Date Filed: October 06, 2026

Witness: Mark P. Baldwin, Clifford G. Williams, Leanne M. Landry and John G. Griffin
Request from: Office of Education, Outreach, and Enforcement

Question:

(MS24F-VENDOR-CIVIL) Refer to Exhibit ACCT-2 CLP-6, and Confidential Exhibit ACCT-2 CLP-6A-6, pp. 280-281. The Company reported an incremental charge of $35,967 for the KTI Utility Construction & Maintenance LLC vendor. Respond to the following:

a. Identify the total amount of charges applicable to standby activity.
b. Explain the process for when the vendor would be mobilized to perform pole replacements or repairs. As part of the response, explain why the vendor would be mobilized prior to the worksite being properly secured.
c. For each standby charge, explain the circumstances for which the vendor was engaged prior to worksite being secured.
d. Referring to the applicable Event Level Matrix (ELM) within EOE-010, Att. 5, pp. 17-19, identify where the civil crews are identified for staging purposes. If not included in referenced pages, cite the applicable pages.

Response:

Referring to Exhibit ACCT-2 CLP-6 (MS24F), Outside Contractors-Vendors, line 197, vendor KTI Utility Construction & Maintenance LLC, total invoice amount of $35,967.

a. The total amount of charges applicable to standby activities is $14,848.50.

b. During storm events, the Company may direct KTI to set poles to support and expedite restoration efforts by line crews. The Company may mobilize KTI prior to the worksite being properly secured because the Company may be notified of a broken pole while all other resources are engaged on other events. To maintain the pace of restoration efforts, the Company may dispatch KTI to begin replacing the pole. If a traffic detail is required or a tree crew is required, then KTI would notify the Company immediately and KTI would wait until the job site is ready to go to work.

c. Please refer to subpart (b) on why the job site would not be secured prior to KTI getting on site.

d. KTI is staged for each storm event to assist with pole setting. Given that setting poles is a time-intensive process, KTI is a key resource during storm events, providing pole-setting support so that line crews can focus on restoration activities and restore service as quickly as possible. The ELM does not explicitly include provisions for the staging of pole-setting crews. However, the Company stages pole setting/rock drilling crews similar to line crews. This ensures that the necessary resources are available when needed, allowing line crews to remain focused on restoration activities and helping to accelerate service restoration. If crews are not secured in advance, they may be committed or deployed out of state when needed, potentially leaving them unavailable to support the Company's restoration efforts.