Date Filed: August 14, 2026

Witness: Leanne M. Landry and John G. Griffin
Request from: Office of Education, Outreach, and Enforcement

Question:

(STORM EVENT DOCUMENTATION) For each catastrophic storm event included in the Company's storm request, provide an unlocked Excel spreadsheet detailing the total number of billable hours for each external line crew. Specifically include the breakdown of hours split between work, standby, and mobilization/demobilization. Additionally, identify the total dollar amount billed for each category, summarize the total number of hours per category, and cite the supporting documentation.

Response:

The Company does not track or account for the billable hours in the manner requested in this interrogatory. In order to respond to this request, the Company must perform a manual exercise to identify each billable hour by work or standby time for each individual invoice by storm. The Company is currently working through this exercise for each storm. Please reference EOE-030, Attachment 1, for a summary of hours and costs associated with external line crew support for MS24A011. The Company will supplement the remaining spreadsheets for the remaining 13 storm events included in the request.