INTERROGATORIES OF THE CANADIAN UNION OF PUBLIC EMPLOYEES, LOCAL ONE

Issues 3.1 and 3.2:

- Are the overall levels of the 2011 Operation, Maintenance and Administration budgets appropriate?
- Is the proposed level of 2011 Shared Services and Other O&M spending appropriate?

Interrogatory 1 -

Ref: C2-T2-S5; D1-T7; D1-T8; D1-T9

Toronto Hydro acknowledges its aging distribution system states that it has undertaken "substantial modernization" of the existing infrastructure. THESL further acknowledges that a multi-faceted approach is required in order to bridge the gap in labour and other resource inputs necessary for renewal of the distribution system. Pending completion of the refurbishment project, the state of THESL's existing infrastructure contributes to risks in working conditions that are of significant concern to the bargaining unit. In light of this concern, and with specific reference to working conditions at the Utility, please advise as to whether the Capital Expenditures noted, including the specific Operational and Emerging Requirements categories, are appropriate to address the aging condition of the plant?

Issue 3.4:

 Are the 2011 Human Resources related costs (wages, salaries, benefits, incentive payments, labour productivity and pension costs) including employee levels appropriate? Has Toronto Hydro demonstrated improvements in efficiency and value for dollar associated with its compensation costs?

Interrogatory 2 – Ref: C2-T2

How does Toronto Hydro intend to address the problem of retention of trades persons and other technically skilled workers? Given the importance of this factor in respect of the safe, effective, and efficient operation of the Utility, please provide a more detailed

description of any human resources plan in this regard and provide an outline of the projected allocation of resources in this regard, having reference to the particular goals outlined in the THESL Workforce Strategy. Is the projected allocation of resources in this regard adequate to address this aspect of the human resource crisis referenced in the Application materials?

Interrogatory 3 – Ref: C2-T2

Given challenges with retention and attrition of competent skilled trades and technical workers referenced in the Application, and the contributing factor of increasing industry competition for skilled trades persons, is the projected allocation of resources to apprentice training programs in the Trade School sufficient to meet the THESL's ongoing demand for internally-trained trades persons?

Interrogatory 4 – Ref: C2-T2

How does Toronto Hydro intend to actualize its Workforce Strategy goals with respect to attracting already-skilled trades and technically-skilled employees? Please provide a detailed outline of THESL's plans and intended resource allocation in this regard.

Interrogatory 5 – Ref: C2-T2

In light THESL's ongoing modernization of its aging distribution system, and the projected retirement of 45% of the existing workforce between 2010 and 2019, we ask that THESL provide details in respect of any and all strategies for provision of training programs designed to update/replenish the knowledge base of the existing THESL employee complement. In addition, please outline the projected resource allocation for 2011 in relation to this aspect of the human resources strategy.

Interrogatory 6 – Ref: C2-T2

Toronto Hydro indicates that apprentices trained outside the Utility have been found lacking in necessary expertise to function at the requisite standard for maintenance of safe and efficient operations and satisfactory customer service in THESL's "complex distribution territory". Please indicate whether this finding will result in any overall reduction from the current allocation of resources to external contractors for performance of technical and/or trades work. If not, please provide a detailed explanation for THESL's rationale in this regard.