

KOSKIE MINSKY

February 13, 2019

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Via Courier & Via Email (Registrar@oeb.ca)

Ontario Energy Board
2300 Yonge Street
27th Floor, Box 2319
Toronto, ON M4P 1E4

Attention: Ms. Kristi Sebalj, Registrar

Dear Ms. Sebalj:

**Re: Hydro One Networks Inc. and 1937689 Ontario Inc.'s and Peterborough
Distribution Inc. and Peterborough Utilities Services Inc.
OEB File No. EB-2018-0242
Our File No. 190091**

As you are aware, we are counsel to the International Brotherhood of Electrical Workers, Local 636 (the "IBEW") and have been retained with respect to this matter.

Further to the Decision of the Board dated January 30, 2019 please find enclosed the Interrogatories of the Intervenor IBEW.

We confirm that two (2) hard copies have been sent via courier.

Yours truly,

KOSKIE MINSKY LLP



Ernie A. Schirru
EAS:ar
Enclosure

c. (via email) IBEW Local 636
Messrs. Barry Brown & Mike Hall

Ontario Energy Board
Mr. Andrew Pietrewicz, Case Manager & Mr. Michael Millar, OEB Counsel

Hydro One Networks Inc.
Ms. Julie Lee & Ms. Linda Gibbons

Osler Hoskin & Harcourt LLP
Mr. Richard King

Peterborough Distribution Inc.

Mr. John Stephenson, Mr. Mark Rodger & Ms. Sandra Clancy

City of Peterborough
Ms. Sandra Clancy

Borden Ladner Gervais LLP
Mr. Mark Rodger

Consumers Council of Canada
Ms. Julie Girvan

Energy Probe Research Foundation
Mr. Tom Ladanyi

Independent Participants
Ms. Alison Davidson

Power Workers' Union
Mr. Paul Reece & Mr. Richard Stephenson

Elenchus Research Associates Inc.
Ms. Kim McKenzie

Save PDI Coalition
Mr. Guy Hanchet & Mr. Peter Morgan

School Energy Coalition
Mr. Jay Shepherd & Mr. Mark Rubestein

Ontario Public School Boards' Association
Mr. Wayne McNally

Vulnerable Energy Consumers Coalition
Mr. John Lawford & Mr. Bill Harper

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, Schedule B;

AND IN THE MATTER OF an Application for Approval to amalgamate Peterborough Distribution Inc. and Peterborough Utilities Services Inc. and to sell the amalgamated electricity distribution system to Hydro One Networks Inc.

INTERROGATORIES FROM IBEW Local 636

EB-2018-0242

1. Reference: Ex. A/T2/S1 P.11 & 12 of 24

In regards to "Direct Staff", how many employees are expected to be affected? Which specific "duplicative functions" are the Applicants referring to? How many positions will be declared redundant? Will Hydro One be able to offer continued employment to all existing PDI and PUSI staff? Where will the local complement of retained staff be based? Will any staff be relocated?

2. Reference: Ex. A/T2/S1/P 12 of 24

In regards to staff "not working directly on the distribution assets", how many positions will not be absorbed into vacancies within Hydro One? How many support staff will not move to positions within Hydro One once integration is complete? Will Hydro One be able to offer continued employment to all existing PDI and PUSI staff? Where will the local complement of retained staff be based? Will any staff be relocated?

3. Reference: Ex. A/T2/S1/P 15 of 24

Please specify the "duplication in transaction-processing functions" referred to. How many positions will the Applicants declare redundant for "efficiency gains"?

4. Reference: Ex. A/T1/S1/P 9 of 12

The evidence states that the proposed transaction will deliver cost synergies and economy of scale savings. Please provide a detailed list of the specific areas where these synergies/savings are expected to occur. Please indicate when these synergies/savings are expected to occur.

5. Reference: Ex. A/T4/S1/P 12 of 12

The evidence states that the transaction meets the Board's "No Harm Test". How specifically will the proposed transaction improve the reliability and quality of the electrical service as opposed to the status quo? How exactly will PDI and PUSI customers benefit from being served by a larger utility?

6. Reference: Ex. A/T1/S1/P 5 of 12

Did Peterborough City Council approve the transaction based on the "no harm" test? If not, what was the approval based on?

7. Reference: Ex. A/T2/S1/P 2 of 24

Please provide all assumptions used to create Tab 1= Projected Cost Savings.