Page 1 of 4

1	Q.	Assuming a transfer of operating responsibility for all Newfoundland Power hydro
2		generation to Newfoundland Hydro (termed for the purpose of this set of questions
3		as the Small Hydro Transfer From NP Option) please provide:
4		a. The estimated incremental change in current Hydro staffing (permanent and
5		embedded contractors (if applicable) staff, support functions and position
6		designations (e.g., operator, millwright, engineering, safety, environmental, HR,
7		etc.)
8		b. All assumptions underlying that analysis.
9		
10		
11	Α.	For the support services component of operating responsibility, Hydro estimated
12		this in two methods and suggests that the required FTEs could range from eight to
13		15 FTEs for support services.
14		
15		a. If Hydro were to assume operating responsibility for all Newfoundland Power
16		hydro generation, Hydro estimates an incremental 18 operational FTEs would
17		be required. This includes:
18		one Supervisor;
19		 three Technologists;
20		• four Electricians;
21		 nine Millwrights; and
22		• one Planner.
23		
24		b. Assumptions & Logic

- 1 • Hydro assumes that the amount of staffing required by Newfoundland 2 Power for their generating assets are already optimized and that the staffing is based on the Newfoundland Power determined asset 3 management and operational needs. Therefore, the changes in staffing 4 5 level would be only those which would be absorbed by very closely situated Hydro or Exploits staffing, and assuming some level of future 6 7 combined efficiencies. Hydro utilized Newfoundland Power's map that showed the operational staffing currently in place and proposes the 8 9 Newfoundland Power staff located at Rattling Brook and Sandy Brook 10 would be absorbed into the staffing already in existence for the Exploits 11 facilities. Due to these two plants relatively small size and impact on the 12 system, the maintenance timing utilizing Exploits or Hydro Generation 13 staffing is expected to be flexible, similar to current.
- 14 Hydro Western Operations could look after the two additional plants on 15 the south/west coast, however, these units are about four hours from 16 the home base of the Western Operations group in Hinds Lake. 17 Assuming an appropriate response time similar to how Newfoundland 18 Power are organized, an addition of two extra trades/operators would 19 add the extra personnel to allow coverage of this big geographical area 20 (Cat Arm to Rose Blanch). The additional trades support would allow response to operational issues and to allow execution of the asset 21 22 management program.
- Hydro has no hydraulic units on the Avalon Peninsula. To assume
 current operation and maintenance of the nineteen generating units in
 Newfoundland Power's Eastern Operations, the staff structure in the
 Eastern Generation Operations would have to be closely replicated by

1	Hydro on the east coast. The geographical separation from the crews in
2	Grand Falls and Bay d'Espoir does not make it feasible to expand the
3	existing maintenance groups to provide support. There could potentially
4	be some FTE savings by absorbing some of the work by utilizing the
5	skilled and technical trades based in Holyrood for the Newfoundland
6	Power facilities in Eastern Newfoundland, but this would have to be
7	further examined with more detail on Newfoundland Power's asset
8	management program.
9 •	Hydro's Eastern Operations would be based out of Hydro Place or
10	Holyrood.
11 •	Hydro did not have access to information on how Newfoundland
12	Power's generating facilities operations are supported; therefore, it is
13	difficult to estimate how many resources are required to offer the same
14	level of already determined support to operations.
15 •	Using the ratio of Newfoundland Power operations staff provided on
16	maps (approximately 22 ¹ generation, a subset of the corporate total of
17	approximately 321 ² operations FTEs) to Newfoundland Power total FTEs
18	(approximately 572 ³), Hydro high level estimates support staff is
19	approximately 17 support staff. While, Hydro would need additional
20	detail on the support required in order to make an informed assessment
21	of how many FTEs would be additional to support the assets, due to
22	economies of scale, Hydro already has many generation based support
23	services and suggests a minimum of two FTE reduction in support
24	services compared to the estimated 16 FTEs should Newfoundland

¹ Counted from PUB-NP-051, Attachment A. ² Counted from PUB-NP-050, Attachment A and PUB-NP-051, Attachment A. ³ 2019 Planned FTEs not including temporaries, Newfoundland Power's "Quarterly Regulatory Report for the Period Ended March 31, 2019," Appendix F.

1	Hydro assume operating responsibility for these assets. To be further
2	responsive to this question, Hydro did make assumptions on how to
3	resource support services for the generation facilities generally based on
4	its existing resources. Hydro expects it would require additional dam
5	safety, clerical/maintenance planning support, environment and safety,
6	as well as technical resources for operational and capital support. Hydro
7	estimates this could range between eight and 10 FTEs depending on the
8	size and complexity of the capital budget. Hydro expects any additional
9	management, human resource, financial and IT services could be
10	absorbed within existing staffing levels.