Date Filed: October 19, 2026

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

Question:

(MS24E) Please refer to the Response to OCC-629. Exhibit ACCT-2 (CLP-5A-01) (MS24E) p. 65-66, specifically states the vendor was on "standby." Did this crew perform any work or were they idle, waiting for work for two days? If the crew performed work, please describe and provide all evidence and/or substantiation supporting this assertion.

Response:

Referring to the Company's response to OCC-629[i], and Exhibit ACCT-2 (CLP-5A-01) (MS24E), pages 65-66, the tree crew in question worked a single 16-hour overnight shift that started on March 11, 2024, at 21:00, and ended on March 12, 2024, at 13:00. There is no standby designation or rate for tree crews. The term "standby" on a timesheet is a shorthand note that the tree crew is on their assigned storm shift and are actively ready to respond to events. The tree crew did not record any ticket locations where tree work was performed and therefore did not respond to an outage/non-outage event during the assigned 16-hour overnight shift.

Prior Referenced Response:

[i] OCC-629 Question:

(MS24E) Please refer to Exhibit ACCT-2 (CLP-5A-01) (MS24E), p. 65-66. Please confirm that this crew was on standby throughout March 11 and March 12, 2024, performed no work, and was paid overtime.

OCC-629 Response:

The tree crew worked a 16-hour overnight shift which was billed as work time at the overtime rate as it was outside the standard work schedule hours. There is no standby designation or rate for tree crews. The crew did not record any ticket locations.