| 1  | Q. | At page 12 of the Regulated Activities: Evidence, it states that "Over the past |  |  |  |  |
|----|----|---|--|--|--|--|
| 2  |    | three years, there has been a reduction of 53 positions in the full time        |  |  |  |  |
| 3  |    | complement of Hydro's regulated activities, reaching a baseline, without        |  |  |  |  |
| 4  |    | сотр  | promising safety or reliability."                                    |  |  |  |
| 5  |    |   |  |  |  |  |
| 6  |    | a.  | Please explain how Hydro makes the determination that the reduction  |  |  |  |
| 7  |    |   | of these 53 positions has not compromised safety or reliability.     |  |  |  |
| 8  |    | b.  | What evidence exists that further reductions in the full time        |  |  |  |
| 9  |    |   | complement of Hydro's regulated activities would compromise safety   |  |  |  |
| 10 |    |   | or reliability?  |  |  |  |
| 11 |    | C.  | Has Hydro undertaken a review directed at determining which          |  |  |  |
| 12 |    |   | positions could be eliminated without compromising safety or         |  |  |  |
| 13 |    |   | reliability?   |  |  |  |
| 14 |    |   |  |  |  |  |
| 15 |    |   |  |  |  |  |
| 16 | Α. | a.  | At Hydro, safety is a primary consideration in all its day-to-day    |  |  |  |
| 17 |    |   | activities. Hydro evaluates FTE eliminations in light of changes to  |  |  |  |
| 18 |    |   | work methods, technology, and system requirements. Hydro has not     |  |  |  |
| 19 |    |   | compromised safety for the purposes of FTE reductions. While CEA     |  |  |  |
| 20 |    |   | has not yet approved release of its composite industry safety        |  |  |  |
| 21 |    |   | statistics, Hydro compares favourably to CEA industry performance.   |  |  |  |
| 22 |    |   |  |  |  |  |
| 23 |    |   | Hydro's performance to the end of the third quarter in 2006 compares |  |  |  |
| 24 |    |   | very favourably for the same period in 2005 as indicated in the      |  |  |  |
| 25 |    |   | following table:   |  |  |  |
| 26 |    |   |  |  |  |  |

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| Hydro's Q3 YTD 2006/2005 Performance |       |      |               |  |  |  |
|--------------------------------------|-------|------|---------------|--|--|--|
|                                      | 2005  | 2006 | % Improvement |  |  |  |
| All Injury Frequency                 | 2.33  | 2.10 | 9.9%          |  |  |  |
| Disabling Frequency                  | 1.61  | 1.05 | 34.8%         |  |  |  |
| Severity Rate                        | 21.48 | 2.80 | 87.0%         |  |  |  |

In terms of reliability, the KPIs are reviewed in Exhibit JRH-1 of Regulated Operations Activities pre-filed evidence, specifically at page 23 and while the indicators vary, they generally show improving trends.

9 b. Hydro evaluates opportunities for complement reduction as they arise. 10 Workforce attrition, for example, provides opportunity to re-evaluate 11 the work being performed, and the optimal manner in performing that 12 work. Such opportunities may be addressed through a variety of 13 means, including contracting out, redeployment of existing work 14 forces, or realignment of work responsibilities. As noted above 15 however, all such changes are evaluated within the context of 16 maintaining a safe and healthy workplace and continued reliability 17 improvement.

19c.Hydro continuously evaluates opportunities to provide customers with20reliable power at least cost, and as such continuously evaluates its21match of workforce complement and safety requirements.

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