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

Question:

(Storm MN25K – Service Crew) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). The following pertains to invoice #WO-13990 (p. 200-221):

a. Per inspection of the documentation, there were no Time & Work Reports that recorded supervisor hours or the equipment utilized by the supervisors. Provide an explanation of the hours allocated to the supervisors on the invoice and provide the associated Time & Work Report for the hours worked.

b. The timesheets on p. 201-218 contain no approval by the Eversource Representative. Explain the reason for the lack of approval by the representative and how the Company validated the work without that approval.

c. Several timesheets (ex. p. 201) contain no event start time and event end time. Explain how the Company verified and justified the work performed for the hours stated in box 12 (Work Time) without event information to indicate time worked.

Response:

a. Please refer to OCC-638, Attachment 1, for the Supervisor timesheets that were inadvertently omitted from the original submission.

b. During the Company's initial review of the invoice, it was determined that the supporting timesheets were missing. The vendor was notified of the omission and subsequently provided timesheets signed by its representative. In instances where required signatures are unavailable, the Company relies on its established internal review procedures, including discussions with personnel responsible for overseeing the contractor, to verify the accuracy and validity of the timesheets and associated invoice charges.

   For this invoice, the Company's internal review process successfully identified that the supporting timesheets were missing during the initial review. After the vendor provided the missing timesheets, the review process was completed and confirmed the accuracy of

the hours billed. If the Company is unable to satisfactorily validate supporting documentation or invoice charges, the invoice is rejected and returned to the contractor for correction and resubmission.

c. Please refer to the Company's response to OCC-634[i]. Time intervals will exist on the timesheets as not every activity in which a crew engages is reduced to a written record, nor would it be safe or efficient to do so.

Prior Referenced Response:

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[i] OCC-634 Question:

(Storm MN25K - Timesheets) Refer to Exhibit ACCT-2 (CLP-13A-16) (MN25K). The following pertains to invoices #3634R, 3635R, 3633R, 3648R, 3646R, and 3644R (p. 30-173) and invoices #3630R, 3643R1, 3639R2, and 3636R1 (208-285):

a. Several timesheets (ex. p. 38) contain missing information within the 'Work Distribution' section. Explain how the Company verified and justified the work performed for the hours stated in box 12 (Work Time) without event information to indicate time worked.

b. Several timesheets (ex. p. 37) contain a difference in hours worked in boxes 6 and 7 (start time and end time) compared to boxes 24 and 25 (event start time and event end time). Explain what work occurred during the time differential including the event details, the event start time, the event end time, and any documentation over the work performed. Cite to the contract provision contained in the contracts provided in Response to OCC-44 explaining that the tasks noted should be logged as work and not standby.

OCC-634 Response:

a. Reviewing the specified timesheets, there is no significant missing information within the "Work Distribution" section. The timesheets are not live documents that can be used to track the crews on a minute-by-minute basis, nor is the timesheet the method by which the Company manages the crews or assures that the crew is working how and where they are supposed to be. The timesheets are used to track the time spent on the system primarily from a work status perspective and are typically filled out after the day's work is done with reference to the major work assignments. It is not realistic to expect that the crews will record every activity that they have engaged in during the day with specificity because this would detract severely from the job at hand, which is the emergency response and restoration of power while maintaining paramount attention to the personal safety of these critical resources.

The Company manages the crews through the oversight of the employee dispatching the crews and the External Field Resource Coordinator (EFRC), who is physically in the field with the crews, each assuring that the crews are properly engaged and assigned work to restore the system from storm damage. The linemen who are filling out the timesheets are primarily focused on ensuring that their crews are working safely in a dynamic environment that is full of potentially lethal hazards. The EFRC is the Company representative that is responsible for signing the timesheets and they have personal knowledge of the work that the crews have performed and the activities they have engaged in, particularly in relation to the hours stated in boxes 6 and 7. The Company also verifies that crews were actively engaged in storm restoration activities through operational oversight, dispatch records, crew assignments, and direct EFRC field supervision. As a result,

the Company is able to confirm that the hours recorded in Box 12 reflect time during which the crews were performing restoration-related work or restoration-support activities, regardless of whether a specific event number was recorded within the Work Distribution section.

Importantly, the crews are on a working status from the time they are directed to report for duty until restoration activities are completed and they are released from duty at the end of the shift. They do not get paid by the specific restoration "event" that they are assigned to and they will not be actively working an "event" every hour of a work shift. There is time that must be taken at the start and end of the day and between active restoration "events" to complete all of the steps necessary to assure safe conditions in the field while they work the event. These activities include, but are not limited to, receiving work assignments, conducting safety briefings, performing required vehicle inspections, obtaining and staging materials, traveling to and between work locations, assessing damage, coordinating switching activities, establishing safe work zones, and completing job site closeout activities.

For the Resource Management Teams identifying jobs and deploying crews, and for the EFRC, the critical focus is to follow procedures, keep the crews safe, and keep them moving efficiently throughout the working shift. In this context, there is no bright line that separates one event from another and dissects the day from an "event" perspective. All activities, whether in preparation for restoration work or actively performing restoration work, are proper work activities undertaken during the work shift and will not necessarily be specified on the timesheet. Accordingly, the absence of detailed event information within portions of the Work Distribution section does not indicate that work was not performed during those hours.

b. Please refer to subpart (a), above.

Further, all contractor crews and non-Connecticut based Company employees working storm restoration in Connecticut are required to be lodged in hotel rooms. Prior to beginning their first job of the day, the crews eat a meal, conduct safety briefings, perform U.S. Department of Transportation mandated pre-trip inspections on their trucks, and restock their trucks as necessary with material needed for their day. This takes time and the crews are methodical because they don't want to get out into the field without the right equipment or materials.

The crews may start the work shift by driving from their hotel rooms to the job site and depending on the availability of hotel rooms, that can add an additional 30 minutes or more. During this period, the crews remain under Company direction, available for assignment, and engaged in activities necessary to support restoration operations.

At the end of their last job of the day, the crews are required to clean up their job site, properly store all equipment and tools, eat a meal after performing physical labor all day in situations where their personal safety is continually at risk and often in unforgiving conditions; and drive back to their hotel rooms, which again, could be 30 minutes or more away from the jobsite. Therefore, intervals of time at the start and end of the work shift and between restoration "events" are an expected and necessary part of the work shift, for which the crews are paid. Within a work shift, the crews do not get paid differently for different types of work. Therefore, from a field perspective, the start and stop time is the critical datapoint for the timesheet.

Refer to p. 4495 of OCC-044 Attachment 2 CONFIDENTIAL Exhibit A - Pricing Schedule. Emergency Response Working Rates for Labor are defined as the agreed labor rates payable from the commencement of applicable Emergency Response Work through to termination of such Emergency Response Work, excluding rest time during the Emergency Response Work. The crews were not in a period of rest or otherwise unavailable to perform work.

During the periods reflected by the difference between Boxes 6 and 7 and Boxes 24 and 25, crews remained under Company direction and were engaged in activities such as safety briefings, vehicle inspections, travel to and between assignments, material procurement and staging, damage assessment, job site cleanup, and other restoration-support functions necessary to facilitate emergency restoration work.

Accordingly, the Company considers this time to constitute payable Working Time, consistent with the contractual definition of Emergency Response Working Rates, rather than standby time. The event start and end times recorded on the timesheet identify a particular restoration assignment but do not capture the full range of restoration-support activities performed during the shift. Because the crews remained in working status from the time they reported for duty until they were released from duty, the Company considers the differential time to be payable working time and not standby time.