

1 **Q. In reference to the evidence of Earl Ludlow, page 15, line 17, please advise as to the**
2 **number of employees in Administrative and Engineering Support, year over year,**
3 **from 1996 to current and forecast and the percentage of increase/decrease, as the**
4 **case may be.**

5
6 A. Administrative and Engineering Support, as referred to on Page 15 of the *Operations &*
7 *Customer Service Evidence* and on line 5 of Mr. Ludlow's Exhibit EAL-1 represents a
8 wide range of costs charged to a specific class of functional accounts, as defined in the
9 Company's approved System of Accounts, and includes both labour and non-labour
10 expenses.

11
12 The Company's employees are not organized in accordance with the Company's
13 functional accounts. Rather, the assignment of employees follows a departmental
14 organizational structure as shown in the Company's response to Request for Information
15 NLH-203. The number of employees assigned to each Company department is shown on
16 a full-time equivalent basis in the Company's response to Request for Information NLH-
17 205.

18
19 Labour charged to the Administrative and Engineering Support class includes:

- 20
21 1. All labour associated with the operation of the Company's System Control
22 Centre;
23 2. Labour associated with supervisory, administrative, engineering and technical
24 staff within the Engineering and Operations Division, where the labour is of a
25 general operating, supervisory or administrative nature; and,
26 3. Labour costs associated with the maintenance and repair of Company owned
27 tools, instruments and equipment (other than vehicles).