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Witness: Mark P. Baldwin, Clifford G. Williams, Leanne M. Landry and John G. Griffin
Request from: Office of Consumer Counsel

Question:

(MS24E) Please refer to the Response to OCC-714(a). Please explain how the Company verifies the additional amount of time billed but not indicated as worked on the timesheet.

Response:

The premise of this question is suggesting that the lower section of the timesheet ("Work Distribution" section) represents the amount of hours a contractor should be paid, which is incorrect.

Part of the Company's review process is to verify the accuracy and reasonableness of contractor labor charges using the billable hours per day (Timesheet boxes 10, 11, and 12), dates and times of service (Timesheet boxes 2, 6, and 7), crew information (Timesheet boxes 8 and 9), validation from field supervision overseeing the contractors work, and through consultation with supervisory personnel, as necessary. This review process serves as a key control to ensure that contractor invoices are reasonable, supported, and accurately associated with the applicable event.

Boxes 20 through 25, on the timesheet ("Work Distribution") serve as supporting information but are not representative of the total hours the contractors are entitled to be paid. Contractors are paid for their full shift regardless of whether they are working a specific OMS event. Many required work activities are performed outside of specific OMS event times.

For instance, prior to beginning their first job of the day, the crews eat a meal, conduct safety briefings, perform U.S. Department of Transportation mandated pre-trip inspections on their trucks, and restock their trucks as necessary with material needed for their day. This takes time and the crews are methodical because they do not want to get out into the field without the right equipment or materials. The crews start the work shift by driving from their hotel rooms to the job site and depending on the availability of hotel rooms, that can add an additional 30 minutes or more. At the end of their last job of the day, the crews are required to clean up their job site, properly store all equipment and tools, eat a meal after performing physical labor all day in situations where their personal safety is continually at risk and often in unforgiving conditions; and drive back to their hotel rooms, which again, could be 30 minutes or more away from the jobsite. Therefore, intervals of time at the start and end of the work shift and between restoration "events" is an expected and necessary part of the work shift, for which the crews are paid. Within

a work shift, the crews do not get paid differently for different types of work. Therefore, from a field perspective, the start and stop time is the critical datapoint for the timesheet.