Date Filed: October 06, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Education, Outreach, and Enforcement

Question:

(MS24F-VENDOR-TREE-EQUIPMENT) Refer to Exhibit ACCT-2 CLP-6 (Outside Contractors tab), and Confidential Exhibit ACCT-2 CLP-6A-6, through CLP-6A-8. The Company reported 126 incremental charges (Excel Rows 198-323) for the combined amount of $495,799 for the Lewis Tree Service Inc. vendor. The Company was billed for atypical equipment including extra chainsaws, chipper disks, chip trucks, log trucks, and a backyard lift. Provide an unlocked Excel spreadsheet listing each applicable invoice, the referenced equipment, the amounts billed for the applicable equipment, and the justification for why the equipment was necessary for storm remediation purposes. Additionally, please provide documentation of prior authorization for each charge.

Response:

It is an established practice for contractor tree crews to bill for larger chainsaws during storm restoration activities. The use of larger-bar chainsaws when removing large-diameter trees improves operational efficiency and enhances worker safety by allowing the work to be performed quicker and with less risk to the operator. The chainsaws billed on the referenced invoices are larger than the standard chainsaws provided on each bucket truck, consistent with the applicable contract provisions. Because tree crews cannot determine the size and removal requirements of a tree until they arrive at the work location, requiring a separate trip to obtain a larger chainsaw could delay restoration efforts and result in additional travel costs. Accordingly, billing for a larger chainsaw is permitted for the entire shift when utilized, as that equipment resource is dedicated to the assigned crew and is therefore unavailable for use on other work during that period.

The Company Arborist may approve the use of a Disk Chipper and Chip Truck for several reasons. There may not be anywhere to place damaged vegetation except in a roadway which would cause a public safety hazard. The Company Arborist may approve the use of chipper due to the location of the issue to proactively prevent customer complaints. Use of a chipper is an exception that is only allowed at the direction of the Company Arborist.

The Company will request backyard lifts and associated equipment for storm response. If the Company does not secure the equipment, tree contractors could use the equipment for municipal or private residential jobs and it could be unavailable when needed. There are vegetation related event tickets requiring climbing crews or backyard lifts nearly every storm event. A backyard lift

can support increased safety and efficiency in areas where typically a tree contractor would need to send climbing tree crew personnel up into the trees.

During storm response, log trucks may be used to remove large trunk sections and, when necessary, safely support unstable tree sections with their grapples where no safe drop zone exists. Log trucks also substantially improve restoration efficiency. Large-diameter trunk sections that would otherwise require significant time for ground crews to cut, move, and stage manually can often be removed in minutes, allowing roads to be reopened faster and restoration resources to be deployed to additional outage locations. The Company authorized the use of these services through its storm restoration contractor as part of the overall restoration effort. Because the work was performed to facilitate blocked-road clearing and the safe restoration of electric service, the associated costs were appropriately incurred by the Company as storm remediation expense.

The associated equipment charges were reviewed and approved by the Company Arborist through the timesheet approval process, confirming that use of the equipment was appropriate for the work performed.

The Company does not possess the requested detailed breakdown of all invoices and associated timesheets filed in this proceeding for tree-contractor work. All of the requested data is available to EOE, in the invoices and associated timesheets that pertain to Tree Crew vendors for the MS24F event. The Company's regulatory requirement is to utilize the timesheets to document the hours worked by each crew, for each vendor, in order to support payment to that vendor. Accordingly, the Company's processes are constructed to obtain and use those records for validating payment, subject to review and sign off by the Company Arborist, who has contemporaneous knowledge of the work performed. The Company's financial systems do not record invoiced amounts by data field, for each data point included on the invoices or the associated timesheets. Therefore, extracting and compiling this information from the timesheets in the manner sought by EOE would require extensive manual efforts that can be performed by EOE, or EOE's consultant, if information in that format assists EOE in putting forth its case.