity of Little Brook Road, Darien, CT (withdrawal of appeal granted December 7, 2022). I also testified on behalf of Eversource in Docket No. 17-12-03RE08, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Resilience and Reliability Standards and Programs, final decision issued August 31, 2022.

Q. Ms. Turner, please state your name and business address.

A. My name is Jenna Turner. My business address is 107 Selden Street, Berlin, Connecticut.

Q. By whom are you employed and in what capacity?

A. I am employed by CL&P as Manager of Vegetation Management for CL&P's distribution vegetation-management program.

Q. What are your principal responsibilities in this position?

A. As Manager of Vegetation Management for CL&P, I am responsible for managing the Company's distribution vegetation management department for both scheduled work on blue-sky days and storm response. This includes obtaining and coordinating contractor tree crew resources to support storm restoration and monitoring vegetation management contractor safety, production and work quality year-round.

Q. Please summarize your professional and educational background.

A. I received a Bachelor of Science degree in Natural Resources Management with a concentration in Sustainable Forest Resources from the University of Connecticut in Storrs, Connecticut. I have over 11 years of experience in utility vegetation management in Connecticut. I am a Connecticut-licensed Arborist, an International Society of Arboriculture-certified Arborist, and hold an ISA Tree Risk Assessment Qualification. From 2015 to 2018, I worked for United Illuminating in Orange, Connecticut overseeing distribution utility vegetation management work. In 2018, I joined Eversource Energy as an Arborist for the Distribution Vegetation Management Program, managing tree contractors in the field, working closely with town tree wardens, and dispatching contractor tree crews during storm events. In 2021 I was promoted to Supervisor, Vegetation Management for Eastern Connecticut overseeing

a team of six CL&P Arborists. I transitioned to Manager of Vegetation Management for CL&P distribution operations in 2023.

Q. Have you previously testified before PURA?

A. Yes, I have. I sponsored testimony in Docket No. 20-08-03. I also testified in Docket No. 25-12-13, which remains pending before PURA.

II. Overview of Testimony.

Q. What is the purpose of your testimony?

A. The purpose of our joint testimony is to provide an overview of the Company's proposals for its comprehensive vegetation management program ("VMP") and the modifications to the VMP that the Company is planning to make to improve the program from a cost-efficiency and reliability of service perspective. To that end, it is significant that this rate proceeding is occurring coincident with Eversource's efforts to commence a new four-year vegetation management cycle (January 2027 to December 2030), which is providing a unique opportunity for a restructuring of the Company's strategic approach to improve the performance of the VMP for the benefit of customers. The start of a new contract cycle, combined with a change in strategic approach, will have important operational and cost-efficiency benefits for customers. Consequently, the Company has compiled a detailed proposal for PURA to consider in order to enable the implementation of a VMP that will serve the interests of the system over the next four years while paying attention to affordability concerns. The Company's proposed VMP is presented in this joint testimony and accompanying exhibits.

Q. Why is the VMP so important for the CL&P distribution system?

A. As commonly acknowledged, the CL&P system is a heavily forested system with vegetation standing as the leading cause of customer interruptions on blue sky and gray-sky days. Vegetation-related system disruptions occur where vegetation comes into contact with the Company's system – an impact that is exacerbated by the relatively large proportion of bare copper wire conductor remaining on the Company's overhead distribution system. The Company's VMP is therefore designed to clear vegetation and remove hazard and risk trees away from the system on a consistent, systematic and cost-effective basis. Hazard and risk trees are specifically identified through surveys and visual inspections as trees that are more likely than other trees to fail and cause customer outages. Hazard trees are a major focus of the VMP because hazard trees constitute only a small percent of the overall Connecticut tree population but are responsible for approximately 76% of tree failure-related customer outages experienced across the operating year. For this reason, prioritized tree removals are key in preventing blue-sky and gray-sky interruptions to customers.

In addition, Eversource focuses continually on the safety and reliability of the distribution system. Since the Company's last rate case, the Company's reliability performance has remained in the top quartile based on IEEE benchmarking; however, the Company's System Average Interruption Duration Index ("SAIDI") and Customer Average Interruption Duration Index ("CAIDI") scores are increasing, which is a signal that the VMP and other asset-condition work on the system needs to ramp up in order to maintain expected service levels for customers. In this context,

the Company has experienced declining tree health over the past several years, along with a persistent number of trimming refusals, modifications and non-responses in relation to the Company's trimming notifications. The Company has also experienced an increased severity and frequency of strong weather systems causing damage to the system. All of these factors have influenced the Company's evaluation of the appropriate program design and associated cost.

The need to address these interrelated issues, coupled with rising costs, has created the impetus for the Company's redesign of the overall VMP. As we explain below, the redesign of the VMP is fundamentally aimed at getting more out of the program, while at the same time assuring that the cost of the VMP is reasonable, warranted and effective. The Company's changes to the VMP will directly benefit customers because the expenditures will maintain and improve system performance in the face of issues involving reliability needs, climate change and forestry health, while also making efficient use of the money devoted to the program.

Q. Could you provide some additional explanation as to the reliability challenges that the VMP must address?

A. Yes. The Company has a strong institutional commitment to providing safe, reliable and resilient service to customers each and every day. This includes avoiding or mitigating outage events and restoring service to customers in a safe and efficient manner when outages do occur, whether as part of normal operations or as a result of large-scale weather events. Given the high proportion of forested areas and canopy cover on the Company's distribution system, the system is vulnerable to service outages

whenever and wherever relatively harsher weather conditions occur, which certainly includes weather impacts associated with tropical weather systems, ice storms, heavy wet snow, high winds, but also increasingly includes impacts resulting from smaller weather systems that beset the system in peak summer and winter seasons and other times during the year.

Despite continued efforts to combat these weather impacts, the Company is experiencing these types of weather events more frequently and at increased levels of strength even in normal operating conditions due to climate change. In particular, wind "turbulence" is a growing threat due climate change, with normal summer or winter weather bringing stronger winds with a level of "torque" that imposes stress on the trees across the system and can cause outages and structural damage. The VMP needs to be redesigned to meet the challenge of climate change and the less obvious impact it is having on the force of weather conditions affecting the Company's distribution system.

In these circumstances, a thoughtful, well-designed and well-executed VMP is a critical-path item to maintain the reliability of the distribution system and to assist in controlling overall system costs for customers, particularly in the longer term. Investing in the VMP will enable the Company to conduct tree work consistently; to trim branches that are encroaching into conductors and remove overhanging branches and hazard and high-risk trees on a proactive basis; and to spare the system from unnecessary, avoidable damage, thereby saving costs caused by the need to

repair or replace equipment on the system due to weather-related system damage. In addition, maintaining and increasing clearances also assists with the inspection of electrical facilities and completing line work without the interference of encroaching vegetation will make the work more efficient.

Therefore, although the total cost of the VMP is significant in relation to other operating costs that the Company incurs to provide service to customers, the money is well spent in terms of the cascading benefits that come from having vegetation systematically cleared from electric infrastructure.

Q. What are the primary factors causing VMP costs to increase?

A. Fundamentally, vegetation management costs are comprised of labor and equipment costs that are highly susceptible to inflationary increases. In particular, labor costs in a construction environment with a heavy dependency on a supply of skilled human resources are subject to "supply and demand" cost drivers. Other key drivers of costs for the VMP are the notification process that PURA established several years ago for maintenance trimming, which has increased costs materially, as well as increased traffic control costs, an increased need for right of way ("ROW") work and other factors.

Q. What is the funding request that the Company is making in this proceeding?

A. Understanding that affordability is an important issue that PURA will grapple with in this case, the Company is making several proposals to PURA in relation to the structure of the VMP with a focus on getting the necessary work done to protect service

reliability, while managing increasing program costs to the maximum extent possible. The key to achieving this balance is efficiency in the way that the program is designed and implemented, including the use of a competitive request for proposals ("RFP") process to identify vendors that will partner with the Company to provide quality services at a competitive cost. As explained below, the timeline for this proceeding is coinciding with the Company's process to conduct the competitive solicitation for the four-year cycle, 2027-2030, and the Company plans to use the RFP process to: (1) validate the cost components associated with the Company's redesigned VMP; (2) identify and select a vendor to fulfill the Company's needs for the VMP over the next four years; and (3) generate information to demonstrate to PURA that recovery of the "known and measurable" costs of supporting the redesigned VMP is appropriate to further the interests of customers.

In terms of cost, the Company's test-year expenditures for the VMP totaled approximately $65.1 million, comprising approximately $29.7 million in operating expense and approximately $35.4 million in capitalized tree work[1], primarily associated with tree removals. In this filing, the Company is seeking PURA's approval of a VMP program allowance totaling approximately $89.6 million, with the expectation of: (1) validating the program cost through the VMP vendor contracting

[1] During the test year, capitalized vegetation management work was limited to certain program components associated with the legacy Enhanced Tree Trimming project, which was ended in 2020. These program components include Customer-Focused Enhanced Tree Trimming, Enhanced Tree Removals and work designated by the Connecticut Department of Transportation, as further described in this testimony, below.

process, which will be undertaken as a result of the upcoming RFP; and (2) an increased annual contribution from Frontier of approximately $13.5 million annually.

The redesigned VMP would terminate the capitalized work, converting the VMP to an expense-only program. 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. This impact is discussed in our testimony, below. With the increased Frontier contribution, the cost of the VMP 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,[2] which is roughly a 17 percent increase – and still less than total program costs that the Company has incurred in prior years. Below, the Company provides information as to the historical costs of the VMP.

Q. How is your testimony organized?

A. Our testimony is organized into the following sections: Section I presents the introduction and Section II an overview for our joint testimony. Section III is a summary of the current VMP, including its key initiatives and objectives and the costs historically associated with the program. Section III also reviews the Company's historical implementation of the Enhanced Tree Trimming project and its

[2] The Frontier contribution in 2025 was $4.4 million, associated with approximately $30 million of VMP work charged to expense.

subcomponents. Section IV describes the Company's proposed changes to the VMP to enhance the program and increase system reliability and resiliency, as well as a discussion on the need for increased funding to support the necessary program changes. Section V discusses the Company's contract procurement strategies and management of the VMP costs. Section VI discusses the evaluation of customer benefits associated with the Company's VMP and Section VII is the conclusion.

Q. Would you please identify the exhibits submitted in support of this testimony?

A. Yes, this joint testimony is supported by the following exhibits and documentation:

Exhibits	Description
Exhibit CLP-VMP-1	Joint Testimony of John DiPaola-Tromba, Sean Redding and Jenna Turner
Exhibit CLP-VMP-2	Presentation of the CL&P Vegetation Management Plan
Exhibit CLP-VMP-3	*Assessing the Effects of a Vegetation Management Standard on Distribution Grid Outage Rates*, Cerrai, D.; Watson, P.L.; Anagnostou, E., Electric Power Systems Research 175 (2019).
Exhibit CLP-VMP-4	*A Statistical Framework for Evaluating the Effectiveness of Vegetation Management in Reducing Power Outages Caused during Storms in Distribution Networks*, Taylor, W.O.; Watson, P.L.; Cerrai, D.; Anagnostou, E., Sustainability 2022, 14, 904.

III. Historical Approach to the Company's Vegetation Management Program.

Q. What is the overall design of the vegetation management work performed under the VMP?

A. The VMP is structured as a comprehensive effort to address tree growth and vegetation failure across the Connecticut distribution system. To conduct the VMP, the Company

has developed a structured organization and approach, involving multiple operating departments and substantial reliance on data analysis to plan, direct and implement vegetation-management activities on a cost-effective basis. The VMP is coordinated on individual circuits or portions of a circuit with input from the Distribution Engineering group in order to optimize reliability and resiliency investment and to drive a positive customer impact. The execution of the actual tree work is managed by Eversource's Vegetation Management Department using a staff of Company arborists, contract arborists, and tree trimming and removal vendors. The program covers all primary circuits and certain secondary wires, with scheduling developed on the basis of a combination of performance and risk, using circuit-specific cycle-based tree work to prioritize reliability focused improvements. The Company's vegetation management team performs quality assurance of in-progress work and quality control of completed tree work, including review and adherence to specification of 100 percent of all scheduled maintenance trimming. To ensure that program objectives are met, the Company uses key performance indicators in the areas of safety performance, schedule performance, customer care performance and quality and requires corrective actions by the contractor as needed.

Q. What are the primary components of the Company's historical VMP?

A. Historically, the Company's VMP has centered primarily around a four-year cycle trim, the legacy Enhanced Tree Trimming ("ETT") project and associated work, including Customer Focused Tree Work, and Enhanced Tree Removals ("ETR"), including Connecticut Department of Transportation ("CTDOT") collaboration work. More

specifically, in addition to ETT and its subcomponent, the VMP has included Scheduled Maintenance Trimming ("SMT"), Hazard Tree Removals, Distribution ROW maintenance, emergency work, vine removal, emergent work, and "VMP Support Work." VMP Support Work includes customer education on the VMP and utility-compatible tree planting, plus the Energy Saving Trees program that provides customers with trees for planting at their properties through the Arbor Day Foundation.

Q. Would you please describe the history of the ETT project and the evolution of the VMP around that work?

The Enhanced Tree Trimming or "ETT" project was a unique VMP tool in that it was aimed at removing all tall-growing trees and branches within a certain distance from the primary conductors, going well beyond the parameters of a routine trim cycle. The program was first implemented in 1998, per Docket No. 96-10-33, Petition of Stuart Zimmerman for an Investigation of the Connecticut Light and Power Company's Wire Maintenance Plan, targeting all the circuit roadside backbones, striving to clear all trees and branches within eight feet of the conductors with ground to sky clearances. ETT work was also conducted on a selective basis for multiple lateral segments on a scheduled circuit and was applied based on the number and type of downstream customers served, as well as the track record of vegetation and storm related outages on those circuits.

CL&P conducted ETT on backbone circuits through 2003. In 2003, the ETT program was expanded, per Docket No. 03-07-02, Application of The Connecticut Light and Power Company to Amend Its Rate Schedules, to conduct ETT on lateral circuits

feeding one or more major customers. "Customer Focused ETT" was designed to address emergent reliability issues on lateral segments that had not been eligible for ETT previously, mainly because the customer count on the lateral was relatively small. Specific lateral sections of circuits were selected to be included in this program based on reliability performance and number of customers affected.

In 2012, and continuing through 2020, the ETT project was conducted to apply the ETT specification systematically in conjunction with the SMT cycle on lateral portions of overhead circuits. Ultimately, the Company was completing approximately 500 miles of ETT annually. Given its effectiveness at limiting vegetation damage, the project was recognized as a foundational element of the Company's System Resiliency Plan, established in Docket No. 12-07-06, Application of the Connecticut Light and Power Company for Approval of Its System Resiliency Plan. PURA terminated funding for the system resiliency plan on November 25, 2020, in Docket No. 17-10-46RE02 (Motion No. 43), thereby directing the Company to request recovery in the next distribution rate proceeding. However, work continued on the customer-focused ETT and CT DOT work.

In the 2025 test year, the work that continued as capitalizable work included: (1) enhanced tree removals ("ETR"); (2) customer-focused ETT work; and (3) CTDOT work pursuant to the CTDOT vegetation standard. In the Company's redesigned VMP, this work would be transferred to other program components and would not continue to be capitalized.

Q. Would you provide some additional detail on the Customer-Focused ETT work?

A. Yes. To manage vegetation along the main backbone of the circuit and large customer count laterals, the Company historically utilized the ETT program. In contrast to standard trimming, ETT substantially expanded the zones of tree pruning activity to create additional clearances between tree growth and electrical facilities. The ETT specification is removal of all incompatible tall growing trees and branches within 10 feet of the power lines, including all branches overhanging the power lines. With the expanded clearance of ETT, beyond the SMT specification, reliability improvements were observed ranging from a 16% to 48% improvement, according to a study conducted by the University of Connecticut. The improvement was primarily attributed to the removal of the overhang and, secondarily, to the removal of trees closer than 10 feet, which reduced the amount of regrowth encroachment.

ETT was completed on circuit backbones between 1998 to 2003, and large customer count laterals from 2004 through 2020. Without the ability to execute on the ETT program, as designed, the Company experienced diminishing returns in terms of system-reliability impacts because only smaller customer count laterals remained available for ETT work. A Customer Focused ETT program was therefore designed to address emergent tree-related issues, especially locations experiencing multiple tree outages, on laterals not previously included within the ETT.

Importantly, ETT required the same documented notification and consent as SMT and was subject to limitations on achievement of the specification because individual

property owners retained the ability to deny, modify or not respond to the request for tree work. In addition, ETT was limited in some circumstances as a result of the permitting process conducted by town tree wardens. Consequently, there were numerous locations where overhang remains and trees remained within the 10-foot ETT specification, driving the need for the customer-focused ETT program.

Q. Would you describe the ETR-related work performed for the Connecticut Department of Transportation?

A. Yes. An ETR program component includes collaboration on CTDOT-related work ("CTDOT Collaboration Work"). This work is completed in collaboration with CTDOT and requires clearances greater than the Company's normal standard specification. CTDOT Collaboration Work is initiated based on coordination between Eversource and the CTDOT to obtain substantial vegetation clearance on priority state roads.

Q. Would you please summarize the other components of CL&P's historical VMP?

A. Yes. Aside from ETT and its subcomponents, the primary component of the VMP is the Scheduled Maintenance Trimming program, or "SMT," which is designed to trim along the Company's approximately 16,000-mile roadside distribution system. Through the SMT, the Company currently schedules circuits on a four-year cycle with segments of each circuit trimmed as needed, following visual inspection and performance analysis. In this cycle, the Company focuses on targeted work that trims the backbone of the scheduled circuits, as well as lateral lines with known reliability issues; high numbers of customers served; or encroachment conditions determined

through an on-site assessment performed by a Company arborist. The clearance specifications for the SMT program vary based on the part of the circuit, backbone or lateral and whether the lines were previously addressed through the ETT program. For the backbone and laterals that had ETT done in the past, the specification is trimming all branches above and below the conductors that are within 8-10 feet to the side. Backbone and lateral ETT had an intent to remove all existing overhang, but in many locations that was not achieved due to tree owner modification or refusal, Tree Warden restriction or physical limitation of equipment, tree height and topography.

Lateral clearance specification is to trim eight feet to the side of the conductors, ten feet below and 15 feet above. Additionally, selective brush (tall-growing trees less than six inches in diameter) removal is included for brush over 16 feet tall. The Company competitively bids and enters into four-year contracts for SMT and other work. The commercial evaluation of the bids includes the price per mile at the Area Work Center ("AWC") level, unit price tree removal costs by size class in six-inch increments and labor, equipment and material costs for each year of the contract. The Company has employed several types of contracting strategies when adopting the four-year contracts. The current contract began in 2023 and continues through the end of 2026. The SMT is the core of the VMP and there are approximately 100 crews on the Company's distribution system every day performing this critical baseline clearance work. SMT work will be a central component of the upcoming RFP process. For purposes of developing cost forecasts in this proceeding, the Company has used historical data and

inflation trends to estimate the cost levels it expects to see in the upcoming competitive bids.

Second, is Enhanced Tree Removals, which involves the identification and complete removal of trees that pose a threat to electrical facilities or public safety, both within and outside standard trimming zones. "Risk trees" are trees that should be removed rather than trimmed due to the likelihood of failure, the potential to strike the power lines, and the potential to impact the electric system. The Company seeks to remove trees that are identified by trained arborists as a risk to primary conductors. Eversource prioritizes trees for removal using the Tree Risk Assessment Environmental Systems Research Institute (ESRI) GIS tool that focuses on dead, declining, or structurally unsound trees including trees impacted by drought, disease or invasive insects. Additionally, risk trees may be identified for removal that are physically too close to the power lines, particularly in relation to backbone lines, or trees where a large portion of the canopy would be removed when trimmed to obtain the clearance.

During the SMT cycle, the Company assesses and catalogs trees along the circuit to identify trees that are a risk because of their condition and location, both in proximity to the power lines and topography. Trees are then prioritized for removal, based on the risk and consequences to maximize the reliability impact with the Tree Removal program budget based on the anticipated costs of removal and tree debris disposal. The Tree Removal program is conducted in conjunction with SMT to optimize the effort for documented notification for trimming and the permission for tree removal from the

same property owners, streamlining the interaction with town tree warden or DOT to obtain the permit for the tree work along public roadways and maximize efficiency of tree crew vendors who perform the work to minimize mobilization to different parts of the system and other geographical considerations such as parking and debris disposal locations.

Permission for removal of risk trees is sought from the tree owner and requires a permit from the town tree warden or the CTDOT in circumstances where the tree is overhanging the public roadway. If the tree owner refuses the removal of the tree and the tree is wholly on private property, the Company is without any mechanism to take additional action to remove the tree. If the tree is overhanging the public roadway, the tree warden or CTDOT may post the tree and the process outlined in Conn. Gen. Stat. § 23-65 is followed. Depending on the outcome of that process, which may include a public hearing and decision by the town tree warden, the tree owner or the Company may appeal that decision PURA for mediation or potentially a hearing. The decision for removal or not from the mediation or hearing is followed by the Company. There have been limited situations of the highest risk to reliability and public safety where the Company has appealed the decision to PURA for mediation or hearing.

As the program progresses through the annual work scope, additional trees may be added from assessed, cataloged trees for the next highest risk to reliability to replace trees that were refused by the property owner for removal or emergent tree identified by the arborist, tree crew vendors or property owners. Tree removal unit pricing per

size of tree (six-inch size classes) is included in the evaluation of multi-year contract awards to tree crew vendors. Traffic control is not included in the tree removal unit price as volume of removals and traffic control requirements varies from town to town in each area, limiting the cost to only where traffic control is needed. Tree removals are paid for by the unit price or by the competitively bid labor and equipment rates depending on the volume of removals and the skills and efficiency of the vendor tree crews to perform the removals, for optimized efficiency and costs. Labor and equipment rates are often used when special equipment is needed to remove a tree safely, such as a crane, one-hundred-foot bucket, climbing crew, or some other equipment is required for tree removal and debris disposal

A third component is Emergent work, which is generated or instigated to address an issue identified by a customer, town or other Eversource department rather than as part of the scheduled or planned circuit miles. Often, these inquiries are service-line trimming requests but can also address reliability issues such as encroachment, dying trees, or vines. The amount of Emergent Work varies every year. Eversource has encouraged customers through social media and the Company's website to consider hiring professionals to handle their tree concerns. However, due to the prevalence of invasive insects and disease in Connecticut, the Company sometimes learns about outbreaks and problematic trees or groups of trees directly from our customers. There are also instances where customers identify work that requires Company resources due to a tree's proximity to distribution system assets. Each inquiry is assessed by an employee or vendor to evaluate the situation and determine if the work impacts the

electric system, is the tree owner's responsibility, can wait until the next upcoming scheduled maintenance cycle, or needs to be addressed more immediately. The customers are contacted to discuss the assessment, any course of action, and the time frame it will be completed.

Fourth, the Company's Distribution Right-of-Way program is applied to distribution primary lines that traverse cross country and not along or adjacent to roadways. These may include bulk distribution lines that go from substation to substation with few customers served directly from the lines. The program is performed using an integrated vegetation management approach, which includes brush removal and treatment in ROWs on a 4-year cycle. Additionally, the program includes trimming of branches encroaching into the ROW that are within 20 of the power lines and risk tree assessment for removals. Eversource performs quality assessment reviews while the work is in progress and 100% quality control inspections of the mowing and treatment upon completion.

Fifth, emergency work is vegetation management work arising as a result of restoration needs not associated with major storms. Tree crews are requested by the Electric System Operations based on the evaluation by Response Specialists when trees are the cause of the outage, particularly when vegetation is still present on the power lines or equipment.

Sixth, is the Vines component, which is where the Company cuts and treats vines on the backbone overhead distribution lines between scheduled maintenance and mid-

cycle years. Vines grow much faster than trees and climb both poles and guy wires and into the power lines and equipment and may cause outages.

Lastly, the category of "VMP Support Work" includes items such as customer education and Energy Saving Trees program. Customer education on the purpose and need for the VMP is important because vegetation-management work requires the Company to receive written consent for its work and specifically trimming refusals have been increasing over time. Through education of our customers, communities and stakeholders, the Company seeks to broaden those individuals' understanding and acceptance of the program. Customer education is delivered via Eversource's webpage, at public meetings, community events and stakeholder presentations by the Vegetation Management team, and by the on-line and published plant guides. The plant guides provide suggestions for utility compatible trees and shrubs that can be planted adjacent to our power lines. Utility compatible plants are those that do not reach a mature, full growth height of over 30 feet tall and therefore may not need to be trimmed for encroachment into power lines. The guides include the "30 under 30" tree poster with thirty trees that are under-utilized in planting plans, a "Pollinator Roadmap" highlighting flowering plants that support essential pollinators, and "Nature's Natives" suggesting native plants that are critical to the ecosystem. These guides were sent to each town and registered plan nursery in the state and provided to customers or stakeholders at meetings.

Q. What is the current funding level for the VMP?

A. In Docket No. 17-10-46, PURA approved a rate settlement resolving the Company's base distribution rate request in that docket (the "2018 Rate Settlement"). The 2018 Rate Settlement included two funding mechanisms for the VMP. First, the 2018 Rate Settlement established an annual recovery of $29,800,000 for the VMP program expense. Second, the Company was authorized to collect the costs for its ETT project work as capitalized cost, although the nature of the work completed through the ETT project changed over time. For example, in Docket No.17-10-46RE02, PURA approved the expansion of the ETR program funding in 2019, while PURA had denied recovery of system resiliency costs, including ETT, in Docket No. 17-10-46, Motion 53. In terms of actual program cost, the table below specifies the cost that the Company has incurred over the past six years for the VMP:

	2018	2019	2020	2021	2022	2023	2024	2025
Total	**$82,645,160**	**$81,881,160**	**$77,226,611**	**$74,161,712**	**$75,340,077**	**$76,239,423**	**$73,648,074**	**$65,003,482**
Expense	$29,774,055	$30,605,592	$27,166,489	$33,978,982	$33,880,090	$32,808,662	$32,461,899	$29,643,480
Capital	$26,407,187	$36,236,538	$35,232,145	$40,182,730	$41,459,987	$43,430,761	$41,186,175	$35,360,002
System Resiliency Expenditures	$26,463,918	15,039,030	$14,827,976	$0	$0	$0	$0	$0

Q. For the test year 2025, what is the breakdown of cost for the VMP program components?

A. For calendar year 2025, the VMP costs by program components are as follows:

Expenditure	Cost
Roadside Maintenance	$27,564,533
ROW Brush Control	$70,683
Vine Control	$145,097
Customer Request Work	$260,943
Emergency Restoration	$1,466,414
Transformer Enclosure	$15,835
Other	$150,034
Subtotal – Expense	**$29,673,538**
ETT/ETR Components	**Budget**
Customer Focus ETT	$2,598,395
CTDOT Project	$972,368
Enhanced Tree Removals	$31,789,242
Subtotal – Capitalized	**$35,360,005**
TOTAL VMP COST	**$65,033,543**

IV. <u>Redesign of the VMP for Operational and Cost Efficiency.</u>

Q. What are the key changes that the Company is proposing to make to its existing VMP?

A. There are four key changes that the Company is proposing with respect to the VMP, which are to: (1) transition the four-year SMT cycle to require a full circuit trim on a uniform basis rather than utilizing visual surveys, partial trims and risk-based management of circuit segments; (2) establish a resiliency tree work ("RTW") and resiliency tree removal ("RTR") program to address vegetation overhang and trees in close proximity to public ways for the highest impact areas of the system (incorporating work previously conducted through the ETT program); (3) renew the mid-cycle and

ROW program; and (4) utilize remote sensing "light detection and ranging" technology, or "LIDAR," program to drive priority optimization and cost controls. The Company is also proposing to increase funding for vine maintenance, emergent work, CTDOT collaboration, and VMP Support Work. Overall, the Company's redesign of the VMP is aimed at capturing cost efficiencies within the new VMP approach in order to optimize the reliability impact associated with the dollars that will be spent on the program.

Q. Why is the Company suggesting a change in how it has approached the four-year cycle trim work for the SMT program?

A. Through the SMT program, the Company inspects the overhead circuit system on a four-year cycle, while implementing trimming on a prioritized basis, focusing on the circuit backbones, large laterals (high customer count laterals), and any circuit zones that had reliability issues over the prior four years. This "hybrid" approach allowed the Company to perform maintenance trimming on each circuit on the entire system every four years to avoid vegetation growth that could cause interruptions to the largest number of customers, while saving money on trim work for segments that did not experience as much tree growth during the four-year cycle and had relatively better performance. However, the Company's experience since 2023 is that, while the approach avoids cost and generally maintains adequate reliability in the short term, it can create additional work and cost over the longer term because vegetation along the circuit is not all at the same growth stage when the next trim cycle is performed. Over the past two cycles, the Company's evaluation is that it would be more efficient to trim

circuits on an end-to-end uniform basis, regardless of whether individual circuits are in direct need at the time the trim is performed, keeping the entire circuit at the same stage. In addition, the Company plans to prioritize circuits with greater reliability concerns for trim work relatively earlier in the year with portions of the circuit serving the most customers sequenced first. The Company also plans to use spatial analysis from LiDAR scans or other sources to further prioritize work. The sequencing of the maintenance trimming would also account for operational efficiencies.

In addition to efficiency, maintaining clearance will more uniformly assist Electric Operations in assuring that infrastructure is unencumbered by vegetation near the lines, facilitating their ability to find and repair issues when an outage does occur. More uniform clearances will also assist Engineering as it evaluates outage mitigation initiatives, as well as providing a better foundation for vegetation management conditions pre- and post-storm.

Q. Is it the Company's assessment that there are cost efficiencies that could be achieved by transitioning the SMT to a full circuit trim rather than targeted trim?

A. Yes. During 2025, Eversource captured vegetation encroachment and fall-in risk using ground-based LiDAR technology for circuits scheduled for vegetation management work in 2026. The results of this LiDAR analysis highlighted Connecticut's tree density and overhanging limb exposure. The analysis evaluated the scanned miles per segment for fall-in risk and generated a composite encroachment risk level for each segment.

The Company then performed an analysis that compared LiDAR prescriptive trimming costs (based on segment risk level) to a four-year maintenance cycle that would involve uniformly trimming overhead circuits on a four-year cycle and found that cycle trimming would be $68 million less over a four-year cycle. Although selective risk-based segment trimming was found to be less expensive in the first year of the program, it became more expensive than cycle trimming in years 2, 3 and 4, which reflects the Company's experience over the past four years. Although targeted trimming is effective in the short term, in subsequent years, relatively lower-risk segments require pruning due to the continued tree encroachment growth. In other words, the Company's experience is that some segments of the overhead circuits can be successfully addressed on a six or seven-year trim cycle given their growth rates; however, eight years is too long and, therefore, it becomes more cost efficient to transition to a system where the full circuit is trimmed every four years. The elevated cost of performing scheduled maintenance based on risk-based assessments is experienced in subsequent cycles after the first year of the trim cycle. It has also developed that contractor costs per mile for selective trimming are more expensive due to efficiency loss as compared to trimming the entire circuit, even though not all of the vegetation is growing at the same rate across the circuit length, and some segments could be trimmed at a later date. A summary of the Company's analysis is presented in the chart below.

Condition-Based Year	Risk Levels	Miles	Condition-Based Cost	Cycle Year	Miles	Cycle Cost
1	5,4,3	2,261	$37,312,593	2026	4,340	$41,313,531
2	5,4,3,2	2,965	$56,119,097	2027	4,202	$47,604,033
3	5,4,3,2,1	3,252	$64,595,286	2028	4,133	$49,870,594
4	5,4,3,2,1,0	3,993	$83,519,021	2029	3,766	$45,867,021
		12,472	$241,545,997		16,441*	$184,655,179

*Excludes Rights-of-Way Mileage

With this result, the Company's assessment is that modification of the SMT approach will accomplish more for the system, while saving costs for customers over the trim cycle.

Q. Why is the Company proposing to implement a Reliability Tree Work program component and Risk Tree Removal?

A. As noted above, the Company is proposing to establish a Reliability Tree Work (RTW) and Risk Tree Removal (RTR) programs that would incorporate the work associated with ETR, Customer-Focused ETT, and CTDOT Collaboration Work and terminate the capitalization treatment. The Company's redesigned RTW program will allow the Company to address the locations on scheduled circuits where overhang and ETT clearances were not previously achieved on the portion of those circuits that serve the most customers and are highly susceptible to tree-related outages, particularly in relation to circuit backbones that were addressed through the ETT program over 20 years ago. RTW will encompass trimming of overhanging branches, as overhanging branches that break and fall on the power lines account for approximately 24% of the tree-related outages on the system. By targeting the zones with overhang that serve the highest number of customers through the RTW program, risk will be mitigated. The

program will also strive to remove all overhang and trees in close proximity, although the Company remains constrained by tree owner consent and tree warden limitations.

Circuit selection will be made by evaluating past performance of the zone over the prior trim cycle for tree-related outages and the potential risk to customers if there were to be an outage based on the number of customers impacted, as well as input from LiDAR or other spatial analysis. The RTW program component will focus on these high priority line segments with the goal of achieving clearance of 10 feet from the power lines of all tall-growing trees and branches permission allows.

The Risk Tree Removal (RTR) program will be primarily conducted in conjunction with the SMT and RTW programs to optimize the effort for permission for tree removal from the same property owners, streamlining the interaction with town tree warden or CTDOT to obtain the permit for the tree work along public roadways and maximize efficiency of tree crew vendors who perform the work to minimize mobilization to different parts of the system and other geographical considerations such as parking and debris disposal locations. RTR continues the focus on assessing trees by the Company arborist to evaluate for likelihood of failure, strike and consequence if contact with conductors is made resulting in an outage. RTR may also be used on off-cycle circuits on specific zones to address significantly poor reliability or localized tree decline and die-off from disease or insect infestation.

Q. What is the Company's plan for reinstituting its mid-cycle trim program component?

A. Mid-cycle work is geared toward addressing those issues where a limitation was imposed during the scheduled maintenance trim, whether by a property owner, tree owner, or the tree warden with respect to getting the specification clearance. Mid-cycle work is also useful to address vegetation that is growing back faster than expected for the trim specification. The Company's assessment is that mid-cycle work should be performed on circuit backbones two years after the most recent SMT cycle trim to address encroachment and trees that become high risk for removal subsequent to the prior SMT trim cycle. Certain trees, young trees and fast-growing trees, respond to trimming by putting out aggressive resprouting that grows faster than typical tree growth. These "cycle-buster" trees can have regrowth and encroachment to potentially be back in contact with the powerlines after two years. Trees can also decline or die rapidly from environmental factors such as drought, disease or insect infestation or major site disturbance (construction). Addressing rapid regrowth or recently declined tree by trimming or removal at the mid-point of the cycle on backbones mitigates potential outages to large numbers of customers before the next scheduled maintenance. The Company's assessment is that reinstituting a robust and formal mid-cycle trim program will help to extend the intrinsic value of the SMT and potentially reduce costs in subsequent trim cycles. In addition, with the completion of RTW work across more backbones, the need for mid-cycle program may be reduced over time where specification is met and not limited by property owner limitation or tree warden permitting. The Company will need to gain experience with the interrelation of these

program components before any decision can be reached. However, the integration of these components is necessary to get the system to a point where the synergies of these program components can be realized.

Q. What is the Company's plan to reinstitute its ROW program. Would you please explain why this program is important?

A. The ROW Program is important as the approximate 800 miles of primary power lines that are in these ROWs primarily serve as direct backup between substations for shifting load or back-up electric supply in the event that there are outages or maintenance at the connecting substation. The ROW program will provide the ability to maintain the ROW using integrated vegetation management techniques for the area below and adjacent to the lines and trimming any tree branches encroaching into the ROW.

Q. The Company is also proposing to institute LiDAR. What is LiDAR?

A. LiDAR is an active remote sensing technology that uses pulsed lasers to measure distances. The Company plans to use LiDAR for vegetation management to evaluate branch encroachments across the upcoming year's scheduled maintenance circuits. The processing and classification of the LiDAR data is translated to segment level encroachment risk based on a composite evaluation of encroachment based on our specifications along the segment. The segment level risk can then be evaluated by zone, isolating device to isolating device, and the customer and outage impact so work can be prioritized and sequenced to optimize trimming for reliability. Additionally, the LiDAR processed data can be ingested into work management software to assist with

planning, scheduling and issuing work out contractor tree crews. There is also potential for the LiDAR to be used for contracting scheduled maintenance, providing data to contactors to identify specifically where work is needed and volumetric measures of vegetation to be trimmed. This could assist with pricing and line-of-sight decisions on what needs to be trimmed.

Q. What information did LiDAR yield in relation to the cycle trims?

A. In 2025, the Company conducted a ground-based LiDAR scan to prepare for the 2026 trim cycle (scheduled maintenance) and the scan determined that – across 4,000 miles of overhead circuits, approximately 71% of the system was showing a need for trimming, with vegetation encroaching on the Company's system despite all of the diligent work that the Company has undertaken year-over-year to apply several different strategies to control vegetation and its impact on the distribution system. This information revealed to the Company that a relatively major shift in approach is warranted, requiring the Company to evaluate closely what steps it can take to conduct an integrated, effective vegetation management program, optimizing the value obtained for the annual expenditure level.

Q. How did this evaluation lead to the conclusion that the Company should terminate its program components with capitalized costs?

A. There are several reasons to transfer the capitalized work to expense work. However, the major reason is that additional work is needed to address areas of the system that could not be reached by ETT and would not meet the criteria for capitalization. The capitalization of ETT project work made sense for that program over its 20-year life

because of the drastic change that it made in clearances, cutting clearances back to eight feet on a standardized basis, which constituted a substantial one-time improvement of the circuit that could not be achieved in lieu of the aggressive trim standard that ETT applied. However, once the backbone circuits benefitted from ETT and the Company progressed to conducting ETT on circuit laterals, the project produced diminishing marginal returns and was slowed down in favor of other, more effective strategies.

In addition, the Company cannot go back to circuits and readdress those circuits that did benefit from ETT, except with treatment that would be an expense item, not capital. For example, at the time that ETT was originally performed, there could be extensive tree canopy over some of the circuits, preventing the Company from deploying ETT for that segment. With an operating expense approach, the Company can revisit those areas with a new, taller bucket truck with specialized equipment, which enables the Company to take care of the canopies driving some of the reliability impacts during minor storms. In addition, ETT clearances were 8 feet to the side and RTW will be 10 feet to the side. However, the eight feet was already applied to thousands of miles of ETT on backbones and laterals and expanding from the 8 feet to 10 feet is not as big a change as going to the eight-foot clearance to begin with and it was really the significance of that cutback that called for the one-time treatment as capitalized ETT work.

Q. Given the changes in how the costs of the program will be accounted for, what is the Company's expectation of annual program cost for the term 2027-2030?

A. For calendar year 2027, the VMP costs by program component are estimated below, subject to the results of the Company's upcoming RFP for the 2027 to 2030 term:

2027 Estimated Budget for VMP Redesign	
Expenditure	**2027 Projection**
Roadside Scheduled Maintenance	$48,000,000
Risk Tree Removals (RTR)	$18,500,000
Reliability Tree Work (RTW)	$14,500,000
Distribution Rights-of-Way	$1,900,000
Emergency	$2,000,000
Vines	$375,000
Emergent Work	$900,000
Mid-Cycle	$950,000
CTDOT Collaboration	$1,200,000
LiDAR	$950,000
Other	$300,000
TOTAL PROJECTED VMP EXPENSE EXPENDITURES	**$89,575,000**

Q. Please discuss the estimated program spending shown in the table above and how it compares to expenditures in the 2025 test year.

A. The table above reflects several changes from the expenditures made in 2025. First, the Scheduled Maintenance Trim budget is increased from approximately $28 million annually to $48 million annually, in order to support a four-year cycle that includes trimming the entirety of each circuit rather than using segment-level priority assessments on laterals. The Connecticut LiDAR data collected in 2025 indicates that the best strategy moving forward is to treat all vegetation encroachment along the entire circuit length during the same year on a cyclical basis for optimal efficiency and lower

overall unit costs per mile. Experience has now shown that, if there is vegetation on the same circuit segment that will grow into contact in 1-2 years' time, it is operationally and financially advisable to treat that vegetation uniformly across the entire circuit at the time of SMT. Although the Company has successfully implemented condition-based trimming in other geographic areas with lower tree density, the strategy results in lost efficiency in having to return to the same segment multiple times and is therefore not as suitable for Connecticut's dense, roadside forests.

Second, work on Enhanced Tree Removals (ETR) will be transitioned into Risk Tree Removals (RTR) where risk and hazard trees will be assessed across the Connecticut distribution system, regardless of the circuit trim year. Historically, ETR was managed at the circuit level. Moving forward, RTR will be prioritized using a risk tree assessment model entered in an online ESRI dashboard system. Reliability Tree Work (RTW) is a change from previous tree removal programs that focused on targeting risk and hazard trees in critical zones. The RTW program will seek to establish ground to sky clearance through both trimming and removals in areas that have existing overhang and trees near the conductors. The previous ETR program was split between the RTR and RTW programs with increases for inflation and tree mortality related to Beech Leaf Disease.

Third, projected spending for other program components reflects current costs projections for work that was previously performed, including vegetation work on distribution ROWs, Vines, Emergent Work, CTDOT Collaboration Work, and VMP

Program Support. The decision to incorporate a mid-cycle program was based on the high-level of encroachment shown in analysis of the 2025 LiDAR data and the need to revisit refusal and modifications to trimming mid-cycle as well as to assess for recently declining trees.

The collection of LiDAR data on an annual basis is a new program that was supported by a successful pilot utilizing terrestrial LiDAR technology to accurately assess vegetation conditions along heavily forested electric distribution systems. The ground-based LiDAR collection strategy allowed remote sensing collection in areas with dense vegetation overhang and high levels of accuracy in the field verifications support the incorporation of LiDAR data into the VMP. The LiDAR data will allow the VMP manager to assess vegetation risk across the Connecticut system without regional biases in tree density.

Lastly, the entire VMP program will be conducted as an operating expense in order to increase operational efficiency and establish needed vegetation clearances on high priority circuit zones. The program was previously limited by having to separate out all aspects of the work between O&M and capitalized programs. Maintenance and tree removal crews were exclusive and differentiated their work between O&M and capitalized programs. It is more efficient to utilize the same tree crew to perform maintenance and tree removals as they move through a span rather than requiring exclusive crews to perform the work independently. This efficiency is heavily

impacted by the need to secure traffic control support in some areas, which increases the cost of having to return with a separate crew or program.

V. Procurement Strategies and Managing VMP Costs.

Q. Please outline how the Company procures and employs contractors for its VMP.

A. As discussed above, it is the Company's practice to conduct a competitive RFP process to solicit multi-year contracts for the activities performed for the VMP. Through this process, Eversource's procurement agents conduct a robust bidding process and then work with short-listed vendors to refine bid pricing and reach final contract terms that are reasonable given the skill set required to perform the work safely and reliably and prevailing market conditions.

The Company is currently under the final year of a four-year contract covering the term 2023-2026. In May 2026, the Company commenced the RFP process for the next multi-year contract commencing January 1, 2027. Vendors are currently preparing their bid submissions. The Company anticipates finalizing its VMP contract by November 2026 and will update its proposed VMP work plan in this case based on that final contract pricing.

Q. What are considerations that apply in terms of procuring vegetation management contractors at a competitive, affordable price?

A. Eversource currently has experienced professionals managing its VMP. However, there are longer-term concerns with the workforce in the field because of a lack of seasoned and skilled crews. These challenges are not unique to Eversource or to Connecticut. There are very few programs in high school or college to attract students

to the field of Arboriculture/Forestry, and it is a difficult, and oftentimes hazardous job, performed in all types of weather, usually aloft. The salary for tree trimmers is also not commensurate with many other professions. A commercial driver's license (CDL) is required for operating much of the equipment used by the tree contractor crews, like an aerial lift device trucks. CDLs are in high demand from many industries and contractor personnel are often recruited out of the tree care industry. As a result, the number of individuals working in this field continues to decrease particularly as the existing workforce reaches retirement. Lastly, in addition to fewer workers and rising costs overall, the industry has faced challenges due to the need to bring in "travel" vegetation management crews, creating inherent cost pressures for the vendor – and for Eversource, as a result.

By entering into multi-year vendor contracts, the Company is providing support for vendors, enabling them to hire, train and employ skilled works with a level of certainty and stability in the available workflows. Multi-year contracts provide the contractor and their workers predictable available work over a four-year contract term and that certainty not only assists the vendor in retaining crews but also provides a basis for tree vendors to submit competitive pricing bids in response to Eversource's solicitations.

Q. Are traffic-control requirements also a driver of cost for Eversource and its vendors?

A. Yes. The traffic control necessary to ensure the safety of crews and the public is the largest risk for the contractor when bidding because every town is different. Some towns may require a certified flagger or uniformed police officer depending on the

traffic patterns, speed, set up or line of sight for the work zone. Additional factors that impact these traffic control costs include how many officers are required on each road and for what duration, whether the officers require a cruiser, and annual hourly rate increases. In some communities, the cost for police detail can approach $163/hour per officer and one of the Company's contractors suggested an estimate of $3,400 per mile for police details in some towns. Eversource is observing a trend of increasing costs for police detail work associated with towns that have passed ordinances requiring police to be used on all roads.

Q. What steps has Eversource taken to contain costs and promote efficiency?

A. The most significant step that the Company takes to control costs associated with the VMP is the competitive solicitation of multi-year contracts that lock in unit pricing for the SMT and RTR program components, as well as the applicable rates for time, equipment and materials over the four-year term of the contracts. The Company also takes steps in relation to operational efficiency and quality assurance, which is performed by Company representatives who are charged with closely monitoring in-progress work and conducting on-site crew reviews. The reviews include feedback to the contractor tree crews and their supervision on corrective actions to work more effectively while the crew is still on site and on upcoming work. Quality control occurs through systematic reviews of completed work to identify any instances of incomplete tree work per the contract specification, which is then required to be properly completed. Both of these efforts promote efficiency for the contractor to avoid reoccurring deficiencies and remobilization costs in time and travel.

The Company also uses the ESRI GIS platform to assist in the capture, catalog, tracking and monitoring of certain aspects of the VMP including tree removals and documented notification and consent for scheduled maintenance. ESRI allows to geospatially collect and capture standardized, formatted information for the tens of thousands of trees that are assessed and removed annually, as well as the exceptions for all scheduled maintenance outreach, making the management of these programs and regulatory reporting easier than past practices which used paper forms, manual entry in excel or other databases. The ESRI platform also includes the ability to create dashboards of critical information to help the Company's arborist, supervisors, and managers track progress and make operational decisions.

Q. Does the Company monitor the performance of its vegetation management contractors to ensure compliance with the Company's specifications and operational efficiency?

A. Yes. The Vegetation Management staff audits 100 percent of scheduled maintenance work performed on its system and reviews contractor work for adherence to the standards for vegetation management. Arborists document any areas that do not adhere to the contracted specification by location and issue. All locations are sent to the contractors performing the work and they are required to complete any necessary re-work in accordance with the specification. The contractor is responsible for completing all rework within four weeks. If the contractor does not complete the rework as required, the contractor may not start any new scheduled maintenance work until rework is complete.

Q. It is noted above that the Company's current contract for VMP crews expires as of December 31, 2026. What steps is the Company taking to procure crews after the expiration of that contract?

A. As already noted, Eversource conducts a competitive solicitation process to procure crews for its VMP through multi-year contracts that leverage unit pricing and other contract terms to maintain cost efficiency. The Company issued an RFP in May 2026 for the contract term 2027 through 2030. The RFP requests bids for a full four-year cycle consistent with the Company's proposal for its VMP. The RFP requested bids that provide a unit cost per mile for the SMT program component, as well as inclusion of the costs associated with notifications and traffic control; hourly labor and equipment rates; the unit cost per tree removal per size class; and labor, equipment and material rates for each year of the four-year contract.

Based on the Company's experience, contract pricing is most competitive when established at the area work center level and that furthers the contractor's efforts to hire and retain skilled workers familiar with the system for both day-to-day restoration and non-catastrophic storms.

Q. The Company's proposed modification of the SMT would transition to a standardized, uniformly implemented four-year trim cycle for all overhead circuits, which will cost more than the program has cost in the past. If PURA does not approve this increase to Eversource's VMP budget, does the Company plan to move forward with redesign of the VMP?

A. There are no two ways about it, the Company's proposal to redesign the VMP will require a larger expenditure than in the past few years. However, the net program cost to CL&P customers remains below the total cost incurred through 2020, partially due to the higher Frontier contribution. In the event that PURA decides against funding the

program at the level proposed by the Company, the Company will need to adjust the VMP to align with the costs that PURA does approve in rates as the appropriate expenditure level for the program. Accordingly, the Company designed the RFP to allow flexibility based on PURA's final decision in this proceeding. For example, the RFP seeks contracts for a four-year trim cycle consistent with the Company's proposed modifications and, in addition, has reserved the right to make adjustments to the planned cycle trim undertaken by contract to align with PURA's rate decision. Final contract pricing will therefore be dependent on the actual volume of work that is necessary to align with the budget approved by PURA.

Similarly, the Company can adjust the budgets for other programs to align with PURA's approval of the proposed budget. The proposed budget was developed based on best practices and the specific needs of the distribution system. However, the Company is cognizant of the need to balance these needs with customer affordability and will follow PURA's lead on the appropriate level of expenditure for the VMP.

Q. Will any of the VMP costs be funded by Frontier?

A. The Company is presenting the total VMP annual budget that aligns with its workplan. However, a portion of this annual budget will be recovered from Frontier Communications. Pursuant to the agreement between Eversource and Frontier Communications, the Company is reimbursed for 15 percent of all vegetation management O&M costs. This reduces the total annual VMP costs to be recovered from customers in base rates from $89.6 million to approximately $77 million.

Q. Are there any factors that PURA should consider that could mitigate VMP costs?

A. The Company recommends that PURA revisit its directives regarding vegetation management documented notifications that have been in place for over ten years and that are more stringent than the requirements of Conn. Gen. Stat., § 16-234. These directives issued by PURA in Docket No. 12-01-10 require the Company to send notices to customers and receive confirmation of notice by email, fax, or direct, personal contact and if those methods are unavailable, through certified mail with return receipt. The cost for this service is significantly higher than a standard first class mailing and is far more onerous than the requirements of Conn. Gen. Stat. § 16-234, which allows for notice through first class mail, electronic mail, or text message. Complying with PURA's additional directives have added costs to the VMP that could be mitigated if the requirements for notice were aligned with § 16-234.[3] The cost of these notification requirements accounted for approximately 12% of the 2025 VMP budget and ranges from $700 to $1,200 per mile or approximately $2.8 to $5 million per year. This funding could be reallocated to trimming hundreds of additional miles each year if PURA reconsidered its notification requirements. Further, technology advancements including the return receipt email functionality allow the Company to achieve the same objective as certified mail with return receipt mailings without the significant associated costs.

[3] Not all property owners that require notification pursuant to Conn. Gen. Stat. § 16-234 are customers or customers that have provided the Company with an email or telephone number for text messaging purposes. Accordingly, some property owners will still require mail notification. However, first class mail to this subset of property owners will still drastically reduce the notice costs associated with the Company's VMP.

VI. Evaluating the Benefit of Expending Customer Funds on Vegetation Management.

Q. Why is vegetation management important, particularly in the state of Connecticut?

A. Connecticut is a heavily forested state with canopy coverage of approximately 75-78 percent. Connecticut has the highest urban tree canopy cover in the country. As a result, most outages are caused by trees or tree limbs on blue sky days (i.e., under normal operations) and during storm events. Outages caused by trees or tree limbs are largely caused by tree failure and not tree growth; 95% of tree related outages are due to tree or branch failure. Tree and branch failure is driven by wind, rain, snow, ice, decay and gravity. In addition to outages, tree failures have public safety implications associated with blocked roads which are a critical priority for towns and emergency services.

To combat this, the Company prioritizes vegetation management as an opportunity to improve system reliability and manage outages with an emphasis on hazard and risk tree removal. Hazard trees are identified based on any part of the tree that is dead, extensively decayed, or structurally weak such that the tree could fall and endanger utility infrastructure, facilities or equipment. Hazard trees are more likely to fail and to cause outages under normal operations. While hazard trees are a small percentage of the overall tree population, approximately 1.5%, these trees caused 28% of tree failure-related outages between 2023 and 2026. Hazard and risk tree removals are also prioritized because 79% of tree failure-related outages were caused by trees or limbs

located outside the trim zone. This means that scheduled maintenance trim will not address all tree related outages.

Vegetation management is also important to impact reliability in the wake of climate change. Because the Company has been experiencing more extreme weather year over year, and the extreme variable weather exacerbates tree disease and insects, it is now more crucial to invest in vegetation management in order to address the environmental factors effecting the system.

Q. Are there any vegetation issues specific to the Connecticut region that make vegetation management particularly important in Connecticut?

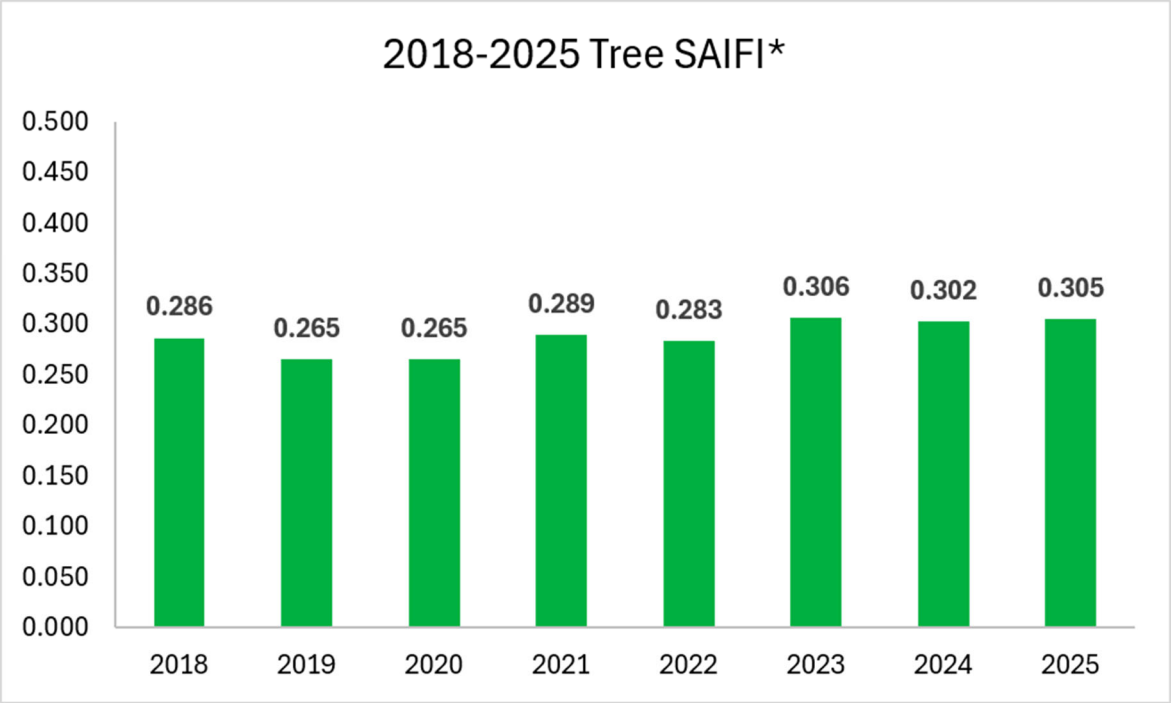
A. Yes. The trees in Connecticut have been impacted by many weather and biotic factors over the last several years. These issues include repeated droughts, polar vortexes, bombogenesis, Nor'easters, microbursts, tornados, tropical storms, hurricanes, the Emerald Ash Borer ("EAB"), Spongy Moth, spotted lantern fly, and beech leaf disease. EAB infestation is of particular concern given the manner in which it affects ash trees, the fact that there is no "cure" after the infestation, and the 100 percent mortality rate and failure rate of infested ash trees. Trees can be treated with pesticide before infestation, but it must be done annually, and the amount of pesticide is dependent on the size of the tree. Few tree owners have made the decision to proactively treat trees. The residual effect of the above factors are more trees that are standing dead or in declining health along the roadside forest and within reach of the Company's lines. Therefore, continuing the maintenance cycle, along with an aggressive hazard tree removal program are the key components to a successful VMP in the state Connecticut.

Q. Has the Company undertaken any additional activities to combat these factors?

A. The Company has worked over the last decade with the Connecticut Agriculture Experiment Station to receive updated information on the locations and spread of these disease and insect infestations. This information is disseminated to our arborists, vendors and tree contractors for awareness, identification and to use in communication with customers, towns and stakeholders. In most cases, the solution is to remove the infested tree or preemptively remove potential host trees like white ash that are not being treated to protect against EAB.

Q. Has the Company observed benefits associated with the VMP activities to date?

A. Yes. As shown in the chart below, despite the increased mortality of Connecticut's trees since 2018 due to drought and invasive insects, tree SAIFI has remained stable due to the Company's prioritization of scheduled maintenance and risk tree removals on zones with larger customer counts and the presence of the affected trees.



* Non-storm related

Q. How did the Company prioritize its VMP work to maintain reliability?

A. The Company selected 21 circuit zones with high SAIDI for targeted vegetation management in 2023. The table below shows pre- and post-treatment customer reliability (CMI and CI) for circuit zones that received targeted vegetation management. This targeted vegetation management included seeking to remove within 10 feet of the outermost conductor and all overhanging vegetation.

SAIDI Zone	Miles	Pre-Treatment CMI	Post-Treatment CMI	Pre-Treatment CI	Post-Treatment CI
1	2.00	683,568	0	796	0
2	0.21	211,513	0	587	0
3	2.47	1,127,503	0	2,750	0
4	1.90	663,440	0	922	0
5	1.44	1,235,729	0	1,273	0
6	0.60	187,030	0	901	0
7	1.16	150,136	0	373	0
8	0.47	597,777	412,100	506	247
9	0.40	832,707	0	507	0
10	1.79	334,388	0	697	0
11	2.30	306,624	229,194	640	973
12	3.24	519,696	91,437	1,804	783
13	5.39	59,393	0	577	0
14	1.30	1,020,467	0	3,120	0
15	3.54	216,263	0	3,504	0
16	2.61	13,757	0	1,069	0
17	1.20	1,925,945	0	7,021	0
18	4.60	257,947	0	4,115	0
19	0.15	737,953	0	1,370	0
20	0.60	2,516,333	0	2,656	0
21	0.50	146,182	0	1,805	0
	37.87	13,744,351	732,731	36,993	2,003

On average, the segments where targeted vegetation management was performed experienced a 94% reliability improvement demonstrating a benefit for these circuits associated with removal of overhang, trees that are too close to the distribution system, and removal of high-risk trees.

	CMI/Mile	CI/Mile
Pre-Treatment	362,935	977
Post-Treatment	19,349	53
Δ	343,586	924
Reliability Improvement	94.67%	94.59%

The University of Connecticut ("UCONN") also published a report on Eversource's ETT Program in 2022.[4] This report found that enhanced vegetation management is particularly helpful in reducing trouble spots for lower severity storms with reductions of between 45.8% and 63.8%. The report also found that enhanced vegetation management can substantially reduce trouble spots during the most severe events. The report's analysis found a 37.3% reduction of trouble spots when compared with circuits with little to no enhanced tree trimming.

VII. Summary and Conclusion.

Q. Please summarize your testimony.

A. The Company is committed to improving the resiliency and reliability of its distribution system. In order to meet this commitment, the Company has designed a robust VMP which is being described and proposed herein.

Q. Does this conclude your testimony?

A. Yes, it does.

[4] Taylor, W.O.; Watson, P.L.; Cerrai, D.; Anagnostou, E. A Statistical Framework for Evaluating the Effectiveness of Vegetation Management in Reducing Power Outages Caused during Storms in Distribution Networks. Sustainability 2022, 14, 904.