STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

October 13, 2026
Docket No. 26-05-10

Re: Docket No. 26-05-10 - Application of CL&P dba Eversource Energy to Amend its Rate Schedules

Enclosed are interrogatories **EOE-377 through EOE-418** directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or "Company"). The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) Office of Education, Outreach, and Enforcement (EOE) in connection with the above referenced docket, and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **4pm on October 27, 2026**. If a response to any of the requested information has already been filed in response to another interrogatory response in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

EOE requests that all interrogatory responses be included in the same document, rather than responses to each interrogatory being filed as individual documents.

Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to Electronic Filing on the Authority's website for more information. **Paper filings will be accepted only if a person is unable to file electronically. The Authority reserves the right to request paper copies of certain filings at a later date.** No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by email using the following directions: confidential material must be emailed directly to **Jeff.Gaudiosi@ct.gov** in an email with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed publicly.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. § 1-200 et. seq. In those

exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion, a proposed protective order and nondisclosure agreement must be appended to the Motion. The Authority will rule on the Motion forthwith, and give further direction as necessary. Contact the Authority's Executive Secretary at (860) 827-1553 with questions regarding making a confidential filing.

The current service list for this docket is available on the Authority's website located at www.dpuc.state.ct.us/DPUCservlist.html.

Sincerely,

By: /s/*Britany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement

Enclosure
cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Sincerely,

By: /s/*Britany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement

The following Interrogatories, designated as EOE-377 through EOE-418, are directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or "Company").

EOE-377. (CUSTOMER CALLS) Refer to the call labeled CL&P_2_7_25_Hour 1_Call 1 submitted in response to EOE-1.

a. The customer mentions a previous call with the Company in relation to a $1,000 payment. Provide a copy of this call.
b. The customer claimed that the Company withdrew $1,000 from their account without the customer's approval which was subsequently returned due to insufficient funds. Please explain the situation which the customer was referring to, including but not the automatic payment status of the account at the time and the automatic payment status of the account currently.

EOE-378. (CUSTOMER CALLS) Refer to the call labeled CL&P_2_7_25_Hour 10_Call 1 submitted in response to EOE-1.

a. The CSR informed the customer that their FPA down payment would be $35, after the customer informed the CSR that their intention was to pay $200 towards their past due balance. Please explain if customers may pay more than the minimum FPA down payment. If they are, did the CSR in this call act in a manner consistent with the Company's policy? Explain why or why not.
b. The CSR stated, "you're not able to make any payments on the payment arrangement until March 10th." Are customers able to make payments towards their past due balance prior to their first FPA monthly required payment due date?
c. How did the CSR calculate the $35 down payment? Was $35 the lowest down payment amount available to the customer?
d. If a customer pays off their past due balance before the end of their FPA term, are they removed from the FPA, or must the customer proactively remove themselves?
e. The CSR states that the total balance for this account was $519.64 with an amount of $312.47 to avoid termination. Would the $200 initially offered by the customer have been enough to avoid termination pursuant to General Statutes §16-262d(f) and Conn. Agencies Regs. § 16-3-100(d)(4)? If yes, should the CSR have informed the customer of that other option? Explain why or why not and provide all related policies, procedures, and scripts.

EOE-379. (CUSTOMER CALLS) Refer to the call labeled CL&P_2_7_25_Hour 10_Call 1 submitted in response to EOE-1. Are CSRs required to inform customers that they may have an arrearage at the end of their 18-month

FPA term based on their usage during that time? Explain why or why not and provide all related policies, procedures, and scripts.

EOE-380. (ELECTRIC SYSTEM IMPROVEMENTS-ESI) Refer to Responses EOE-064 and EOE-158. Provide a discussion of the ESI's history, to include detail on the permitted capital funding levels by year, the requirements for annual submissions, the timing of changes to revenue requirements, how excess capital funding is handled, and other relevant information. Additionally, identify any changes to the ESI that resulted from subsequent dockets or settlement agreements.

EOE-381. (EARNINGS SHARING MECHANISM-ESM) Discuss the method or methods used by the Company to calculate the ESM results (e.g., cost of capital method) and explain how the Company accounts for estimated activity, including revenue that would be subject to annual true-up within the RAM dockets.

EOE-382. (EARNINGS SHARING MECHANISM-ESM) Identify if there are any non-regulated costs included within the ESM calculation to include, but not be limited to, charitable contributions, lobbying costs, and amortization of goodwill. If non-regulated costs are included, identify each of the cost categories, the amounts for each year 2020-2025, and explain why the costs are included.

EOE-383. (STORM VEGETATION REMOVAL) Provide copies of all policies, procedures, guidance, statutes, or regulations, that details the Company's obligations for the removal of vegetation caused by a storm event. As part of the response, identify if the Company is permitted to perform vegetation removal and then bill the costs to the property owner or municipality.

EOE-384. (STORM-EXTERNAL VENDORS) Refer to Response to EOE-176. The Company identified that "[t]he contract currently allows for two hours pre/post mob/de-mob to complete activities related to travel, which include but are not limited to safety briefings, meals, and hotel room assignments." The Company further provided an excerpt from the "current" Exhibit C Pricing Schedule which referenced an applicable Rate. Respond to the following:

a. Identify the specific dates for which the "current Exhibit C Pricing Schedule" was included within the various external vendor contracts. To the extent that the schedule was updated for vendors for storm events included in the current docket, provide a listing of the applicable vendors and identify the corresponding effective dates.
b. Identify if the pricing schedules have also been modified to define specific rates that are applicable to the "Travel Pre/Post" activity.

c. Explain why de-mobilization would require an additional two hours of billable treatment for "safety training/site or storm specific trainings or briefings and hotel assignments".
d. Provide a complete copy of the "current Exhibit C Pricing Schedule" template.

EOE-385. (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.

EOE-386. (MS24A-VENDOR-FOOD/LODGING) Refer to Response to EOE-219. The Company's response identified that it "did not require rooms and meals" for January 22, 2024 (i.e., for the HT-Exit 88 Hotel TRS LLC vendor, aka Marriott Mystic) and that a "cancellation notification was sent via email on Wednesday, January 10, 2024, at 2:19pm." Respond to the following:

a. Provide a copy of the contract with the Marriott Mystic.
b. Identify the minimum amount of notice that would have prevented a cancellation charge and cite the applicable provisions within the contract. As part of the response, please identify if there are different notice requirements for meals versus lodging.
c. Identify the breakdown in costs for rooms (i.e., the evening of January 11, 2024) and meals (i.e., breakfast, lunch, and dinner for both January 11, 2024, and January 12, 2024).
d. Identify any efforts that the Company performed to donate the unused meals to charitable organizations. If no efforts were performed, explain why.

EOE-387. (MS24A-VENDOR-FOOD) Refer to Response to EOE-235. Respond to the following:

a. Identify the total cost of meals that were paid and not used.
b. Provide a copy of the January 8, 2024, email confirming that meals "could not be cancelled."
c. Identify any efforts that the Company performed to donate the unused meals to charitable organizations. If no efforts were made, explain why.

EOE-388. (MS24A-VENDOR-TREE) Refer to Response to EOE-231. The interrogatory requested for the Company to "[i]dentify if the extra chainsaws were pre-authorized by the Eversource arborist and identify the total incremental amounts. If pre-authorization occurred, please provide documentation, along with explanations for why the extra equipment was necessary." Respond to the following:

a. Identify if pre-authorization occurred and, if so, provide supporting documentation of the pre-authorization.
b. Identify the incremental amounts charged.

EOE-389. (LINE CREW EMERGENCY RESPONSE AGREEMENTS) Refer to Response to EOE-174. The Company's response clarified that the "*Master Service Agreements do not include the provision stated in the question of 'standby rates apply to labor resources only.' This standby language is included in the Line Crew Emergency Response agreements.*" Respond to the following:

a. Explain the difference between the Master Service Agreements and the Line Crew Emergency Response agreements.
b. Provide a copy of every template Line Crew Emergency Response agreement utilized by the Company since 2018, indicating the period of time each template was utilized. Identify all "template" changes made to the Line Crew Emergency Response agreement since 2018, along with the respective dates of the changes.
c. Provide a listing of all vendors subject to the Line Crew Emergency Response agreements and, if applicable, including the specific version of the template that they are subject to. As part of the response, cite the documents in the record.

EOE-390. (MS24A-VENDOR-LINE) Refer to Response to EOE-188. The Company's response to EOE-188 (and other INT responses), subsection 'b' states "*Contractually when contractor crews are directed to be on shift and ready to receive work, they are automatically on 'Work Time' rates, regardless of when they receive their first assignment.*" Cite the contract provisions that define this billing treatment. Additionally, please reconcile the Company's

response to the ERSG-Contractor Obligations-Instructions provided at EOE-173, Att.1, p. 27, which states "*3. Per the contract: b. All crews on standby until they receive the first ticket.*"

EOE-391. (MUTUAL AID) Refer to Responses to EOE-038 and EOE-186. In reference to EOE-038, Att.3, respond to the following:

a. Provide a breakdown of the Labor Benefits & Non-Productive Time costs (i.e., $492,233.44) split between Straight Time and Over-Time.
b. Discuss the specific activities or expenses that comprise the $331,638.85 Contractor Charges referenced.
c. Discuss the specific activities or expenses that comprise the $135,287.58 Mutual Aid – Administrative Fee referenced.

EOE-392. (STORM INTERNAL CONTROLS) Refer to Response to EOE-184 and Exhibit CLP-STORM-1, pp. 94-103. Identify and discuss the Company's internal controls performed in support of the Rate Case submission for storm related expenses. Specifically, discuss how the Company accumulated the costs and verified the accuracy of supporting documentation. This inquiry differs from the Company's PFT included within Ex. CLP-STORM-1 in that it is looking to understand the controls applicable to the Company's storm data aggregation (i.e., a different set of controls).

EOE-393. (STORM FLEET) Refer to Responses to EOE-177 and EOE-178. Provide an unlocked Excel spreadsheet calculating the breakdown of the Storm Fleet costs split between Connecticut, Massachusetts, and New Hampshire. As part of the request, provide calculations using actual information wherever possible (e.g., depreciation expense on actual vehicles per state) and discuss any assumptions necessary for costs that cannot be attributed to a given location.

EOE-394. (STORM FLEET) Refer to Response to EOE-177, Att.1. Respond to the following:

a. Explain why the number of storm fleet vehicles has decreased for each state and explain if the Company is expected to sustain the decreases.
b. Referring to the MN26C011 event (i.e., Excel row 103), identify the ES Electric vendor. If this entity is indicative of the Company, explain why it was necessary for the Company to utilize the Storm Fleet and explain how this usage aligns to the Company's response to EOE-031.

EOE-395. (STORM FLEET-DEPRECIATION/RATE OF RETURN) Refer to Response to EOE-178, Att.1. Provide an unlocked Excel spreadsheet demonstrating the calculations supporting the Service Company Depreciation and Rate of Return amounts reported within the Storm Fleet Clearing by CE-2025 tab.

As part of the response, identify all inputs and assumptions and provide citations, where possible. Additionally, identify any changes to the Company's calculation approaches for 2024 or 2025.

EOE-396. (STORM FLEET-EXPENSES) Refer to Response to EOE-178, Att.1. Provide documentation supporting the following sampled expenses reported within the Vendor Inv#-2025 tab. As part of the response, provide explanations detailing the nature of the expenses and invoices or other relevant documentation.

a. Row 213; Altec Industries Inc; $18,710.56
b. Row 358; Altec Industries Inc; $12,572.83
c. Row 714; LDV Inc; $76,463.33
d. Row 725; Maximos Construction; $11,910.53
e. Row 942; Mirabelli Automotive LLC; $17,347.95
f. Row 951; Stuart C Irby Co; $33,041.38
g. Row 965; (blank); $232,106.98
h. Row 991; Global Rental Company Inc; $4,781.25

EOE-397. (WIRE GUARDS/COMP BID) Refer to Response to EOE-182. The Company was requested to provide competitive bid assessments that were relevant for the years 2024-2025. In response, the Company provided a one-page summary of results that appears to be applicable to Connecticut, Massachusetts, and New Hampshire. Please supplement the response with specific details on each vendor's location(s) and the corresponding bid cost structure. Additionally, explain how each of the scores were derived and how the scores account for incremental costs that would result from travel from their respective locations to Connecticut. If an assessment of the incremental costs associated with travel did not occur, explain why.

EOE-398. (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.

EOE-399. (EXHIBIT B PRICING SCHEDULE) Refer to Response to EOE-209, Att.1. Provide a complete listing of vendors subject to the referenced Exhibit B document and identify the specific dates in which the Exhibit B documents became effective within each vendor's contract. Specifically, the Exhibit B documents referenced are those which permit equipment to be billed at 50% during standby. Additionally, cite the location of each respective Exhibit B or provide the corresponding executed documents.

EOE-400. (MS24A-VENDOR-LINE) Refer to Response to EOE-188. The Company's response to EOE-188, subsection 'c' states "*Asplundh is a COC contractor. Per the provisions in their contract equipment -- while on standby -- is permitted to be charged at 50%.*" Cite the contract provisions included within the record that define this billing treatment as of January 2024. If not included, please provide a copy of the executed Schedule.

EOE-401. (MS24A-VENDOR-LINE) Refer to Responses to EOE-206, EOE-209, EOE-216, EOE-237, and EOE-244. The Company provided the E-J Electric T&D LLC, Elecnor Hawkeye LLC, Harlan Electric Company, Inc, McPhee Electric LTD, and Riggs Distler & Company Inc's contractual Exhibit B Pricing Schedules that were inadvertently omitted. Respond to the following:

a. Referring to each Att.1 Redacted, provide documentation demonstrating the timing and approval of each pricing schedule for each of the respective vendors. Additionally, identify the specific date(s) for which the pricing schedules became effective and provide documentation of the execution.

b. Referring to Att.1 Redacted, Section 4.4(e) details that the Contractor shall reimburse the Company for any provided fuel costs. Explain how the Company accounts for the fuel reimbursement process. As part of the response, provide documentation supporting the Company's process and administration of fuel reimbursements and identify how these costs were removed from the storm recovery balances.

EOE-402. (MS24A-VENDOR-TREE) Refer to Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-15, pp. 116-118 and Response to EOE-229. EOE's initial interrogatory incorrectly cited pp. 119-121 in lieu of pp. 116-118. Referring to pp. 116-118, please explain how the vendor was permitted to bill for nine hours on January 12, 2024, when they recorded work hours between 7am and 3pm (total of eight hours). To the extent that additional hour related to travel to the crew's "reporting or parking location," provide documentation to support this position and explain why the time reporting was inconsistent for the remaining days. As part of the response, please identify the impact of billing an extra hour (OT) for each employee.

EOE-403. (MS24A-P-CARDS) Refer to Response to EOE-260. In support of selection 'b', the Company provided two identical submissions (Att.1 Redacted and Att.2 Redacted), inclusive of the receipts for the same date and with the same payment ID (p. 7). Identify if the selection was duplicated. If not duplicated, provide the omitted receipt for the second $3,729 charge. As part of the response, please also provide a copy of the p-card statement showing two charges of the same amount.

EOE-404. (MS24A-P-CARDS) Refer to Response to EOE-260. In support of selection 'd', the Company provided five receipts detailing different dates (Att.3 of 1/9/24; Att.4 of 2/13/24; Att.5 of 1/5/24; Att.6 of 1/9/24; and Att.7 of 1/10/24) with minimal details regarding underlying unit costs. Respond to the following:

a. Explain how meal charges applicable to 1/5/24 (prior to the storm event) and 2/13/24 (approximately one month after the storm event) are applicable to MS24A.
b. Provide an unlocked Excel spreadsheet detailing the number of meals, the type of meal (breakfast, lunch, dinner), and the average cost per meal. Additionally, compare the average cost per meal to the amounts detailed within the Eversource Restaurant Meal Policy provided at EOE-058, Att.1 Redacted and, if applicable, identify the amounts paid in excess of the policy.

EOE-405. (PHOTOGRAPHY) Refer to Response to EOE-238. Identify if any of the photography costs included either within the Company's storm recovery request or the Company's test year amounts have produced work product (i.e., photographs) that have been used in the Company's shareholder funded advertising.

EOE-406. (MS24A-VENDOR-LINE) Refer to Response to EOE-234 and Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-16, pp. 207. The Company's response to subsection 'b' concluded that the "car vs pole" reference within the signed timesheet was a "documentation" error and provided an OMS report (i.e., Att.1) to support this position. Respond to the following:

a. Explain how this type of "documentation" error was not identified during the Company's review.
b. Explain why the Company believes that it is more accurate to rely on the OMS system in lieu of a signed Eversource Contractor Storm Daily Time & Work Report.
c. Discuss if the Company is capable of querying the OMS system to identify instances where the OMS system identified "car vs pole" activity. If the OMS system is able to be queried, provide an unlocked Excel spreadsheet detailing all references to "car vs pole" or similar

terminology for the period of January 2024 through March 2025 with similar details as reflected within EOE-234, Att.1. If possible, please also include the work order number details.

EOE-407. (MS24A-VENDOR-LINE/FLEET) Refer to Responses to EOE-177, Att.1 and EOE-251. The Company's response to EOE-251, subsection 'a' identified that the vendor (i.e., SOS) was staged in Massachusetts to obtain Eversource Storm Fleet vehicles. The Company's response to EOE-177, Att.1 identified a total of 68 Fleet units available for Connecticut and 49 units were used by SOS. Respond to the following:

a. Identify the specific location(s) where the Connecticut Fleet vehicles (i.e., 68 vehicles) were located. If any vehicles were located in Massachusetts, explain why.
b. Explain why the SOS vendor was not mobilized directly to a Connecticut Fleet location in lieu of the Massachusetts location.
c. Referring to Confidential Exhibit ACCT-2 CLP-1A-19, pp. 819-820, 822-824, and 827-828, identify the incremental cost impact resulting from the vendor being required to remobilize from Massachusetts to Connecticut and return vehicles, including the "extra time to return trucks" as referenced on pp. 827-828. As part of the response, please provide supporting calculations.

EOE-408. (MS24A-VENDOR-LINE-TRAVEL) Refer to Response to EOE-246 and Exhibit ACCT-2 CLP-1, and Confidential Exhibit ACCT-2 CLP-1A-17, pp. 329-333. The Company appears to have confirmed that the vendor incurred five hours of travel for mobilization in lieu of the 11 hours reported on pp. 331 (i.e., duplicated on p. 332). Respond to the following:

a. Provide a reconciliation of the equipment hours billed within the Eversource Contractor Storm Mobilization & Demobilization reports (i.e., pp. 331-333) to the equipment hours billed within the billing calculation on p. 330.
b. Referring to EOE-246, subsections 'a' & 'b', identify the correct number of hours attributed to travel and standby.
c. Using the response to subsection 'b', identify the revised total amount of equipment that was billed during standby activities. As part of the response, please provide supporting calculations.

EOE-409. (MS24A-VENDOR-LINE) Refer to Response to EOE-201 and Exhibit ACCT-2 CLP-1, and Confidential Exhibit ACCT-2 CLP-1A-8, pp. 27-125. Respond to the following:

a. Provide an unlocked Excel spreadsheet analyzing the total billable travel hours for each invoice and corresponding Eversource Contractor Storm Mobilization & Demobilization Time Report based on the billed travel

time versus the estimated travel time, including the Company's 1.3 hour factor discussed in EOE-130. As part of the information, identify each timesheet's starting/ending locations and identify any required corrections (i.e., to include the example identified in EOE-201, subsection 'a'). To the extent that the billed travel hours exceed the estimated hours, provide any contemporaneous documentation that supports the initial evaluation and approval of the excess billed hours. Additionally, provide the estimated cost impact of the resulting from the evaluation.

b. Referring to EOE-201, subsection 'a', explain why it was acceptable for the vendor to deploy crews from Albany in lieu of Deep River. Additionally, provide documentation supporting the crew's actual starting location and explain why the erroneous information was not corrected prior to invoice approval.

c. Referring to EOE-201, subsection 'b', clarify why the Company identified that there would be a reimbursement "to the vendor" when the documentation appears to support an over-billing. Additionally, please provide the total monetary impact of the additional hour billed as originally requested.

EOE-410. (MS24A-VENDOR-LINE) Refer to Response to EOE-205 and Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-9, pp. 182-226. Respond to the following:

a. Comparing EOE-205 Att.1 with Att.2, confirm that the vendor did not bill for equipment during standby. If confirmed, identify if this was another vendor billing error similar to the Company's response to EOE-201 or if there is a different rationale. If not confirmed, please discuss.

b. Referring to EOE-205, Att.1, confirm that the vendor's billing for 12 hours of standby "waiting for Lodging Information" without assignments resulted in an incremental cost of $91,689. If not confirmed, identify the increment impact and provide supporting calculations.

c. Referring to EOE-205, subsection 'd', the Company confirmed that "the contractor's timesheet did not fully conform to the Company's requirements" but didn't explain why the Eversource reviewer did not require the information to be completed prior to approval. Please respond.

EOE-411. (MS24A-VENDOR-TREE) Refer to Response to EOE-203 and Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-9, pp. 136-139. Respond to the following:

a. Referring to EOE-203 subsection 'a', provide the requested pre-authorization for use of the mini excavator. If documented pre-authorization does not exist, please confirm.

b. Referring to EOE-203 subsection 'a', specify if the vendor required the use of the mini excavator or if the device was solely available.
c. Referring to EOE-203 subsection 'b', clarify if the vendor would have been eligible for a meal stipend both in a situation where they did receive a Company-provided meal or in a situation where they could have received a Company provided meal, but chose not to.
d. Referring to EOE-203 subsection 'c', provided the additional records referenced to include the "dispatch information".

EOE-412. (MS24A-VENDOR-TREE) Refer to Response to EOE-232 and Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-16, pp. 135-151. Explain why the vendor was not required to submit details regarding their mobilization and demobilization. As part of the response, provide details on the vendor's travel and corresponding billing. Additionally, explain how the Eversource reviewer was able to contemporaneously assess the appropriateness of the billed travel hours.

EOE-413. (MS24A-VENDOR-LINE; WIRE GUARDS) Refer to Response to EOE-236 and Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-16, pp. 214-225. Specific to subsection 'd', provide the requested "documentation to support the specific efforts performed by the Company to obtain local wire down guard crews in lieu of those throughout the northeast." If documentation (i.e., emails) does not exist, explain why.

EOE-414. (MS24A-VENDOR-TREE) Refer to Response to EOE-225 and Exhibit ACCT-2 CLP-1 and Confidential Exhibits CLP-1A 13 through CLP-1A-14. Referring to EOE-225, subsection 'c', the Company cited its response to EOE-130 for a broad explanation of situations that could impact travel time. Please provide the specific documentation (i.e., emails) available to the Eversource reviewer contemporaneously with their initial review to support billing of 12 hours for both mobilization and demobilization. If documentation (i.e., emails) does not exist, explain why.

EOE-415. (MS24A-VENDOR-TREE) Refer to Responses to EOE-227 and EOE-228, Exhibit ACCT-2 CLP-1, and Confidential Exhibit ACCT-2 CLP-1A-15, pp. 53-54 and 58-59. The Company confirmed that the post storm remediation was not documented through OMS and that "[t]he Eversource Arborist would not have approved the timesheet if they did not direct the crew to use…." Respond to the following:

a. Referring to EOE-227/EOE-228 subsection 'c', explain why all tree related damage is not input within the Company's Outage Management System (OMS) for post-storm remediation.
b. Referring to EOE-227 subsection 'd', provide documentation of the Eversource Arborist "direction" and explain why the Disk Chipper and Chip Truck were specifically necessary for MS24A storm remediation

purposes. Additionally, provide the requested "incremental amount associated with this equipment."

c. Referring to EOE-228 subsection 'd', provide the requested "documentation to support the Company's pre-authorization of the additional chainsaw charges and specifically identify the incremental amount associated with this equipment."

EOE-416. (MS24A-VENDOR-LINE) Refer to Response to EOE-239, Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-17, pp. 100-151. Respond to the following:

a. Provide a redacted version of the referenced documentation.

b. Referring to subsection 'a' and pp. 118-121 and pp. 134-136, explain why the vendor was permitted to submit Eversource Contractor Storm Daily Time & Work Reports without completing any Event Start Times (box 24) and Event End Times (box 25).

c. Referring to subsection 'a' and pp. 118-121 and pp. 134-136, explain how the "number of tickets and the various locations and the various locations that these crews had to travel to and from" would support the hours billed. As part of the response, please provide copies of OMS tickets or other documentation and demonstrate how this information verifies the accuracy of the hours billed for each vendor employee.

d. Referring to subsection 'b', and p. 150-151, clarify the Company's response where the Company referenced "4 hours of travel" for the referenced example but the documentation depicts 6.5 hours. Does the increased number of hours billed for mobilization change the Company's position?

EOE-417. (MS24A-VENDOR-LINE) Refer to Response to EOE243, Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-17, pp. 238-301. Referring to subsection 'd', the Company's response deduced that there was a clerical error with the hours reported on pp. 274-275 but asserted that there was no duplicate billing. The Company also referenced its review of the "State Resource Acquisition's Report and confirmed that this crew did arrive on site at 6PM." Provide the referenced report that was contemporaneously available to the invoice reviewer and explain how this report can be relied upon in lieu of the signed Eversource Contractor Storm Mobilization & Demobilization Time Report. As part of the response, identify the incremental impact of the two hours billed.

EOE-418. (EMERGENCY RESPONSE SPECIALIST) Refer to Response to OCC-829. Respond to the following:

a. Identify the average Emergency Response Specialist staffing levels for each year 2021-present.

b. Provide an unlocked Excel spreadsheet detailing the following information for both each year 2021-2025:

i. Number of Emergency Response Specialists
ii. Average Base Pay
iii. Average Annual Overtime Pay
iv. Average Annual Premiums
v. Average Overhead or Other Costs
vi. Fully Loaded Labor Costs
vii. Hourly Equivalent Rate