Date Filed: September 24, 2026

Witness: Christopher E. Colorio, Mark P. Baldwin, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

(MS24E) Please refer to Exhibit ACCT-2 (CLP-5A-01) (MS24E) p. 22. The times allocated in the "Work Distribution" section of the form overlap and cannot apply to all workers. Please explain how the Company verified that all workers listed on this form worked for 11 hours.

Response:

Referring to Exhibit ACCT-2 (CLP-5) (MS24E), Outside Line Contractors, at Line 34, Asplundh Construction Corp, in amount of $259,165.

A general foreman or similar position is responsible for a complement of workers who are often split into multiple crews. The general foreman coordinates the work of the group, aligning disciplines, qualifications, and equipment to address assigned events. In some cases, crews may work independently in two or three-person crews or otherwise combined to tackle larger, more complicated and time-consuming assignments. This can shift throughout the restoration event. Assignment by assignment details for each individual employee are not maintained in the Company's systems. The External Resource Field Coordinator is in constant communication with the foreman or lead to keep track of restoration assignments and progress. They review each timesheet and, by signing off, confirm that the events performed and hours reported are accurate.