

**Public Service of New Hampshire d/b/a Eversource Energy  
Docket No. DE 20-005**

**Date Request Received: 05/28/2020**

**Date of Response: 06/12/2020**

**Request No. STAFF 1-033**

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**Request from: New Hampshire Public Utilities Commission Staff**

**Witness: Catherine Finneran**

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**Request:**

Please explain why Eversource agreed to pay MBI any costs resulting from the Safety Stand Down.

**Response:**

Not paying “any” costs would have caused a very severe setback to the overall project and would have caused Eversource to incur greater cost than it did. Therefore, Eversource made the determination that this course of action would be highly detrimental to the project (and customers) in terms of cost and timing.

During the Safety Stand Down, it was critical that Eversource held onto the skilled labor that was on-site and working every day. Eversource agreed to pay for: (1) ongoing work performed by the trained and experienced labor crews; (2) health and safety protections; (3) capital equipment standby; and (4) equipment material and supply costs. Eversource did not pay for any other costs during this time period.

It was necessary for Eversource to pay these costs to keep the MBI workforce intact for the upcoming re-start of operations to complete demolition activities. It was a significant challenge to hire the large numbers of properly experienced workers at the beginning of the project. There was work available in eastern Massachusetts and southern New Hampshire that made it difficult to attract the necessary expertise at the outset of the project. If Eversource did not pay keep these workers, the existing labor force would have been dispersed, requiring costly and time-consuming hiring and retraining of a new labor force once the re-start began.

New hires would have to undergo site orientation, safety and health training, and training on site-specific safety and work procedures – all of which would have required many weeks. Also retaining the existing workforce enabled Eversource and its contractors to avoid costs of demobilization and re-mobilization of contract supervision and management resources and their technical professionals. All of this process would have caused significant delays beyond September 2017.

Lastly, the labor resources paid by Eversource during the Safety Stand Down performed productive work outside of the containments during this period. This work was necessary to maintain containment integrity and to package removed materials. In addition, training was conducted to prepare for the re-start of full-scale operations.