



**Northeast
Utilities System**

Northeast Utilities Service Company
107 Selden Street
Berlin, CT 06037

Stephen T. Sullivan
Vice President – Operation Services
(860) 665-2155

March 13, 2014

Mr. Nicholas E. Neeley
Acting Executive Secretary
Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, CT 06051

Re: Docket 12-01-10, *PURA Investigation into the Tree Trimming Practices of Connecticut's Utility Companies* – CL&P's Response to Notice of Technical Meeting and Written Confirmation

Dear Mr. Neeley:

The Connecticut Light and Power Company ("CL&P") hereby submits its response to the Notice of Technical Meeting issued by the Public Utilities Regulatory Authority ("PURA" or "the Authority") on March 11, 2014 ("Notice"). The Notice stated, in pertinent part:

Upon receipt and review of the information from comments in this docket, the Authority hereby requests that CL&P and UI voluntarily suspend their Enhanced Tree Trimming programs, including but not limited to the removal of entire trees except for hazardous trees, pending a Final Decision in this docket. The Authority requests CL&P and UI to respond in writing to this request for voluntary suspension within three business days of this Notice. The Authority does not seek a suspension of routine vegetation management activities.

CL&P acknowledges the importance of the Authority's role in this docket - to ensure that utility tree trimming practices appropriately balance the safety and reliability issues associated with operating and maintaining the state's electric distribution systems with the aesthetic and other benefits of living in Connecticut's densely forested communities.

It is now well-recognized that trees are the number one cause of power outages. CL&P is committed to continue to work closely with PURA and with our communities to achieve and maintain the appropriate balance within its vegetation management programs.

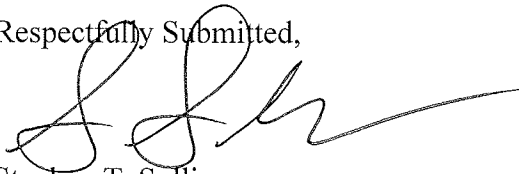
As noted during the March 5, 2014 Technical Meeting, 80% of CL&P's vegetation management program involves Standard Maintenance Trimming ("SMT") and the remaining 20% of the program includes Enhanced Tree Trimming and Removal ("ETT"). However, approximately 65 local tree crews, comprised of approximately 170 local Connecticut residents, are actively working on CL&P's 2014 ETT program. Suspension of this work until the March 27 Technical Meeting would affect approximately 60 miles of scheduled work. It should be noted that this work has already been noticed to property owners and permissions have been received from municipal officials. CL&P would like to be able to continue such work pending a final decision in this docket.

If all ETT work is suspended or if the suspension continues indefinitely, there is a risk that tree trimming contractors will shift resources out of state, adversely impacting the Company's ability to respond to a major weather event. Additionally, suspending all such work until a final decision is rendered will have significant cost and schedule impacts on the ETT program. Pursuant to contractual commitments with tree trimming contractors, the Company could incur demobilization expenses in the event of a suspension. Then, once the suspension is lifted, available contractors will be required to re-mobilize their workforce and notify customers with respect to the remaining work in the pipeline prior to commencing work. The ability to complete the planned 2014 ETT work will be diminished and resources, if available, may only be available at premium rates. It should also be noted that some of this ETT work has been planned as a necessary pre-requisite to the infrastructure hardening projects that are part of the Company's System Resiliency Plan. A suspension of work will not only delay the ETT work itself, but will delay completion of the structural and electrical hardening projects that are designed to improve system performance during adverse weather events.

For the reasons stated above, CL&P respectfully requests the Authority's approval to continue with noticed ETT activities for which customer and municipal consents have been granted. In accordance with PURA's request, CL&P commits to suspend any ETT work (including appeals) to which property owners and/or town officials have objections pending a final decision in this docket.

If you have any questions concerning this filing, please contact me at (860) 665-2155.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'S. Sullivan', with a long horizontal flourish extending to the right.

Stephen T. Sullivan
Vice President – Operation Services

cc: Service List