

February 21, 2018

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

Dear Ms. Walli:

Re: 2018 IRM Electricity Distribution Rate Application,

Interrogatory Response to SEC 7 Confidential Filing - Halton Hills Hydro Inc.,

Board File no. EB-2017-0045

Halton Hills Hydro Inc. ("HHHI") submitted the following response to the Interrogatory Request from School Energy Coalition ("SEC") question number 7:

SEC-7: [p.5] Please provide a copy of the Agreement. Response: Filed in Confidence.

HHHI requests that the copy of the Memorandum of Agreement regarding Pay Equity Maintenance, dated February 2, 2017, between HHHI and Power Worker's Union, CUPE Local 1000 (the "Union") be considered confidential in its entirety.

The agreement in question is a signed confidential agreement between the two parties that indicates previous and agreed upon wage rates in addition to retroactive adjustment payments by position. In addition to the pay equity portion of the agreement, Exhibit 3 is directly related to the agreed upon internal equity that is not a part of this proceeding. It should be noted that at no time in the application did HHHI include any internal equity adjustment amounts; the requested amounts only relate to retroactive pay equity adjustments and incremental pay equity wages.

Halton Hills is a closely knit community and the employees of HHHI are well known in the community. Even though there are only positions listed in the agreement, it is very possible for citizens to be able to determine wages for specific employees in the Exhibits. HHHI would never disclose the wages of a particular employee to the public and by releasing the agreement, HHHI would, in fact be allowing for that very scenario. It should also be noted that the job description in Exhibit 5 also indicates the name of the incumbent employee.

In addition to the above argument for confidentiality, prior authorization from the Union would be required before any portion of the agreement could be made public.



This request and a complete copy of the Agreement have been couriered to the Board office. This request and a summary of the document have been forwarded to the intervenors on record in proceeding EB-2017-0045.

In the event of any additional information, questions or concerns, please contact David Smelsky, Chief Financial Officer, at dsmelsky@haltonhillshydro.com or (519) 853-3700 extension 208, or Tracy Rehberg-Rawlingson, Regulatory Affairs Officer, at tracyr@haltonhillshydro.com or (519) 853-3700 extension 257.

Sincerely,

(Original signed)

David J. Smelsky, CPA, CMA Chief Financial Officer, HHHI

Cc: Arthur A. Skidmore, President & CEO, HHHI R. King, Osler, Hoskin & Harcourt LLP Intervenors on record in proceeding EB-2017-0045



## SUMMARY OF MEMORANDUM OF AGREEMENT REGARDING PAY EQUITY MAINTENANCE – FEBRUARY 2, 2017

The Memorandum of Agreement Regarding Pay Equity Maintenance details:

- retroactive pay equity maintenance payments
- adjustments to Band E positions
- pay equity maintenance review process

## The Exhibits include:

- 1. Pay Equity Adjustments identified by year from 2012-2016
- 2. Wage Rates Actual and Adjusted for Pay Equity Maintenance identified by year from 2012-2016
- 3. Internal Equity Adjustments for Band E
- 4. Administration Clerk Job Description
- 5. Engineering Clerk Job Description