Date Filed: September 24, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(MS24E) Please refer to Exhibit ACCT-2 (CLP-5A-01) (MS24E) p. 65-66. Please confirm that this crew was on standby throughout March 11 and March 12, 2024, performed no work, and was paid overtime.

Response:

The tree crew worked a 16-hour overnight shift which was billed as work time at the overtime rate as it was outside the standard work schedule hours. There is no standby designation or rate for tree crews. The crew did not record any ticket locations.