Date Filed: October 26, 2026

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

Question:

(MS24A-VENDOR-TREE) Refer to Response to EOE-225, and Exhibit ACCT-2 CLP-1, and Confidential Exhibits CLP-1A 13, through CLP-1A-14. Referring to EOE-225, subsection 'c', the Company cited its response to EOE-130, for a broad explanation of situations that could impact travel time. Please provide the specific documentation (i.e., emails) available to the Eversource reviewer contemporaneously with their initial review to support billing of 12 hours for both mobilization and demobilization. If documentation (i.e., emails) does not exist, explain why.

Response:

This question conveys a lack of clarity on the components of mobilization and demobilization. The associated travel time (and the factors addressed in the Company's response to EOE-130[i]) are just some components of the mobilization and demobilization process. However, mobilization and demobilization also includes "muster time." Muster time is a term that refers to a range of activities such as crew preparation, pre-trip safety briefings, DOT pre-trip and post-trip inspections and numerous other tasks that go with a lineworker's craft of infrastructure work.

Regarding the invoices referenced in Confidential Exhibits ACCT-2(CLP-1A 13)(MS24A), through ACCT-2 (CLP-1A-14)(MS24A), Lewis Tree Service's external tree crew contract specifically includes language that allows for up to four hours of billing per crew member for muster time in addition to the travel time. Please refer to OCC-044, Attachment 2, at page 3226, for an example of the language included under "MANPOWER CHARGE SCHEDULE." Considering muster time and stops for fuel, meal breaks, restroom breaks and traffic, the Company determined that the billable hours for mobilization and demobilization were reasonable and appropriate for approval.

Prior Referenced Response:

[i] EOE-130 Question:

(VENDOR TRAVEL) Explain the Company's travel review process for external vendors to include any assumptions for determining whether mobilization/demobilization travel time would be considered reasonable (i.e. in relation to Google/MapQuest estimates), how estimates would be increased by escalation factors, whether the review process differs for different vendors or types of vendors, and whether the Company has performed a study supporting that policy. Additionally, identify if the Company has changed its position outlined within its supplemental response to OCC-041, from Docket No. 25-12-13.

EOE-130 Response:

The Company applies the formula described below to determine whether line and vegetation crews can mobilize, travel and arrive on a timeline to assist productively in restoration. The Company uses a formula to calculate daily travel time capability of a line crew traveling at 60 mph for 10 hours (maximum drive time), or approximately 600 miles per day. Based on the expected duration of the restoration, the Company will procure crews factoring in this travel time when validating invoices. The Company looks at the location of mobilization, the 600 miles per day and any external factors that may come into play to determine what is a reasonable travel time when reviewing and approving invoices. Application of the above formula combined with the overall projected impact of the weather event (i.e. duration of restoration, number of potentially impacted states, availability of local or regional resources) enables the Company to determine, on an event by event basis, what travel time is reasonable. Due to size, refueling and possible weather/traffic delays, actual daily mileage of a bucket truck may differ from 600 miles per day. Google Maps is a useful reference point for determining travel time. However, the accuracy and reliability of Google Maps data is subject to qualification in its terms of use, and therefore it should not be relied upon as the exclusive measure of reasonable travel time. In Docket No. 25-12-13, the Company responded to OCC-041 and associated attachments provided here for reference as EOE130, Attachment 1. Page 2, of OCC-041-SP01, Attachment 1 (which is page 4 of 24 of EOE-130 Attachment 1), is the Google Maps End User Additional Terms of Service ("Google Maps T&Cs"), and states that: "When you use Google Maps map data, traffic, directions, and other content, you may find that actual conditions differ from the map results and content, so exercise your independent judgment and use Google Maps at your own risk." The Google Maps T&Cs further provide that end users of Google Maps must accept the Google Terms of Service, which is attached hereto as OCC-041-SP01, Attachment 2 (which is page 5 of 24, of EOE-130, Attachment 1). Page 13, of OCC-041-SP01, Attachment 2 (which is page 17 of 24, of EOE-130, Attachment 1), presents the following warranty disclaimer:

> TO THE EXTENT ALLOWED BY APPLICABLE LAW, WE PROVIDE OUR SERVICES "AS IS" WITHOUT ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. FOR EXAMPLE, WE DON'T MAKE ANY WARRANTIES ABOUT THE CONTENT OR FEATURES OF THE SERVICES, INCLUDING THEIR ACCURACY, RELIABILITY, AVAILABILITY, OR ABILITY TO MEET YOUR NEEDS. DON'T RELY ON THE SERVICES FOR MEDICAL, LEGAL, FINANCIAL, OR OTHER PROFESSIONAL ADVICE. ANY CONTENT REGARDING THOSE TOPICS IS PROVIDED FOR INFORMATIONAL PURPOSES ONLY AND IS NOT A SUBSTITUTE FOR ADVICE FROM A QUALIFIED PROFESSIONAL.

As the Company has explained in its response to several discovery responses in Docket Nos. 24- 03-30, and 25-12-13, all provided here for ease of reference as EOE-130, Attachment 2 (see, e.g., OCC-031; EOE-501; EOE-517; EOE-536; and EOE-0590), Google Maps and its underlying algorithms do not incorporate vehicle sizes and dimensions, the safe operating speed of contractor vehicles traveling in a convoy, fuel capacity/efficiency, activities that do not include actual driving, such as refueling, safety rest breaks, and meal breaks, and/or different commercial vehicle types (e.g., pick-up trucks, various sized bucket trucks, including diesel models, lifters, pole trailers, diggers/derricks, etc.) in travel time calculations. Each of these factors can affect the actual time it takes for a contractor to arrive at the contractor's designated location in the Company's service territory and, therefore, are appropriate for consideration in the cost validation process. Accordingly, the Company uses the estimated time calculated by Google Maps for car travel as a data point and multiplies that figure by a factor of 1.3 hours to compute a reasonable benchmark for actual travel time. The Company applies the 1.3 hours factor to account for, among other things, the slower speed of fully loaded line trucks that travel as a convoy and make more frequent stops than a conventional sedan vehicle. The Company further evaluates the reasonableness of travel time based on its experience and professional judgment on an

event-by-event basis. These additional layers of analysis are necessary because Google Maps does not account for factors and variables that are known to impact travel time. Thus, Google Maps cannot, and should not, be relied upon as the sole measure of travel time.