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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 Response to EOE-193, subsection 'a'. The initial interrogatory requested the Company to "provide emails or other correspondence obtained during the initial review to support the hours billed. Additionally, identify the total incremental costs for the hours billed in excess of the estimated travel." Respond to the following:

a. Confirm that the Company does not have emails or other correspondence obtained during the initial review to support the hours billed. If not confirmed, provide the requested documentation.
b. Provide an unlocked Excel spreadsheet calculating the hours and corresponding costs billed in excess of the estimated travel. As referenced within the Company's response to EOE-130, the analysis should include the Company's 1.3 hour factor used to compute the assumed benchmark.

Response:

As referenced in the Company's response to EOE-130[i] (emphasis added): "*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.*" The 1.3 hours factor does not account for the impact of severe weather on travel time; rather, the factor of 1.3 hours to compute a reasonable benchmark for actual travel time during normal travel conditions.

The associated travel time, and the factors addressed in the Company's response to EOE-130, is a component of the mobilization and demobilization process; however, mobilization and demobilization also include "muster time". Muster time is a broad, general term that includes crew preparation, pre-trip safety briefings, and DOT pre-trip and post-trip inspections, among other factors.

In reference to Confidential Exhibit ACCT-2 (CLP-1A-2)(MS24A), pages 104-142, the Asplundh Tree crews in question traveled through periods of heavy, wet snow, and heavy rainfall and high winds throughout the duration of their travel on January 9, 2024. During travel, particularly in hazardous weather conditions, communication is not conducted in a documentable manner. Vendor supervision will typically call with updates on their travel progress if it is safe to do so while traveling. They do not send emails during this period of time and, therefore, that documentation is not available to provide.

Considering muster time and stops for fuel, meal breaks, restroom breaks, traffic, and weather, the Company determined the billable hours for mobilization and demobilization were reasonable and approved them.

All of the requested data is available to EOE in the invoices and associated timesheets that pertain to Tree Crew vendors for the MS24A event. 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.