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**Witness: John P. Dipaola-Tromba, Sean D. Redding, Jenna M. Turner, John G. Griffin and Leanne M. Landry**
**Request from: Office of Education, Outreach, and Enforcement**

**Question:**

(MS24A-VENDOR-TREE-TRAVEL) Refer to Exhibit ACCT-2 CLP-1 (rows 159-176 and 178-187), and Confidential Exhibits ACCT-2 CLP-1A-2, through CLP-1A-6. The Company reported 28 incremental charges in the combined amount of $982,455 for the Asplundh Tree Expert Co. Each of the charges primarily applied to travel (i.e., mobilization and demobilization) between Connecticut and North Carolina, Kentucky, New Jersey, Virginia, Maryland, or Ohio. Provide an unlocked Excel spreadsheet analyzing the total billable travel hours (i.e., both labor and equipment) for each invoice based on the billed travel time versus the estimated travel time, as included within the supporting documentation (see e.g., Exhibit CLP- 1A-2, p. 156). To the extent that the billed travel hours were in excess of 1.3 times the estimated hours, please provide any contemporaneous documentation that supports the evaluation and approval of the excess billed hours, as well as an estimated cost impact of the excess costs. To assist with this request, EOE offers the following visual but is amenable to other included information.

| Line | Amount | Activity (Mob/Demob) | Starting Location | Ending Location | Crew Size | Est. Travel Hours | Est. Travel Hours x1.3 | Travel Hours Billed | Excess Hours | Excess Costs (labor/equip) |
|---|---|---|---|---|---|---|---|---|---|---|
| 159 | | | | | | | | | | |
| 160 | | | | | | | | | | |

**Response:**

Please refer to the Company's response to EOE-130[i], which explains that Google Maps and its underlying algorithms do not incorporate vehicle sizes and dimensions, the safe operating speed of contractor vehicles traveling in a convoy, fuel capacity/efficiency, activities that do not include actual driving, such as refueling, safety rest breaks, and meal breaks, and/or different commercial vehicle types (e.g., pick-up trucks, various sized bucket trucks, including diesel models, etc.) in travel time calculations. The aforementioned factors and variables are known to impact travel time. The maps are provided as a reference to substantiate the miles and travel time billed and are compiled during the invoice creation process and do not reflect weather/traffic-related delays during the actual mobilization and demobilization process. The associated mobilization and demobilization time was completed during a significant winter storm and travel conditions were poor including heavy, wet snow during mobilization, along with heavy rain and wind during demobilization, which impacted the travel time further.

EOE is requesting a compilation of disparate data that is available to EOE, in the invoices and associated timesheets that pertain to Tree Crew for the MS24A event. The Company's regulatory requirement is to utilize the timesheets to document the hours worked by each crew, for each vendor, in order to support payment to that vendor. Accordingly, the Company's processes are constructed to obtain and use those records for validating payment, subject to review and sign off by Eversource Arborist, who has contemporaneous knowledge of the work performed. The Company's financial systems do not record invoiced amounts by data field, for each data point included on the invoices or the associated timesheets. Therefore, extracting and compiling this information from the timesheets in the manner sought by EOE, would require extensive manual efforts that can be performed by EOE or EOE's consultant, if Information in that format assists EOE in putting forth its case.

**Prior Referenced Response:**

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[i] EOE-130 Question:

(VENDOR TRAVEL) Explain the Company's travel review process for external vendors to include any assumptions for determining whether mobilization/demobilization travel time would be considered reasonable (i.e. in relation to Google/MapQuest estimates), how estimates would be increased by escalation factors, whether the review process differs for different vendors or types of vendors, and whether the Company has performed a study supporting that policy. Additionally, identify if the Company has changed its position outlined within its supplemental response to OCC-41, from Docket No. 25-12-13.

EOE-130 Response:

The Company applies the formula described below to determine whether line and vegetation crews can mobilize, travel and arrive on a timeline to assist productively in restoration.

The Company uses a formula to calculate daily travel time capability of a line crew traveling at 60 mph for 10 hours (maximum drive time), or approximately 600 miles per day. Based on the expected duration of the restoration, the Company will procure crews factoring in this travel time when validating invoices. The Company looks at the location of mobilization, the 600 miles per day and any external factors that may come into play to determine what is a reasonable travel time when reviewing and approving invoices.

Application of the above formula combined with the overall projected impact of the weather event (i.e. duration of restoration, number of potentially impacted states, availability of local or regional resources) enables the Company to determine, on an event by event basis, what travel time is reasonable. Due to size, refueling and possible weather/traffic delays, actual daily mileage of a bucket truck may differ from 600 miles per day.

Google Maps is a useful reference point for determining travel time. However, the accuracy and reliability of Google Maps data is subject to qualification in its terms of use, and therefore it should not be relied upon as the exclusive measure of reasonable travel time. In Docket No. 25-12-13, the Company responded to OCC-041 and associated attachments provided here for reference as EOE-130, Attachment 1. Page 2 of OCC-041-SP01, Attachment 1 (which is page 4 of 24 of EOE-130 Attachment 1), is the Google Maps End User Additional Terms of Service ("Google Maps

T&Cs"), and states that: "When you use Google Maps map data, traffic, directions, and other content, you may find that actual conditions differ from the map results and content, so exercise your independent judgment and use Google Maps at your own risk." The Google Maps T&Cs further provide that end users of Google Maps must accept the Google Terms of Service, which is attached hereto as OCC-041-SP01, Attachment 2 (which is page 5 of 24 of EOE-130 Attachment 1). Page 13 of OCC-041-SP01, Attachment 2 (which is page 17 of 24 of EOE-130 Attachment 1), presents the following warranty disclaimer:

> TO THE EXTENT ALLOWED BY APPLICABLE LAW, WE PROVIDE OUR SERVICES "AS IS" WITHOUT ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. FOR EXAMPLE, WE DON'T MAKE ANY WARRANTIES ABOUT THE CONTENT OR FEATURES OF THE SERVICES, INCLUDING THEIR ACCURACY, RELIABILITY, AVAILABILITY, OR ABILITY TO MEET YOUR NEEDS.
>
> DON'T RELY ON THE SERVICES FOR MEDICAL, LEGAL, FINANCIAL, OR OTHER PROFESSIONAL ADVICE. ANY CONTENT REGARDING THOSE TOPICS IS PROVIDED FOR INFORMATIONAL PURPOSES ONLY AND IS NOT A SUBSTITUTE FOR ADVICE FROM A QUALIFIED PROFESSIONAL.

As the Company has explained in its response to several discovery responses in Docket Nos. 24-03-30, and 25-12-13, all provided here for ease of reference as EOE-130, Attachment 2 (see, e.g., OCC-031; EOE-501; EOE-517; EOE-536; and EOE-0590), Google Maps and its underlying algorithms do not incorporate vehicle sizes and dimensions, the safe operating speed of contractor vehicles traveling in a convoy, fuel capacity/efficiency, activities that do not include actual driving, such as refueling, safety rest breaks, and meal breaks, and/or different commercial vehicle types (e.g., pick-up trucks, various sized bucket trucks, including diesel models, lifters, pole trailers, diggers/derricks, etc.) in travel time calculations. Each of these factors can affect the actual time it takes for a contractor to arrive at the contractor's designated location in the Company's service territory and, therefore, are appropriate for consideration in the cost validation process. Accordingly, the Company uses the estimated time calculated by Google Maps for car travel as a data point and multiplies that figure by a factor of 1.3 hours to compute a reasonable benchmark for actual travel time. The Company applies the 1.3 hours factor to account for, among other things, the slower speed of fully loaded line trucks that travel as a convoy and make more frequent stops than a conventional sedan vehicle. The Company further evaluates the reasonableness of travel time based on its experience and professional judgment on an event-by-event basis. These additional layers of analysis are necessary because Google Maps does not account for factors and variables that are known to impact travel time. Thus, Google Maps cannot, and should not, be relied upon as the sole measure of travel time.