Date Filed: September 25, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Education, Outreach, and Enforcement

Question:

(MS24A-VENDOR-TREE) Refer to Exhibit ACCT-2 CLP-1 and Confidential Exhibit ACCT-2 CLP-1A-11, pp. 252-254. The Company reported an incremental charge of $7,002 for the Lewis Tree Service Inc vendor. Explain why the vendor was necessary for January 11, 2024 when the storm was demobilized on January 10, 2024, the crew had only performed standby activity on both January 9th and 10th, and the crew was only used for standby on January 11th (p. 254). As part of the response, please identify the incremental charge associated with the standby activity on January 11th.

Response:

Throughout a storm event, Vegetation Management and Operations stay in close communication to ensure tree crew resources are appropriate. In many storm events tree crew counts are decreased gradually, rather than occurring all at once. Demobilization of tree crews is paired with demobilization of line crew resources and the number of outage events remaining per AWC or division. Even when customers are substantially restored from a storm event, there are often remaining outage and non-outage Outage Management System ("OMS") tickets that need to be addressed. It is not uncommon for Operations to request that tree crews remain on shift to address any remaining vegetation related work or to support line crews as needed. Once released from the storm shift and sent home to rest, it will take longer for tree crew personnel to travel in and respond. The decision to keep tree crews on shift is made by Operations leadership based on the state of OMS tickets regionally or by area work center.

The Company does not track time differently between standby and work time for tree crews in the same manner as line crews. There are no separate billing rates or work designations for vegetation management crews that would differentiate standby and remediation work. Contracts with tree contractors do not differentiate standby time or billing rates as is typical with line crew contracts.

The term "standby" on a tree crew timesheet indicates that the crew was assigned a storm shift and was actively ready to respond to events. The charge associated with the work time on January 11, 2024, was $1,795.27.