Date Filed: September 28, 2026

Witness: Craig Dikeman and Matthew J. Correia
Request from: Office of Education, Outreach, and Enforcement

Question:

(CONTRACTS) Refer to Responses to OCC-044, and EOE-024. Compare and contrast the Confidential information provided in OCC-044, versus EOE- 024. As part of the response, explain why the Company included certain contracts in OCC-044, that were not consistent with the contracts provided in EOE-024, Att. 1. As an example, OCC-044, Att. 1, references Contract Nos. CW2292868 and CW2281565 for the Asplundh Construction Corp vendor where neither contract was referenced in EOE-024, Att. Specifically, EOE-024, Att. 1, references Contract Nos. CW2241580 and CW2280421. To the extent that the contracts are for different effective periods, please identify each vendor's respective contract number(s), and provide the applicable contract term.

Response:

The question to OCC-044, requested for contracts for external line crew and vegetation contractors that have costs reflected in the storms presented for recovery in this docket and for all current external line crews.

The question to EOE-024, requested for a copy of the Company's Master Service Agreement (MSA) with each line crew contractor, in effect from 2018 to present. Accordingly, the two responses had different scopes: OCC-044, focused on the contracts and associated contract workspaces under which storm costs were incurred, while EOE-024, focused on the governing MSAs for line crew contractors. This difference in scope accounts for the differences in the contract numbers identified in the two responses.

For Asplundh Construction Corp., OCC-044, Attachment 1, references Contract Nos. CW2292868 and CW2281565:

- CW2292868 is an ERP Distribution Overhead Line Storm Restoration agreement with Asplundh Construction Corp. This agreement was included in OCC-044, because costs were incurred under it for storm events included in this docket.

- CW2281565 is the sub-agreement contract workspace for the Construction Distribution Overhead Line agreement effective from 2021 through 2023. This contract workspace was included in OCC-044, because it contained the contract value and costs reflected in the storm events included in this docket.

EOE-024, Attachment 1, references Contract Nos. CW2241580 and CW2280421:

- CW2241580 is an MSA with an effective date beginning in 2018. It was included in EOE-024, because that request sought the governing MSAs effective from 2018 to the present. It was not included in OCC-044. because it was not a current line crew contract and was not the contract workspace under which the applicable storm costs were recorded.

- CW2280421 is the MSA contract workspace associated with the same Construction Distribution Overhead Line agreement represented by sub-agreement workspace CW2281565. The applicable agreement was effective from 2021 through 2023.

In SAP Ariba, an MSA contract workspace contains the governing terms of the agreement but generally does not hold the associated contract value. The MSA may have one or more related sub-agreement contract workspaces under which the contract value and associated costs are recorded. Therefore, CW2280421, and CW2281565 are not two inconsistent agreements. CW2280421 is the governing MSA workspace, while CW2281565 is the related sub-agreement workspace under which the applicable value and storm costs were recorded. EOE-024, identified CW2280421 because that request sought the governing MSA.

OCC-044, Attachment 1, identified CW2281565 because that request sought the contracts associated with costs reflected in the storm events included in this docket. Thus, although the two responses referenced different SAP Ariba contract workspace numbers, those numbers relate to the same underlying agreement.