

**The United Illuminating Company**  
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**A UIL Holdings Company**

March 14, 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

Dear Mr. Neeley:

The United Illuminating Company ("UI" or the "Company") appreciates the Public Utilities Regulatory Authority's (the "Authority") on-going consideration of this very critical matter. UI has reviewed the Authority's March 11, 2014 Notice of Technical Meeting in which the Authority states:

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.

Further, UI has also reviewed the Authority's March 11, 2014 press release in which the Authority states:

Changes made to state law in 2013 provide that a utility may perform vegetation management within the utility protection zone to secure reliability, and the utilities have proceeded to fulfill their responsibilities under this law. In this proceeding, PURA is addressing the parameters of the word "may" to ensure appropriate balance between service reliability and retention of healthy trees wherever possible. Until we complete our assessment, the PURA calls upon the utilities to suspend complete eradication of trees not sanctioned by local tree wardens and to continue with ongoing programs of therapeutic trimming.

Based on the direction provided by the Authority; the Company responds to the Authority's request for voluntary suspension of the ETT program as follows:

1. UI does not presently perform vegetation related work to create the Utility Protection Zone ("UPZ") if the work is not sanctioned by the local tree warden. UI will continue to follow this policy. UI also will not perform vegetation related work when a private tree owner objects to vegetation management related work. When UI receives consent from a private tree owner or local tree warden, UI will apply its new specification. Further, UI will not appeal a tree warden's decision until the Authority issues its final decision in this matter unless a severe public risk exists. In instances of state roads, UI will continue to work with the state authorities.
2. In cases where the work is not sanctioned by the local tree warden, state authority or a private tree owner, UI will request utilization of the alternate specification provided by the EDC's in the State Vegetation Management Task Force report of 10 feet below, 8 feet to the side and 15 feet above energized conductors as well as any additional clearances approved by the private tree owner, local tree warden or state authority. Although this alternative specification will have limited impact during extreme weather, proper clearances must be maintained from energized conductors and direct contact avoided in order to provide for public and worker safety as well as protection from damage to the utility infrastructure. UI will document these specific areas in our records.
3. All work performed under the vegetation management program, including the use of an alternative specification, will be accounted for under the approved vegetation management program authorized in UI's last rate case. That accounting treatment established that such costs be established as a regulatory asset to be recovered over a five year period via amortization with carrying charges applied at UI's approved cost of capital.
4. As directed, UI will also continue to identify hazardous tree or tree parts that could fail during extreme weather and remove those trees or tree parts as appropriate.

UI looks forward to the March 27, 2014 Technical Meeting to further review the CL&P/UI Vegetation Management Plans, including coordination of future projects with local officials, and how the process may be improved.

Very truly yours,

Michael A. Coretto  
Vice President – Regulatory Affairs  
UIL Holdings Corporation  
As Agent for The United Illuminating Company