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Witness: John P. Dipaola-Tromba, Sean D. Redding and Jenna M. Turner
Request from: Office of Consumer Counsel

Question:

(VEGETATION MANAGEMENT CREW TIME) Please refer to the Response to EOE-129, which states that tree crews have no different billing rate for standby versus work time, and standby on a timesheet means the crew is waiting to work. Has the Company examined the amount of standby time noted on tree crew timesheets from 2018 to the present? If so, please provide that analysis.

Response:

For purposes of this question, it is important to note that there are two vital differences between line crews and tree crews.

First, referring to the Company's response to EOE-129[i], paragraph 3, line crews have separate billing rates for mobilization, demobilization (Travel Time), Standby Time (arrived at Company designated location but not yet started Working), and Work Time. Vegetation crews are primarily (not always) local crews. Consequently, as shown with reference to the applicable contractual requirements in OCC-1021, Attachment 1 (entitled, "2023 Section II Special Conditions and Amendments"), vegetation crews do not have a Standby rate. Vegetation crews have only Work Time and they are paid when they are on-shift – not before. For vegetation crews, Work Time starts when they are activated and dispatched to their initially assigned work location (for example, a staging area or one of the Company's Area Work Centers). At the end of each day, the tree crew goes off-shift (unpaid) and comes back on-shift (paid) the following day.

Second, vegetation tree crews perform a critical function in restoration, operating as a <u>support</u> resource to line crews. That means that, during restoration, tree crews may work independently of line crews or may be paired with: (1) line crews working with a public-safety specialist to clear blocked roads, or (2) restoration line crews – either way responding in tandem to specific trouble spot locations. When paired with either type of crews, there is time in the field that is needed for coordination with the central Restoration Management Teams ("RMT"). Crews cannot travel from one spot to another to conduct restoration work without complete coordination with the RMT. To maintain the safety of all field crews, there are switching activities and other protocols that have to be followed to make sure that overhead circuits are deenergized before anyone starts working in a given location. Because tree crews are the support crew for both line crews and public-safety crews, tree crews are subject to periods of time where they must wait at the blocked road location or at trouble spot restoration location until the line crew either alone, or in tandem with system

controllers when necessary, have deenergized the area to ensure that vegetation has not been energized through contact with electrical system components, making is safe for the tree crew to do their work.

When trees and branches are entangled with electrical system wires, the line-crew work must be completed first, in order to enable the tree crew to work safely. The line-crew work may include opening fuses, grounding, isolating, or requesting and coordinating switching with the system operators in each RMT to deenergize a portion of a distribution circuit. The tree crew, working collaboratively with the line crew, is then able to remove the entangled vegetation from the wires. As the line crew next makes repairs to restore power at that location, the tree crew may be removing the vegetation from the roadway or clearing other hazard storm damaged branches at that location that could cause future outages or may be clearing vegetation debris from the blocked road that may have created a public safety hazard. Clearing blocked roads may also require close coordination with public works representatives from each municipality, requiring the tree crew to remain at the blocked road location for a longer period of time.

Alternatively, tree crews may be directly dispatched by arborists to trouble spots where vegetation may be suspected as the cause of damage. Based on how the initial outage is reported by customers -- whether from a direct customer report, a damage assessment report filed by damage assessment patroller, or a referral from a line crew -- each trouble spot event in the Outage Management System (OMS) may indicate that a tree, branch or other vegetation is, or may be, the cause of the outage. Arborist dispatchers working in the OMS may directly dispatch a tree crew to that location to assess the situation and conduct any work possible. Upon arrival, the tree crew may report that a line crew is also needed at that location and may be instructed to await arrival of the line crew so that the tree crew is ready to go to work as soon as the line crew has made it safe to conduct work. The arborist dispatcher may also dispatch a tree crew to a trouble spot location in close collaboration with the line crew dispatcher in the RMT, to efficiently coordinate the resources needed at each trouble spot to affect repairs in a timely manner.

The point is that, during this Work Time, there will be periods of "stand-down" time, which is not the same as "Standby" time for line crews. The term "stand by" may be used on a daily time sheet to indicate that the tree crew waited until it was safe for them to begin work, or during the period when their assigned line crew/ public-safety response specialist was completing their work so the crew pair (line and tree) could be dispatched to their next blocked road or trouble spot location, or during the period awaiting the municipal public safety representative at a blocked road location. Standby time noted on a timesheet is the time at each assigned trouble spot or blocked road location, often for safety reasons, and may indicate a tree crew is at the ready waiting for an arborist dispatcher to assign a trouble spot location to assess and possibly work.

Because stand-down time is part of getting the job done safely and efficiently, working in tandem with line crews or on their own in the field, the Company does not separately track this time, nor

does the Company require crews to try to track this time on the timesheet on a fully reliable and detailed basis. It is simply not efficient or feasible for the crew to track this time in specificity separately from active vegetation work because the crews in the field experience this time all as one work effort in doing their job.

Prior Referenced Response

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[i] EOE-129 Question:

(VEGETATION CREW BILLING) Explain the contractual obligations for the correct treatment of billing hours during meal breaks for each external tree crew vendor for both non-storm and storm events (i.e., including both working time and standby time). As part of the response, list each vegetation vendor and cite the contract provisions that detail the correct billing practices. If the contracts do not explicitly detail the permitted billable treatment of labor hours for meals, please provide email or other communications supporting the billable treatments.

EOE-129 Response:

Please refer to the response to EOE-128. Work practices govern the treatment of meal breaks during billing hours. Please refer to EOE-128, Attachment 1. During non-storm or blue-sky days, local Connecticut tree crews are paid 9-hours of straight time for time worked during 7 AM to 4:30 PM (07:00 to 16:30), up to the first 45 working hours, with a 30-minute unpaid meal break.

During storm events, a meal break is not excluded so the 9-hours paid for straight time are 7 AM to 4:00 PM (i.e. 07:00 to 16:00) and everything worked between the hours of 4:00 PM to 7:00 AM (16:00 to 07:00) of the next day have a premium rate applied.

For tree crews, all time on shift is work time. Tree crews do not have contractual provisions allowing for payment of standby time. When a tree crew indicates “standby” on a timesheet, it is not equivalent to the “standby” time of line crews. Instead, this is a shorthand note that the crews are on their assigned storm shift and are actively ready to respond to provide the service for which they are hired. For example, they may be waiting for a line crew to arrive or to make the location safe for them to do their work, all of which is part of the tree crew’s work time hours.