Date Filed: October 27, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: Public Utilities Regulatory Authority

Question:

(EXPENSES) Interrog. Resp. OCC-375(b). Provide the following:

a. All written policies or documentation regarding the Company's shift to significantly reduce the number of contractor dock crews working on the system;
b. The average annual number of contractor dock crews separately for years 2023-2025; and
c. The predicted annual average number of contractor dock crews for 2026 and 2027.

Response:

a. As part of the Company's 2016 contract with IBEW Locals 420 and 457 (referred to as "Teal Book") the Response Specialist Organization (RSO) was formed between 2016 and 2017. At this time, 100 linemen were moved from the Area Work Centers (AWC) to staff the RSO group. The Company's attempts to fill these journeymen linemen roles externally were unsuccessful. Consequently, the only way to increase lineworker staffing was to hire non-qualified employees to enter and complete the four-year apprenticeship program to become journeyman lineworkers. The Teal Book contract negotiation in 2019 increased the RSO staffing by an additional 26 lineworkers. These transitions of linemen from the AWCs to RSO left the AWCs with insufficient internal resources to complete their work. Thus, the Company hired contractor dock crews to supplement the internal workforce to complete necessary work until the newly hired employees finished their apprenticeships and became qualified lineworkers. As the hires completed their apprenticeships and the AWCs began to take on more work on their own, the Company reduced and then subsequently eliminated the contractor dock crews.

b. In 2023, the Company had 36 dock crews, of which three were released in early 2023 and nine were released later in the year. In 2024, the Company had 24 dock crews to begin the year and all were released in April.

c. The Company did not have any contractor dock crews in 2026 and does not plan on having any for the remainder of 2026 or at any point in 2027.