Date Filed: October 27, 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-TRAFFIC) Refer to Response to EOE-253. Clarify the Company's response to subsections 'd' and 'e'. Specifically, subsection 'd' inquired "why services were billed for five hours when the documentation details services for the hours of 0800-1000, or a total of two hours." The Company's response cited Confidential Exhibit ACCT-2 CLP-1A-20, p. 40 for justification of an additional hour that would be charged, not three hours. Additionally, subsection 'e' referenced that the services were cancelled. Respond to the following:

a. Explain how the Company derived four hours when the timesheet and invoice both detailed the hours of 0800-1000, or a total of two hours.
b. Explain if any of the originally scheduled services were performed or if all services were cancelled for January 9, 2024. If all services were cancelled, explain why the Company would be billed for travel when travel did not occur. If certain services were performed prior to cancellation, explain why all costs were charged to the MS24A event.
c. Explain why the Company was unable to cancel the traffic control request within the 24-hour period that would have prevented a cancellation charge.

Response:

a. The Company derived the four-hour charge from the Ellington Resident State Trooper's *"Procedure/Agreement for Hiring Ellington Town Police Officers for Traffic Control at Highway Construction Sites/Special Events,"* referenced in Confidential Exhibit ACCT-2 CLP-1A-20, at page 40. Specifically, the document provides for a minimum call-out of four hours per event and states that "hours should be paid in increments of four hours regardless of the actual hours worked." Accordingly, the Company incurred and paid the charges based on the required four-hour minimum. Travel time is separate from, and not included within, the four-hour minimum charge.

b. All services were canceled on January 9, 2024, due to the anticipated storm event later that evening. It is common practice for police traffic control personnel to report directly to the job site rather than remain at their agency location. Accordingly, travel is incurred for each event for which services are requested. While the Company makes every effort to cancel such services within the required notice period to avoid incurring charges, that was not possible under these circumstances. As the Company was rapidly reallocating resources

in preparation for the incoming storm event, the traffic control services were canceled after the applicable cancellation deadline, resulting in the associated charges being incurred.

c. To avoid cancellation charges, the Company would have been required to cancel the services by 7:00 a.m. on January 8, 2024, in accordance with the applicable 24-hour cancellation requirement. At that time, plans for the anticipated storm event had not yet been finalized, and the Company could not reasonably determine whether the services would still be necessary. Accordingly, the services were not canceled until January 9, 2024. As the Company's priority shifted to preparations for the anticipated storm event, planned work scheduled for that day was deferred, resulting in the cancellation of the traffic control services after the applicable notice period and the associated charges being incurred.