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August 31, 2018

NEWFOUNDLAND POWER INC.
55 Kenmount Road
PO Box 8910
St. John's, NL A1B 3P6

Via Email: khopkins@newfoundlandpower.com

**ATTENTION: KELLY HOPKINS
CORPORATE COUNSEL**

Dear Ms. Hopkins:

**RE: NEWFOUNDLAND POWER INC. – 2019 – 2020 GENERAL RATE APPLICATION
REQUESTS FOR INFORMATION**

Enclosed are Information Requests IBEW-NP-012 to IBEW-NP-033 regarding the above-noted application.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,
MARTIN WHALEN HENNEBURY STAMP

MARK MURRAY
MM/mdg
Encls.

cc. **Newfoundland Power Inc.**
Liam O'Brien, E-mail: lobrien@curtisdawe.com
NP Regulatory, E-mail: regulatory@newfoundlandpower.com
Consumer Advocate
Dennis Browne, Q.C., E-mail: dbrowne@bfma-law.com
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Board of Commissioners of Public Utilities
Cheryl Blundon, E-mail: cblundon@pub.nl.ca

1 **IN THE MATTER OF**
2 the *Electrical Power Control Act, 1994*,
3 SNL 1994, Chapter E-5.1 (the “*EPCA*”)
4 and the *Public Utilities Act*, RSNL 1990,
5 Chapter P-47 (the “*Act*”), as amended; and
6
7 **IN THE MATTER OF** a general rate
8 application filed by Newfoundland Power Inc.
9 to establish customer electricity rates for 2019
10 and 2020

INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS LOCAL 1620 (IBEW)

REQUESTS FOR INFORMATION

IBEW-NP-012 to IBEW-NP-033

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- 1 IBEW-NP-012 Please explain why Tables 1 and 2 provided in response to IBEW-NP-
2 001(a) indicate 4.0 or 4.3 FTEs and headcount in the executive category
3 while the organizational chart provided in PUB-NP-009 appears to show 8
4 executive positions.
- 5 IBEW-NP-013 Please expand Tables 1 and 2 provided in response to IBEW-NP-001(a) to
6 include 4 categories: union, non-union, managerial, and executives and
7 directors.
- 8 IBEW-NP-014 What percentage of the workforce at the Atlantic Canadian electric
9 utilities shown in Attachment A to IBEW-NP-005 are classified as a)
10 managerial and b) executives and directors?
- 11 IBEW-NP-015 In reference to IBEW-NP-005, please explain the process of “geo-
12 adjusting” market group data for Newfoundland for non-union employee
13 salaries. Does geo-adjusting result in higher or lower salaries than the
14 market group data?
- 15 IBEW-NP-016 In reference to the IBEW-NP-005 response that states “[f]or its unionized
16 employees, Newfoundland Power benchmarks its wages to those of the
17 other Atlantic Canadian electric utilities” does Newfoundland Power
18 consider scope of work in comparing wages for all unionized positions
19 (not just PLTs, as discussed in IBEW-NP-007)? Are the scopes of work
20 for all positions listed in Attachment A to IBEW-NP-005 exactly or
21 closely comparable to those of employees at Newfoundland Power?
- 22 IBEW-NP-017 Does Newfoundland Power consider cost of living when benchmarking its
23 wages to those of other Atlantic Canadian electric utilities? If not, why
24 not?
- 25 IBEW-NP-018 In benchmarking wages to those of other Atlantic Canadian electric
26 utilities, how does Newfoundland Power ensure it is comparing “apples to
27 apples”? What factors and considerations does Newfoundland Power
28 normalize for against these other utilities and other jurisdictions? If none,
29 please explain how the wage comparison provided as Attachment A to
30 IBEW-NP-005 is in fact comparable.
- 31 IBEW-NP-019 In reference to IBEW-NP-005, please provide the combined median salary
32 of the market group data for non-union employees from the Canadian
33 General Industry market and the Canadian Energy Services market and the
34 median base salary for non-union employees at Newfoundland Power.
- 35 IBEW-NP-020 With reference to IBEW-NP-010(d), please provide turnover rates for
36 2017 and 2018 for other comparable companies in Newfoundland and
37 Labrador. If these are not available, please comment generally on the
38 effect of a declining economy and increasing unemployment rates on

- 1 turnover rates. Is it likely that turnover will typically be lower in areas
2 where unemployment is rising and job security is decreasing?
- 3 IBEW-NP-021 Regarding the response to PUB-NP-006 please explain how progression
4 increases are determined and awarded to employees for each of the
5 following categories of employees: union; managerial; executives and
6 directors.
- 7 IBEW-NP-022 Regarding the response to PUB-NP-006 please explain why
8 Newfoundland Power refers to “the average progression/merit increase for
9 managerial employees” as opposed to just a progression increase.
- 10 IBEW-NP-023 In general, how do managerial employees and executives and directors
11 achieve “progression/merit” increases? How do union employees achieve
12 progression increases?
- 13 IBEW-NP-024 Regarding the response to PUB-NP-006, please explain how the average
14 progression increases for 2018F-2020F for managerial employees (Table
15 2) and executives and directors (Table 3) were calculated.
- 16 IBEW-NP-025 Please provide the calculation for the forecast progression increases for
17 2018F-2020F for union, managerial and executives and directors that are
18 all estimated to be 0.75% per year. Please discuss the accuracy of this
19 estimate.
- 20 IBEW-NP-026 Please provide the percentage of union employees, managerial employees
21 and executives/directors that received a progression increase in each of
22 2016 and 2017.
- 23 IBEW-NP-027 Regarding the response to PUB-NP-006, please provide expanded
24 versions of Tables 1, 2 and 3 showing the years 2010-2020F.
- 25 IBEW-NP-028 Please provide the forecasts for the average managerial employees’
26 progression increases for 2016 and 2017 from the most recent applicable
27 regulatory filing.
- 28 IBEW-NP-029 Regarding the response to PUB-NP-006, given that the actual average
29 progression increases for managerial employees in 2016 was 0.85% and in
30 2017 0.99%, are union compensation increases keeping pace with that of
31 management?
- 32 IBEW-NP-030 Regarding the responses to PUB-NP-006 and PUB-NP-010, please
33 provide an expanded version of Table 2 in PUB-NP-006 showing annual
34 pay-for-performance payouts as a percentage in addition to the
35 percentages for base increases and progression increases.

- 1 IBEW-NP-031 Regarding the responses to PUB-NP-006 and PUB-NP-010, please
2 provide an expanded version of Table 3 in PUB-NP-006 showing the STI
3 provided as a percentage in addition to the percentages for base increases
4 and progression increases.
- 5 IBEW-NP-032 Regarding the response to PUB-NP-010, please provide the minimum
6 threshold level Newfoundland Power’s ROE must reach to allow for STI
7 payments.
- 8 IBEW-NP-033 Regarding the response to PUB-NP-010, please list all operating costs
9 included in the performance measure “Controllable Operating Cost per
10 Customer”. Are labour costs included? Are overtime labour costs
11 included? Are purchased power costs and fixed costs such as finance
12 charges and depreciation included? As possible, please use the same cost
13 categories as shown in *Exhibit 2: Operating Costs by Breakdown (2015-*
14 *2020F)*.