Date Filed: October 16, 2026

Witness: Christopher E. Colorio and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

(Storm Cost Recovery) Of the $157 million in total costs, external line and tree crews represent 68 percent (Exhibit CLP-STORM-1 page 81). Please provide the Company's analysis of whether greater use of internal or affiliated resources, rather than non-affiliated contractors or mutual aid, was feasible for any of the events, and the basis for the resource mix actually chosen. In your response,

a. please describe, for each storm event, the process and personnel responsible for deciding to request mutual aid versus independent contractor crews, and the comparative cost of each option at the time the decision was made,

b. please provide all after-action reports for each storm event, including any internal criticism of restoration timing, crew sizing, or cost control.

Response:

a. The Company follows the same analytical path for each storm event, whether the storm ultimately is categorized as a non-catastrophic or catastrophic. Specifically, when a weather system is approaching the Company's service area, the Company will analyze the weather forecast to determine whether the Company's own resources are likely to be able to handle the contemplated damage and associated outages, or whether it is advisable to pre-stage resources. If it is determined that external crews are needed in advance of the weather onset to the system, the Company identifies a quantity of resources to procure, based on a number of factors including the number of internal resources that are available, anticipated storm conditions, the expected regional impact, and several other factors.

   The Company then proceeds through a protocol starting with local dock crews (crews with blue-sky work on the system), then local independent contractors, then the Company's affiliate crews from other states (not always available where weather events are commonly experienced), then contractors from outside the state, moving from shorter distances to longer distances for crew mobilization. The Company's Emergency Response Plan delegates emergency response authority to the Incident Commander, who maintains communication with the President and executive leadership of Eversource Energy. Through the course of this tiered approach, the Company incorporates information on contractor availability, mobilization

timelines, existing contractual arrangements and cost. Contractors are generally engaged in accordance with this tiered approach before seeking further assistance.

If restoration requirements exceed the capacity of available on-system and contracted resources, the Incident Commander may request assistance through the Mutual Aid network. Mutual Aid resources are utilized when available and additional qualified personnel are necessary to support restoration objectives and are available from participating utilities.

The question asks whether greater use of internal or affiliated resources, rather than non-affiliated contractors or mutual aid, was feasible for any of the events. Please note that, for all events, the Company's process utilizes any and all available internal resources first, eliminating the possibility the there was a "feasible" opportunity to utilize a greater number of internal crew resources. Similarly, once the Company decides that it needs to bring external crews in, the decision point largely rests on proximity. In terms of cost, the differentiating factor is primarily one of distance, given that the hourly crew rates all fall within a relatively narrow range. In this regard, there is no certain "type" of crew that is more or less expensive – it is all a matter of distance. At the same time, cost is not the only – or even primary – driver of crew decision in the face of an oncoming weather system. Cost is considered as part of the contractor sourcing process, however, the primary objective is to ensure sufficient qualified resources are available to restore service as quickly and safely as possible.

b. Please refer to the Company's responses to interrogatories OCC-551[i] and OCC-552[ii].

Prior Referenced Responses:

[i] OCC-551 Question:

For each storm event, please provide the lessons-learned action tracker and show how completed actions changed later event plans or procedures and how their effectiveness was verified.

OCC-551 Response:

The Company conducts lessons learned exercises for larger events focused on managerial and operational processes and actively pursues opportunities for improvement following every ERP event. Items developed from a formal After Action Review are tracked in an Improvement Plan. Initiatives that the Company has identified through these efforts include but are not limited to initiatives for development of a Pole Setting Branch, cost tracking, contractor hiring processes, and invoice review processes. The effectiveness of these improvements is verified through routine training and exercises. Please refer to the Company's response to interrogatory OCC-552i confirming that none of the storms included in the application met the requirements for an After Action Report under the standards set forth in PURA Doc. No. 12-06-09, PURA Establishment of Performance Standards for Electric and Gas Companies, Final Decision, Appendix A, Section 3.7 After Action Report.

[ii] OCC-552 Question:

For each storm event, please provide the after-action reports and each post-event comparison of forecasts, resources, restoration performance and cost, including the management review and resulting corrective actions.

OCC-552 Response:

None of the storms included in the application met the requirements for an After-Action Report under the standards set forth in PURA Docket No. 12-06-09, PURA Establishment of Performance Standards for Electric and Gas Companies, Final Decision, Appendix A, Section 3.7 After-Action Report. PURA Doc. No. 12-06-09, Appendix A, Section 1 Purpose and Applicability states: The purpose of these standards is to ensure that the electric distribution companies (EDCs) are prepared for emergencies and disasters in order to minimize damage and inconvenience to the public which may occur as a result of electric system failures, major outages, or hazards posed by damage to electric distribution facilities. These standards apply to any Emergency Event, which is defined as electric service interruptions involving 10% or more of the EDC's total number of customers who are out for a period of 48 consecutive hours or more…" Please refer to Exhibit CLP-STORM-IMT-2 for storm-by-storm breakdown of costs and outage data.