Date Filed: October 05, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 76-77. Please confirm that this vendor was on standby for 13 hours on March 12 and for 13 hours on March 13 and performed no work during that time.

Response:

The tree crew worked two 16-hour overnight shifts on March 11-12, 2024, and March 12-13, 2024, which was billed as work time. There is no standby designation or rate for tree crews. The crew did not record ticket locations on March 12 or March 13.