1 Q. Has Hydro made an allowance for productivity in its test year operating expenses? If 2 so, please explain how the productivity allowance was arrived at. If not, please 3 explain why not.

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A. Hydro has achieved productivity gains over the 2007 to 2013 time frame in the area of workforce and cost management. As outlined in its evidence, Hydro has added a further 18 Engineering and Operations FTEs to its workforce while resulting in an overall increase of only two FTEs since 2007. Since 2007, operating labour costs have decreased by 0.01¢/kWh on an inflation adjusted basis¹ from 0.83¢/delivered kWh in 2007 to 0.82¢/delivered kWh² in the 2013 Test Year. This has been achieved while Hydro has implemented a retention and recruitment initiative in order to have the available workforce necessary to continue to meet its infrastructure renewal challenge.

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Hydro continues to target productivity improvements in the future. The 2013 Test Year includes a vacancy allowance of 40 FTEs, or \$3,175,000 and a challenging reduction in overtime expenses from historic levels³. Management is targeting to reduce higher cost overtime through improved redeployment of staff and recruitment initiatives outlined in the response to NP-NLH-085. If reductions are not achieved, Hydro will incur higher costs which will negatively impact net income

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¹ Adjusted for inflation using general economic adjustment factor for salaries: 2007: 3.0%; 2008: 3.0%; 2009: 3.0%; 2010: 6.5%; 2011: 4.0%; 2012: 4.0% and 2013: 4.0% which excludes merit, special market based adjustments and other factors.

² Calculated as the ratio of the salary cost category to energy delivered. This is indicative of improved productivity as the assets are used more intensively requiring additional maintenance and in some areas there are customer-driven asset additions resulting in more required maintenance.

³ Overtime cost in 2011 was \$9.5m and in 2012 was \$10.6m and is budgeted at \$8.6m in the 2013 Test Year.

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- 1 however, customers will still benefit through lower Test Year based rates. Refer
- 2 also to Hydro's response to CA-NLH-210.