Date Filed: September 24, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Office of Consumer Counsel

Question:

Temporary Help. Refer to the response to OCC-359, Attachment 1.

a. Explain why the Rate Year amount should be inflated if the Company is requesting recovery of 41 new positions.
b. Explain why the company applied inflation in deriving the Rate Year amount since the costs declined each year from 2021-2025.

Response:

Part (a) and (b)

The response to OCC-359[i] relates to short-term temporary staffing hired through staffing agencies, whereas the 41 new positions correspond to the full-time equivalent employees included in the Company's payroll expense. Please refer to the Company's response to OCC-333[ii] for a discussion on the new positions requested in this application. The Rate Year temporary staffing expense is escalated by the GDP-PI as a proxy for a representative level of expense into the Rate Year as ongoing temporary staffing is expected in the Rate Year and general wages for such temporary staffing are expected to increase for cost of living adjustments.

Prior Referenced Responses:

[i] OCC-359 Question:

Temporary Help. Provide the amount of temporary help expense (direct and allocated) for each of the years 2021, 2022, 2023, 2024, 2025 and the amount included in Rate Year. The information requested is for the temporary help expenses incurred by the company to supplement its employee workforce, rather than services it always retains contractors for (e.g., janitorial, landscaping, etc.)

OCC-359 Response:

The Company interprets "Temporary Help" to mean short-term temporary staffing hired through staffing agencies. During the period requested, the Company had two outside vendor companies that acted as staffing agencies, Randstad and Allegis Global Solutions. Please refer to OCC-359, Attachment 1, for the temporary staffing expense for each year 2021 through 2025 and the Rate Year.

[ii] OCC-333 Question:

Payroll. For each of the new positions that the Company is requesting recovery of in the Rate Year, state whether the hiring of the positions are conditioned on their approval in this case.

OCC-333 Response:

The Company is providing an update for the Full Time Equivalent ("FTE") counts included in the request for recovery in the Rate Year in this response as OCC-333, Attachment 1 (note that this is an update of Exhibit CLP-REVREQ-2, Work Paper C-3.5, page 3). The Company will update the payroll expense and other affected costs as part of its next cost of service update.

The number of FTEs included in the original filing was fifty-eight (58). This number was a preliminary number and included FTEs contemplated in the Advancing the Grid plan that is above and beyond the Targeted System Plan ("TSP") requested for review and approval in this application. The updated number of incremental FTEs to be included in the Rate Year of the Company's cost of service is forty-one (41).

Included in the forty-one (41) full-time positions are twenty-one (21) in Vegetation Management, five (5) Power Quality positions, two (2) in Distribution Planning & Forecasting and one (1) Asset Health, these are contingent on PURA's approval in this case. In addition, for Grid Modernization there are seven (7) for Control Room Operations, three (3) for Data Innovation, and two (2) for Field Communications that the Company will consider hiring based on business needs and changing requirements as necessary, but most likely not all requested.

The Vegetation Management positions allow the Company the opportunity to improve the system's reliability and improve cost-efficiency by transitioning more work in-house to restructure vegetation management performance for the benefit of our customers. While the twenty-one (21) Vegetation Management positions appear to be incremental, in reality there is only 1 incremental resource. Of the twenty-one (21), eight (8) of the FTEs are the result of 16 employees who currently split their time 50%/50% between O&M and capital work shifting to solely working on the proposed combined O&M program, if approved, results in the equivalent of 8 incremental employees working on the O&M program; twelve (12) resources would be converted from contracted resources to internal resources of which the Company's proposed vegetation management expenses in Exhibit CLP-REVREQ-2, Work Paper C-3.31 reflect the reduction in outside contractor services; and one (1) resource would be truly incremental.

The Grid Modernization positions are needed to support large-scale distributed energy resource ("DER") integration and clean-energy advancement; develop and deploy advanced tools and analytics for integrated distribution system planning and grid modernization; and drive increased innovation and application of GenAI, LLM and machine learning capabilities.

The Company is also providing as OCC-333, Attachment 2, which is a corrected Exhibit CLP-TSP-3, page 43 of 149 that has been updated with the corrected number of FTEs in the parenthesis in the text boxes on the right.