Date Filed: August 21, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, Leanne M. Landry and John G. Griffin
Request from: Office of Education, Outreach, and Enforcement

Question:

(STORM PURA ORDERS) Provide a detailed listing of all storm-related PURA Orders or Guidance, including cites, that supports the incremental storm costs included within the docket. Additionally, provide copies of each of the applicable documents with references to the specific sections that apply.

Response:

This request poses an impossible task in that PURA has addressed numerous aspects of the recovery of costs and the factual and legal parameters relevant thereto, in innumerable decisions spanning decades and the Company relies on that body of precedent as a whole. For purposes of responding to this request, the Company has identified the directives issued in PURA's most recent proceeding (Docket No. 25-12-13) addressing storm-related costs and explains the manner in which the Company has complied, or will comply, with those directives. Please refer to EOE-119, Attachment 1, for a copy of the Docket No. 25-12-13 Decision (or the "2026 Storm Decision").

Docket No. 25-12-13 Directives		
Directive	**Page**	**Compliance**
No later than August 31, 2026, the Company shall submit in Docket No. 26-05-10, an updated storm deferral balance calculating the catastrophic storm reserve accruals starting January 1, 2024, and through at least the start of the Company's proposed rate year as specified in that proceeding, as discussed in Section III.H, Catastrophic Storm Costs Reserve Accruals.	144	The Company plans to file the updated storm deferral balance as directed by August 31, 2026.

Docket No. 25-12-13 Directives		
Directive	**Page**	**Compliance**
No later than August 31, 2026, the Company shall submit documentation clarifying its policies governing the transition from standby status to emergency response work status as discussed in Section III.F.3.e, Standby Billing for Labor. The documentation shall demonstrate that vendor instructions, contractual provisions, and billing practices are applied consistently. The Company may request an extension to this order, but any such request must be accompanied by a status report, including scope of contractual amendments necessary and a proposed timeline for completion of those amendments.	144	The Company plans to file the specified document as directed by August 31, 2026, but should it need an extension, it will request one consistent with the requirements in the Decision.
No later than August 31, 2026, the Company shall, in consultation with the OCC, submit to the Authority for review and approval a revised compensation policy that permits ERP Awards only for ERP Level 3 events or more severe, consistent to the greatest extent possible with its New Hampshire and Massachusetts affiliates, and that excludes a minimum of nine overtime hours before an ERP Award applies, as discussed in Section III.F.2.b, Exempt Employee Emergency Response Plan Payments.	144	The Company plans to file a response by August 31, 2026.
No later than November 20, 2026, the Company shall submit in Docket No. 26-05-10: (a) a report on Eversource's evaluation of options to replace the manual, paper-based contractor timesheet process with an electronic field time-capture system, as described in Section III.C.2, Accounting and Operational Controls; and (b) a plan to evaluate and score the performance of its contractors, FRCs, and arborists against the timesheet requirements, which shall consider implementation of the factors regarding the completeness and timeliness of the contractors', FRCs', and arborists' timesheets, as identified in Section III.C.3.b, Eversource Timesheets.	145	The Company plans to file the report and plan as directed by November 20, 2026.

Docket No. 25-12-13 Directives		
Directive	**Page**	**Compliance**
No later than November 30, 2026, the Company shall submit in Docket No. 26-05-10 an analysis of whether the storm fleet has provided a maximum positive benefit to ratepayers, including an evaluation of whether the storm fleet has provided net benefit to ratepayers for the catastrophic storms under review in that proceeding, as discussed in Section III.F.6.a, Storm Fleet.	145	The Company plans to file the analysis as directed by November 20, 2026.
No later than December 31, 2026, Eversource shall update its Expense Policy to identify meal stipend criteria and to include the following two requirements: (1) supporting documentation for the calculated number of meal stipends; and (2) an affirmation from each employee to confirm that they did not receive a Company-provided meal, as discussed in Section III.F.7.a, Meal Stipends.	145	The Company is currently assessing the steps necessary to comply with this directive.
No later than April 1, 2027, Eversource shall comply with mileage reimbursement requirements as outlined in Section III.F.7.b, Employee Mileage.	145	The Company is currently assessing the steps necessary to comply with this directive.
In the Company's next application to amend its base distribution rates, the Company shall separately account for prestaging and non-prestaging costs, if the Company is requesting recovery of prestaging costs, as discussed in Section III.E.2, Remediation and Materials Costs.	145	The Company is not seeking recovery for any pre-staging costs in Docket No. 26-05-10. The Company keeps separate FERC Accounts for both the catastrophic storm costs and pre-staging event costs.

In addition to the Directives listed above, in the 2026 Storm Decision, PURA directed the Company to propose in Docket No. 26-05-10, a modification to the regulatory framework for deferred storm expenses (2026 Storm Decision, at 37). Consistent with that directive, the Company proposed a modified storm cost-recovery framework in this proceeding. The details of that proposal are set forth in Exhibit CLP-ELP-1 at pages 122-156.

In addition, in this proceeding, as discussed in Exhibit CLP-STORM-1 at page 87, the Company adjusted by 25 percent the cost of small tools included in its requested recovery in this proceeding. This adjustment is reflected in the cost exhibits for each storm event, specifically Exhibits CLP-STORM-ACCT-2 (CLP-1 through CLP-14), "Materials" tab. The Company made

this adjustment based on PURA's precedent in Docket No. 18-11-12 (the "2019 Storm Decision"). In the 2019 Storm Decision, PURA determined that a portion of the costs of tools, supplies, and personal protective equipment ("PPE") should be considered normal operating expenses and, accordingly, found it reasonable to disallow 25 percent of those costs. 2019 Storm Decision, at 13-14. The Company has maintained this approach in this filing. Please refer to EOE-119, Attachment 2, for a copy of the 2019 Storm Decision.

After the Company filed its testimony in this proceeding, PURA issued the 2026 Storm Decision. In that decision, PURA found that 25 percent of materials expenses were non-incremental and therefore not eligible for deferral. 2026 Storm Decision, at 54, 107-109. The 2026 Storm Decision, however, differs from the 2019 Storm Decision in an important respect, which is that, rather than limiting the adjustment to categories such as tools, supplies and PPE, PURA applied the 25 percent adjustment to materials expenses generally.

The Company's proposal in this case is consistent with the fact that the more targeted approach reflected in the 2019 Storm Decision is appropriate. The relevant inquiry is whether the costs were incremental to the storm event, and the various categories of materials do not necessarily have the same characteristics for purposes of that determination, which is the implication of PURA's decision in the 2026 Storm Decision. In particular, tools and durable goods may be reusable after the completion of storm restoration activities and therefore may provide benefits beyond the particular storm event for which recovery is sought. Those costs are fundamentally different from materials that are consumed in the restoration process and have no continuing utility following the storm.

Accordingly, in this proceeding, the Company is requesting that PURA apply the targeted approach from the 2019 Storm Decision and limit the 25 percent adjustment to those categories of materials that may reasonably be considered reusable or otherwise part of the Company's normal operating expenses, including tools and durable goods. Applying the 25 percent adjustment indiscriminately to all materials would overstate the portion of the Company's storm-related costs that is properly characterized as non-incremental and would fail to account for the differing nature and use of the materials included in the Company's request.

Date Filed: August 21, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Office of Education, Outreach, and Enforcement

Question:

(STORM CUSTOMER CONTRIBUTIONS) Refer to Exhibit-ACCT-1. Provide a reconciliation of the customer contributions reported within Exhibit-ACCT-1 (i.e., WACC Cust Cont tab) to the customer contribution cutoff authorized within Docket No. 25-12-13. To the extent that the contribution dates do not align, explain if there is an update required to the revenue request and provide documentation or calculations supporting the amount.

Response:

Please refer to the Company's response to interrogatory EOE-018[i] for a reconciliation of the customer contributions reported in Exhibit-ACCT-1, tab "WACC Cust Cont", Column E to the customer contribution cutoff authorized within Docket No. 25-12-13.

As noted in the Company's response to interrogatory EOE-018, subsequent to filing this rate amendment application on July 14, 2026, the Company has received the final decision in Docket No. 25-12-13. The Company will be updating its cost of service to reflect the final decision in Docket No. 25-12-13 during the course of this proceeding and will reflect any changes related to Exhibit ACCT-1 including customer contributions.

Prior Referenced Response:

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[i] EOE-018 Question:
(STORM CUSTOMER CONTRIBUTIONS) Refer to Exhibit-ACCT-1, WACC Cust Cont, Column E. Explain how each of the customer contribution amounts were derived.

EOE-018 Response:
Please refer to EOE-018, Attachment 1, for the calculation of the monthly customer contributions included in Exhibit-ACCT-1, tab "WACC Cust Cont", Column E. EOE-018, Attachment 1, is further explained below:

(1) Rows 15 through 22 identify the storm amortizations included in CL&P's base distribution rates established as a result of storm reviews in Docket Nos. 17-10-46 and 18-11-12. This reflects the annual revenue the Company receives from customers associated with prior storm amortizations. As these amortizations fully

collect their respective storm costs the amortizations transition from funding prior storm costs to funding the storm reserve.

(2) Rows 25 through 28 identify the total revenues recovered in rates for the storm amortizations and removes the amortizations that are still being applied against prior storm costs. For example, Row 26 shows that the $2.940 million amortization was being applied against prior Docket No. 17-10-46 storm costs through April 30, 2024, and then was utilized to fund the storm reserve effective May 1, 2024 (i.e. increases the storm reserve funding). Row 27 shows that the $23.504 million amortization was being applied against prior Docket No. 18-11-12 storm costs through April 30, 2025, and therefore was not utilized to fund the storm reserve during this time period.

(3) Rows 30 and 31 show the base distribution funding of the catastrophic storm and pre-staging reserves authorized in Docket No. 17-10-46, which were each established at $3 million annually.

(4) Rows 32 and 34 show the total customer contributions to the storm reserve annually and monthly respectively. As shown on Row 34, customers contributed to the storm reserve $2.839 million monthly for the period May 1, 2023 through April 30, 2024 and $3.084 million for the period May 1, 2024 through April 30, 2025.

The customer contributions shown on Row 34 of Attachment 1 are reflected in Exhibit ACCT-1, tab "WACC Cust Cont" on a 2-month lag to reflect the billing and customer payment lag experienced by the Company. For example, the $3.084 million customer contributions beginning in rates on May 1, 2024 are reflected in Exhibit ACCT-1, tab "WACC Cust Cont" beginning in July 2024. Consistent with PURA's treatment of customer contributions in their final decision in Docket No. 25-12-13 the Company has applied only the contributions during the period for which the storms were incurred (i.e. January 2024 through March 2025).

Please note that the February 2024 customer contribution is a net amount resulting from PURA's final decision in Docket No. 25-12-13. In that Docket the Company presented total customer contributions for the period May 2018 through December 2023 of $101,882,534. PURA's final decision ultimately utilized $101,469,791 to offset 2018 – 2023 catastrophic storm and pre-staging events resulting in a remaining customer contribution amount of $412,743 as of December 31, 2023. Consistent with the 2-month lag above, the $412,743 remaining amount as of December 31, 2023 is reflected in February 2024.

Subsequent to filing this rate amendment application on July 14, 2026, the Company has received the final decision in Docket No. 25-12-13. The Company plans to update the cost of service in this case to reflect the final decision in Docket No. 25-12-13 during the course of this proceeding and will reflect any changes related to Exhibit ACCT-1 including customer contributions.

Date Filed: August 21, 2026

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

Question:

(STORM SNACKS) Provide an unlocked Excel spreadsheet detailing incremental recovery amounts for any costs related to snacks that are included within the storm recovery amounts for each event. To be clear, snacks are defined to include food and beverages that are not specifically required in support of a meal and would include, but not be limited to, candy, chips, beef jerky, and energy drinks. As part of the response, please cite the specific expenses within the respective Exhibit-ACCT-2 filings.

Response:

Please refer to EOE-121, Attachment 1, and EOE-121, Attachment 2, for the amounts for costs that could be related to snacks that are included in the storm recovery amounts. Please note that in these amounts there are essential, non-snack items, such as cases of water and coffee and it is not possible to distinguish those amounts from the pure snack items.

Eversource personnel work under difficult conditions during emergency events, often for long hours and frequently outside and beyond normal working hours. Items such as snacks, candy, drinks, and other basic provisions are regularly stocked and on-hand in our storerooms to support all Eversource employees during storm events. These supplies play a vital role in helping to boost employee morale at a time when all efforts and energy are focused on responding to, and restoring power for, customers effectively throughout extended storm restoration efforts, often under extremely challenging conditions for our employees while working their emergency response roles.

Date Filed: August 21, 2026

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

Question:

(STORM EMERGENCY RESPONSE PAY/STIPEND) Provide copies of any applicable emergency response pay policies or procedures applicable to incremental amounts included within the Company's storm balance.

Response:

Please refer to EOE-036, Attachment 1, for the compensation policy in effect for the 2024 and 2025 storms.

Date Filed: August 28, 2026

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

Question:

(INTERNAL STAFFING LEVELS) Provide an unlocked Excel spreadsheet detailing the Company's average staffing levels by position (e.g., job title, not individual employees) for each year starting from 2018 through present, along with the overall costs (gross). Additionally, identify the average annual counts and actual amounts that were applicable to Operations and Maintenance (O&M), Capital, Storm, and any other allocated use (including allocations to RAM).

Response:

Please refer to OCC-202, Attachment 1 and Attachment 2, for the staffing level and overall costs (gross).

Please refer to EOE-123, Attachment 1, for O&M, Capital, Storms and RAM Labor costs applicable by year.

Date Filed: August 28, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray and Sasha P. Lazor
Request from: Office of Education, Outreach, and Enforcement

Question:

(INTERNAL RESOURCE COSTS) Provide an unlocked Excel spreadsheet listing each employee position (e.g., job title, not individual employees) and separately identify the fully loaded employee cost per year from 2018 through present, along with the calculated hourly equivalent costs. As part of the response, please discuss any assumptions used.

Response:

Please refer to OCC-202, Attachment 1 and Attachment 2, for the requested information.

Date Filed: September 01, 2026

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

Question:

(EXTERNAL STAFFING) Provide an unlocked Excel spreadsheet detailing the Company's 'external' average staffing levels for each year starting from 2018 through present, along with the overall gross costs. To the clear, this request is looking to identify the roles, counts, applicable external vendors, costs, and any other relevant details that could assist in minimizing follow-up interrogatories. This request is applicable to all types of external staffing including, but not limited to, vendors supporting line crew activities, customer service activities, IT development activities, etc.

Response:

The Company began tracking external staffing counts on a systematic, reportable basis starting in 2023. As a result, the system has data as of December 2023, and December 2024 and then by month starting in 2025 and 2026. Please refer to EOE-125, Attachment 1, for a headcount by Business Area using the respective December counts.

Please note that external staffing counts are not associated with a specific operating company. Therefore in EOE-125, Attachment 1, the Company provides the requested data in relation to any business area that could potentially support CL&P. This includes Shared Services Organizations such as CFO and Customer Group, as well as operational organizations such as Engineering and Safety, Training, and Fleet.

"External Staffing" referenced above is generally held to mean short-term temporary staffing that can include administrative/clerical, accounting/financial, technological, and project support. External staffing is hired through staffing agencies (i.e., temp agencies) or can been contracted directly with firms. During the period requested, the Company had two outside vendor companies that acted as staffing agencies, Randstad and Allegis Global Solutions. During the requested period, the Company directly contracted with 30 outside vendor companies. These vendors are Burns & McDonnell, TRC Engineers, Progressive Global Energy, United Utility Power Services, CHA Consulting, Capital Staffing Solutions, Leidos, RLC Engineering, Plant Forward Energy Services, Qualus, Ironhouse, Qualus Consulting, AI Engineers, ESPii, EN Specialty Services, PMA Consultants, Watkins Strategies, Airswift, Wunderlich-Malec, Power Engineers, Cascade, RCM Technologies, Global Technical Talent, Shermco Industries, EPST-A Voltyx Company, Parsons, Asplundh Engineering Services, BHI Energy, Saybrook Associates Inc., and Control Point Technologies.

The Overhead Line Department has kept internal reporting on counts for CL&P Distribution Overhead Line crews, as shown in EOE-125, Attachment 2. This includes headcounts by vendor with the averages from 2018 to June 2026.

The Company does not track staffing counts for any other types of Contractors. "Contractors" are vendors used to supplement the Company's internal work force for specific functions and projects to respond to the increase of work during peak need times including the seasonal demand of the work plan, repairs, and project management.

The gross costs on all Outside Services are included in EOE-125, Attachment 3, including all Outside Services provided to the Company by vendor. This includes the External Staffing, CL&P Overhead Line Crews and all other Contractors, as described above.

Date Filed: August 28, 2026

Witness: Erin M. Travassos
Request from: Office of Education, Outreach, and Enforcement

Question:

(EXTERNAL STAFFING-BCA) Identify and discuss all benefit-cost analyses (BCA) performed by the Company since 2017 that assesses the overall costs of hiring internal employees versus external vendors. Additionally, provide complete copies of the analysis and results.

Response:

The determination of the proper staffing levels for internal and external work resources is an exercise that occupies substantial management attention and work effort due to inherent complexities. In that regard, there is no unit of measurement that can be applied to form a direct comparison of the costs and benefits of internal and external resources because there are so many advantages and disadvantages inherent in each staffing type that cannot be reduced or neutralized to enable a pure hourly rate or price comparison. All of the Company's decisions about the use of internal or external staff flow from a multi-dimensional perspective, of which cost is a major factor.

Chief among other factors is that the Company's internal crews are a permanent workforce that must be paid to work on a full-time basis across an entire calendar year, with or without storm events. As a result, the Company's calculus is to maintain staffing levels that are sufficient to conduct the annual workplan, encompassing both operations and maintenance ("O&M") work and capital work. Current staffing levels are matched with the current annual work plan. The Company's internal staff is always 100% utilized in responding to a storm event. However, if staffing levels were raised in order to assure the displacement of the need for external crews to respond to storm impacts, then the Company would need to enlarge and increase the annual work plan in order to assure that those incremental resources have work to do, across a calendar year, when storms *are not occurring*. This would come at a significant cost for customers *on a year-round, permanent basis*, as compared to paying for external crews just when they are needed.

In addition, the Company always needs to maintain some complement of external crews working on the system so that the Company has the ability to pull in external crews when they are needed for ERP storm response. Even if internal crews were less expensive, on an hourly rate basis, which they generally are not, it is incumbent upon the Company to maintain access and availability of external crews because the Company will never have a staffing level that obviates the need for external crews in larger events.

There are also numerous operational costs that vary with, and are a function of, internal staffing levels. In fact, a bulk of the operating cost that the Company incurs each year is tied to staffing, including costs such as facilities, vehicles, stores and administrative costs, supervision, and many other expenses. All of these costs factor into the Company's perspective on comparative costs and benefits.

In this context, the Company has been executing a strategic staffing plan since 2017. Following the in-sourcing of the troubleshooter organization, over 100 internal resources were transferred into the organization to fill spots that had been previously outsourced to contract vendors. To accommodate this transition, the Company developed the necessary training infrastructure, creating opportunities for chief line mechanics to join the organization and train new apprentices, while managing ongoing retirements. These three dynamics: workforce replenishment, training and development, and retirements—drove the Company's long-term staffing strategy to establish the appropriate level of internal resources to handle day-to-day work.

More specifically, beginning in 2017, the Company consistently hired apprentice line workers, as well as already-qualified journeyman line workers to build the workforce to the complement it has today. That effort has been successful and the Company is now in a steady state in which apprentice classes are primarily focused on replacement hiring. At the same time, the Company continues to use a complement of external contractors that can be mobilized to support additional project work that arises and emergency restoration events. This scalable contractor model allows the Company to increase staffing beyond its normal day-to-day requirements without maintaining an unnecessarily large permanent workforce. As a result of this strategic staffing plan, the Company's current staffing levels reflect a substantial increase in line workers since 2021, as shown in the table, below.

		Dec 2020	Dec 2021	Dec 2022	Dec 2023	Dec 2024	Dec 2025
11 CL&P	LINE MECHANIC	Actual	Actual	Actual	Actual	Actual	Actual
11 CL&P	LEAD LINE MECHANIC	76	77	99	111	135	151
11 CL&P	LINE HELPER	24	21	20	20	31	46
	Chief/Top Line Mechanic	109	131	120	124	135	106
		57	54	54	60	70	80
		266	283	293	315	371	383
11 CL&P	Chief Splicer/Chief Cable Splicer	11	12	15	16	19	19
11 CL&P	Splicer/Cable Splicer	23	19	19	19	19	25
11 CL&P	Lead Splicer/Lead Cable Splicer	9	12	12	11	12	13
11 CL&P	Splicer/Cable Splicer Helper	22	18	27	33	37	26
		65	61	73	79	87	83

In addition, Table 1 on page 7 of the 2018 Settlement Agreement showed the expected reduction to outside contractor expense following from the Company's efforts to hire up to 100 incremental FTEs to replace those contractors positions. The number of contractors (and the associated expense reduction) for the reduction to outside contractor expense was the outcome of substantial negotiations and discussions between the settling parties at the time. As noted above and in the 2018 Settlement Agreement, the reduction to contractor expense is small at the beginning of the analysis and grows over time as new Company FTEs typically require 4-5 years to be fully trained and therefore, during each new FTE's early years of training and employment with the Company, each new FTE cannot displace the work performed by an outside contractor on a one-for-one basis.

Date Filed: August 21, 2026

Witness: Brendan J. O'Brien and Timothy J. Griffin
Request from: Office of Education, Outreach, and Enforcement

Question:

(SAMPLING) Respond to the following:
a. Identify and discuss any sampling methodologies followed by Eversource in support of the execution or review of the Company's internal control environment. As part of the response, identify how the Company extrapolates the results of discrepancies identified.
b. Identify and provide complete copies of any authoritative guidance used by the Company or its consultants that defines requirements for sampling in support of internal controls, independent validations, or assurance engagements. To be clear, this request is looking for any guidance leveraged by the Company, including guidance prescribed by the American Institute of Certified Public Accountants, if applicable.

Response:

a. On an annual basis the Internal Audit team will evaluate and test the Company's internal control environment by evaluating the design, implementation and operating effectiveness of all identified controls, consistent with standard Sarbanes Oxley ("SOX") practices. This process is conducted internally, in addition to the annual external audit performed by the Company's external audit firm (Deloitte), who issues an independent opinion each year on the Company's internal controls over financial reporting in accordance with the standards of the Public Company Accounting Oversight Board ("PCAOB").

   When testing the operating effectiveness of internal controls, the Internal Audit team determines sample sizes based on the frequency of the control (i.e. daily, weekly, monthly, etc.) and the assessed risk level, consistent with standard SOX practices. For manual controls, frequency-based sampling tables are used to establish sample sizes. The Company applies both random sampling and judgement-based sampling. In performing SOX testing of the operating effectiveness of internal controls, exceptions are not typically extrapolated. Instead, any discrepancy identified during testing is evaluated qualitatively and quantitatively to determine the severity of the internal control deficiency. This evaluation considers whether the exception is isolated, whether it indicates a broader issue, the potential impact on financial reporting, the compensating controls (if any), etc. The Company follows the standard SOX approach of assessing the nature and significance of any exception.

b. The SOX sampling performed to test the operating effectiveness of controls each year is based on the internal guidelines outlined within EOE-127, Attachment 1. This table was developed in consultation with our external audit firm. Additionally, in general the Internal Audit group relies on authoritative guidance, including:

- IIA International Standards for the Professional Practice of Internal Auditing (please refer to EOE-127, Attachment 2)

- COSO Internal Control – Integrated Framework (please refer to EOE-127, Attachment 3)

Date Filed: August 21, 2026

Witness: John P. Dipaola-Tromba, Sean D. Redding, Jenna M. Turner, Craig Dikeman, and Matthew J. Correia
Request from: Office of Education, Outreach, and Enforcement

Question:

(VEGETATION CREW HOURS) Confirm whether each tree crew vendor's contractual "normal working hours" remain 7 AM to 4:30 PM (i.e., 0700 to 1630) for each weekday, or a maximum of 9 hours. As part of the response, identify each tree crew vendor and cite the contract provisions that detail these hours. If the contracts do not detail the normal working hours, please provide email or other communications supporting the normal working hours that would bill at standard time (ST) rates.

Response:

The normal working hours for local tree crews are confirmed as 7 AM to 4:30 PM (or, stated differently, 07:00 to 16:30) and the tree crews are paid nine hours of straight time for time worked during these hours, up to the first 45 working hours, with a 30-minute unpaid meal break. This language is not included in contract provisions, rather it is a department practice.

Please refer to EOE-128, Attachment 1, for the Eversource Contractor Tree Crew Work Schedule.

Date Filed: August 21, 2026

Witness: John P. Dipaola-Tromba, Sean D. Redding, Jenna M. Turner, Craig Dikeman, and Matthew J. Correia
Request from: Office of Education, Outreach, and Enforcement

Question:

(VEGETATION CREW BILLING) Explain the contractual obligations for the correct treatment of billing hours during meal breaks for each external tree crew vendor for both non-storm and storm events (i.e., including both working time and standby time). As part of the response, list each vegetation vendor and cite the contract provisions that detail the correct billing practices. If the contracts do not explicitly detail the permitted billable treatment of labor hours for meals, please provide email or other communications supporting the billable treatments.

Response:

Please refer to the response to EOE-128. Work practices govern the treatment of meal breaks during billing hours.

Please refer to EOE-128, Attachment 1. During non-storm or blue-sky days, local Connecticut tree crews are paid 9-hours of straight time for time worked during 7 AM to 4:30 PM (07:00 to 16:30), up to the first 45 working hours, with a 30-minute unpaid meal break.

During storm events, a meal break is not excluded so the 9-hours paid for straight time are 7 AM to 4:00 PM (i.e. 07:00 to 16:00) and everything worked between the hours of 4:00 PM to 7:00 AM (16:00 to 07:00) of the next day have a premium rate applied.

For tree crews, all time on shift is work time. Tree crews do not have contractual provisions allowing for payment of standby time. When a tree crew indicates “standby” on a timesheet, it is not equivalent to the “standby” time of line crews. Instead, this is a shorthand note that the crews are on their assigned storm shift and are actively ready to respond to provide the service for which they are hired. For example, they may be waiting for a line crew to arrive or to make the location safe for them to do their work, all of which is part of the tree crew’s work time hours.

Date Filed: August 21, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, John P. Dipaola-Tromba, Sean D. Redding, Jenna Turner and Mark P. Baldwin
Request from: Office of Education, Outreach, and Enforcement

Question:

(VENDOR TRAVEL) Explain the Company's travel review process for external vendors to include any assumptions for determining whether mobilization/demobilization travel time would be considered reasonable (i.e. in relation to Google/MapQuest estimates), how estimates would be increased by escalation factors, whether the review process differs for different vendors or types of vendors, and whether the Company has performed a study supporting that policy. Additionally, identify if the Company has changed its position outlined within its supplemental response to OCC-41 from Docket No. 25-12-13.

Response:

The Company applies the formula described below to determine whether line and vegetation crews can mobilize, travel and arrive on a timeline to assist productively in restoration.

The Company uses a formula to calculate daily travel time capability of a line crew traveling at 60 mph for 10 hours (maximum drive time), or approximately 600 miles per day. Based on the expected duration of the restoration, the Company will procure crews factoring in this travel time when validating invoices. The Company looks at the location of mobilization, the 600 miles per day and any external factors that may come into play to determine what is a reasonable travel time when reviewing and approving invoices.

Application of the above formula combined with the overall projected impact of the weather event (i.e. duration of restoration, number of potentially impacted states, availability of local or regional resources) enables the Company to determine, on an event by event basis, what travel time is reasonable. Due to size, refueling and possible weather/traffic delays, actual daily mileage of a bucket truck may differ from 600 miles per day.

Google Maps is a useful reference point for determining travel time. However, the accuracy and reliability of Google Maps data is subject to qualification in its terms of use, and therefore it should not be relied upon as the exclusive measure of reasonable travel time. In Docket No. 25-12-13 the Company responded to OCC-041 and associated attachments provided here for reference as EOE-130, Attachment 1. Page 2 of OCC-041-SP01, Attachment 1 (which is page 4 of 24 of EOE-130 Attachment 1), is the Google Maps End User Additional Terms of Service ("Google Maps T&Cs"), and states that: "When you use Google Maps map data, traffic, directions, and other

content, you may find that actual conditions differ from the map results and content, so exercise your independent judgment and use Google Maps at your own risk." The Google Maps T&Cs further provide that end users of Google Maps must accept the Google Terms of Service, which is attached hereto as OCC-041-SP01, Attachment 2 (which is page 5 of 24 of EOE-130 Attachment 1). Page 13 of OCC-041-SP01, Attachment 2 (which is page 17 of 24 of EOE-130 Attachment 1), presents the following warranty disclaimer:

> TO THE EXTENT ALLOWED BY APPLICABLE LAW, WE PROVIDE OUR SERVICES "AS IS" WITHOUT ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING THE IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, AND NON-INFRINGEMENT. FOR EXAMPLE, WE DON'T MAKE ANY WARRANTIES ABOUT THE CONTENT OR FEATURES OF THE SERVICES, INCLUDING THEIR ACCURACY, RELIABILITY, AVAILABILITY, OR ABILITY TO MEET YOUR NEEDS.
>
> DON'T RELY ON THE SERVICES FOR MEDICAL, LEGAL, FINANCIAL, OR OTHER PROFESSIONAL ADVICE. ANY CONTENT REGARDING THOSE TOPICS IS PROVIDED FOR INFORMATIONAL PURPOSES ONLY AND IS NOT A SUBSTITUTE FOR ADVICE FROM A QUALIFIED PROFESSIONAL.

As the Company has explained in its response to several discovery responses in Docket Nos. 24-03-30 and 25-12-13, all provided here for ease of reference as EOE-130, Attachment 2 (see, e.g., OCC-031; EOE-501; EOE-517; EOE-536; and EOE-0590), Google Maps and its underlying algorithms do not incorporate vehicle sizes and dimensions, the safe operating speed of contractor vehicles traveling in a convoy, fuel capacity/efficiency, activities that do not include actual driving, such as refueling, safety rest breaks, and meal breaks, and/or different commercial vehicle types (e.g., pick-up trucks, various sized bucket trucks, including diesel models, lifters, pole trailers, diggers/derricks, etc.) in travel time calculations. Each of these factors can affect the actual time it takes for a contractor to arrive at the contractor's designated location in the Company's service territory and, therefore, are appropriate for consideration in the cost validation process. Accordingly, the Company uses the estimated time calculated by Google Maps for car travel as a data point and multiplies that figure by a factor of 1.3 hours to compute a reasonable benchmark for actual travel time. The Company applies the 1.3 hours factor to account for, among other things, the slower speed of fully loaded line trucks that travel as a convoy and make more frequent stops than a conventional sedan vehicle. The Company further evaluates the reasonableness of travel time based on its experience and professional judgment on an event-by-event basis. These additional layers of analysis are necessary because Google Maps does not account for factors and variables that are known to impact travel time. Thus, Google Maps cannot, and should not, be relied upon as the sole measure of travel time.

Date Filed: August 21, 2026

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

Question:

(VEGETATION INVOICES) Explain why vegetation invoice costs do not agree to the requested recovery amounts. As part of the response, please provide an example of the relevant calculations and system screenshots supporting the reported differences.

Response:

The vegetation invoices and supporting documentation are indicative of the pretax total cost and do not include the 3.335% tax included in the recovery amounts. See, Conn. Gen. Stat. § 12-407(2)(i)(V)-1.

Please refer to EOE-131, Attachment 1 CONFIDENTIAL, for examples of the relevant system screenshots supporting the pre- and post-tax differences. These examples are from invoices charged to MS24A, as referenced in Exhibit ACCT-2 (CLP-1)(MS24A), "Outside Contractors-Vendors" tab, Lines 38-40.