PWU Interrogatory #19

Interrogatory

Reference:
Reference 1: Exhibit F2, Tab 1, Schedule 1, Attachment 6, Page 3 of 42

> Our current analysis shows that OPG, as of August 2019, is 239 FTEs (4.5%) *below* the total North America nuclear operator benchmark of 5,255 FTEs. The North American benchmarks have increased slightly since 2014 due to aging plants and a less-experienced workforce which required additional staff.

Reference 2: Exhibit F4, Tab 3, Schedule 1, Page 23 of 31

> Benchmarking conducted by WTW indicates that OPG's Total Direct Compensation and Total Remuneration are at market: 5.2% and 7.7% above the midpoint of market peers, respectively.

Questions

a) Please discuss OPG's benchmark total compensation relative to its peers, with consideration to both the Willis Towers Watson compensation and Goodnight Consulting workforce benchmarking studies.
b) Please discuss OPG's required qualifications for employees in its workforce and the relationship between OPG employee qualifications and its total workforce.
c) If North American benchmarks have increased due to aging plants, would it be reasonable for nuclear generating stations at the end of life (ie. Pickering) to require relatively higher workforces than the benchmark? If not, why not?

Response

a) The Goodnight Nuclear Staffing Study compares OPG's Nuclear staffing levels to peers, and does not consider total compensation relative to peers. Please refer to Ex. F4-3-1, Section 6 for a detailed discussion on OPG's total compensation benchmarking study as prepared by Willis Towers Watson.

b) Employee qualifications are determined by requirements outlined in various regulations and standards that apply to the work being done at OPG facilities. Nuclear employee qualifications are developed using the Systematic Approach to

Training as per CNSC RegDoc 2.2.2. Training programs are developed for jobs that have a significant impact on nuclear safety. The tasks performed in these jobs are analyzed to determine the training/qualifications required. Staff who perform these tasks are linked to the respective qualifications and receive the necessary training to become and remain competent in those tasks. Before executing tasks, the employee and their supervisor are required to review staff qualifications to ensure the staff performing the task have completed the necessary training. OPG's workforce is generally determined based on the necessary skills and qualifications needed to execute work and the scope of work programs necessary to operate and maintain generating unit's safety and reliability.

c) The 2019 Nuclear Staffing Benchmarking Analysis compared OPG Nuclear as a whole to the benchmark and Pickering and Darlington were not compared to the benchmark separately. This Analysis indicated that "North American benchmarks have increased slightly since 2014 due to aging plants <u>and a less-experienced workforce which required additional staff"</u> (Ex. F2-1-1, Attachment 6, p. 3; emphasis added). While Pickering is an older plant, unlike Goodnight's analysis of North American benchmarks, it also has an experienced workforce. OPG believes its staffing levels are appropriate.