Date Filed: September 25, 2026

Witness: Christopher E. Colorio, Mark P. Baldwin, John G. Griffin and Leanne M. Landry
Request from: Office of Education, Outreach, and Enforcement

Question:

(MS24A-VENDOR-OTHER) Refer to Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-17, p. 68. The Company reported an incremental charge of $75 for the Michael Bryggare vendor for photography services. Explain why photography services were a necessary incremental storm cost.

Response:

Please refer to Refer to Exhibit ACCT-2 CLP-1 (MS24A), Outside Contractors-Vendors, line 455, vendor Michael Bryggare, invoice totaling in the amount of $75. The Company's use of external photography and content-gathering services during major storm events is necessary to support essential storm response, stakeholder communications, and post-event evaluation functions while preserving internal resources for restoration-related activities. During significant storm events, Company personnel are principally dedicated to critical operational responsibilities, including damage assessment, outage restoration, system operations, public safety coordination, customer communications, and incident management. Reassigning these personnel to photography and content-collection duties would reduce the resources available to perform restoration activities and could adversely impact the efficiency of the Company's response efforts.

Although the Company has enhanced its internal capabilities by training employees with photography experience and utilizing available personnel when practicable, the scale, geographic scope, and resource demands associated with major storm events frequently exceed the capacity of internal resources alone. The use of external photographers provides additional coverage and flexibility, enabling the Company to document conditions across multiple locations simultaneously without diverting personnel from restoration and emergency response functions.
The photographic documentation obtained through these services serves a legitimate business purpose and is an integral component of the Company's storm response process. The photographs provide contemporaneous visual records of storm conditions, infrastructure damage, field operations, and restoration activities. These records support the Company's communications with customers, municipalities, state and local officials, news media, and other stakeholders by providing accurate and timely information regarding storm impacts and restoration challenges. Such documentation also assists in managing customer expectations, particularly in heavily impacted areas where visual evidence of damage conditions helps explain restoration timelines and operational constraints.

Additionally, the photographic records are utilized for post-event analysis, lessons-learned reviews, emergency preparedness assessments, and the evaluation of restoration practices. Maintaining comprehensive documentation of storm impacts and response activities supports the Company's continuous improvement efforts and enhances its ability to assess the effectiveness of restoration strategies following major events.

Accordingly, the Company's limited use of external photography services during major storm events represents a reasonable and prudent business practice. The engagement of these resources supplements internal capabilities, ensures adequate documentation of storm-related conditions and response efforts, and allows Company personnel to remain focused on their primary responsibility of safely and efficiently restoring electric service to customers.