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Witness: Christopher E. Colorio, Mark P. Baldwin, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

(STORM) Please refer to Exhibit ACCT-2 (CLP-13A-18) (MN25K), Invoice #4023-01, p. 69-84. Explain the reason for deploying a crew from Chicago, IL and justify the hours allocated for this crew to travel and be on standby. Were there any additional charges billed regarding this crew, such as flights?

Response:

Referring to Exhibit ACCT-2 (CLP-13)(MN25K), Outside Line Contractors, at Line 608, vendor Support Operations Services LLC, invoice in the amount of $609,293.

The MN25K storm system began to impact Connecticut on Saturday, February 15th, with snow falling across the state. Snow accumulation varied by region, with higher totals in the northern areas. As the event progressed, conditions transitioned from snow to sleet and subsequently to freezing rain. From February 16th through February 17th, the region experienced sustained winds, with gusts in the 40 to 60-mph range. The combined effects of ice loading and high winds caused damage to electric distribution infrastructure and resulted in significant power outages. Based on the extent of the damage to the electric distribution system, the Company secured additional restoration resources to support the safe and efficient restoration of power.

Regarding standby time, maintaining supplemental resources on standby enables the Company to keep crews available and strategically positioned to respond quickly and efficiently as needed. This approach avoids having to release resources and incur additional time and expense to remobilize them as conditions change. Accordingly, keeping this out-of-state resource on standby was a reasonable and prudent decision because it ensured that the Company maintained access to this resource and could promptly dispatch crews as restoration needs arose.

Regarding travel time, the decision to mobilize an out-of-state contractor using air travel was necessary given the need to make additional resources available in Connecticut as quickly as practicable, based on the Company's assessment of the conditions that existed at the time the decision was made. The contractor's crews were located in the Chicago area, and transporting those crews and their equipment by ground would have required approximately 18.5 hours, each way for mobilization and demobilization. Given the extent of the storm damage and the expected need for additional resources, waiting for crews to travel by ground would have delayed their

availability at a time when the Company determined that additional restoration resources were needed as quickly as possible to commence restoration. Air transportation allowed the Company to reduce the time required to position this out-of-state crew in Connecticut and made those resources available for dispatch sooner.

During this storm event, the existing contracts did not specify a "Fly-In" Rate. However, the Contractor and the Company agreed to 10 hours of travel for both Mobilization and Demobilization.

There were no additional costs beyond those stated in the invoice. Currently, an established "Fly-In" Rate is in place for contractors to utilize.