Date Filed: October 06, 2026

Witness: Mark P. Baldwin, Clifford G. Williams, Leanne M. Landry and John G. Griffin
Request from: Office of Education, Outreach, and Enforcement

Question:

(MS24F-VENDOR-LINE) Refer to Exhibit ACCT-2 CLP-6 and Confidential Exhibit ACCT-2 CLP-6A-1, pp. 23-62. The Company reported an incremental charge of $377,813 for the Asplundh Construction Corp. Respond to the following:

a. Referring to pp. 40, 44, 47, 49, 51, 53, 55-56, and 59, explain why each of the crews were permitted to commence billing on April 3, 2024, at either 0600 or 0630 and solely bill for standby when the ERP declaration did not occur until 1800. As part of the response, please identify the incremental cost for the standby billing on April 3, 2024, for the hours prior to the 1800 ERP declaration.
b. Referring to p. 43, explain why two individuals were permitted to bill for four hours (each) of travel for demobilization on April 5, 2024, without any details regarding the commute or the documentation to demonstrate that there was a commute (i.e., there was no corresponding mobilization). As part of the response, please provide documentation that was available at the time of the review.
c. Cite the location of the vendor's contractual Pricing Schedule Exhibit (i.e., typically referred to as Exhibit A). The contract provided at OCC-044, Att.2 (Confidential), starting at p. 180 includes a List of Exhibits at p. 188 which references the Pricing Schedule as Exhibit B but was unable to locate the document. Additionally, EOE observed similar documentation within EOE-024, Att.2 (Confidential). with a similar omission.
d. Referring to pp. 24-34, explain why the vendor billed for equipment during standby. As part of the response, identify the total incremental charge for the equipment billed during standby and separately identify the incremental equipment charge for the hours referenced in subsection b.

Response:

Referring to Exhibit ACCT-2 (CLP-6)(MS24F), Outside Line Contractors, at Line 37, Asplundh Construction Corp, in the amount of $377,813.

a. Asplundh was permitted to be on standby starting 0600-0630 because these crews were on a 4-10 schedule. Not paying these crews standby time would have likely resulted in losing the crews for the storm event, which the Company could not afford to do given the pending conditions. The Company also needed the crews on standby to assist in any weather-

related events that may occur prior to 1800. Without tree crews, the Company cannot restore power or address emergencies and the Company retained the crews for that purpose. The incremental cost for the standby billing on April 3, 2024 for the hours prior to the 1800 ERP declaration is $94,674.27.

b. These two individuals remained on system in CT. The individuals remained in Western region to support any potential need for final support that may have been required. It was determined they could be demobilized and they completed that process on April 5th which included any required safety debriefs, equipment and material securement and travel activities. The balance of their contingent traveled to another state to continue support. The incremental cost for the standby billing for the timeframe requested on April 3 is $96,850.

c. The vendor's contractual Pricing Schedule, identified as Exhibit B, was inadvertently omitted from the Company's responses to both OCC-044 and EOE-024. The Pricing Schedule is now provided as EOE-273, Attachment 1 CONFIDENTIAL. The contractual provisions addressing standby rates begin on page 3 of the Pricing Schedule.

d. The contractor is a Contractor of Choice ("COC") and per the contract they are permitted to charge for equipment. The total incremental charge for the equipment billed during standby is $8,152. The total incremental charge for the equipment billed for the employees mentioned in subsection b is $108.