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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:

(MS24E) Please refer to Exhibit ACCT-2(CLP-5A-07)(MS24E), p. 92-94.

a. Box 12 on the timesheet indicates 15 or 16 hours worked on March 12, but boxes 24 and 25 show the earliest work time starting at 6:45 am and the latest end time at 7 pm. Please explain this discrepancy.
b. Boxes 24 and 25 contain overlapping work times, such that every member of the crew could not have worked each of the times indicated. Please explain how the Company confirmed that every member of the crew worked for 15 or 16 hours that day.

Response:

a. 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 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. 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" is 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.

b. The timesheets on p. 92-94 are not for a single crew. The size of a line crew is dependent upon the work being performed. For a lot of jobs that have minimal damage, a single two-

person crew in one bucket can accomplish the job on their own. On other events with extensive damage (broken poles, many spans of wire down, etc.) it can require several two-person crews working as a team to make the repairs and re-energize the area. When the Company onboards contractor crews, it is identified how many crews the contractor contingent is bringing onboard. The Company employee dispatching the crews and the ERFC physically in the field with the crews both confirm that all crews are properly engaged and working throughout the duration of the storm.