# AMPCO Interrogatory #169

## Interrogatory

**Reference:** F4 T3 S1 Attachment #1

a) Please define EPSCA.

b) Please add Executive as a Staff category.

c) Please separate Salary and Incentive Pay costs.

d) Please separate Benefits and Pension & OPEB costs.

e) Please add Plan data to the table for 2016, 2017, 2018, 2019 and 2020.

f) Please provide an excel version of Attachment #1 that reflects part (b), part (c), part (d) and part (e).

## Response

a) The Electrical Power Systems Construction Association ("EPSCA") category of employees is OPG's direct hire construction trades workforce. Collectively known as the Building Trades Unions ("BTU"), EPSCA is a subset of the BTU acquiring the title as a result of EPSCA being the accredited bargaining agent for the majority of the constructions trades OPG employs. The EPSCA category of employees as used by OPG in this application is a generalized reference to temporary construction trades employees, sourced from one of the BTUs, hired to perform construction trades work on OPG generating station property.

b) – f)
Refer to Attachment 1, which has also been provided in Excel format within the Excel file filed on RESS, titled 'OPG 2K with 2020 Actuals' at the tab named 'AMPCO-169 Attachment 1'.