Date Filed: October 09, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Office of Consumer Counsel

Question:

Payroll. Refer to the response to OCC-333 which states that of the 41 new positions requested, 21 vegetation management, 5 power quality positions and 2 distribution planning and forecasting positions are contingent on PURA's approval in this case. If they are contingent on PURA's approval, explain how these positions are necessary.

Response:

For the 21 vegetation management positions, all but one (1) of these are already included in the current vegetation management operations and are necessary for the accomplishment of the vegetation programs. The Company is proposing a shift from contract to internal resources in this case.

As noted in the Company's response to OCC-333[i]:

"The Vegetation Management positions allow the Company the opportunity to improve the system's reliability and improve cost-efficiency by transitioning more work in-house to restructure vegetation management performance for the benefit of our customers. While the twenty-one (21) Vegetation Management positions appear to be incremental, in reality there is only 1 incremental resource. Of the twenty-one (21), eight (8) of the FTEs are the result of 16 employees who currently split their time 50%/50% between O&M and capital work shifting to solely working on the proposed combined O&M program, if approved, results in the equivalent of 8 incremental employees working on the O&M program; twelve (12) resources would be converted from contracted resources to internal resources of which the Company's proposed vegetation management expenses in Exhibit CLP-REVREQ-2, Work Paper C-3.31 reflect the reduction in outside contractor services; and one (1) resource would be truly incremental."

The five (5) power quality positions allow the Company to better serve our customers with dedicated resources that can troubleshoot, analyze, and identify power quality problems. Power Quality is typically a deviation from sinusoidal voltage or frequency and encompasses a wide variety effects, ranging from voltage sags and swells, surges, transients, low power factor, harmonics and other phenomena that disrupt service or damage customer and utility equipment. The causes of these issues can be failing equipment, lightning, equipment operation or installation as well as customer loads and DER, identifying the causes and mitigation requires specialized skills, field data and analytics. Currently within the Company there is no dedicated group

responsible for resolving customer power quality issues This group will take ownership of these complaints and problems and troubleshoot customer power quality issues by taking actual field measurements at both the Company and customer premises. With field measurement and further engineering analysis, the power quality group will be able to identify the source of power quality concerns which could be at the utility side or at the customer side. Based on the group's assessment the Company will be able to improve response to customer power quality concerns and improve customer service.

The two (2) distribution planning and forecasting positions are designated resources for forecasting and modeling in distribution planning to comply with PURA's requirements outlined in the IDSP for advanced forecasting, 8760 forecasting, and larger number of scenarios, as well as to manage the stakeholder input, verification, and data sharing efforts associated with the IDSP docket. As stated by the Company in 21-05-15 RE03, compliance with an IDSP as outlined by the Authority will require significant additional efforts. Not adding these incremental positions would severely hamper the Company's ability to:

- Meaningfully engage with the stakeholder process, review recommendations, data sets, and provide adequate responses and justifications to stakeholders
- Limit the ability to develop more than the currently staffed and resourced for single scenario peak load forecast
- Jeopardize the 8760 model delivery at circuit levels as envisioned by the Authority and Stakeholders

Supporting this effort would in turn provide the Company with these abilities, which would provide the Authority and stakeholders with more granular data as envisioned by the IDSP to better understand investment decisions.

Prior Referenced Response:

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[i] OCC-333 Question:

Payroll. For each of the new positions that the Company is requesting recovery of in the Rate Year, state whether the hiring of the positions are conditioned on their approval in this case.

OCC-333 Response:

The Company is providing an update for the Full Time Equivalent ("FTE") counts included in the request for recovery in the Rate Year in this response as OCC-333, Attachment 1 (note that this is an update of Exhibit CLP-REVREQ-2, Work Paper C-3.5, page 3). The Company will update the payroll expense and other affected costs as part of its next cost of service update.

The number of FTEs included in the original filing was fifty-eight (58). This number was a preliminary number and included FTEs contemplated in the Advancing the Grid plan that is above and beyond the Targeted System Plan ("TSP") requested for review and approval in this application. The updated number of incremental FTEs to be included in the Rate Year of the Company's cost of service is forty-one (41).

Included in the forty-one (41) full-time positions are twenty-one (21) in Vegetation Management, five (5) Power Quality positions, two (2) in Distribution Planning & Forecasting and one (1) Asset Health, these are contingent on PURA's approval in this case. In addition, for Grid Modernization there are seven (7) for Control Room Operations, three (3) for Data Innovation, and two (2) for Field Communications that the Company will consider hiring based on business needs and changing requirements as necessary, but most likely not all requested.

The Vegetation Management positions allow the Company the opportunity to improve the system's reliability and improve cost-efficiency by transitioning more work in-house to restructure vegetation management performance for the benefit of our customers. While the twenty-one (21) Vegetation Management positions appear to be incremental, in reality there is only 1 incremental resource. Of the twenty-one (21), eight (8) of the FTEs are the result of 16 employees who currently split their time 50%/50% between O&M and capital work shifting to solely working on the proposed combined O&M program, if approved, results in the equivalent of 8 incremental employees working on the O&M program; twelve (12) resources would be converted from contracted resources to internal resources of which the Company's proposed vegetation management expenses in Exhibit CLP-REVREQ-2, Work Paper C-3.31 reflect the reduction in outside contractor services; and one (1) resource would be truly incremental.

The Grid Modernization positions are needed to support large-scale distributed energy resource ("DER") integration and clean-energy advancement; develop and deploy advanced tools and analytics for integrated distribution system planning and grid modernization; and drive increased innovation and application of GenAI, LLM and machine learning capabilities.

The Company is also providing as OCC-333, Attachment 2, which is a corrected Exhibit CLP-TSP-3, page 43 of 149 that has been updated with the corrected number of FTEs in the parenthesis in the text boxes on the right.