Date Filed: August 14, 2026

Witness: Leanne M. Landry and John G. Griffin
Request from: Office of Education, Outreach, and Enforcement

Question:

(STORM RESPONSE-INTERNAL AUDIT REVIEWS) Identify if the Company has performed an Internal Audit over its storm response or any related activities since 2023. If applicable, provide complete copies of any Internal Audit Reports inclusive of all findings, observations, and remediations. If internal audits have not occurred, please explain why not.

Response:

Prior to 2023, the Company completed several significant internal audits of the emergency preparedness and response functions, following from PURA's findings in Storm Isaias. For example, in the timeframe 2022-2023, the Company retained the services of Accenture to conduct a full-scale review of all aspects of the ERP function and to make recommendations incorporating the Company's experience in Storm Isaias. These audits were detailed in Docket No. 25-12-13 in response to EOE-039, Attachment 5 CONFIDENTIAL. EOE-15, Attachment 1, provides a copy of the Accenture audit.

As a result, there has not yet been the need for the Company to conduct additional internal audits of the Emergency Preparedness function, with the exception of the Contract Compliance Audits performed by Revenew International, LLC, which include contractors that provide storm restoration services.

The Company's response to EOE-16[i] provides a description of the services performed by Revenew. The vendors included in the contract compliance audits are referenced in OCC-142[ii].

Prior Referenced Responses:

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[i] EOE-016 Question:
(STORM REVENEW UPDATE) Explain the specific services that have been performed by the Revenew vendor and provide an updated status of any billing reviews or negotiations since March 10, 2026, to the present.

EOE-016 Response:
Please refer to OCC-142[i] for the services provided by Revenew.

As of August 6, 2026, the status of billing reviews or negotiations since March 10, 2026 are as follows:

Supplier Name	Net Recovery Amount[i]	Status
Mid-Con Energy	$965,321	Completed
Asplundh Tree	None	No discrepancies identified
MTV Solutions	$546,020	Completed
Elecnor Energy Services	TBD	Settlement Pending
Elecnor Hawkeye	TBD	Settlement Pending
Michels	TBD	Settlement Pending

Also Elecnor Hawkeye and Michels provided both blue sky and storm services to Eversource, which were included in the contract compliance audit scopes performed by Revenew.

[ii] OCC-142 Question:
(STORM AUDITS)

a. If the Company has audited and/or contracted with a vendor to audit and/or review the storm costs requested in this proceeding, please indicate the date of the audit/review, the scope of the review, the type of the review, and the entity conducting it.
b. Please provide all reports and/or final written conclusions of audits and/or reviews performed on the storm costs requested in this proceeding.

OCC-142 Response:

a. Please see the description below defining the Internal Audit function's responsibilities, with a focus on the annual contract compliance audits that Eversource conducts through Revenew International LLC. The contract compliance audits may include vendors that provide storm support services, such as, but not limited to, overhead line crews, but can also include non-storm work. Vendors selected for contract compliance audits are evaluated according to the methodology described below.

Internal Audit Approach
The Eversource Energy Internal Audit Department ("IAD") is responsible for several important functions within the management structure, including but not limited to the following functions:

- Establishing controls and risk management activities and assuring that those processes are designed adequately and operating effectively.
- Implementing processes to assure that resources are acquired economically, used efficiently, and protected adequately.
- Implementing processes to assure that business programs, plans, and objectives are achieved.
- Implementing processes to assure that quality and continuous improvement are fostered within the organization.

The development of the annual Audit Plan is among the most critical functions that IAD performs. A thorough and effective planning process helps to ensure that IAD is able to assemble a meaningful and challenging plan, designed to provide Company management with timely and useful feedback on Company operations and the control environment.

Annual Contract Compliance Audit
IAD's Annual Audit Plan encompasses approximately 50-55 audits, including a Contract Compliance Audit. The Contract Compliance Audit is designed as an overlay to other processes that the Company conducts to assure that Eversource vendors are fully complying with the terms and conditions of the contracts. This approach is considered an industry "best practice" and generally relies on the use of an external firm with the technical skills and resources to perform the audit most effectively.

For this purpose, Eversource Energy is using the services provided by Revenew. Revenew is based in Houston, Texas, and has been conducting contract compliance audits for over 25 years. External audits of contract compliance are typically utilized to execute on the "right to audit" clause that Eversource includes in vendor contracts. External vendor audits are a highly specialized discipline that requires analyzing source records that must be obtained from the vendor. Revenew performs line-item analysis of contracts, invoices, and payment transactions by running over 140 audit tests on the vendor's documentation, mostly at the vendor's own premises, which Eversource is unable to do. Revenew's compensation is tied to actual results through a "shared gains" arrangement, resulting in no net cost to Eversource. Specifically, Revenew's fee structure is that it is entitled to a cash payment equal to approximately 30% of the invoice credits obtained through Revenew's audit work. Revenew is not paid for contract reviews that do not result in dollar savings for Eversource. Historically, Revenew will conduct 3-6 vendor audits per year. This practice has an added benefit in that it sends a strong signal to suppliers that contract compliance is monitored and enforced, putting Eversource in a strong position for future contract negotiations.

Vendor Selection Methodology/Criteria
All Eversource vendor contracts have a right-to-audit clause, as a result, vendors are identified and selected through the joint coordination of Eversource and Revenew, using a set of criteria applied to the Eversource Procurement vendor database of more than 4,300 vendors. The criteria for a vendor audit require a three-year spend over $10 million and an invoice count of 300 or more, along with consideration of the pricing structure of the good/services contracted for (time and materials preferred), contract complexities, and recommendations from Procurement and Operations Management.

To identify vendors that provide storm and non-storm services to Eversource operating affiliates in Connecticut, Massachusetts, and New Hampshire and that are appropriate for the type of audit that Revenew performs, Eversource takes the following steps:

- Eversource Procurement provides a report of vendor spend and invoice counts.
- The top 20 vendors from that list are selected for vetting by Revenew.
- Thereafter, a Contract Owner Questionnaire meeting is held with IAD, Revenew, Eversource Procurement, and the affected Eversource Business Partners to discuss contract pricing structure, any billing issues and the vendor relationship with Eversource.
- Eversource issues an Audit Notification Letter to the affected vendors.
- Revenew performs audits at the vendor's premises, which is supported by Eversource IAD.
- Revenew produces an audit *Summary of Monetary Issues*, which is reviewed with Eversource IAD, Procurement, and Operations.
- Eversource engages in negotiations with affected vendors.

Storm vendors are considered to be those that provide emergency response services to Eversource during restorations events occurring across one or all of Eversource's three jurisdictions. There are other line contractors used by Eversource that perform daily work on the Eversource system and would also be used

for storm restoration. However, these contractors are not considered to be "ERP contractors" for audit purposes.

Revenew conducted vendor contractor compliance audits for work performed on both storm and blue-sky days for vendor invoices between January 2024 and March 2025, noting that it is common for storm vendor invoices to be submitted months after a storm occurs.

Vendors providing storm support services were part of contract compliance audits reported on in 2025 and 2026. The audit periods for these vendors differ depending on when the contract compliance audit started. The vendor selection is done independent of which operating company to which storm support services were provided. Revenew selects invoices to include in the audit which may include The Connecticut Light and Power Company or Eversource's other operating companies. Storm cost audits for the period January 2024 – March 2025 (covering storms submitted for prudency review in this proceeding) include:

Date of Audit/Review	**Vendor**	**Scope**	**Type of Review**	**Entity Conducting Review**	**Reference to Reports**
Completed January 9, 2025	Multiple	January 2020-February 2024	Contract Compliance Audit	Revenew	Audit Report # 25-04, provided as OCC-142, Attachment 1
Completed January 6, 2026	Multiple	January 2020-March 2025	Contract Compliance Audit	Revenew	Audit Report # 26-02 provided as OCC-142, Attachment 2[ii]
Completed August 4, 2026	MTV Solutions	Jan 2020-Feb 2024	Contract Compliance Audit	Revenew	OCC-142, Attachment 3
Completed May 28, 2026	Asplundh Tree	Jan 2022-Mar 2025	Contract Compliance Audit	Revenew	Will be reported in the 2026 Contract Compliance Annual Report

Please note that scope refers to the billing time period for the vendors selected for the Contract Compliance Audits. See the corresponding audit report for specifics by vendor.

b. See table above for reference to each report.