



January 18, 2011

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

Re: Toronto Hydro-Electric System Limited  
Application for an Electricity Distribution Rate Change  
Submission of AMPCO's Questions for the Technical Conference  
Board File No. EB-2010-0142

Dear Ms. Walli:

In accordance with the Board's Procedural Order # 3 dated December 13, 2010, attached please find AMPCO's questions for the Technical Conference to be held on January 24, 2011.

Please do not hesitate to contact me if you have any questions or require further information.

Sincerely yours,

*(ORIGINAL SIGNED BY)*

Adam White  
President  
Association of Major Power Consumers in Ontario

Copies to: Toronto Hydro-Electric System Limited  
Intervenors

**EB-2010-0142**  
**Toronto Hydro-Electric System Limited (THESL)**  
**2011 Electricity Distribution Rate Application**

**AMPCO Technical Conference Questions**

Question #1

**Ref: R1-T2-S1 (AMPCO Interrogatory #1)**

With the response, THESL provided an organizational chart showing 12 executive level positions and incumbents.

At reference C2-1-2, Appendix A, 10 executive positions are shown in the 2011 Test Year.

Please explain the forecasted decrease from 12 to 10 executive positions in 2011.

Question # 2

**Ref: R1-T2-S9 (AMPCO Interrogatory #9)**

The response indicates that Mercer Human Resources completed an external benchmarking study for THESL in May 2007.

Please provide a copy of this study.

Question # 3

**Ref: R1-T2-S12 (AMPCO Interrogatory #12)**

THESL provided the following Table on unfilled vacancies.

<b># of Unfilled Vacancies</b>	<b>2008 Actual at Dec 31</b>	<b>2009 Actual at Dec 2009</b>	<b>2010 Bridge at Dec 31</b>	<b>2011 Test Projected at Dec 31</b>
Executive	0	0	2	
Managerial	6	4	2	
Management/Non-Union	19	8	27	
Union	92	45	58	
Total	117	57	89	
Total number of employees*	1546	1574	1773	1944
*Ref: C2-1-2, Appendix A				

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- a) The table indicates that taking into account the 89 vacancies, the number of filled positions in 2010 is 1684. Please confirm.
- b) Is THESL planning to fill these 89 unfilled vacancies in 2011? If so, how many and by when? If not, why not?
- c) Please provide details on how long these positions have been vacant. How many of the positions have been vacant for six months and under? How many positions have been vacant for six months to a year and how many for more than one year any why?
- d) In 2011, THESL is proposing to add an additional 171 FTE's. Please provide a breakdown of FTEs by Executive, Managerial, Management/Non-union and Union.

Question # 4

**Ref: R1-T2-S13 (AMPCO Interrogatory #13)**

The response indicates that effective January 1, 2010, 33 employees from THC joined THESL.

Did the reorganization include the transfer of unfilled vacancies from THC to THESL? If so, how many?

Question # 5

**Ref: R1-T2-S14 (AMPCO Interrogatory #14)**

It is unclear to AMPCO from the response how THESL projects a shortfall based on current staffing levels of approximately 320 FTEs in 2011.

Please provide the underlying calculations of the capacity gap between current staffing levels and what is needed to i) deliver the expanded distribution system; and ii) mentor new staff, to arrive at approximately 320 full-time employees.

Question #6

**Ref: R1-T2-S15 (AMPCO Interrogatory #15)**

The response indicates that job harmonization has enabled THESL to replace numerous job classifications with consolidated jobs of greater scope.

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- a) How many job classifications have been harmonized to date since amalgamation?
- b) What job classifications are affected?
- c) Are additional job harmonization efforts planned in 2011 and beyond? If yes, please describe.

Question # 7

**Ref: R1-T2-S19 (AMPCO Interrogatory #19)**

The response provides the recruiting fees for 2006 to 2010.

- a) Please provide the recruiting fees forecasted for 2011.
- b) Please provide the number of positions where recruiters were used to fill the position in the past four historical years and the test year.

Question # 8

**Ref: R1-T2-S27 (AMPCO Interrogatory #27)**

Please provide the fixed and variable components for the Large User class if the fixed/variable split is maintained for the Large User class at 2010 approved levels.

Question #9

**Ref: R1-T2-S28 (AMPCO Interrogatory #28)**

AMPCO's interrogatory # 28 contained a typo in the units requested.

If possible, please provide the Distribution Volumetric Rate for the Large Use class using the units \$/kW, not \$/kWh as previously requested.

Question #10

**Ref: R1-T2-S29 (AMPCO Interrogatory #29)**

AMPCO requested a sample bill for a typical Large User Customer. The response directed AMPCO to Exhibit O1, Tab 1, Schedule 1, page 5 for a comparison of the 2011 proposed bill components vs. 2010 approved bill components.

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If possible, please provide a sample of the form of bill that is rendered by Toronto Hydro to the large volume customer.