Date Filed: October 05, 2026

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

Question:

(MS24E) Please refer to Exhibit ACCT-2 (CLP-5A-03) (MS24E), p. 106-108.
Please clarify if this crew performed any work or was on standby for 3 hours on March 11 and 13 hours on March 12.

Response:

The tree crew worked a 16-hour overnight shift on March 11-12, 2024, which was billed as work time. There is no standby designation or rate for tree crews. The crew did not record any ticket locations.