

1 Q. At page 13 of the Corporate Overview evidence, it states, *"Through*  
2 *attribution, operating and process improvements as well as technological*  
3 *investments, Hydro's regulated activities' workforce has been reduced by 53*  
4 *full-time equivalents since 2003. Despite this, there is still a 7% increase in*  
5 *labour costs from the 2004 to the 2007 Test Year"*.

6 Please:

7  
8 a. provide details as to how many full-time equivalent positions were  
9 eliminated in each of 2003, 2004, 2005 and 2006;

10 b. please provide a breakdown as to the number of employees  
11 eliminated, broken down by:

12 i. job description;

13 ii. salary level;

14 iii. seasonal staff;

15 iv. temporary staff;

16 v. full time staff;

17 vi. management staff;

18 vii. non-management staff;

19 viii. department and division;

20 c. please provide details as to how many full time equivalent positions  
21 the Company forecasts to reduce in each of 2006, 2007  
22 and 2008 and the aggregate salary and fringe benefit savings for each  
23 year.

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26 A. a. Please refer to the schedule on page 3 to 5 and to CA 129 NLH.

- 1           b.     Please see attached schedule outlining details of permanent positions  
2                 added and deleted in each of the years 2003 to 2005. In addition,  
3                 Hydro's utilization of temporaries has declined over this timeframe.  
4  
5           c.     FTEs are forecast to increase slightly in the 2006 and 2007 periods. A  
6                 forecast of FTEs for 2008 is not available.