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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 – Travel) Refer to Exhibit ACCT-2 (CLP-13A-17) (MN25K). The following pertains to Invoice #2502415R (p. 23-69). Provide the Mobilization Report for this invoice to indicate the starting location and ending location of travel the crew performed. Explain how the Eversource reviewer confirmed that the travel hours were appropriate for mobilization of the crew without the Mobilization Report.

Response:

Referring to ACCT-2 (CLP-13A-17) (MN25K), pp 23-69, the Northline Utilities crews in question were first hired to work in New Hampshire, mobilizing to New Hampshire and charging their mobilization time to New Hampshire. On February 17th, the crew was released from work in New Hampshire and directed to travel to Connecticut to provide emergency restoration services.

Referring to p 26 of Exhibit ACCT-2 (CLP-13A-17) (MN25K), Column 10, the crews reported a Travel Time of four hours from New Hampshire to their assigned Company work location in Connecticut of Stamford, CT. Though the exact starting point of mobilization from New Hampshire to Stamford was not recorded, travel from the farthest southern New Hampshire town of Nashua NH to Stamford is approximately 200 miles, according to Google Maps, making a reported travel time of four hours for a convoy of utility trucks reasonable and appropriate. To calculate the shortest expected travel time, regardless of traffic or other road conditions, using 200 miles as the base and Google's travel time estimate of 3 hours and 15 minutes for passenger vehicles, when multiplied by the Company's 1.3 starting factor for utility trucks, the estimated travel time would be 4 hours and 22 minutes.