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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-717. What did this crew do between 6am and 8am and between 6 pm and 10 pm? To the extent the Company can answer the question, please provide evidence and/or substantiation for how it knows the answer.

Response:

As evidenced by the approved timesheet, these crews were engaged by the Company in restoration efforts from 6:00am until 10:00pm and were paid according to their respective contract.

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.

This crew documented the OMS tickets ranging from 8am to 6pm on their timesheet referred to in OCC-716[i]. When the crew's shift begins, they need to have a safety tailboard and prepare for their first job of the day. Then they head to their first job. When they complete their final ticket of the day, there is still work that needs to be done before they are finished with their shift. This includes cleaning up their worksite, cleaning up their trucks and grabbing a meal. This was also the final day of the storm and the crews are required to perform demobilization activities including the return of unused materials and any other Company property.

Prior Referenced Response:

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[i] OCC-716 Question:

(MS24E) Please refer to Exhibit ACCT-2(CLP-5A-02) (MS24E), p. 155. Box 12 indicates a total work time of 16 hours, but boxes 24, and 25, appear to total a maximum work time of 12 hours.

a. Was this crew on standby from 6 a.m. to 8 a.m.? If yes, please explain why this time was billed as work time and not standby time? If no, please explain what occurred in those two hours and how Eversource is now aware of what occurred.
b. Please explain why the crew ended work at 8 p.m. but billed until 10 p.m.

OCC-716 Response:

a. Based on the Company's review of the specified timesheets, there is no significant missing information within the "Work Distribution" section. The timesheets are not a contemporaneous record of every minute, task, or discrete activity undertaken by a crew in the course of performing its work. Nor is the timesheet the method by which the Company manages the crews or assures that the crew is working how and where the crews are supposed to be. The timesheets are used to document the time worked and general nature of the work performed. Timesheets are typically completed at the end of each workday, with time allotted to the major work assignments completed that day. Given the nature of storm restoration work, it would be impractical and inconsistent with the crews' primary responsibility of safely and efficiently restoring electric service to require personnel to contemporaneously record every minute task or discrete activity performed throughout the workday. The Company manages the crews through the oversight of the employee dispatching the crews and the External Field Resource Coordinator (EFRC), who is physically in the field with the crews, ensuring that the crews are properly engaged and assigned work to restore the system from storm damage. The linemen who are filling out the timesheets are primarily focused on ensuring that their crews are working safely in a dynamic environment that is full of potentially lethal hazards. The EFRC is the Company representative that is responsible for signing the timesheets and have personal knowledge of the work that the crews have performed and the activities the crews have engaged in, particularly in relation to the hours stated in boxes 24 and 25.

   Importantly, the crews are in "working" status for the entire duration of their shift – from start to finish. The Company does not compensate crews based on the specific restoration event to which they are assigned, nor are crews expected to be actively engaged in an "event" every minute of their shift. Time must be allocated at the start and end of each day, as well as between restoration "events," to complete all necessary steps to

ensure safe working conditions in the field. For the Resource Management Teams identifying the jobs and deploying crews and the EFRC, the critical focus is to follow procedures, keep the crews safe, and keep them moving efficiently throughout the working shift. In this context, there is no bright line that separates one event from another and neatly segmenting the day from an "event" perspective – all activities whether in preparation of, or "on the pole," are proper work activities that are undertaken during the work shift and will not be specified on the timesheet.

b. Please refer to subpart (a), above. Further, all contractor crews and non-Connecticut based Company employees working storm restoration in Connecticut are required to be lodged in hotel rooms. 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 trucks as necessary with material needed for their day. This takes time and the crews are methodical because they don't 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 the last job of the day, the crews are required to clean up the job site, properly store all equipment and tools, eat a meal after performing physical labor all day in situations where the personal safety is continually at risk and often in unforgiving conditions; and drive back to the 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 data point for the timesheet.