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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-13989R2 (p. 222-243):

a. The timesheets on p. 224-243 contain no approval by the Eversource Representative. Explain the reason for the lack of approval by the representative and how the Company validated the date work was performed without that approval.
b. Several timesheets on p. 224-243 contain no event start time and no event end time. Explain how the Company verified that the work performed by workers for the hours stated in box 12 (Work Time) without the event start times and end times to indicate time worked.

Response:

a. 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 invoiced charges, the invoice is rejected and returned to the contractor for correction and resubmission.

b. 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:

[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 – with 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.

   Importantly, the crews are on a "working" status, once they are on shift – from beginning to 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 for the crews while they work the event. For the Resource Management Teams identifying the jobs and deploying crews and 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 of, or "on the pole," are proper work activities that are undertaken during the work shift and will not be specified on the timesheet.

   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 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. 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. 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.