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c) Headcount is incomparable to FTE. OPG defines headcount as the staffing level at the end of a year, whereas "FTEs" represent the number of hours worked converted to a full-time equivalent.

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In addition, the 9,453 employees (headcount) who worked directly in or were allocated to the regulated business included staff from the Darlington Refurbishment and Nuclear New Build Projects, and excluded non-regular staff. Appendix 2K reflects FTEs, including those associated with the Darlington Refurbishment, Nuclear New Build projects and non-regular staff.

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 i) The breakdown of the approximately 1,300 regulated headcount reduction between nuclear, previously regulated hydroelectric and newly regulated hydroelectric is as follows:

Nuclear 1,294
Previously Regulated Hydro 13
Newly Regulated Hydro 3

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ii) The breakdown of the approximately 1,300 regulated headcount reduction by representation is as follows:

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Management 73 Society 453 PWU 785

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e) A breakdown of total OPG regulated staff on the basis of regular staff and non regular staff including temporary tradespersons is provided in the following chart.

OPG Regulated Staff (FTE)	2010 2011 Actual Actual		2012 Actual	2013 Budget	2014 Plan	2015 Plan	
Regular Staff	9,693.6	9,575.8	9,370.5	9,405.2	9,142.4	8,920.2	
Non-Regular Staff	787.2	698.6	635.0	485.9	423.8	475.4	
Total	10,480.8	10,274.4	10,005.5	9,891.2	9,566.1	9,395.6	

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f) Management staff at OPG is not compensated for overtime. For PWU and Society staff overtime premiums are prescribed by the collective agreements. Overtime is paid when employees are required to work beyond their normally defined hours of work in a day or week. The hourly premiums for overtime range from one and half times an employee's hourly rate of pay to two times an employee's hourly rate depending on the time period when the overtime is required. There is no distinction on overtime payments between regular, non-regular, and temporary tradespersons.

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g) The requested overtime costs are provided in the following chart.

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Overtime (\$M)	2010	2011	2012	2013	2014	2015
	Actual	Actual	Actual	Budget	Plan	Plan
Total OPG Regulated	169.2	146.7	147.8	134.4	117.1	130.0

Overtime is primarily driven by Nuclear planned and forced outages described in h), below.

h) The purchased services costs for the 2010 to 2015 period are as follows:

	2010	2011	2012	2013		2014	2015
('\$M)	Actual	Actual	Actual	Actual	Budget	Budget	Budget
Nuclear	300	221	250	274	355	329	364
Hydro	43	39	38	39	44	45	48
Corporate	118	106	117	124	138	134	127
Total	460	366	405	437	538	508	538

Cost increases from 2010 actual to 2015 budget are due to the following:

Nuclear

The purchase service reflects resources requirements to meet the work programs. OM&A projects vary and the trending of external purchase services varies as projects utilize external resources. Outage campaign utilize external resources and in 2010 there was a Pickering Vacuum Building Outage ("VBO"), an additional Darlington outage in 2013, and the Darlington VBO in 2015;

 For Base OM&A external purchase trending, refer to Ex. L-6.3-15 PWU-018. interrogatory response;

 o Increase in external purchased service costs are also due to timing of attrition versus the full implementation of Business Transformation initiatives. Temporary resources are required until the business re-engineering and streamlining processes have reduced work requirements.

Hydro

 OM&A external purchased services is trending upward in the test period due to increased resource requirements for the commencement of a number of major projects as described in Ex. F1-3-1.

Corporate

Costs increase primarily due to the transfer of Business Unit staff to Support Services groups, as part of Business Transformation and various business development initiatives in Corporate Centre, partially offset by reduction of IT costs driven by Information Management Transformation Program.