CL&P dba Eversource Energy
Docket 24-03-30
Set OCC-02
Date Issued May 30, 2024
Q- OCC-031
Page 1 of 1

Date Filed: June 14, 2024

Witness: Desautels, Dean C, Dipaola-Tromba, John P, Colorio, Christopher E, Hayhurst, Michael F, Sullivan, Stephen T
Request from: Office of Consumer Counsel

Question:
Travel Time. Please provide a detailed explanation as to how the Company determines that the travel time (i.e., mobilization and demobilization) of line contractors and vegetation contractors is reasonable, including any analysis it has prepared to support this conclusion.

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.

Eversource 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. We look 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 be under 600 miles per day.

Date Filed: July 08, 2025

Witness: Landry, Leanne M, Dipaola-Tromba, John P, Hayhurst, Michael F, Colorio, Christopher E, Sullivan, Stephen T, Griffin, John G
Request from: Public Utilities Regulatory Authority

Question:
(MS22A-STORM VENDOR CHARGES-LINE) Refer to Exhibit CLP-34, Confidential Exhibit CLP-34(A), pp. 2367-2524 of 3050 and Responses to EOE-426 and EOE-427.

a. Identify the starting address for the vendor employees (crews) relevant for each of the four invoices that billed for travel (starting on pages 2367, 2414, 2437, and 2456). (Note: EOE-426, att.1 identifies each home location as Michigan but it is unclear if all crews are from the same location.)
b. For each of the four invoices identified in a., identify the estimated travel time that would apply from the vendor's starting address to the Eversource staging area. Provide documentation supporting the estimates.
c. Compare the billed travel time summarized within EOE-426, Att. 1 to the estimated time identified in b. for each respective crew/invoice. To the extent that the comparison identifies discrepancies, please explain why this wasn't identified during the invoice review process.

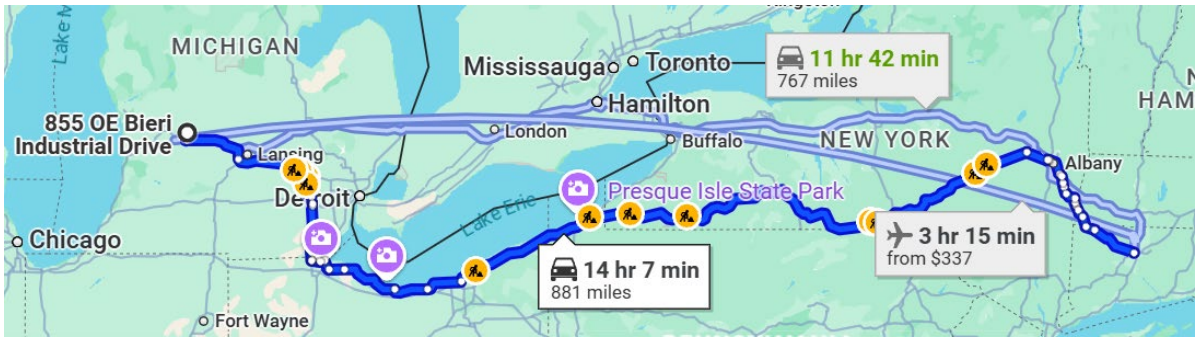
Response:

To determine the reasonableness of travel time, the Company applies the formula discussed in the Company's response to Q-OCC-031 and Q-OCC-042, which is designed to validate the mobilization location and to compute what is reasonable for travel time from that point given distance and speed of travel, as well as contract billing elements. In addition, Eversource uses historical knowledge of storms, weather, traveling in a convoy of larger vehicles, possible routes, as well as stops for refueling and eating when reviewing the time and distance provided by the contractors to validate in order to determine what is a reasonable amount of drive time from their mobilization location and back to their home location following demobilization.

For the referenced invoices, the table below shows a summary of home locations and travel time, assuming travelling at the speed limit and no stops.

Summary of home locations and travel time

Invoice	Home Location	Google Map Estimated Time	------ Travel Hours Billed ------		Reasonable
			Mobilization	Demobilization	
2518	Michigan	14 Hours	18 Hours	18 hours	Yes
QB 2493R3	CT	NA	NA	NA	No Charge
2499	CT	NA	NA	NA	No Charge
2551R	Michigan	14 Hours	18 Hours	18 hours	Yes ★
QB#2560R2	Michigan	14 Hours	18 Hours	18 hours	Yes ★
2490	Michigan	14 Hours	18 Hours	18 hours	Yes ★



★ Eversource utilizes a method to determine a reasonable amount of time for outside resources to travel from their origin to the Eversource point of destination and then back to their home location. We take the time that it would take a normal size car in hours to travel to the destination point and multiple it by 1.3 hours. For example, if it was going to take a normal sized car 2 hours to travel to an Eversource destination we would multiple it by 1.3 hours and estimate that the resource would arrive in 2.6 hours for a large utility vehicle to arrive at the Eversource destination. When it falls outside of that range by more than a reasonable amount of time, approximately 3-4 hours when we receive the invoice, our invoice team would question why the excess time. Examples of reasons why it may take longer than the calculated amount of time could be but not limited to:

- Inclement weather during their mobilization or demobilization travel duration
- Major accidents/construction on the route during their mobilization or demobilization travel
- Vehicle breakdowns during mobilization or demobilizing
- A sizable caravan of large utility vehicles may require more stops than for a smaller caravan
- If the travel occurs during a major holiday or a major city during high travel times

CL&P dba Eversource Energy
Docket 24-03-30
Set EOE-08
Date Issued June 17, 2025
Q- EOE-501
Page 3 of 3

- Excessive travel time which may include an overnight stay due to the distance and travel

CL&P dba Eversource Energy
Docket 24-03-30
Set EOE-09
Date Issued July 10, 2025
Q- EOE-517
Page 1 of 1

Date Filed: July 22, 2025

Witness: Griffin, John G, Landry, Leanne M
Request from: Public Utilities Regulatory Authority

Question:

(MS22A-STORM VENDOR CHARGES-TREE) Refer to Responses to EOE-416 and EOE-470. The Company's response to EOE-416 asserted that there was no billing error and that a tree crew can bill for the travel between their assigned location and their equipment parking location. EOE-470 requested that the Company cite the specific contract provisions that allow for the billing between the assigned location and the parking location and to provide documentation to support that the distance between the two locations would equate to an hourly charge. The Company did not provide the contract citations – please provide. Additionally, the Company identified that the staging location was Norwalk, CT and the parking location was New Canaan, CT. The Company did not provide documentation supporting the additional one-hour charge – please provide. Of note, EOE performed a Google search between the two towns (specific addresses were not provided) and found that the commute could take approximately 15 to 20 minutes, not the referenced hour.

Response:

As explained in the Company's response to Q-EOE-470, Tree Contractors invoice the Company for their entire shift, which includes their travel time. Although the contract does not explicitly reference "travel" time, travel is a necessary component of restoration work and an implied term in the contract. Accordingly, travel is a valid and reasonable cost for remittance by the Company.

The discovery request notes that EOE performed a Google search for the two towns, which the contractor traveled between, and found that the commute could take approximately 15 to 20 minutes, not the referenced hour. Google Maps, while generally a useful tool for standard vehicle navigation, does not explicitly incorporate hazardous conditions and/or vehicle types in its travel time calculations. The vehicles in this case were bucket trucks, which travel slower than standard cars and often need fuel before returning to their staging locations. Based on the Company's experience, the one-hour travel time between these two locations was reasonable under the circumstances.

Date Filed: August 06, 2025

Witness: Griffin, John G, Landry, Leanne M
Request from: Public Utilities Regulatory Authority

Question:

(MS22A-STORM VENDOR CHARGES LINE) Refer to responses to EOE-426 and EOE-501. EOE-426, Att. 1 provides a breakdown of hours billed per MTV Solution vendor for each invoice. EOE-501 provides details regarding the travel locations and hours billed for each of the MTV Solution employees and concluded that 18 hours of travel time being billed for each employee is "Reasonable". Specifically, the Company's response to EOE-501 discusses a method of multiplying the commute for a normal size car by a factor of 1.3 and provided two Google Map estimates (11 hr 42 mins and 14 hr 7 min) with an analysis that used the 14 hours to justify billing of 18 hours (14 x 1.3 = 18.2 hours). Respond to the following:

a. Identify the number of travel hours billed for this vendor that would have resulted in further inquiry by the Company or denial of the hours billed.
b. Identify if the Company questioned the billed travel hours at the time of the invoice approval. If yes, provide any supporting documentation (emails) between the Company and the vendor explaining the hours billed.
c. Explain how the Company derived the 18 hours of travel time for demobilization as presented in EOE-501.
d. Explain why the Company permitted the MTV Solution vendor to generally bill between 21 and 26.5 hours for the demobilization hours on January 17-18, 2022 when the Company's analysis only supports 18 hours. (See EOE-426, Att.1)

Response:

For parts (a) and (b), the Company reviewed the contractor's travel time and did not have any concerns based on its assessment of the relevant facts and circumstances.

The Company does not employ a bright-line threshold for "further inquiry by the Company or denial of the hours billed." Rather, the Company conducts a review of all travel time billed by contractors informed by the Company's historical knowledge of storms, weather, the logistics of traveling in a convoy of larger vehicles, and other factors as discussed in the Company's response to Q-EOE-501. For instance, if a contractor travels a greater distance (for example, from Michigan to Connecticut as compared to New York to Connecticut), the likelihood of travel delays will increase (i.e., longer distance to travel, greater potential for difficulties along the way). As a result, it is not as simple as looking at the estimated travel time shown on Google Maps, without considering practical factors encountered in real life. The Company uses the estimated hours

shown on Google Maps for *car travel* as a reference point and multiples that figure by 1.3 hours to account for the slower speed of a heavy line truck that needs to make more frequent stops than a conventional sedan vehicle. As a general rule, an invoice approver would question travel time that was 3-4 hours more than what the Company would expect for the distance traveled.

The Company did not "derive" the 18 hours of demobilization presented in response to Q-EOE-501. The vendor reported 18 hours of demobilization and, based on review, the Company found this to be reasonable under the circumstances (i.e., 14 hours times 1.3 is 18.2 hours).

The Company did not permit, and MTV Solution did not bill, between 21 and 26.5 hours for demobilization. The travel time listed in the timesheets on January 17th represented travel *between assignments*. The 18 hours of demobilization occurred on January 18th and was identified as such in the timesheets.

Date Filed: September 05, 2025

Witness: Griffin, John G, Landry, Leanne M
Request from: Public Utilities Regulatory Authority

Question:
(MS23J-VENDOR-TREE) Refer to Exhibit CLP-54, Confidential Exhibit CLP- 54(A), p. 3788-3924. The Company included seven charges totaling $138,825 for the Lewis Tree Service Inc for services performed by out-of-state vendor employees. Respond to the following:

a. Provide a current, applicable copy of the contract and corresponding pricing schedule in support of the billed rates.
b. The documentation includes screenprints (e.g., pp. 3804) detailing a commute of 5 hr, 14 mins. Explain why the vendor was permitted to bill for 14 hours of travel on Sunday and 11 hours of travel on Thursday when the documentation would suggest less than half the hours billed.
c. The Invoices included charges for mileage. Cite the contract provisions that allow for the billing of mileage. If the contract does not specifically permit the billing of mileage, identify the total amount of mileage billed by this vendor for the storm event.
d. The vendor billed all work performed between Monday and Thursday at OT rates in lieu of the ST rates outlined in the Company's response to EOE- 119. Cite the contract provisions that allow for this billing treatment. If this treatment is not defined within the contract, identify the total amount of incremental billing that occurred at the OT rate versus if the vendor were to bill at an ST rate for normal working hours.
e. Cite the contract provisions that permit the billing of the referenced per diem rate.

Response:

Referring to Exhibit CLP-54 (MS23J), Outside Contractors-Vendors, lines 554 through 560, Lewis Tree Service, Inc., seven invoices totaling in the amount of $138,825.

a. Please refer to Q-EOE-590, Attachment 1 Confidential for a copy of the contract and pricing schedule.

b. There was inclement weather on Sunday, December 17th that resulted in a longer travel time. The path of inclement weather was along the crew's travel route throughout, which was provided on pages 3804 – 3810 and stated the travel mileage was approximately 332 miles (page 3804). Bucket trucks traveling in inclement weather, as was the case on December 17,

may need to travel as slow as 30 mph or less (332 miles / 30 miles = approx. 11.1 hours). The screenprints show estimated travel time for an average vehicle traveling at the speed limit, and without considerations for traffic conditions, construction, accidents, or weather conditions. Depending on the time of day, Google Maps shows the route from 4085 James Madison Highway, Haymarket Virginia to 80 Newtown Road, Danbury, Connecticut may take 7 to 8 hours for a standard vehicle, excluding any impacts for weather conditions. Included in travel time, there must also be time allowed for fuel refill and breaks for meals. Once arrived in state, the contractor would need to complete Eversource onboarding and safety reviews. The travel time billed for 14 hours on Sunday, December 17th, is reasonable based on the challenges faced by the traveling crew during that day of inclement weather. The travel time returning home was 3 hours less because road conditions were not impacted by an active inclement weather event.

c. For travel, the equipment may be billed at the mileage rate instead of billing hourly time and material for the equipment. See Q-EOE-590, Attachment 1, Confidential, pages 11-12 for the Standardized Equipment Storm Billing Rates.

d. Crews traveling from out of state may bill OT. See Q-EOE-590, Attachment 1, Confidential, pages 9 - 10 for the Standardized Storm Labor Rates.

e. For the per diem rates for meals and lodging see Q-EOE-590, Attachment 1, Confidential, page 13, for the Expense Charge Schedule.