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Q. 1 a) Please provide tables, similar to the format below, showing actual or forecast 2 FTEs and headcount for 2015-2020 for unionized, non-unionized and executive 3 employee classifications. 4 5 b) For both FTE and head count, please indicate the reductions that are 6 attributable to the completed deployment of Automated Meter Reading (AMR) 7 meters. 8 9 c) If there are workforce reductions additional to those attributable to the AMR 10 program captured in the tables provided in question a) please indicate the positions, reasons for the reductions, and years in which the reductions 11 12 occur(ed). 13 14 d) Newfoundland Power states "meter reading operating costs were reduced by approximately 65%, or \$1.8 million, between 2012 and 2017. These cost savings 15 16 are reflected in Newfoundland Power's proposed customer rates for 2020." On 17 the complete Operating Costs by Breakdown statement please indicate in which 18 line item(s) these costs savings are reflected. 19 20 e) Newfoundland Power states "[i]n 2020, Newfoundland Power expects an FTE 21 reduction of 4.4 FTEs as a result of the conclusion of the Five-Year Conservation 22 Plan: 2016-2020. This will result in a labour reduction of \$440,000." Please explain how the Conservation Plan will result in a reduction of 4.4. FTEs and 23 24 which positions will be eliminated. 25 26 f) At present, what percentage of Newfoundland Power's workforce is in the 27 executive employee classification? 28 29 g) What percentage of the workforce at other investor owned utilities in Canada 30 are classified as executive employee? For the purposes of this question please use the list of investor owned utilities considered in Mr. Coyne's evidence: ATCO 31

Electric; FortisAlberta; FortisBC Electric; FortisOntario Inc.; other Ontario

electric distributors; Maritime Electric; and Nova Scotia Power.

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a) Table 1 provides employees categorized by unionized, non-unionized and executive on a headcount basis. Table 2 provides similar information on a full time equivalent basis.

Table 1 Headcount¹

Category	2015	2016	2017	2018F	2019F	2020F
Union	323	313	300	301	301	303
Non-union	276	261	260	264	267	264
Executive	4	4	4	4	4	4
Total	603	578	564	569	572	571

Table 2
Full Time Equivalents (FTEs)

Category	2015	2016	2017	2018F	2019F	2020F
Union	357.2	349.3	333.9	328.1	333.4	336.7
Non-union	291.8	281.2	273.0	286.7	286.8	282.4
Executive	4.0	4.0	4.3	4.0	4.0	4.0
Total	653.0	634.5	611.2	618.8	624.2	623.1

- b) The completed deployment of Automated Meter Reading (AMR) meters has resulted in a reduction of 25.5 FTEs and 9 regular employees from the headcount from 2015 to the 2020 forecast.¹
- c) Newfoundland Power has not had any material workforce reductions in addition to those attributable to the AMR program.

and labour expense.

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Headcount reflects the resources of the Company at a point in time and only includes regular employees due to the dynamic nature of temporary employees. Newfoundland Power calculates FTEs based on employee hours worked divided by total working hours in a year. Since the FTE calculation reflects only hours worked, it is a better indicator of the reduction in work requirements. See "Labour Forecast 2018-2020" of *Volume 2*, *Supporting Materials* for additional information on the method used by Newfoundland Power to calculate FTEs

d) Table 3 s

d) Table 3 shows the operating savings related to reduced meter reading costs reflected in the Operating Costs by Breakdown.

Table 3 Operating Cost Savings² Reduction in Meter Reading Costs 2017A over 2012A (\$000s)

Total Labour	1,782
Overtime	14
Temporary	969
Regular and Standby	799

e) The 4.4 forecast reduction in FTEs in 2020 reflects the planned conclusion of the Instant Rebates and residential Benchmarking programs at the end of 2019. The Benchmarking program is not expected to be cost-effective following a forecast decline in the marginal cost of electricity in 2020. Conclusion of the Instant Rebates program in 2019 reflects forecast market saturation of LED light bulbs.

The labour decrease reflects reduced support of these two programs and the completion of the Five-Year Conservation Plan in 2020. For example, there are 10 temporary employees who deliver the Instant Rebates program during the Spring and Fall campaigns. These 10 temporary Retail Coordinators combined are equivalent to one FTE. Reassessment of resources and staff requirements will take place during this planning process to review the team composition required to deliver the next conservation plan. Any staffing vacancies within the conservation function are being filled as temporary assignments to allow for flexibility as future staffing needs are confirmed through the official planning process.

- f) At present, 0.6% of the Newfoundland Power's workforce is in the executive employee classification.³
- g) The Company does not track or maintain information relating to the percentage of employees classified as executive for the utilities listed.

Reduction in Meter Readers has also resulted in non-labour savings such as reduced Tools and Clothing Allowances. These savings are offset by inflationary increases from 2012A to 2020F.

 $^{^3}$ 2018F includes 618.8 FTEs of which 4 are in the executive employee classification (4 / 618.8 = 0.6%).