Date Filed: September 28, 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-CONST) Refer to Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-20, pp. 70-111. The Company reported two incremental charges for a total of $39,874 for the United Utility Service Holdings LP vendor. Respond to the following:

a. Explain what specific services were provided by the various individuals represented within the invoices to include Crew Guides, External Resource Field Coordinators, Construction Managers (clearance) Level 3, Construction Managers (clearance) Level 2, Senior Construction Manager (clearance), and Senior Project Manager.
b. Referring to p. 89, explain why there are various charges applicable to January 13, 2024, when that date appears to align with a later event (i.e., MS24B). Provide all related documentation supporting those charges.
c. Cite the location of both the contract and the specific pricing schedule applicable to the MS24A event and corresponding services provided.

Response:

a. For the vast majority of storm events ERFC's are staffed by Company employees. During very large events or events where multiple states are being affected, we have created a list of predominately retiree employees that work for a vendor whom we hire to perform this function. This position is critical because it is our physical oversite of the contractor line resources, we hire to verify their hours worked and their physical activities in the field.

   The individuals listed within the invoices fill the role of an "ERFC" (External Resource Field Coordinator). The duties and responsibilities of the ERFC include coordinating the activities of crews assigned to them, communicating the restoration strategy to the crews, and providing them with logistical details and support concerning food and lodging.

   Additionally, the ERFC provides two-way communications regarding damage, restoration times, and materials needed between the Operations Coordinator in the RMT and field crews. As an ESOP-100 APL (Authorized Persons List) Qualified person, they are qualified to hold clearances for contractors and to coordinate tagging and switching with the RMT System Operators.

b. Upon review in drafting this response, the Company has identified an error within the submitted amount for ACCT-2 CLP-1 (MS24A), Outside Contractors-Vendors, Line 540, and ACCT-2 CLP-2 (MS24B), Outside Contractors-Vendors, Line 558, vendor United Utility Services Holdings LP. The Company will adjust ACCT-2 CLP-1 (MS24A), line 540 to reflect $17,401. In addition, ACCT-2 CLP-2 (MS24B), line 558 will be adjusted to reflect $5,487.68.

c. The contracts applicable to the two invoices are located in EOE-014 Attachment 2, Page 2891 and EOE-014 Attachment 2, Page 4060.