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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) Refer to Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-20, pp. 1-34. The Company reported 11 incremental charges for a total of $35,510 for the Tennett Tree Service Inc vendor. Respond to the following:

a. Ten of the eleven invoices included extra charges for atypical equipment, including additional saws, chippers, chip trucks, and a crane. Please identify the total incremental amount associated with this equipment. Additionally, provide documentation to support the Company's pre-authorization of these costs.
b. Three of the invoices include services performed on January 12, 2024 (i.e., rows 520, 527, 528). Provide documentation to support the applicability of the services performed on January 12 to the MS24A event.
c. One invoice included a miscellaneous charge of $300 that appears to have been supported by illegible documents (i.e., row 528, supported by p. 31). Provide a legible version of the documentation included on p. 31 and explain what the $300 miscellaneous charge represents and how those charges were necessary for storm recovery purposes.

Response:

a. The additional equipment charges were incurred for storm-response tree work involving storm-damaged trees and conditions that required equipment beyond a standard tree crew configuration. During storm restoration, larger chainsaws are permitted and may be billed so that crews have the appropriate equipment available when needed. Because storm work is unscheduled and crews do not know in advance the size, condition, or complexity of the trees they will encounter, it is necessary for crews to maintain access to larger saws capable of safely addressing large-diameter trees.

   Similarly, Company arborists may approve the use of chippers, additional chip trucks, cranes, or other equipment when site conditions warrant their use for safety, operational efficiency, or restoration purposes. For example, chippers may be necessary where debris accumulation would create safety hazards, obstruct traffic, or impede access to electric facilities. Cranes may be required to safely remove storm-damaged trees or large tree sections that are broken, suspended, leaning precariously, or entangled with other trees or structures, where conventional removal methods would present an increased risk to

workers, the public, or nearby property. The need for such equipment is evaluated in the field by the supervising Company arborist, and the arborist's approval and sign-off on the associated work serves as documentation supporting authorization of these storm-related costs.

The total incremental amount associated with saws, chippers, chip trucks, and a crane was $3,844.91.

b. The tree work performed on January 12, 2024, was associated with the MS24A event and involved the remediation of trees or tree parts damaged by that storm. Storm-related tree work commonly extends beyond the initial impact date and electric restoration date as tree crews continue removing storm damaged trees and branches that were structurally compromised due to the storm event. Customers and tree wardens may call to report storm damaged trees days and weeks after the initial storm event. The Company's verification that the work was attributable to MS24A is based on the Company arborist's oversight of the work and approval of the associated contractor timesheets and invoices.

c. The $300 miscellaneous charge represents wood disposal and log removal services necessary to support storm restoration activities. While debris is left on-site for most storm-related calls, certain conditions require removal when leaving logs would create a public safety hazard or obstruct roadway access. During storm response, log trucks may be used to remove large trunk sections and, when necessary, safely support unstable tree sections with their grapples where no safe drop zone exists. In areas with limited shoulder space or other site constraints, immediate removal of logs helps safely clear roadways and maintain restoration progress. Log trucks also improve restoration efficiency by removing large trunk sections that would otherwise require significant time for ground crews to cut, move, and secure manually. The use of these services was approved through the Company's storm restoration oversight process and was necessary to facilitate roadway clearing and the safe restoration of electric service. The Company will supplement with a more legible copy of the documentation if one can be located.