Date Filed: October 26, 2026

Witness: John P. Dipaola-Tromba, Sean D. Redding, Jenna M. Turner, John G. Griffin and Leanne M. Landry
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-15, pp. 116-118 and Response to EOE-229. EOE's initial interrogatory incorrectly cited pp. 119-121 in lieu of pp. 116-118. Referring to pp. 116-118, please explain how the vendor was permitted to bill for nine hours on January 12, 2024, when they recorded work hours between 7am and 3pm (total of eight hours). To the extent that additional hour related to travel to the crew's "reporting or parking location," provide documentation to support this position and explain why the time reporting was inconsistent for the remaining days. As part of the response, please identify the impact of billing an extra hour (OT) for each employee.

Response:

Referring to Confidential Exhibit ACCT-2 (CLP-1A-15)(MS24A), pages 116-118, the tree crew in question was utilizing an overnight parking location on Lakeside Avenue in New Canaan. The estimated travel time from Flax Hill Road, Norwalk, to Lakeside Avenue, New Canaan, is approximately 25-minutes for a bucket truck under normal traffic conditions and approximately 45-minutes for a bucket truck during Friday afternoon traffic conditions. This does not include post-trip inspections required at the end of the shift.

Please refer to Confidential Exhibit ACCT-2 (CLP-1A-15)(MS24A) on page 117. There is no "impact of billing an extra hour (OT) for each employee". The Company Arborist corrected timesheet from 33-OT "Payable Hours" to 30-OT "Billable Hours". The three-hour reduction is a culmination of one hour corrected from OT to ST on January 9, 20204, one hour corrected from OT to ST on January 10, 2024, and one hour corrected from OT to ST on January 12, 2024. The conversion of OT to ST was due to the hours worked within the 07:00 to 16:00 storm normal working hours.