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 Responses to EOE-227, and EOE-228, Exhibit ACCT-2 CLP-1, and Confidential Exhibit ACCT-2 CLP-1A-15, pp. 53-54 and 58-59. The Company confirmed that the post storm remediation was not documented through OMS and that "[t]he Eversource Arborist would not have approved the timesheet if they did not direct the crew to use…." Respond to the following:

a. Referring to EOE-227/EOE-228, subsection 'c', explain why all tree related damage is not input within the Company's Outage Management System (OMS) for post-storm remediation.
b. Referring to EOE-227, subsection 'd', provide documentation of the Eversource Arborist "direction" and explain why the Disk Chipper and Chip Truck were specifically necessary for MS24A storm remediation purposes. Additionally, provide the requested "incremental amount associated with this equipment."
c. Referring to EOE-228, subsection 'd', provide the requested "documentation to support the Company's pre-authorization of the additional chainsaw charges and specifically identify the incremental amount associated with this equipment."

Response:

a. The Company's Vegetation Management personnel only utilize the Outage Management System ("OMS") while activated in their respective storm-response roles and do not operate within OMS while conducting and organizing post-storm patrols or while overseeing post-storm remediation tree work. In 2024, the Company Arborists would have conducted and organized post-storm patrols with physical maps. Vegetation Management has since transitioned to an Environmental Systems Research institute ("ESRI") Geographic Information System ("GIS")-based post-storm patrol process in 2026.

b. The signature on the invoice is the documentation that the Company Arborist directed the vendor to utilize the chip truck and disk chipper. The Company Arborists are working in highly dynamic situations involving the physical identification and remediation of storm damage in order to avoid customer outages caused by continuing vegetation impacts. The "tree-by-tree" work of the Company Arborists help to contain isolated outages by eliminating damaged vegetation on a proactive, intensive basis. By necessity, the Company Arborists are delegated to push post-storm vegetation work out to contractors

via written lists, emails, texts or phone calls and work to address issues in an efficient manner.

Reviewing the associated work locations, the Company Arborist may have approved the use of the chipper and chip truck on January 8-9, 2024, and January 11-12, 2024, due to the roadside topography of the properties, limited drop zone areas available, and roadside snow load at the time of mitigation. This would have required storm debris to be placed in the roadway, resulting in a public safety hazard, or introduced risk to the tree crew's safety.

The total incremental amount associated with the disk chipper and chip truck is $1,010.52. Please note that these charges are itemized directly on the invoice. Please refer to Exhibit ACCT-2 (CLP-1A-15)(MS24A), at page 53.

c. Please refer to the response to EOE-231[i], (emphasis added): 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.

Pre-authorization for utilizing a larger chainsaw during storm-response activities is not required as it is an established practice. Requiring pre-authorization would hinder storm restoration activities as the tree crew would not know that a larger chainsaw was needed until they arrived at the outage location and evaluated the situation. If a larger chainsaw was required, the tree crew would need to leave the outage event, drive to a centralized location where chainsaws would be stored, select and inspect the chainsaw, and drive back to the outage event before the tree crew was able to start their job briefing and perform the associated tree work. Pre-authorization to utilize larger chainsaws would not be operationally efficient or beneficial to our customers.

The total incremental amount associated with the larger chainsaws is $80.91. Please note that these charges are itemized directly on the invoice. Please refer to Exhibit ACCT-2 (CLP-1A-15)(MS24A), at page 58.

Prior Referenced Response:

---

[i]EOE-231 Question:

(MS24A-VENDOR-TREE) Refer to Exhibit ACCT-2 CLP-1, and Confidential Exhibits ACCT-2 CLP-1A-15 through CLP-1A-16, Rows 373-376, 393. The Company reported various incremental charges for the Lewis Tree Service Inc vendor. Each of the invoices included billing for extra chainsaws. Identify if the extra chainsaws were pre-authorized by the Eversource arborist and identify the total incremental amounts. If pre-authorization occurred, please provide documentation, along with explanations for why the extra equipment was necessary.

EOE-231 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 associated chainsaw charges were reviewed and approved by the Eversource Arborist through the timesheet approval process, confirming that use of the equipment was appropriate for the work performed.