

1 Q. **Reference: At page 44 of the report, Liberty recommends an overtime disallowance**
2 **of \$3.6 million. Please confirm the following:**

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- 4 a) **The \$3.6 million Liberty identified was calculated using 12 months actuals of**
5 **gross pay for Regulated Operations permanent employees.**
- 6
- 7 b) **The overtime Hydro requested in the \$45.9 million deferral was based upon**
8 **five months of actuals and seven months of forecast.**
- 9
- 10 c) **The \$3.6 million Liberty identified includes both operating and capital**
11 **overtime. If it includes both operating and capital, please provide a breakdown**
12 **of the \$3.6 million between operating and capital, in dollars and hours.**
- 13
- 14

15 A. Liberty responds to the question's three parts as follows:

- 16
- 17 (a) Liberty performed the calculation as described on report pages 45 and 46, using
18 2014 actuals provided by Hydro in response to PR-PUB-NLH- 86, 89 and 186.
- 19
- 20 (b) Hydro reported to Liberty that it calculated the \$45.9 million as described, but
21 Liberty did not review or confirm the calculations or components of the deferral.
- 22
- 23 c) The break-down of incremental overtime is as follows:

Capital		Expense		Total	
Gross Pay	Hours	Gross Pay	Hours	Gross Pay	Hours
\$901,414	18,829	\$3,272,091	62,391	\$4,173,506	81,220