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Witness: John P. Dipaola-Tromba, Sean D. Redding, Jenna M. Turner, John G. Griffin and Leanne M. Landry
Request from: Office of Education, Outreach, and Enforcement

Question:

(MS24A-VENDOR-TREE) Refer to Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-16, pp. 135-151. The Company reported an incremental charge of $93,805 for the Lucas Tree Experts vendor. The charge was supported by multiple timesheets that reference activities starting on January 7, 2024 (several days prior to the storm event) and includes Eversource Connecticut Emergency Restoration Tree Contractor Work Location reports that identify remediation at consistent locations for the duration of the activity (see e.g., p. 139, remediation on 1/7, 1/8, 1/10, and 1/11 occurred at "New rd, Nt-Nt" or "New, 1-2"). Respond to the following:

a. Referring to pp. 139, 141, 143, 145, 147, 149, and 151, explain whether each of the referenced Eversource Connecticut Emergency Restoration Tree Contractor Work Location reports were fully completed in accordance with the Company's expectations. As part of the response, explain why most of the activity was solely characterized as "Vine" and does not include additional details on the underlying Trees.
b. Explain what "New rd, Nt-Nt" or "New, 1-2" represents as included within the various timesheets and Eversource Connecticut Emergency Restoration Tree Contractor Work Location reports (i.e., pp. 138-151).
c. Identify the total monetary impact of all services represented as "New rd, Nt-Nt" or "New, 1-2".
d. Referring to pp. 138, 145, 148, and 150, explain the specific storm-related services performed on January 7-8th (i.e., days prior to the MS24A event) and explain why the vendor was permitted to perform services on a Sunday, at higher billable rates.
e. Identify the total amount of per diems that the vendor was permitted to bill and explain why these expenses were warranted for storm remediation purposes. As part of the response, cite the contract provision that permits per diems for storm remediation purposes.

Response:

a. Lucas Tree's electronic Eversource Connecticut Emergency Restoration Tree Contractor Work Location sheet is an electronic form developed and maintained by the contractor. The system contains required fields that must be completed before an entry can be submitted. As a result, when crews are performing storm-related work that is not associated with a specific ticket or work location, they cannot leave those fields blank. In these cases, crews may enter "Vine" as a placeholder value to satisfy the system's data-entry

requirements. "Vine" does not represent a specific work location or activity; rather, it is an administrative entry used when crews are engaged in storm-related work but are not responding to a particular ticket. The Company verifies storm-related work using additional records, including timesheets, dispatch information, and field oversight, and therefore does not rely solely on the placeholder entry for validation purposes.

b. New Rd is the location of the Madison Area Work Center (AWC). It signifies the tree crew was on shift and located at the work center. "Nt-Nt" is a default blank field for pole numbers. If there are no pole numbers recorded, the system prints "Nt-Nt".

c. The tree crew's work hours are not broken down by event locations so this time cannot be separated out.

d. The tree crews referred to in Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-16 on pages 135-151 were non-local tree crews from South Carolina (pages 138, 146, 148, and 150) and North Carolina (140, 142, and 144). The tree crews were mobilizing and travelling from South Carolina and North Carolina to Connecticut on January 7-8, 2024.

e. Contractor tree crews receive meals or meal per diems during active storm response per contract agreements. Lucas Tree's contract for non-local tree crews includes a per diem of $25 per meal per day (up to 3 meals per day). The $75 per diem charged is appropriate per the contract provisions.