Date Filed: October 30, 2026

Witness: Patrick M. Quinn
Request from: Office of Consumer Counsel

Question:

(Company Vehicles) Please refer to the Response to OCC-754, Attachment 1, shows only four levels of executives with assigned vehicles, but the response states that Field Operations Supervisors "may be assigned Company vehicles and authorized to retain those vehicles outside normal working hours" and then listed four other categories of employees that may be assigned a vehicle.

a. For 2023, 2024, and 2025, please indicate what employees were assigned vehicles. If the vehicle assignments were temporary, please indicate the dates of the assignments.

b. The Response indicates that Field Operations Supervisors "are not permitted to use Company vehicles for personal errands in vehicle." Does this restriction apply to all other categories of workers indicated in the response?

c. If workers are not permitted to use Company vehicles for personal use, please explain how the Company ensures vehicles assigned to an employee and/or driven home are not used for personal use.

Response:

a. Apart from the executive vehicles identified in OCC-754, Attachment 1, the Company generally does not assign vehicles on a permanent one-to-one basis to individual employees. Rather, Company vehicles are generally assigned to departments, work centers, and cost centers and are utilized by employees based on operational needs.

   Pursuant to Company policy, employees in certain job classifications may be authorized to retain company vehicles temporarily (on an unassigned basis) outside of normal working hours to support operational requirements, including supervisory responsibilities, on-call duties, operational readiness, emergency response, and storm restoration activities. These classifications include:

   - Field Operations Supervisors
   - Test Department employees, while on call
   - Work Center Electricians, while on call

- Other employees temporarily authorized based on operational need, such as emergency response, severe weather, storm restoration, or business continuity requirements.

Because employees falling into these job classifications are not assigned to specific vehicles, there is no list of vehicle assignments. The Company maintains a decentralized fleet-management model, where routine vehicle use and temporary take-home authorizations are administered with direct oversight at the local work center level and are not centralized as assigned vehicles.

b. Yes. This restriction applies to all employees operating (unassigned) Company vehicles, including those identified in the response to OCC-754. Pursuant to Company policy, Company vehicles are provided for business purposes and are not intended for personal use.

c. The Company maintains strict policies governing the use of Company vehicles and authorizes employees to use vehicles outside normal working hours only for specific business-related purposes, such as supervisory responsibilities, on-call duties, operational readiness, emergency response, storm restoration activities, and other approved operational requirements. Leadership of the local area-work centers are charged with supervising the use of vehicles and adherence to applicable requirements and policies.

More specifically, compliance with Company vehicle-use requirements is supported through:

- Written vehicle-use policies and employee requirements;
- Management approval processes for employees that are authorized to use vehicles outside normal working hours;
- Supervisory oversight at the local operating level, coupled with time-reporting practices that require employees authorized to use Company vehicles to annotate that on their weekly timesheet.
- Fleet-management and telematics systems provide visibility into vehicle utilization and driver activity, including processes that require operators to identify themselves while logging into a vehicle and investigation of potential policy violations and implementation of corrective action.

Through these policies and operational controls, the Company maintains oversight of vehicle utilization and compliance with its vehicle-use requirements, consistent with the Company's decentralized fleet-management model with vehicle assignment and monitoring directly administered by local operational leadership. Fleet-management and telematics systems provide visibility into vehicle utilization and driver activity, and employees authorized to use Company vehicles outside normal working hours are expected

to use those vehicles in accordance with Company policy and approved business purposes. Potential instances of non-compliance are subject to review and corrective action, as appropriate.