

1 **Q. Please advise as to the amount of overtime paid to these mobile forces over the past**  
2 **four years.**

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4 A. The employees who form the mobile workforce, specifically the technical and line  
5 employees, will vary from time-to-time and from project to project. The amount of  
6 overtime paid to employees for work completed outside of their own operating area is not  
7 tracked separately from overtime paid to them for work completed inside their own  
8 operating area.

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10 The mobile workforce approach to major feeder reliability rebuilds yields benefits in  
11 terms of reliability and overall cost reductions when compared with more traditional  
12 approaches to these projects. Customers experience fewer and shorter scheduled outages  
13 during the course of the project and the reliability benefits associated with the rebuilds  
14 are realized much sooner than if the project were completed over several years. These  
15 benefits are described in more detail by Mr. Ludlow's evidence, page 51, lines 8-16.

16  
17 As described by Mr. Ludlow, savings are realized by reducing the costs of mobilizing and  
18 demobilizing construction crews. A concentrated effort by a larger team of employees  
19 means that the project can be completed in a shorter timeframe, which reduces overall  
20 costs.