

BEFORE THE
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of
Consolidated Edison of New York Inc.

Case 08-E-0539

August 2008

Prepared Exhibit of:

David S. Morrell
Utility Analyst 3
(Environmental)
Office of Electricity and
Environment
State of New York
Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

Company Name: Con Edison
Case Description: Electric Rate Filing
Case: 07-E-0523

Response to DPS Interrogatories – Set Staff5
Date of Response: 07/03/2007
Responding Witness: Infrastructure Investment Panel

Question No. :89

Subject: Transmission Tree Trimming Infrastructure Investment Panel Exhibit__ (IIP-6) gives a 2006 actual expense of \$1,923,000 for transmission tree trimming. However, the Company's right-of-way management filing, filed pursuant to 16 NYCRR Part 84 for 2006, shows an actual amount of \$1,823,488. a) Please clarify this discrepancy. b) Please provide a cost breakdown of the forecasted major tree trimming program components for each rate year.

Response:

- a) For the Company's 2006 right-of-way management filing, Vegetation inventory costs were not included, while General Maintenance Roads and Trails costs were. These are the components that we have historically included in this filing. In Rate Case Exhibit (IIP-6), however, Vegetation inventory costs were included while General Maintenance Roads and Trails costs were not. The components and associated costs are detailed in the table below.
- b) The cost breakdown of the forecasted major tree trimming components for each rate year is shown in the table below.

Cost Component	Company's 2006 Right-of-Way Management Filing	Rate Case Exhibit (IIP-6) – 2006 Actual Expense	Forecast of Major Tree Trimming Components For Each Year of the Rate Case
Vegetation Inventory	\$0	\$366,248	\$366,000
General Maintenance Roads & Trails	\$266,331	\$0	\$0
Danger Trees	\$286,585	\$286,585	\$670,000
ROW Mechanical & Chemical Treatment	\$1,270,572	\$1,270,572	\$968,000
Total	\$1,823,488	\$1,923,405	\$2,004,000

Company Name: Con Edison
Case Description:
Case: 08-E-0539

Response to DPS Interrogatories – Set DPS24
Date of Response: 07/21/2008
Responding Witness: IIP

Question No. :364

Subject: Transmission Right of Way Vegetation Maintenance: Relative to the Company response to Staff IR DPS-163 provide the following: 1. A list of all services performed (by either in-house or contract) related to the vegetation inventory work charge of \$269,510 in the historical rate year including the cost and description (include examples of field inventory forms, etc.) of each specific service provided. 2. The line miles and square footage of on-ROW mechanical trimming work for the rate year. Specify the response between edge work (trees located along the edge of the ROW) and any other mechanical trimming planned. 3. The number of off – ROW trees slated for either topping or removal for the rate year. 4. Other mechanical trimming work costs forecasted for the rate year not including on-ROW edge trees or danger trees. 5. Vegetation inventory services planned for the rate year including each specific service, the activities of the specific service and the cost associated with each.

Response:

Item 1:

Nelson Tree Service provided an experienced foreman to assist in the assessment of LiDAR survey vegetation findings. The Foreman inspected each finding assigned to him, made measurements, and solicited trimming or removal permission from landowners as appropriate. See attached "Sample Timesheet". The cost for this work was \$2,733.

Environmental Consultants, Inc. provided a consultant to support the Company's "Plan to Evaluate Transmission Right-Of-Way Maintenance Rights and Widths" as submitted on 9/30/05 in accordance with Commission Order 04-E-0822. The consultant also supported Company vegetation inventory surveys. See attached "Sample Vegetation Inventory" and "Sample ROW Assessment." The cost for this work was \$59,216.

Company labor charges consisted primarily of a Field Operations Planner who is responsible for oversight and implementation of the Company's Commission-approved "Land and Vegetation Management Plan." Additional Company labor costs included all facets of mechanical and herbicide vegetation management, vegetation specific patrols, inventories and other ROW assessments. The cost for this work was \$219,790.

Sales tax associated with vegetation inventory was \$202.

The net accrual is the outstanding balance that the Company estimated was owed to its contractors for previous work performed. In the historic year, there was an overall credit balance indicating that the Company slightly over-estimated the cost of the actual work. The net accrual was -\$12,431.

Item 2:

In 2009, the vegetation management program plans to mechanically treat approximately 41 line miles of ROW. Due to varying width of the Company's property and easements ranging from 50 feet to 300 feet respectively, units of work are not typically tracked in acres or square feet. To execute this work, the Company establishes unit price per ROW-mile contracts. A single price (per mile of ROW treated) incorporates cost for all aspects of work on the ROW (e.g., edgework, mowing, removals, herbicide application, etc.) required. Contractors invited to bid are expected to weigh the varying widths and workloads to provide a standard price per mile and an escalation factor for each year under contract.

Item 3:

The number of off-ROW trees slated to be topped or removed in the rate year will be largely dependent on factors yet to be determined such as the number of danger trees to be identified in the not yet performed 2008 survey, the willingness of neighboring property owners to grant the Company permission to work on their property, and the compensation costs to acquire such rights (e.g., neighbors requesting new plantings in exchange for tree removal rights). The last danger tree survey identified 1133 trees. A new danger tree survey is tentatively planned for the last quarter of 2008 and this will identify the exact number of trees that require topping or removal during the rate year. The Company has removed as many as 3,167 danger trees in a single rate year in recent history (2005).

Item 4:

Other mechanical trimming work costs forecasted for the rate year not including on-ROW edge trees, danger trees, or other mechanical and chemical costs described in response two include (but are not limited to):

- Property line surveys to resolve disagreements with homeowners over ownership and scope of work
- Flagging and traffic protection when working at or along busy road crossings
- Specialized contractor costs such as needed when closing lanes on major parkways
- Management and consultant salaries for working with local government officials (e.g., during the planning stages for major mechanical and chemical treatments)
- Vegetative buffer replacement costs, when applicable (as described in Commission Order 04-E-0822)
- Permit costs, when applicable

Item 5:

Vegetation inventory services planned for the rate year include:

- Continuation of Company and consultant effort performing ROW inventories and general program oversight (as detailed in response 1). The cost is expected to be \$220,000.
- Completion of the Company's "Plan to Evaluate Transmission Right-Of-Way Maintenance Rights and Widths" as submitted to the Commission 9/30/05 in accordance with Order 04-E-0822. Additional costs are anticipated through the deed research stage of this project. We anticipate a \$50-\$75 charge per-property deed researched. The total number of properties to be researched is not yet known as the assessment is ongoing, but the cost is expected to reach the \$50,000 level.