



ONTARIO ENERGY BOARD

FILE NO. **EB-2024-0115** **Hydro Ottawa**

VOLUME: **3**

DATE: **January 16, 2026**

BEFORE: **Allison Duff** **Presiding Commissioner**
 Robert Dodds **Commissioner**
 David Sword **Commissioner**

THE ONTARIO ENERGY BOARD

Hydro Ottawa

**Application for electricity distribution rates
and other charges beginning January 1, 2026**

Proceeding held in person and virtually
at 2300 Yonge Street, 25th Floor, Toronto, Ontario
On Friday, January 16, 2026, commencing at 9:30 a.m.

VOLUME 3

A P P E A R A N C E S

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LAWRIE GLUCK Consumers Council of Canada (CCC)

DT VOLLMER Distributed Resource Coalition
(DRC)

KENT ELSON Environmental Defence

MICHAEL BROPHY Pollution Probe

MARK GARNER Vulnerable Energy Consumers
Coalition (VECC)
BILL HARPER

MARK RUBENSTEIN School Energy Coalition (SEC)

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1 Friday, January 16, 2026

2 --- Upon resuming on Friday, January 16th, 2026,
3 at 9:30 a.m.

4 PRESIDING COMMISSIONER DUFF: Please be seated.
5 Good morning, everyone. We are on day three of our
6 hearing to the unsettled issues, and I welcome
7 everyone in the room and online.

8 Ms. Fearon has circulated a schedule for today
9 starting with OEB Staff. But before we start with
10 that cross-examination, are there any preliminary
11 matters that need to be addressed?

12 **PRELIMINARY MATTERS**

13 D. COBAN: Good morning, Madam Chair,
14 Commissioners. Just two quick preliminary matters.

15 The first one is just an update to confirm that
16 we have received the signoff from all of the parties
17 to make the corrections to the settlement proposal,
18 and that is being filed as we speak.

19 And then the second was just resulting from our
20 transcript reviews and subject to checks that we took
21 over the past couple of days. Ms. Collier and Mr.
22 Freeman would like to clarify some of those subject
23 to checks that we verified. So I will maybe just
24 pass it over to them.

25 The first one relates to Mr. Trevor's exchange
26 with SEC on day one at page 176 of the transcript
27 regarding some of the productivity figures that we
28 were looking at. And then the second correction or

1 clarification relates to Ms. Collier's exchange with
2 SEC at page 146 of the day one transcript relating to
3 the Mercer benchmarking study and the consideration
4 of benefits as part of that study.

5 PRESIDING COMMISSIONER DUFF: Thank you. I can
6 imagine the work involved in reading those
7 transcripts in order to make these corrections. It's
8 great that Mr. Rubenstein is in the room at the same
9 time. Thank you, please proceed.

10 T. FREEMAN: Thank you, Madam Chair. Thank you,
11 Ms. Coban.

12 So there are two items that I would like to
13 correct from the exchange of Mr. Rubenstein on day
14 one.

15 The first is actually on page 182 of the
16 transcript starting at line 16. In that exchange,
17 Mr. Rubenstein notes that for the 2026 savings for
18 only the items where savings started in 2026, meaning
19 there are no savings identified in the '21 to '25
20 period, the sum total for those items in 2026 would
21 be \$300,000, which I agreed to subject to check, and
22 those items would be fleet pooling, net metering
23 automation, and satellite imaging for vegetation
24 management.

25 So looking at the values in the SEC 24 table,
26 that math is correct; however, SEC 24 values are
27 rounded to the nearest million. We do have more
28 detailed representations of those numbers which does

1 impact the math.

2 So, Lianne, if we could please pull up SEC 25.

3 And that would be on page 8.

4 So if you could just scroll a little bit lower,
5 you will see right at the -- kind of in the middle of
6 the screen now, Item 3.1.2, fleet pooling, you will
7 note that the OM&A savings for this item in 2026 is
8 122,000.

9 Now, if we could please jump over to SEC 27 and
10 also on page 8. So the two items here I would like
11 to call out are right at the very top -- oh, just
12 scroll up a little bit. Thanks. So in 2026, the
13 savings for net metering automation are 241,000.

14 And then if we scroll a little bit down to -- if
15 we scroll down to -- yeah, right there. So satellite
16 imaging for vegetation management. You will note
17 that the savings in 2026 are 48,000.

18 So the sum total of those is indeed 411,000, not
19 300,000 as noted in the original testimony, and
20 that's just a function of the table being reviewed
21 being rounded to the nearest million, but these
22 numbers are more granular. So I just wanted to make
23 sure that we corrected that.

24 M. RUBENSTEIN: Sorry. Just to be clear, it's
25 rounded to the nearest hundred thousand?

26 T. FREEMAN: So these are rounded to the nearest
27 thousand, I believe.

28 M. RUBENSTEIN: No, the original table --

1 T. FREEMAN: Sorry.

2 M. RUBENSTEIN: -- I think it is rounded to the
3 nearest hundred thousand, not nearest million.

4 T. FREEMAN: Yes, thank you for that. You are
5 correct.

6 The second item from that portion of the
7 testimony I would like to correct is on page 177 of
8 the transcript starting at line 9. And for context,
9 this exchange was regarding the carryforward of
10 online billing savings from the 2021 to '25 period
11 through to 2026.

12 Mr. Rubenstein and I had a conversation about
13 what the numbers would look like if we did move those
14 savings forward. In that exchange, Mr. Rubenstein
15 states that if we add the 2.8 million to 3.2 million,
16 we get a total of 5 million, and he notes that that
17 number is still lower than the 2025 value of 5.3
18 million.

19 I would just like to correct the math on that to
20 note that the 2.8 million added to the 3.2 million
21 results in a total of 6 million, which is indeed
22 higher than the 2025 value. So I just wanted to
23 correct the math that was done on the stand there.

24 PRESIDING COMMISSIONER DUFF: Thank you. Any
25 questions about that, Mr. Rubenstein? Another lesson
26 not to do math during an oral hearing.

27 T. FREEMAN: And I will pass it to my colleague
28 Ms. Collier.

1 A. COLLIER: Good morning, Madam Chair and
2 Commissioners.

3 So as Ms. Coban mentioned, the point that I want
4 to clarify from day one is on page 146 of the
5 transcript starting on line 19, and it was the
6 exchange I had with Mr. Rubenstein regarding the
7 relationship between the salary levels and the
8 benefit comparators.

9 So Mr. Rubenstein suggested that the higher base
10 salaries might lower the benefit to salary ratio,
11 making our benefit costs appear more favourable.

12 But upon my review, which I noted was subject to
13 check, one of the primary drivers of our benefits is
14 the OMERS pension plan. And the way the OMERS
15 pension plan works, it's a tiered contribution
16 formula, so if you earn below the YMPE, or the yearly
17 maximum pensionable earnings, the contribution rate
18 is 9 percent, and any salary over 74,000, the
19 contribution rate is 14.6. So that's a 60 percent
20 higher contribution for salaries higher.

21 So as salaries rise, the benefits increase at a
22 faster rate than the salary itself. So that actually
23 means that the higher salaries actually lead to a
24 higher weighted average benefit cost rather than what
25 Mr. Rubenstein suggested.

26 In addition, I would also note that on page 6 of
27 Schedule 1 -- Schedule 4-1-3(a), the OMERS
28 contribution rates are changing as of January 1,

1 2027, where the below YMPE is going down and the
2 above YMPE is going up. So that impact will be even
3 greater kind of starting in 2027.

4 PRESIDING COMMISSIONER DUFF: And what does that
5 acronym stand for again, please?

6 A. COLLIER: The yearly maximum pensionable
7 earnings.

8 PRESIDING COMMISSIONER DUFF: Thank you.

9 Mr. Rubenstein, do you have any questions
10 regarding that?

11 A. COLLIER: We can include that maybe in our
12 undertaking that we are talking about the Mercer
13 study if you want to show the...

14 M. RUBENSTEIN: Maybe that would be helpful so I
15 don't have to do math here.

16 A. COLLIER: As an -- just as an illustrative
17 example.

18 M. RUBENSTEIN: Yes, that would be helpful.

19 A. COLLIER: Okay. We can do that.

20 PRESIDING COMMISSIONER DUFF: Okay. Thank you.

21 I am actually at a loss. I don't know when
22 there is corrections to transcripts -- like, there is
23 a correction that can be made because the
24 transcription was wrong or didn't get it correct.
25 These are a different nature. So just calling it out
26 and putting this -- reading this into the transcript
27 today, it's sufficient, I take it?

28 D. COBAN: Yes, from our perspective. We have

1 identified some transcription errors that we will be
2 filing a letter. Those are more just a matter of
3 things that maybe got picked up incorrectly in the
4 transcription as opposed to sort of a clarification
5 that was provided subject to check.

6 PRESIDING COMMISSIONER DUFF: Okay. These
7 corrections are more material to the substance?

8 D. COBAN: Yes. Yes.

9 PRESIDING COMMISSIONER DUFF: So that's the
10 difference. Okay. Thank you very much.

11 One other comment. You're filing the revised
12 settlement proposal. I hope there is a cover letter
13 that really clarifies for us because we have already
14 -- because the panel has already provided an oral
15 approval of it. I am hoping that that list of
16 corrections are very clear and concise so that --
17 with a comment regarding the materiality or the
18 substance of those corrections.

19 D. COBAN: Yes. What I propose we do is we show
20 you the tables that have been updated with the sort
21 of corrections redlined in the cover letter so you
22 can easily identify them if that's helpful.

23 PRESIDING COMMISSIONER DUFF: That sounds very
24 helpful. Thank you.

25 Any other preliminary matters? Okay. Hearing
26 none, Mr. Millar.

27 **CROSS-EXAMINATION BY M. MILLAR**

28 M. MILLAR: Thank you, Madam Chair. Good

1 morning, witnesses. My name is Michael Millar. I am
2 counsel for OEB Staff. I am going to begin the Staff
3 cross-examination, and then I will be handing it over
4 to my colleague Ms. Nowicki.

5 Perhaps we could start just by OEB Staff filed a
6 compendium which I would propose to mark as K3.1.

7 **EXHIBIT K3.1: ONTARIO ENERGY BOARD COMPENDIUM**

8 M. MILLAR: But before we get into that, I am
9 hoping -- I just had a quick follow-up on a couple of
10 exchanges that occurred yesterday in respect of the
11 net metering charge.

12 I am hoping the transcript from yesterday is
13 available, and I think -- I am looking for page 40,
14 if we could have that pulled up. Yes. If we could
15 just scroll down a little further. Okay. Yes,
16 that's --

17 Ms. Barrie, you will recall you had an exchange
18 with Mr. Ladanyi about the net metering charge and
19 Ottawa's decision to not charge that, and he had some
20 questions about, you know, had you gone to the Board
21 for that or what authorization had there been.

22 And you made a reference -- and in fairness to
23 you, kind of a passing reference to some possible
24 direction that the Board had provided in that regard.
25 I was just hoping to follow up on that, if there was
26 a specific document or something that the Board had
27 said that would assist us.

28 And I do want to be careful. It sounds like I

1 am setting a trap or something. I am not. Even
2 though I have worked here 20 years and I read as much
3 as I can about the Board issues, there is stuff that
4 I am not aware of. So I am not seeking to trap you,
5 but I am just trying to understand if there was a
6 particular document you were referring to in that
7 regard.

8 A. BARRIE: So the one I referenced was related
9 to COVID.

10 M. MILLAR: Yes.

11 A. BARRIE: Where they reminded us that we had -
12 - we could have the ability. I was -- I don't think
13 there is an actual document that specifically says we
14 do or we don't have to come back. It's very explicit
15 about, you know, we have to have authority to charge
16 a rate and that rates are approved.

17 And we know that on a regular basis, we are
18 allowed to waive things like our specific service
19 charges when there's unique situations, but there is
20 also conceptually the fairness rule of ensuring that
21 you're treating similar ratepayers in the same
22 manner.

23 M. MILLAR: And I recall during COVID, for
24 example, there was some direction from the Board --
25 and I am operating from memory here -- in respect of
26 late payment fees. I think there was some
27 instruction from the Board that utilities could waive
28 those if they chose to do so, possibly about

1 reconnection fees, though I may have that wrong. Is
2 that the direction that you were referring to?

3 A. BARRIE: Yes, that's correct.

4 M. MILLAR: Okay.

5 A. BARRIE: I meant to look it up actually last
6 night, but I forgot to.

7 M. MILLAR: Okay.

8 A. BARRIE: Reading the transcript.

9 M. MILLAR: No, that's great.

10 So the direction from the Board you were
11 referring to was that COVID-related direction, and,
12 again, either about late payment fees or -- or
13 reconnection fees or possibly both?

14 A. BARRIE: That's correct.

15 M. MILLAR: Okay.

16 And I don't wish to belabour this because a lot
17 of folks asked you about this, but I think the reason
18 you are looking to drop the charge is essentially you
19 weren't incurring any costs related to net metering?

20 A. BARRIE: Related to the residential and small
21 commercials?

22 M. MILLAR: Right.

23 A. BARRIE: The system has been automated, and
24 now it's just -- so we are no longer doing the manual
25 work related to that. We are still needing to --
26 because we haven't automated the larger commercial
27 classes, there is still manual work related to those
28 group of customers.

1 So it's kind of twofold. One, we have chosen to
2 automate a portion because that is the portion that
3 was most efficient, the greater number of customers,
4 and we were seeing that increasing so we did that
5 ahead of time.

6 We had been planning on automating the
7 commercial customers as well with -- but with the
8 introduction of the EV transmission rate, we focused
9 our team on that requirement instead. And at this
10 point in time, given it is a rate class for everyone,
11 we feel it's appropriate. The second -- to remove it
12 at this point in time.

13 And the second reason relates to the fact of the
14 optionality and customers having optionality within
15 the way they choose to pay for their electricity
16 costs. And this would be unique that only one group
17 of customers would be paying for that optionality
18 now. And it's specifically one rate class of that
19 group.

20 M. MILLAR: Right. So if I understand you
21 correctly, there are no or minimal costs related to
22 this for the residential sector. There are still
23 some costs, although modest, if I understand you
24 correctly, related to - was it GS under 50 customers
25 or non-residential customers that this service
26 applies?

27 A. BARRIE: It is the GS over 50.

28 M. MILLAR: GS over 50, okay. Okay. Thanks

1 very much.

2 Now, again, we are not talking about a lot of
3 money. I think I saw something like \$17,000 for one
4 year, so not a lot of money, whatever it is. But is
5 it fair to say that that's revenue you are not
6 earning that would impact your ESM calculations, for
7 example?

8 A. BARRIE: From the period of '21 to '25, yes,
9 it would impact our ESM calculation. We did take
10 that into consideration when we looked at that rate
11 and whether or not we'd have to adjust.

12 But as Ms. Collier has indicated, we are not
13 done our 2025 year; however, from '21 to '24, Hydro
14 Ottawa is -- the difference in that revenue would not
15 have made even close of a difference, so the fact
16 that we have underearned over the period and has not
17 -- have not -- would not put us over that threshold
18 in order to return earnings.

19 Had it, we would certainly have considered to
20 make sure we made that adjustment, seeing that was a
21 corporate decision to stop charging that.

22 M. MILLAR: Yes. Again, I appreciate this is
23 not a lot of money, so no actual impact on any ESM
24 that would have been paid or not paid, but it would
25 go into that calculation?

26 A. BARRIE: That is correct. It would have gone
27 into that calculation.

28 M. MILLAR: Okay.

1 And similarly, to the -- you are, in fact,
2 showing a revenue deficiency, and I think there was
3 revenue deficiency in some of the previous years that
4 would impact that calculation as well, albeit in a
5 very minor way?

6 A. BARRIE: That is correct. But as noted, if
7 we added it back, it would make a difference, and we
8 would not have overearned during that period.

9 M. MILLAR: Okay. Thanks very much. Why don't
10 we move on.

11 Could I -- so I have some questions about your
12 enterprise asset management and customer relationship
13 management programs or projects. And just to set the
14 table, perhaps we could turn to page 6 of the OEB
15 Staff compendium.

16 And if we could scroll down to about the middle
17 of the page. I think I have -- I have page 6 at the
18 bottom. Yes, so that's page 4 -- yes, not of the
19 PDF; page 6 at the bottom of the page. Thank you
20 very much. There we go. Okay. Thanks very much.

21 So just to set the table and to -- I don't think
22 this program has come up yet, so I just wanted to
23 remind both myself and the witnesses what this is.

24 So the enterprise asset management, if we look
25 at this reference to the evidence, it's a \$1.7
26 billion -- or your:

27 1.7 billion asset portfolio projected to reach
28 3 billion by 2030 necessitates a strategic

1 shift towards integrated asset management. A
2 2022 assessment highlighted critical gaps -
3 manual processes, technical limitations, and
4 fragmented data - impeding efficient management
5 of the ISO audit compliance. To address these
6 challenges and capitalize on growth
7 opportunities in a rapidly evolving industry,
8 Hydro Ottawa will begin deployment of an EAM
9 system. The initial deployment of 7.5 million
10 from 2025 to 2028 will centralize data, et
11 cetera, et cetera.[as read]

12 So clearly, you are familiar with this project,
13 and I -- you're prepared to answer a few questions
14 about it?

15 L. HEUFF: Yes.

16 M. MILLAR: And then if we turn to page 11,
17 again, 11 at the bottom of the compendium, you'll see
18 a similar description of the customer relationship
19 management program?

20 A. WILLIS: Yes.

21 M. MILLAR: Okay. And I am not going to read it
22 on to the transcript, but this is just to sort of set
23 the table for some questions about this.

24 Could we please turn to page 10 of the
25 compendium. And if you scroll up just a little bit,
26 you will see what we have done here. We have taken
27 two references directly from the evidence about the
28 cost of these two programs.

1 We produced that chart in the table that you see
2 before us now, but that's taken directly from the
3 numbers that we have in the evidence. We just put
4 them all together, and they are just meant to show
5 the costs of these projects over the three years. So
6 if you look at that table that's sort of at the top
7 of the screen that we have, maybe you can just
8 confirm these numbers for me.

9 If we look at the two programs together, am I
10 correct that the total spend for the test period --
11 or for the 2026 to 2030 period is \$13.1 million?

12 A. WILLIS: Subject to check, yes.

13 M. MILLAR: Okay.

14 And, again, if you -- the -- where -- if you
15 scroll up a little bit on the page, you can see these
16 two exhibits are literally copied and pasted from
17 your evidence, and all we did was add those numbers
18 up and put it on the table below. I accept you say
19 subject to check, and I won't make you count that up,
20 but I just want to show you where we got those
21 numbers.

22 And then, again, the -- so the average over the
23 five-year period for \$13.1 million is \$2.6 million;
24 would you take that or take it subject to check?

25 T. FREEMAN: Yes.

26 M. MILLAR: And if we look at the 2026 test
27 year, the amount that will be added to the revenue
28 requirement under the proposal are \$3.7 million; is

1 that correct?

2 A. WILLIS: That's correct.

3 PRESIDING COMMISSIONER DUFF: Perhaps we could
4 just scroll a little bit down.

5 M. MILLAR: Yes. I'm sorry. If you scroll
6 down, that central table we have here kind of
7 collates all that information.

8 And then if you look at the last row there,
9 that's -- the amount in 2026 is about \$1.1 million
10 more than the five-year average; is that fair?

11 A. WILLIS: Yes.

12 M. MILLAR: Okay.

13 And so if this amount is approved -- if the
14 application is approved in respect of the O&M budget,
15 this \$3.7 million would go into your revenue
16 requirement for 2026; is that correct? That's the
17 proposal?

18 A. BARRIE: That is. I would note you --
19 because you seem to be focusing on our cloud
20 computing solutions, and you don't have all of them
21 in this chart, so I just want to make sure you're
22 aware that, like, for instance, the AMI2.0 is not
23 part of this. So --

24 M. MILLAR: Tell me a little bit more about
25 that.

26 A. BARRIE: Sure. I don't --

27 A. WILLIS: Thank you. I would like to provide
28 some context around our cloud computing program. I

1 think that's really important at this juncture.

2 So our IT investment needs are increasing and
3 becoming more complex as we need to handle a much
4 larger volume of data than ever before. We have a
5 sustained investment in our cloud computing necessary
6 over this rate period for Hydro Ottawa to meet its
7 obligations.

8 We have our EAM, CRM, we have our AMI2 program,
9 customer engagement platforms, our Workday and HR
10 technology, our Google collaboration platform, cyber
11 tools, and other cloud-based applications.

12 The IT solutions that meet the -- the IT
13 solutions to meet these complex needs are increasing
14 and increasingly only offered as cloud services.
15 It's the practical reality of the changing technology
16 market. We are seeing vendors actively move away
17 from traditional on-premise perpetual license model
18 largely as a result of affordability.

19 The level of technology innovations in these
20 platforms is increasing at a very rapid pace. In the
21 near term, we have prioritized investing in our CRM
22 and our EAM system, as outlined in the evidence, for
23 the reason that Ms. Heuff and Mr. Freeman spoke about
24 over the last two days.

25 As these initiatives are implemented, there are
26 going to be costs associated with ongoing
27 subscriptions. The reality is that the year-over-
28 year inflationary pressures we face on these

1 technology services exceed the inflationary pressures
2 that are used to escalate our base rates. We can see
3 this in the current rate period in our evidence in
4 Schedule 1-2-5.

5 Hydro Ottawa, like many other companies, is
6 navigating significant market forces. We are seeing
7 cloud renewals exceed 10 to 20 percent, higher
8 uplifts at the time of renewal. We are seeing a
9 shift from simply access to the application to
10 consumption-based models, tokens, pay per action, pay
11 per conversation, which is making it harder for us to
12 plan our budgets, and this is largely a consequence
13 of AI. With much of the AI automation ongoing, we
14 are seeing heavy compute fees and fees to use the
15 large language models.

16 Secondly, we are in a continuous improvement
17 mode, and we wish to continue expanding the use of
18 our platforms to take advantage of the new
19 functionality we may require in the areas of our
20 business. This is, again, in line with our pursuit
21 of continuous improvement of business processes and
22 the outcomes these platforms will support.

23 Our EAM and CRM are only a subset of the larger
24 investment plan for cloud computing over the rate
25 term. If I direct you to CCC 36, that evidence shows
26 Hydro Ottawa's five-year investment plan with respect
27 to cloud computing. Our subscription costs are
28 expected to grow from 2.7 million in 2021 to 13.3

1 million in 2030 as we will continue to invest in
2 other systems and platforms over the next decade to
3 support our organization.

4 In those numbers, we have cloud-based cyber
5 systems. We have our data warehouse. We have our AI
6 platform, our integration platforms. We have
7 infrastructure hosting, safety systems, and other
8 corporate applications. We really need to look at
9 this cloud budget in CCC 36 as a program envelope,
10 much like many of our capital programs that will
11 allow us to manage the needs of our organization over
12 the period against a technology market that continues
13 to rapidly evolve.

14 Again, AI is accelerating at a rapid pace. We
15 are seeing agentic AI, autonomous agents, intelligent
16 automations, and useful collaboration companions that
17 are of great benefit to our end users' summarization
18 and gen AI productivity tools. This is expected to
19 continue.

20 Unlike the near-term initiatives for our ERM and
21 CRM, we cannot forecast with the same precision the
22 cloud investments we will undertake in the outer
23 years, again, related to the rapidly changing
24 environment. We know that we are going to invest in
25 technology in order to be able to realize our
26 operational efficiencies, and we will have to manage
27 within the reduced envelopes that we have agreed to
28 in the outer years without compromising our

1 performance outcomes.

2 Ms. Collier and other panel members here can
3 speak in more detail about the funding constraints in
4 the outer years and our reliance on technology
5 solutions to manage the constraints while delivering
6 outcomes that our customers expect.

7 M. MILLAR: Thank you for that.

8 If we just -- we are looking at this -- the CCC
9 36. I think we have it in front of us. There is a
10 number of charts there. If you look at capital item,
11 I take it this shows both capital and O&M related to
12 these programs? Table A is the capital?

13 T. FREEMAN: Table A speaks to the capitalized
14 software, and with all capitalized software, there
15 are annual maintenance fees associated with those
16 products that is under the non-capitalized
17 maintenance line.

18 M. MILLAR: Okay.

19 And I see just under capitalized software 2026,
20 9.6 million. That's one that goes down by 2030,
21 though, of course. As you pointed out, for non-
22 capitalized maintenance, the 2030 number is higher
23 than 2026, and the subscription costs, it's the same
24 story; is that correct?

25 A. WILLIS: We are seeing increase in our non-
26 capitalized maintenance as well as our subscription
27 costs. That's correct.

28 M. MILLAR: Right.

1 And I guess it's not unnatural. Any five-year
2 term cost may go up, they may go down, depending on
3 the particular program or the subset of the program;
4 that's fair?

5 A. WILLIS: Well, we would certainly love them
6 to go down, but lately, that has not been our
7 experience.

8 M. MILLAR: Well, some of them go down. I mean,
9 if you look at capitalized software, that's going
10 down; correct?

11 T. FREEMAN: That's the purchase of software. I
12 would say that is largely in line with our transition
13 to cloud.

14 M. MILLAR: And, again, if we look at the EAM
15 and CRM costs that were back on to Staff 10, and,
16 again, I appreciate some go up, some go down, but
17 those costs are going down over the test period; is
18 that fair?

19 A. BARRIE: Just to be clear, as we have settled
20 on a forecasted five-year capital, those -- those
21 elements that you see going down in the capital are
22 reflected in the forecast that's being used in our
23 capital plan.

24 M. MILLAR: Sorry. Could you repeat that,
25 please, Ms. Barrie.

26 A. BARRIE: Because those are capital related,
27 and as part of the settlement agreement, we do have a
28 five-year capital forecast with an additional stretch

1 and an incremental stretch.

2 The fact that you're seeing the capital elements
3 of this go down is already embedded in our rates, as
4 that is what's occurring in our five-year forecast.

5 So I just want to make sure we don't confuse the
6 fact of, like, netting out these two numbers when one
7 is working on an escalator and one is working on a
8 five-year forecast.

9 M. MILLAR: Sure.

10 Just the CCC 36 that we have in front of us,
11 these are pre-settlement numbers; correct?

12 A. BARRIE: They would be pre-settlement, but as
13 we have been discussing over the last couple of days
14 and reflected in the settlement agreement, there is a
15 -- you know, an element of equal reductions for the
16 most part in all the programs.

17 But my main point isn't necessarily the exact
18 dollar amount, but the fact that when we look at the
19 numbers that are actually going down, those have
20 already been reflected because we are using a five-
21 year forecast.

22 So I just don't want it to be confused that we
23 should, like, take these two numbers and add them
24 together because they are very different and they are
25 being dealt with very differently in the rate
26 application. So the numbers that are going down,
27 five-year forecast, so very specifically in 2030, the
28 customer is already receiving that benefit. Whereas

1 the numbers that we are seeing trajectoring up, we
2 are using an escalating factor from the base year in
3 order to try to manage those costs.

4 M. MILLAR: Okay. I understand. Thank you for
5 that.

6 There was a discussion regarding inflationary
7 pressures and how there is a concern that at least
8 some of these costs will raise in excess of
9 inflation, if I heard that correctly.

10 I just wish to confirm the I factor is part of
11 the settlement. That's been settled as part of this
12 proceeding; correct? That's the IRM framework
13 includes the I minus X plus G formula, and all that
14 is part of the settlement.

15 A. BARRIE: That is correct. And if we -- to
16 point -- we did do an extensive inflationary --
17 inflation exhibit that did show that the OEB uses
18 certain factors in establishing an inflationary rate
19 that is used across the Board for all utilities.

20 However, in the last five years, utilities have
21 been experiencing a higher level of inflation just by
22 the nature of the costs they have been incurring, and
23 we don't know what that future is going to predict.
24 But if the past does, we will need to balance what is
25 approved through the OEB inflationary rate as well in
26 the future compared to whatever our industry
27 particularly managed.

28 Ms. Collier went through a number of examples of

1 how our procurement function tries -- you know, has
2 strategies in order to try to manage that, but we do
3 look at that as being something we will need to
4 manage over the five years as well.

5 M. MILLAR: Well, sure. Inflation will be what
6 it will be. But this is something that you have
7 settled with the parties; is that correct?

8 A. BARRIE: That is correct.

9 M. MILLAR: Okay. Could I ask you to turn to
10 page 7 of the Staff compendium.

11 PRESIDING COMMISSIONER DUFF: Mr. Millar.

12 M. MILLAR: Yes.

13 PRESIDING COMMISSIONER DUFF: Can I just ask one
14 question before we leave this page?

15 M. MILLAR: Of course.

16 PRESIDING COMMISSIONER DUFF: You started your
17 question asking about the EAM and the CRM programs.

18 M. MILLAR: Right.

19 PRESIDING COMMISSIONER DUFF: And then the
20 witness took you to this page because there were
21 additional costs that should be considered in that
22 conversation. Can I just ask: Are the EAM and CRM
23 costs in this table or -- that's my working
24 assumption.

25 A. COLLIER: That's correct.

26 PRESIDING COMMISSIONER DUFF: Okay. So you
27 referenced this table in order to have a complete
28 discussion?

1 A. COLLIER: Yes. Because we are on this
2 transition to cloud, and normally EAM and CRM would
3 have been capital projects historically in our rate
4 application that would have been accompanied by a
5 material investment plan write-up, we decided to
6 include the equivalent of a material investment plan
7 write-up in our 4-1-1(a), even though now these are
8 O&M projects. But this is the total of our cloud
9 program.

10 PRESIDING COMMISSIONER DUFF: Sorry, Mr. Millar,
11 for interrupting.

12 M. MILLAR: No, that's a helpful clarification.
13 Thank you, Ms. Duff.

14 Again, if I could ask to turn to page 7 of the
15 Staff compendium. And this is an extract from the
16 Hydro Ottawa evidence, and just around the middle of
17 the page is great.

18 You discuss some of the challenges that have
19 lead to you adopting the EAM program. And if you
20 look, you describe a few things. Starting at about
21 line 11 it looks like, you say:

22 "This evolution -- "[as read]

23 By which you mean the EAM program:

24 "-- will streamline processes, improve data-
25 driven decisionmaking, and enable proactive
26 asset management. The current environment,
27 while functional, presents opportunities for
28 reducing manual processes and improving data

1 accuracy. By unifying data sources, Hydro
2 Ottawa can minimize the need for time-consuming
3 error validation and enhance visibility into
4 data standardization."[as read]

5 Do you see that?

6 L. HEUFF: I do.

7 M. MILLAR: And could I ask us to flip ahead to
8 page 26 of the Staff compendium. That's a response
9 to a Staff interrogatory. And I apologize, I just
10 have the response here. And if you need to you can
11 pull up the -- but the question was essentially, can
12 you show us the cost savings that will result from
13 adopting the EAM program.

14 And then your response is:

15 "While the EAM project is expected to generate
16 future savings through efficiency gains, these
17 savings have not yet been quantified and
18 incorporated into this application."[as read]

19 When do you expect to quantify the savings that
20 will result from these efficiency gains?

21 L. HEUFF: Mr. Millar, if you wouldn't mind, I
22 don't think that the place you referenced is the
23 correct reference in the compendium.

24 M. MILLAR: Oh, I am sorry. I have it as page
25 26 at the bottom. Ah, isn't that funny. Well, it's
26 Staff IR 133.

27 L. HEUFF: I think it might be page 28 of the
28 compendium.

1 M. MILLAR: Yes. Perhaps I printed off an
2 earlier version. Scroll down.

3 L. HEUFF: 29. Yes, at the bottom of --

4 A. BARRIE: The issue is whether or not you use
5 the PDF page or the -- numbering.

6 M. MILLAR: Yeah, I have it -- and we can just
7 turn to Staff 133. These are all just taken directly
8 from the evidence. So, again, if you -- there we go
9 --

10 A. BARRIE: Just because you have two page 1 --
11 I think you have several page 1s.

12 PRESIDING COMMISSIONER DUFF: I just want to say
13 I think Lianne, whoever she is in this room, is doing
14 an excellent job. Thank you very much.

15 M. MILLAR: I must agree, yeah.

16 Okay. So let's go directly to the evidence
17 reference, and you'll see that there -- if it's
18 helpful, I can repeat the question, but essentially,
19 you have stated in that response that you have not
20 yet quantified and incorporated these savings into
21 the application. And my question is when do you
22 expect to be able to quantify those benefits?

23 L. HEUFF: Yes, so the benefits themselves
24 haven't been quantified in the sense of in our
25 productivity exhibits, so 1 SEC 24, I believe. And
26 apologies if that's the incorrect reference. But the
27 one that we were discussing this morning even with
28 Mr. Rubenstein where we have the tables where we have

1 quantified the actual productivity.

2 M. MILLAR: Yes.

3 L. HEUFF: We haven't done it to that extent at
4 this point because we haven't actually implemented
5 the system.

6 And so as you'll note, when we do the calculated
7 productivity calculations, they are very much based
8 on the actual efforts and what has been changed,
9 where we can credibly back it up with data to suggest
10 these are the actual savings.

11 What I will say is what we do expect is labour
12 efficiency savings as a result of this program.
13 Through our difficult conversations that we did have
14 at the preliminary stages of reductions that we had
15 to take on the O&M program, specifically referencing
16 the 11 and a half percent head count increase, we did
17 limit the maintenance and reliability engineers and
18 removed the ones that were originally proposed in the
19 application as a result of the understanding that
20 there will be labour efficiencies that do come out of
21 this program as we do the implementation of the EAM.

22 So we have eliminated future growth or the
23 additional head count in the maintenance and
24 reliability program engineers; however, we have not
25 quantified them in the way that we have done with the
26 other productivity exhibits, hence what we are
27 describing here as having not been quantified
28 specifically in the evidence.

1 A. COLLIER: And maybe if I can add to that
2 because the EAM program obviously impacts multiple
3 groups within Hydro Ottawa, so it also includes our
4 supply chain team. So if you look -- think about CCC
5 50 -- Lianne, which you don't necessarily have to
6 pull it up. It's a table we have been looking at a
7 lot the last few days.

8 It just has our FTEs per year from '20 to 2030.
9 You will see that the dollars being managed by our
10 supply chain team in terms of the dollars managed per
11 FTE is increasing by almost 73 percent.

12 So that efficiency gain is partially coming from
13 the future implementation of EAM, and that's
14 precisely why we didn't request additional head count
15 in the supply chain team, even though we are
16 increasing the capital program significantly.

17 M. MILLAR: It sounds to me like you sort of
18 have quantified these benefits, but maybe -- I am not
19 sure where we are missing each other. You say you
20 have identified areas where savings have occurred,
21 but they haven't been -- you haven't collected them?
22 Where are we missing each other?

23 L. HEUFF: So I think what I would quantify it
24 as is -- or the way I would qualify it is we know
25 there is cost avoidance savings, so there are things
26 that are not built into the budget currently as a
27 result; however, the specific ability to say this is
28 the number of labour hours that were reduced because

1 we did this exact specific activity, which is the way
2 that all of the rest of the items that are in the
3 productivity tables, the actual calculations, are
4 performed, isn't possible to be done until we've
5 actually implemented the software.

6 We can say, you know, like, it used to take this
7 much time to do this activity, it now takes this much
8 time, we have saved this much labour. So that is how
9 the other exhibit has been developed. It's very much
10 in that type of a mindset.

11 And so we have not quantified the savings as a
12 result.

13 M. MILLAR: Okay. So you're expecting either
14 it's less head count or -- associated with it. It's
15 just you don't have enough confidence in the number
16 at this point because the program is still being
17 rolled out; do I understand that correctly?

18 L. HEUFF: Roughly, like, that's -- yeah.
19 That's generally a good explanation.

20 M. MILLAR: Okay. So --

21 A. COLLIER: There's certainly more productivity
22 in our -- if your question is -- I mean, we have a
23 lot of evidence on the record in terms of
24 productivity, but certainly that productivity
25 exhibit, in my mind, is quite conservative because,
26 you know, we don't have an ERP system that's
27 capturing all of these avoided costs, obviously, so
28 we wanted to make sure that anything that we put in

1 that productivity exhibit we could rigorously defend
2 and show the exact and precise calculations.

3 But as I said in my opening remarks on day one,
4 our overall capital program is doubling, and we are
5 only increasing FTEs by 16 percent.

6 So there is a lot of inherent productivity
7 embedded with that that is enabled by a lot of these
8 technology projects. It's just hard to pinpoint. Am
9 I saving 15 minutes per person with this application?
10 And how do we justify that or compute that?

11 So those are the inherent productivity that we
12 are talking about here that's difficult to put a
13 precise dollar value on.

14 M. MILLAR: And I appreciate that would be a
15 difficult exercise. And presumably even the ones you
16 were able to do it for, I don't want to -- it's --
17 there is probably only so accurate you can be in
18 doing something like that. That's fair enough.

19 Is this something that you would be able to
20 quantify? In the unfortunate event I am still here
21 in 2030, is this the type of thing that you may have
22 better data on five, six years from now? Is that
23 something that would be reported?

24 L. HEUFF: We will definitely be endeavouring to
25 calculate as many of the savings as we can precisely
26 and ensure that they are available in the evidence of
27 our next application.

28 M. MILLAR: Okay. Could I ask us to go back to

1 page 12 of the compendium, which I think is probably
2 correct. I am talking page 12 at the bottom.

3 Again, these are similar questions about CRM
4 which may have similar answers, but I am going to put
5 them to you.

6 One of the driving factors behind your CRM
7 program is that you can realize certain efficiencies
8 and you speak of a -- if you look at the top of the
9 page, the first full sentence:

10 "A sales force-powered solution also offers a
11 more intuitive interface that empowers agents
12 with easy access to data, reduces training
13 times, enables more efficient customer service
14 interaction, and leads to faster resolutions
15 and improved customer satisfaction." [as read]

16 I took this -- there are a number of examples
17 where you speak to the benefits and the efficiencies
18 of that program.

19 And if we can turn to Staff 145 C, which I have
20 at page 27 of my compendium, but again, it may be
21 easier just to pull up the reference directly.
22 Again, that's Staff 145, and in particular, response
23 (c).

24 And we asked you a similar question to what we
25 asked about the EAM program. And you will see there,
26 this time the answer is written slightly differently,
27 but it's more or less the same things. It says:

28 "There are no quantifiable OM&A cost savings as

1 a result of the efficiency gains from the CRM
2 platform."[as read]

3 What can you tell me about that? Why would we
4 not see these efficiency gains reflected in cost
5 savings?

6 T. FREEMAN: Yes. Thank you for the question.
7 It's a similar response to the EAM situation, but I
8 am happy to kind of illustrate it out a little bit.

9 So similarly, when we were looking at the needs
10 and the customer engagement areas of the business
11 moving forward into the '26 to '30 period, especially
12 factoring in the increasing customer count,
13 increasing customer complexity, I think throughout
14 the last two days we've shown the evidence of
15 increased DER requests, for example, and the
16 significant increase there, increased large load
17 requests, increased customer connection requests. So
18 these are all stats that are showing a significant
19 uptick from the trends over the '21 to '25 period.

20 All of those have customer touch points. They
21 have interaction from our key accounts team, for
22 example, in the large load requests, helping to
23 educate customers. So the complexity and the volume
24 of work is increasing.

25 Absent efficiencies that we see through
26 initiatives like our CRM, we would have been coming
27 and asking for more head count. We would have been
28 saying, we need to grow our key accounts team, we

1 need to grow our customer contact team, our billing
2 team, et cetera, et cetera.

3 In making the decisions to try and streamline
4 and find efficiencies wherever we can, we opted to
5 invest in a CRM program, which let us keep that head
6 count more or less flat. We are adding one head
7 count in our customer and community relations team,
8 one head count in our billing team. And those are
9 actually designed to leverage the benefits that we
10 will see, in part, from our CRM program and our
11 customer engagement program.

12 So the efficiencies, again, similar to what Ms.
13 Heuff and Ms. Collier said, while we didn't spell
14 them out and quantify them by direct number of hours,
15 saved and put them in a table in some of the other
16 interrogatories, they were costed out in that we
17 built them into our budget, and we didn't ask for
18 that additional head count that we would need;
19 otherwise, we kept that head count relatively flat,
20 and we instead are investing in the CRM as a more
21 efficient way to handle that increased customer
22 complexity and increased customer count, but also as
23 a long-term strategy.

24 So some of the other benefits that you
25 highlighted of having, you know, quicker resolution
26 time, having all the data in our CRM is going to
27 bring all customer data onto a single screen, or
28 that's the goal. Right now, customer data lives in a

1 number of different systems, so even additional head
2 count wouldn't necessarily speed up that customer
3 interaction time.

4 Our customer engagement platforms as a sort of
5 compendium or a corollary to our CRM, that's
6 providing more self-serve options for our customers
7 so that instead of having to go through the system
8 and talk to an agent, they are able to self-serve.
9 So the efficiencies and the productivity gains are
10 built into the OM&A ask in that area.

11 M. MILLAR: Yeah, I am not disputing there are
12 efficiency gains in this, and you have said that
13 throughout the application, and I am not really
14 asking what those efficiency gains are.

15 But you have said you will probably need less
16 head count. You said -- and I heard you just say the
17 word, you "costed" these things out. I guess what's
18 not clear to me is why those can't be -- why those
19 savings can't be approximated in the -- you know, in
20 the response to the Staff IR or throughout the
21 application.

22 T. FREEMAN: Sorry. Apologies. When I say we
23 costed them out, I think we otherwise would have had
24 them in the budget as head count, and so by not
25 including those in the budget, the savings are
26 factored into what our budget is. Sorry if I
27 misspoke.

28 M. MILLAR: That makes sense to me.

1 I guess why can't we have a number for that?

2 T. FREEMAN: And, again --

3 M. MILLAR: Is it just it's too speculative at
4 this point? I know you were able to -- again,
5 everything in the future is a forecast, obviously,
6 and a forecast is always subject, you know -- it's
7 rarely going to be 100 percent, right. But what's
8 the challenge with this one as compared to somewhere
9 you were able to estimate what the savings would be?

10 T. FREEMAN: I think identifying the very
11 specific tasks that will be avoided and the length of
12 time of those tasks, as we have done in other parts
13 of the evidence that I think you are referring to,
14 that is a bit speculative at this point, and so we
15 are not able to provide that level of granularity on
16 the savings and instead have chosen to embed those
17 savings in our proposed budgets.

18 M. MILLAR: Okay. Thank you. That's helpful.
19 And I think that's probably as far as I can take
20 that.

21 And with that, I am going to pass you over to my
22 colleague Ms. Nowicki. Thank you, Panel.

23 **CROSS-EXAMINATION BY J. NOWICKI**

24 J. NOWICKI: Thank you, Mr. Millar.

25 Good morning, Panel. So the focus of my
26 questions today for the Panel is going to be on Hydro
27 Ottawa's proposed vacancy rate. And I do recognize
28 that there have already been some questions on this

1 particular item earlier in the proceeding, so I will
2 try not to overlap.

3 But I would like to begin with some follow-up
4 questions to Hydro Ottawa's testimony on day one, if
5 that's possible to pull up the transcript from day
6 one. And so the page I am looking at is page 107.

7 And so if I could direct you to line 24. So
8 here, Ms. Collier, you noted that there is two
9 drivers that are impacting the vacancy rate. The
10 first is normal attrition, so this would be
11 resignation, retirements; is that correct?

12 A. COLLIER: Correct.

13 J. NOWICKI: And then the second driver you note
14 is how quickly Hydro Ottawa can replace the vacancies
15 as they occur, and this is something that you noted
16 is more within the control of Hydro Ottawa; is that
17 correct?

18 A. COLLIER: Correct.

19 J. NOWICKI: And so if we can please scroll down
20 to page 109 of the transcript at around line 25. And
21 so you have noted here that you have made some steps
22 in improving the administrative processes that are
23 surrounding recruitment, and I think something
24 similar as well is noted on page 98 of the
25 transcript.

26 Ms. Heuff, you mentioned that there is -- your
27 people and culture team has been making some efforts
28 to kind of improve their recruitment processes in

1 light of the kind of significant incremental head
2 count that you are looking to hire in 2026; is that
3 correct?

4 A. COLLIER: Correct. Both in light of the
5 incremental head count that we hired in '24 and '26
6 as well as an effort to get our overall vacancy rate
7 down kind of post-COVID. I think 2022 is the highest
8 vacancy rate that we had in Hydro Ottawa's history.
9 So multiple factors that drove this initiative.

10 J. NOWICKI: Okay.

11 So I would like to turn now to 4 SEC 73, which
12 is page 28 of OEB Staff's compendium. And so the
13 response I am looking at is response (e). And so the
14 question that you are asked here -- and apologies as
15 well. The question itself isn't in our compendium.
16 But the question was why Hydro Ottawa believes that
17 the vacancy rate in 2026 will be lower than in 2024
18 when both attrition rates and internal movement are
19 increasing.

20 And so you note here as well that Hydro Ottawa
21 has implemented a number of programs and initiatives
22 to enhance external recruitment efforts and increase
23 awareness of career opportunities.

24 And so you direct SEC to Exhibit 4, Tab 1,
25 Schedule 3, Attachment B, and 4 Staff 168 for details
26 on these efforts and their effectiveness. And so if
27 we could kindly pull up page 28 of that exhibit. And
28 apologies. This is not in our compendium, but that

1 is Exhibit 4, Tab 1, Schedule 3, Attachment B. B.
2 Sorry. And then if we can go down to Section 4.1.1.

3 Yeah. So in this Section 4.1.1, "External
4 Recruitment", you discuss some of the recent efforts
5 that Hydro Ottawa has undertaken to increase -- has
6 undertaken in light of the increase in recruitment
7 volumes that you will be experiencing; is that
8 correct?

9 A. COLLIER: Yes.

10 J. NOWICKI: And so I can summarize the main
11 points here, if you could scroll down just a little
12 bit into page 29. These include essentially
13 enhancing your employer branding and then connecting
14 with candidates. And then you mention a couple of
15 initiatives here: you know, leveraging your use of
16 social media, in-person events such as career fairs,
17 educational partnerships, speaking opportunities, et
18 cetera.

19 You also mention two here. One is one you refer
20 to as an older worker engagement program in which you
21 hire back recent retirees to act as instructors and
22 mentors, and a new employee onboarding program; is
23 that correct? Is that a fair summary of this
24 section?

25 A. COLLIER: Without reading it all over, I
26 think it's a fair summary.

27 J. NOWICKI: Okay.

28 And these last two efforts, they would be more

1 so that something -- something that candidates would
2 engage with after they have been hired on with Hydro
3 Ottawa? They wouldn't necessarily be efforts that
4 your -- that would be implemented in the recruitment
5 phase, the older worker engagement program and the
6 new employee onboarding program? These are after
7 they have become employees with Hydro Ottawa?

8 A. BARRIE: So the only thing I would point out
9 about that is, yes, that's certainly a program that's
10 engaged after the fact, but when we conduct
11 interviews on a regular basis, candidates ask, you
12 know, how is the company going to support me when I
13 get here? Because training, experience, knowing that
14 they are not going to enter a job and be left to try
15 to figure out things on their own is really
16 important, especially to younger talent who want to
17 make sure that their first steps in a corporation set
18 them up for success in the future.

19 So we think those programs really support when
20 we are going through that, and a lot of the times, it
21 could be some really meaningful items that candidates
22 are considering when they're willing to take a job if
23 they have multiple job offers or we are negotiating
24 on certain items. That is something that we can
25 speak to that is very valuable for candidates.

26 J. NOWICKI: Okay. Thank you.

27 And then you also mention further in this
28 section, I think in subsection 4.1.2, that Hydro

1 Ottawa has certain structured apprenticeship programs
2 as well that you are going to continue to leverage,
3 and -- but these have been in place already within
4 Hydro Ottawa for -- prior to 2026; is my
5 understanding correct?

6 A. COLLIER: Yes.

7 J. NOWICKI: Okay.

8 So I would like to turn to page 31 of OEB
9 Staff's compendium. So this is the response that I
10 mentioned before. This is 4 Staff 168.

11 And so here you mention -- here you describe the
12 success of a couple of recent recruitment-related
13 campaigns, I believe, that you have undertaken, I
14 believe, in 2025. And it will be response (c).
15 Apologies.

16 And so in reading this, it appears that these
17 are two social media-related efforts that you have
18 undertaken in 2025 as well as enhancements you are
19 making to your employer brand strategy. Again, is
20 that a fair summary of what we are seeing here in
21 this response?

22 A. COLLIER: Yes.

23 J. NOWICKI: And so is my understanding correct
24 in that the way that Hydro Ottawa has measured the
25 success of these efforts, and particularly as they
26 pertain to social media, is to -- is to look at the
27 overall engagement that you have with these posts?

28 So the impressions that you get on posts, the

1 click-through, follower count, et cetera, is that how
2 you have kind of measured how well these campaigns
3 are going?

4 A. COLLIER: Yes. It's one of the ways. I
5 mean, our recruitment strategy is multifaceted,
6 right. There is many different things we do from
7 education in primary grade school to our summer
8 student program with university students to social
9 media campaigns and postings. I mean, it's all part
10 of the Hydro Ottawa story on how we get that out
11 there and how we track the best and the top
12 candidates that we can. So it's one of the tools.

13 J. NOWICKI: And so through these efforts, have
14 you been able to see a measurable increase in the
15 number of applications, the quality and suitability
16 of candidates, things like that?

17 L. HEUFF: So perhaps I could speak to just the
18 engineers specifically.

19 So if we went back to 2021 when we were in a
20 very tight labour market for engineers and the
21 recruiting efforts were extremely challenging, we
22 were having a hard time getting qualified candidates
23 to even apply. Having anyone that had a P.Eng., an
24 actual professional engineering designation to apply,
25 was quite challenging. We worked very closely with
26 our teammates and the people and culture group to
27 come up with new strategies and new efforts to
28 improve the recruitment campaign.

1 We have had an evergreen engineering posting up.
2 I think it's got to be going on the better part of
3 four years at this point in time that it's been a
4 perpetual posting.

5 There has been a number of efforts and
6 endeavours that have been undertaken in order for us
7 to improve that candidate pipeline including some of
8 the items Ms. Collier referenced. We have had some
9 of our engineers going to different recruitment
10 fairs. We have had very specific targeted types of
11 campaigns through EHRC and through other endeavours.

12 And I -- and the candidate pipeline has
13 absolutely grown. We have had -- been very
14 successful in filling the positions as of late. We
15 have dramatically improved the vacancy rate of the
16 engineering position as a result of these efforts,
17 and we do feel that these improvements have been
18 quite successful in our ability to both attract and
19 hire and retain employees.

20 Maybe one other thing to add is we have also
21 created a succession plan for our internal engineers.
22 We now have a senior engineering position as well as
23 an internal -- an intermediate engineering position,
24 which are allowing us to also retain candidates that
25 we have managed to successfully hire as well.

26 J. NOWICKI: Okay. Thank you.

27 And then so can we turn now maybe to page 40 of
28 OEB Staff's compendium.

1 And then if we go to the bottom of the table
2 just to the total figures. And I believe we have
3 already mentioned this during the hearing, but the
4 number of positions that you are looking to add in
5 2026 are 81 incremental new positions?

6 A. COLLIER: That's correct.

7 J. NOWICKI: And it would be 37 in 2027?

8 A. COLLIER: As we -- Ms. Barrie mentioned
9 earlier and I think as Ms. Heuff mentioned yesterday,
10 the 2027 to 2030 is part of our settlement agreement
11 in terms of how our OM&A will be escalated over that
12 period. So we will need to look at those reductions
13 because I think as I mentioned in my opening remarks,
14 we do have a \$40 million reduction in that OM&A
15 envelope, so we will need to relook at the '27 to
16 2030 numbers that you see here to determine how we
17 are going to achieve that.

18 J. NOWICKI: Okay, thank you.

19 And this also may have already been previously
20 answered, but have you hired all of the 50 positions
21 that you had included in your initial application for
22 2024?

23 A. COLLIER: I don't know that we have that
24 precise number anywhere on the evidence, but you can
25 certainly see the growth in our FTEs in that CCC 50
26 table. We do also still have a vacancy rate, as I
27 mentioned yesterday. Our vacancy rate as of June
28 2025 is 7 -- 7.19 percent, I believe. So, you know,

1 there is possibility that maybe not 100 percent of
2 those have been all filled, but I don't have the
3 exact number.

4 J. NOWICKI: Is that something that you'd be
5 able to provide?

6 A. COLLIER: I am sure we probably could.

7 J. NOWICKI: Okay. Is it okay if we do an
8 undertaking?

9 D. COBAN: Is that something we can do within
10 the timelines for undertakings?

11 A. COLLIER: I suspect so.

12 D. COBAN: Yes.

13 M. MILLAR: We will mark that as J3.1.

14 J. NOWICKI: Thank you.

15 PRESIDING COMMISSIONER DUFF: Thank you.

16 **UNDERTAKING J3.1: ADVISE WHETHER ALL OF THE 50**
17 **POSITIONS THAT WERE INCLUDED IN THE INITIAL**
18 **APPLICATION FOR 2024 WERE FILLED**

19 J. NOWICKI: And so if we can turn to page 15 of
20 OEB Staff's compendium. This is an excerpt from
21 Exhibit 4, Tab 1, Schedule 3, Attachment B.

22 A. COLLIER: Sorry, can you repeat the page?

23 J. NOWICKI: Sure. Page 15 of OEB Staff's
24 compendium. And I will be looking at the bottom of
25 the page.

26 So in this section, Hydro Ottawa notes that
27 recruiting and retaining talent has been an ongoing
28 challenge for the industry and for Hydro Ottawa. And

1 you reference a report from Electricity Human
2 Resources Canada which found -- which predicts that
3 labour supply gaps between the years 2023 and 2024
4 will occur in three occupational groups, so that
5 includes engineers, technicians and technologists,
6 trades, and information communications technology.
7 And the numbers attributable to those gaps are
8 included there in the evidence.

9 But if we can turn back to page 40 of OEB
10 Staff's compendium, which is the table from JT2.10.

11 And so would you agree that it seems, at least
12 going based off the job titles, that a fair number of
13 the new positions that Hydro Ottawa would be looking
14 to fill, in particular, in section -- in year 2026,
15 will call into -- will fall into these kinds of
16 constrained categories that were mentioned before?

17 L. HEUFF: Yes, I would agree.

18 J. NOWICKI: Okay. And so then my understanding
19 is correct that the competitive market for these
20 specialized roles you note in your evidence will
21 continue to be a factor impacting your hiring in
22 2026?

23 L. HEUFF: Yes, I'd agree. But I would also
24 add, much to what I was describing before with the
25 engineering recruitment efforts that have been taking
26 place and our ability to fill the positions that we
27 have posted since 2024, and even prior to 2024, and
28 having been successful in those efforts as of late.

1 Also I think when we -- with the undertaking and what
2 it will show is that we have been successful in
3 hiring the trades and technicians positions as well
4 over the 2023 -- or 2024 and 2025 period.

5 As a result of a lot of the improvements to the
6 recruitment efforts that have been undertaken by our
7 people and culture team and also a shifting in the
8 labour market, I think we have seen as of late more
9 availability in the labour market.

10 And the challenges that we were seeing post-
11 pandemic have subsided to an extent, and we are
12 seeing a higher number of applicants in these
13 positions coming through, and we have been
14 successfully able to fill them recently.

15 And so at the time of drafting of the evidence,
16 the situation was definitely different. And even
17 just this year, we have seen quite significant
18 improvements in the number of applicants and the
19 ability to acquire the talent that we are looking
20 for.

21 J. NOWICKI: Thank you.

22 And so this is something that you would have
23 factored in, then, to your vacancy rate that you have
24 proposed -- or forecasted for 2026?

25 A. COLLIER: Yes. And we -- you know, in the
26 previous discussion that we had on vacancy rate kind
27 of earlier in this hearing, we do vacancy on our
28 entire population, right, so it's an 8 percent

1 vacancy for 2026 on all positions. So all 748
2 positions. You're referring to kind of 81 here.

3 Obviously, our vacancy rate on our existing head
4 count is much, much lower than new positions, right,
5 so I think we were planning on maybe ten people are
6 retiring next year based on the latest information I
7 have.

8 So turnover on existing head count is low.

9 So when you kind of do the -- I am explaining
10 the math, I am not doing math. When you do the math,
11 kind of in those two separate groups, you can have a
12 much higher vacancy rate on the new positions, a much
13 lower vacancy rate on the existing positions, but
14 when you average them all out it, you know, it
15 arrives at 8 percent.

16 And the way we do it that way as opposed to
17 setting a vacancy rate, you know, for new positions
18 and a vacancy rate for existing positions is we just
19 wouldn't be able to kind of track those -- we would
20 have to do it quite manually. Like, our system
21 doesn't have the ability to calculate or report on
22 different vacancy rates for different kind of
23 populations of employees, so we just have it reported
24 on one population.

25 So that's how, you know, we've captured this, if
26 I have - hopefully I have explained that well enough.

27 J. NOWICKI: Yes, thank you.

28 A. COLLIER: Okay.

1 J. NOWICKI: I believe those are all my
2 questions, so thank you for your time. And I will
3 pass it back to you, Madam Chair.

4 PRESIDING COMMISSIONER DUFF: Thank you, Ms.
5 Nowicki.

6 We are on schedule. The Panel will take -- we
7 will all take a break for 15, 20 minutes. We are on
8 a consensus basis, we will reconvene at 11 o'clock.
9 Thank you.

10 --- Upon recess at 10:39 a.m.

11 --- Upon resuming at 11:02 a.m.

12 PRESIDING COMMISSIONER DUFF: Please be seated.

13 Welcome back, everyone. We are now at the stage
14 of the schedule where we have Panel questions.

15 Just before I did that, I just wanted to make
16 sure there are no other questions from any of the
17 other parties. Okay, great.

18 Commissioner Bob Dodds is going to -- Robert
19 Dodds is going to proceed first, and then followed by
20 David Sword.

21 **CROSS-EXAMINATION BY COMMISSIONER DODDS**

22 COMMISSIONER DODDS: Thank you. Welcome, Panel.
23 Before I proceed, I did not file a compendium. So
24 with your indulgence, I have some tables I am going
25 to refer to. I am sure you will be able to find them
26 fairly quickly for me. It's about three tables.
27 Where necessary, I pulled them from other people's
28 compendiums. Is there someone checking -- there is a

1 check on technical?

2 (Reporter appeals)

3 COMMISSIONER DODDS: For the benefit of the
4 virtual audience, I did not file a compendium, and I
5 will draw from other people's compendiums. And I am
6 sure you will be able to file the tables as I
7 proceed.

8 Could you pull up the -- it is called Table A.
9 It is a reconciliation of positions to FTEs and
10 Appendix 2K. I pulled it up from Consumers Council
11 of Canada 52, if that helps. Exhibit 1, Tab 2,
12 Schedule 5, page 415 to 471. That table was pulled
13 up quite often in yesterday's testimony.

14 No, that's not it. It's Table A, reconciliation
15 of positions to FTEs. I pulled it from CCC 52. It's
16 in there. Oh, that's it. Thank you very much.

17 When did the pandemic end operationally? When
18 did that end operationally with respect to these
19 numbers?

20 L. HEUFF: That's kind of a difficult question
21 to answer, I think, Commissioner Dodds.
22 Operationally, some of the restrictions we had, I
23 would say, like, the restrictions on being able to
24 enter buildings and stuff probably in 2021 -- late
25 2020 and early 2021. The impacts of the vacancies
26 that we were seeing would have persisted, and the
27 labour market challenges we were seeing, they would
28 have persisted into '22, '23.

1 COMMISSIONER DODDS: Okay. That answers my
2 question.

3 So I would be able to say 2024 and 2025 were
4 normal years with respect to the pandemic?

5 L. HEUFF: Yeah, I would agree with that, yes.

6 COMMISSIONER DODDS: Okay, thank you.

7 In that 2024 and 2025, I believe you -- looking
8 at the records, you met all your operational
9 requirements with respect to system average
10 interruption indices for duration and frequency; is
11 that correct? You operated well?

12 L. HEUFF: That's correct. '24 was a good year
13 for performance for reliability.

14 COMMISSIONER DODDS: So the point I am trying to
15 make is that I want to understand the jump from 641
16 FTEs to 716 from one year to the next. I know we
17 have covered this in testimony throughout our
18 proceedings here, but could you just summarize in a
19 few words what are the changes that you are required
20 to justify those numbers? Just in five points, six
21 points; is that possible?

22 L. HEUFF: I think so. It's very much related
23 to the customer demand that we are seeing, both from
24 new load connections and the growth in the demand of
25 the large load connections and the complexity of the
26 requests. Along with the increased DER penetration
27 that we are seeing in that aspect, the majority of
28 the positions that we did add in 2024 and then again

1 the ones that are in 2026 are related to this growth.

2 The doubling of the capital program, which is
3 the one that was approved through the proposed
4 settlement is also driving a significant amount of
5 the head count.

6 So DER connections, customer demand requests and
7 complexity, and the overall doubling of the capital
8 program, I'd say, are the three primary driving
9 factors.

10 COMMISSIONER DODDS: Okay. Thank you very much.

11 A. COLLIER: And if I could add -- could add a
12 fourth, though?

13 COMMISSIONER DODDS: Yes, please.

14 A. COLLIER: I think as I -- as we mentioned
15 kind of in the opening remarks, our head count was
16 relatively flat for the last 10, 15 years. And, you
17 know, the strike kind of demonstrated some of those
18 challenges from a staff pressure perspective, both
19 from safety workload, mental health. So I see some
20 of that jump as just a stabilization of our workforce
21 because we had constrained our head count for far too
22 long, coupled with all the things, obviously, that
23 Ms. Heuff mentioned.

24 COMMISSIONER DODDS: But you were still
25 operating safely, you were still operating properly,
26 you were still servicing your customers the way they
27 should be serviced even though you didn't have the
28 number of FTEs you wanted. Is that what -- that's

1 what I am observing.

2 A. COLLIER: I would say '24 and '25 were normal
3 years in one sense, but from a weather perspective,
4 we were extremely, extremely lucky. So, you know, I
5 don't think that -- that's where we are seeing the
6 ability -- or the lack of ability for our staff to
7 recover is from these events. I don't know if you
8 want to add to --

9 COMMISSIONER DODDS: Okay. Thank you.

10 Now, when you decided you needed 81 more FTEs in
11 2026, did you do a bottom-up analysis of what your
12 requirements are, what is going to be required for
13 this capital, for this extra work you're doing or
14 whatever endeavours you are undertaking?

15 And when you're doing that, did you -- were you
16 checking against benchmarking facilities that are
17 available as well? Did you do that yourself, or did
18 you have somebody alongside you doing that?

19 L. HEUFF: So I would say it was done in two
20 parts, both bottom up and top down.

21 So the bottom up, we did do a labour demand
22 analysis for the trade staff. And so it is very much
23 done based on the budgeted programs and the number of
24 hours of expected work. And in some cases, they're
25 new programs and so --

26 (Reporter appeals)

27 L. HEUFF: There are estimates to some of those
28 demand hours. So we did do a bottom-up analysis for

1 the trade staff very much so.

2 And then the individual -- and I can speak to
3 the engineering and design positions -- are done
4 based on conversations with managers and
5 understanding the number of the workload that people
6 are under and the amount of volume of work that's
7 being projected. And then the similar activities
8 were taken place throughout the rest of the utility
9 for other groups as well.

10 And then, of course, the top down and the
11 benchmarking and looking at how we are performing,
12 that was one of the drivers of the supplemental
13 benchmarking that we did that's in 1-3-3(d) is also
14 those analysis. And we did introduce some of those
15 tables as well in the head count exhibits.

16 COMMISSIONER DODDS: So when you did this
17 bottom-up analysis, and you did benchmarking, which
18 came first? Like, if you do the bottom up and -- and
19 say you do the bottom up and you come to above the
20 P50, did the benchmarking indicate that you should
21 drop down or -- is that what happened in this case at
22 all or...

23 L. HEUFF: So maybe just to clarify, what I am
24 referring to is the number of positions, whereas I
25 think when we use P50 terminology, it's typically the
26 compensation average.

27 COMMISSIONER DODDS: Yes, it is. Yeah.

28 L. HEUFF: So are you interested more in the --

1 how we came up with the number or --

2 COMMISSIONER DODDS: Yes, I am interested in how
3 you came up with the number.

4 L. HEUFF: Yeah, so the number, I would say the
5 bottom-up would have been done by individual work
6 groups specifically. The benchmarking activities
7 were done with Staff -- with Ms. Barrie's team, so
8 from the regulatory team, and the two would then have
9 been combined as an overall viewpoint of -- and the
10 benchmarking helps provide consideration and context.

11 But I would -- I would say the more driving
12 factor at the end of the day too ends up being the
13 compensation impact and the --

14 COMMISSIONER DODDS: Yeah.

15 L. HEUFF: -- and what the budget impact is as a
16 result of what people were requesting.

17 COMMISSIONER DODDS: Okay.

18 So with respect to your structure for a
19 management operation, you did that bottom-up, and you
20 used internal forces to decide if that's a good
21 structure, a bad structure, it should be changed?
22 You didn't use outside consultants? You must have
23 referred to other benchmarking, other utilities at
24 all; did you do that?

25 L. HEUFF: So I would have to give some thought
26 to whether there was any areas that we specifically
27 used external support on in order to determine roles.
28 Off the top of my head, I am not coming to any. I

1 can look to my colleagues as well to see whether they
2 leveraged any.

3 A. COLLIER: So I think, obviously, Laurie speak
4 to the operational folks. I think all the other OM&A
5 programs, each of the groups kind of look to their
6 own benchmarking. For example, in accounting, you
7 know, I look at things like number of invoices we
8 process, number of capital transactions we process,
9 number of journal entries we process, number of
10 expense claims, number of purchase orders we do. So
11 all of that, you see -- seeing a tremendous growth,
12 but largely driven by the capital program expanding a
13 lot. And -- but each work group will have that type
14 of analysis that they have.

15 We didn't hire an external consultant to assess
16 that, but, you know, everyone here and a lot of folks
17 back at Hydro Ottawa do participate in a lot of
18 industry meetings and events, so we have a good
19 sense, I think, of, you know, how organizations are
20 structured and, you know, what that would look like.

21 COMMISSIONER DODDS: I am pleased to hear that
22 because you have been running utility yourself for
23 decades. You know better than anyone else how to run
24 it and achieve what you need. And I am -- as you
25 will find later on in my questioning, I -- when
26 outside consultants are brought in, I do question the
27 -- how good that is for you, as you will see from my
28 other questions.

1 Just to -- I am going to read off from your
2 evidence. You can -- you can take it subject to
3 check if it's accurate or not, but I just want to
4 read off. Hydro Ottawa states that:

5 "Existing methodologies for planning, design,
6 standards, construction, commissioning, and
7 maintenance of its current asset base are
8 insufficient for battery energy storage
9 systems."[as read]

10 Hydro Ottawa goes on to say that:

11 "Although some of the aforementioned items are
12 transferable, BESS, which is battery energy
13 storage systems, installations necessitate
14 unique engineering, maintenance, and operation.
15 The foundational knowledge and compensation for
16 utility-owned BESS are largely new to Hydro
17 Ottawa."[as read]

18 That's a correct quote, I guess, from your
19 evidence?

20 L. HEUFF: Yes, it's a correct quote.

21 COMMISSIONER DODDS: So the question -- like,
22 what do you -- on this battery energy storage
23 systems, what's the size of them? Are they half a
24 megawatt? 1 megawatt? Industrial, commercial,
25 individuals? What are they?

26 L. HEUFF: So you're testing my memory on
27 exactly the sizes, but I believe they are around 15
28 megawatts.

1 COMMISSIONER DODDS: Sorry. 50?

2 L. HEUFF: 15.

3 COMMISSIONER DODDS: 15. Okay.

4 L. HEUFF: Yeah.

5 COMMISSIONER DODDS: And so -- but then they are
6 all industrial, commercial?

7 L. HEUFF: Sorry. Just to correct, they are
8 industrial -- they are owned -- they are Hydro Ottawa
9 owned, and they range in size from 2 and a half
10 megawatts to 10 megawatts that we are currently
11 using.

12 COMMISSIONER DODDS: Okay. But -- and there is
13 no third-party owners?

14 L. HEUFF: So there are -- we do anticipate
15 third-party-owned batteries as well through our non-
16 wires customers solutions program, which is the new
17 program to us that we have proposed through the
18 Kanata North -- the benefit cost analysis that was
19 done.

20 These and the ones that are referred to in the
21 reference you were providing are specifically related
22 and more so to the batteries that Hydro Ottawa will
23 own and operate.

24 COMMISSIONER DODDS: Okay. So how many do you
25 own?

26 L. HEUFF: Today, none.

27 COMMISSIONER DODDS: So you're in a process of
28 owning them? You are in the process of building them

1 --

2 L. HEUFF: So we're --

3 COMMISSIONER DODDS: -- and owning them?

4 L. HEUFF: Yeah, so as per what you were
5 reading, we are in the process of understanding -- we
6 are developing the new standards. We are developing
7 -- we are working with a third-party consultant as
8 well to understand what we don't know -- what we
9 don't know necessarily still in terms of both owning,
10 operating, and maintaining the batteries.

11 And so there has been -- as of -- it started
12 over the last 18 months. We have engineers who are
13 working on creating those standards and understanding
14 what the interactions look like and also
15 understanding how to do the settlement, the metering,
16 metrics of verification, testing, validation, that
17 kind of stuff.

18 COMMISSIONER DODDS: But in the end, maybe none
19 will be constructed. Like, why is this all third
20 party? I don't see why you would have staff
21 developing an expertise that you get from outside.
22 And with staff doing it, it gets ingrown. Like, I --
23 how many FTEs are associated with this endeavour?

24 L. HEUFF: I don't know the specific -- I think
25 we currently have one individual engineer and a
26 supervisor overseeing what they are developing at
27 this point in time. They are also leveraging other
28 individuals from within our standards team to help

1 support the development internally.

2 COMMISSIONER DODDS: And does that necessitate
3 more FTEs at other levels? Like, what I am getting
4 at is why time and effort and staff are being used to
5 develop a technology or a new type of system. You
6 use outside consultants for that, in my mind, and
7 then hire FTEs to operate them later on; does that
8 make sense?

9 L. HEUFF: So I would -- I think the way that I
10 would maybe -- to just create a synonym, so the BESSs
11 will be no different than our meters or our poles or
12 our underground transformers or our overhead
13 transformers. And so we have asset management plans
14 for each one of those. We understand how they
15 behave, what the degradation patterns are of them,
16 what types of failures they may experience.

17 And so our asset engineers are required to
18 understand them so that they can operate and maintain
19 them safely and so that we have standards on how to -
20 - if they need to maintain them, how the -- the work
21 constructions and what they would look like.

22 And so it's very much developing that from the
23 bottom up and then ensuring we have the internal
24 knowledge and expertise to be able to safely operate
25 and maintain them in the future once they are
26 installed. And so at this point in time, I think
27 it's '28, '29, and 2030 are when we are bringing on -
28 -

1 COMMISSIONER DODDS: But, you see, we are
2 carrying these FTEs all that time. Like, you bring
3 in the FTEs once you had the battery storage systems
4 in or maybe a year in advance, because it's taking
5 time. It'll take you some time to actually build
6 these, will it not?

7 L. HEUFF: It will, yes. Yes.

8 COMMISSIONER DODDS: You already own the land;
9 you already own the permits?

10 L. HEUFF: So it's -- they are going on existing
11 land, yeah, where we -- our stations, they are on the
12 same space where the station exists today.

13 COMMISSIONER DODDS: Okay. So there's no issues
14 with zoning land or buying land or permits?

15 L. HEUFF: There is always issues with zoning
16 and all of those types of things and our project
17 managers that would be assigned. So when we actually
18 begin the project and the project engineers who will
19 manage the project to install and do the actual
20 project to install and commission the batteries, at
21 that point in time would be when we would be facing
22 those challenges and working through them.

23 So that would -- that will start '27, likely, to
24 the -- start procuring will depend -- maybe even a
25 little bit earlier, but our project managers will
26 begin working on the project '26/'27 time frame for
27 installation and commissioning '28 and beyond.

28 COMMISSIONER DODDS: I guess I am getting at --

1 so it's still a long lead time.

2 And are you hiring those -- is this part of the
3 81 FTE hires? Are the people for this BESS
4 endeavour?

5 L. HEUFF: So the project engineers for the
6 capital project, so there are -- I think I would have
7 to go back to JT2.10. I believe there is one project
8 engineer that is contemplated, and that would be not
9 just for the BESS project, but just an overall -- all
10 of the projects, all of the capital projects.

11 COMMISSIONER DODDS: But why do you need an
12 extra person? Like, the projects aren't even there
13 yet. Like, I -- what I am having trouble is why are
14 even extra people being hired at all for this
15 endeavour? It doesn't make sense to me.

16 L. HEUFF: So I don't know that I would -- I
17 wouldn't say there is extra -- I think maybe a
18 clarification. It's not like we are hiring four
19 people just to manage the BESSs. I think it's an
20 element of introducing new work volumes on FTEs that
21 will increase the demand of our existing engineers.
22 It would be an element.

23 I would point more towards the items that I
24 described at the beginning as to what's driving the
25 majority of the workload increase. This is an item.
26 At this point in time, we are using existing FTEs
27 that have been hired to help support the development
28 of the standards.

1 In the future, we will leverage the FTEs that
2 exist to do the projects for the project engineers to
3 execute, and then subsequent to that, we would
4 leverage our trade staff and technical staff to do
5 the maintenance and operation.

6 COMMISSIONER DODDS: Okay. Thank you.

7 Now, in the testimony, I believe you mention
8 that some of your FTEs are to do with DERs; is that
9 correct?

10 L. HEUFF: That's correct.

11 COMMISSIONER DODDS: And why is that?

12 L. HEUFF: So there is a number of -- and there
13 was -- that might be helpful to look at the graph.
14 Just a second.

15 If you could pull up Exhibit 4-1-3 (c), page 10,
16 please, Lianne.

17 So the PCRs and CIAs are mandatory reports and
18 requests that have to come in from customers when
19 they are connecting DERs, and this is an evolving
20 space in terms of what's required.

21 But the volume of work on our engineers to
22 review the preliminary consultation reports, the
23 connection impact assessments, and then in some
24 cases, just the overall complexity of connecting the
25 DERs is grown dramatically in the past two years and
26 is one that we forecast to continue to be high
27 through the future years as well.

28 COMMISSIONER DODDS: Okay. Thank you.

1 Who owns these DERs?

2 L. HEUFF: These are customer-owned DERs.

3 COMMISSIONER DODDS: But normally, if you have a
4 third-party owner of a DER, they would do all that
5 work, a lot of that work that you're doing. Like,
6 and a DER goes in for a reason, somebody wants to
7 make money or save money that the utility or the
8 ratepayers pay up one way or another.

9 But are you doing a lot of the work that the
10 third party should be doing?

11 L. HEUFF: So these are assessments to ensure
12 that when they connect to our system, that they won't
13 create problems on our system. So it's really a
14 matter of us assessing, if there's a clustering of
15 solar panels, does that start to create challenges
16 within that specific region?

17 So they're assessments that we are doing to
18 ensure that their individual connection won't cause
19 problems on our system, so --

20 COMMISSIONER DODDS: Okay. Yeah, that does make
21 sense.

22 But you are faced with this all the time, are
23 you not, with new connections coming on? Whether
24 it's a DER, whether it's a new subdivision, whether
25 it's whatever? I mean, that's just -- so the FTEs
26 are just workload, then?

27 L. HEUFF: It's workload, absolutely. Volume.
28 It's a new volume of workload that is very much the

1 driving theme is growth and volume of workload, and
2 complexity as well is the second one I would -- that
3 I would note. There's -- it's much more complex to
4 be managing both DERs and just new load connections
5 as well.

6 COMMISSIONER DODDS: And just to back up a
7 little bit on the -- on the battery energy storage
8 systems, just to go back to what I quoted. Yes, they
9 are insufficient.

10 So -- so this is an initiative of the utility,
11 then, to get more battery energy storage systems
12 online?

13 L. HEUFF: So the battery energy storage
14 solutions that we are putting online are -- is as a
15 result of there is just no other way for us to
16 increase capacity, so they are essentially like us
17 building a station, I would say.

18 It's just a different way for us to grow the
19 capacity of our system because we are very
20 constrained in those regions from a space
21 perspective, and so a physical station expansion just
22 isn't possible. And so the battery energy storage
23 solution is providing us an alternative way of
24 increasing the capacity.

25 COMMISSIONER DODDS: But battery energy storage
26 systems, that's not continuous feed; that's only
27 going to be feed when you need it at certain times?

28 L. HEUFF: Correct. And these are stations that

1 have minimal amounts of overload times, so there --
2 from the forecast, we have hours -- potentially only
3 hours a year where there is insufficient capacity,
4 and so these are able to bridge us for --

5 COMMISSIONER DODDS: So that bridges peaks,
6 then; is what you are saying?

7 L. HEUFF: Exactly that.

8 COMMISSIONER DODDS: Okay, thank you.

9 Just on the IT section, there was some
10 discussion from the intervenors, there is quite a bit
11 of OM&A goes into the IT. I don't want to belabour
12 you, but could you summarize for me just what are the
13 things in IT that are driving that? Just summarize
14 the -- I think it's five additional FTEs in IT.

15 A. WILLIS: That's correct. We have five
16 additional FTEs in IT. The positions are largely
17 around bolstering our cybersecurity program as a
18 result of the operational technology and grid
19 transformation that will be under -- we will be
20 undergoing. There will be a lot more assets that we
21 have to protect.

22 Certainly we talked about cloud. We have some
23 roles for cloud given the transition we are
24 undergoing. We have a project manager role as well
25 due to the large number of transformational projects
26 and, you know, the amount of stakeholders that we
27 need to bring together to deliver on these projects.

28 COMMISSIONER DODDS: Okay. Thank you.

1 So it requires its own project manager, in your
2 opinion?

3 A. WILLIS: Many of the projects we are
4 executing are very complex and very large, and so,
5 yes, they require, you know, a project manager.
6 Within IT, we have a project management discipline
7 with standard artifacts and controls in place to
8 ensure that we are successfully meeting our
9 objectives on time and on budget.

10 COMMISSIONER DODDS: Okay. Thank you.

11 I think in your statement this morning, you
12 mentioned about costs are going up because of
13 increased volumes; is that correct? The volume of
14 data to be processed?

15 A. WILLIS: Costs are going up for Hydro Ottawa,
16 I would say, for a number of reasons. One is
17 certainly related to market forces around cloud
18 computing, which we are trying to do our best to
19 manage. We are spending some money on our business
20 continuity.

21 Especially from some of the climate events we
22 have had, we need a level of geo redundancy for our
23 data centres, our applications. We are segmenting
24 our network to reduce the attack surface. A lot of
25 money being spent on our cybersecurity. We want to
26 avoid a situation like Nova Scotia Power.

27 COMMISSIONER DODDS: Okay. I understand.

28 So -- but it's not really volume driven, it's

1 the fact that you want to measure different
2 parameters or you are going to have different
3 functions, maybe different platforms. I can't see
4 volume because your volume is not going to increase
5 all that much unless you are adding more data points
6 or more data requests to it.

7 A. WILLIS: The volume of our projects are
8 increasing. If -- we have a grid modernization road
9 map, I don't have the evidence number at hand, but
10 that is driving significant increases in the amount
11 of projects, the systems, the applications, the data
12 that's accumulating. All of this has to be managed,
13 and IT resources and staff are required to do that.

14 COMMISSIONER DODDS: Okay. But you're not
15 changing the things you're measuring? All you're
16 saying is -- or are you adding a lot more things you
17 are measuring you didn't measure before? Because
18 volume is -- these systems can take huge volumes.

19 A. WILLIS: The systems themselves are designed
20 to handle a certain level of volume. What I was
21 speaking more to is the velocity of our projects are
22 increasing, and as we deploy new systems, they all
23 need to be integrated. They are not islands. Their
24 data requirements need to be managed. And as the
25 velocity of new applications and systems are put in
26 place, we need the staff to be available to manage
27 these sensibly and to safeguard our systems.

28 COMMISSIONER DODDS: But are you bringing in new

1 parameters to be measured?

2 A. WILLIS: Yes. Yes, we certainly are.

3 COMMISSIONER DODDS: Thank you.

4 This is just a bit of a facetious statement
5 here, though. On Table A that was -- you had up this
6 morning, it mentioned that -- there's an item there
7 on non-capitalized maintenance that was questioned.

8 Would AI not reduce that?

9 A. WILLIS: As we continue transitioning to
10 cloud, we will sunset many of our capital
11 applications, and as a result, the software
12 maintenance fees associated with those will continue
13 to go down over time.

14 COMMISSIONER DODDS: Okay, thank you.

15 You mentioned cybersecurity. As you probably
16 know, the LDCs are gateways to the grid, and right to
17 all of North America.

18 So in your cybersecurity, are you coordinating
19 your systems with IESO?

20 A. WILLIS: We are using a NIST framework. And,
21 yes, our cybersecurity program, I mean, we have our
22 yearly attestation with the OEB, and we are working
23 with people of the IESO.

24 COMMISSIONER DODDS: Okay. Now, in the -- some
25 of your testimony, you said a benchmarking study was
26 done with respect to what you're spending on IT, and
27 you based that on a percentage of revenue. And the
28 study was done by Gartner. And if I recollect the

1 cross-examination, I think it was by you, Mr.
2 Rubenstein.

3 There is only three distribution comparators and
4 about four/five other types of industry comparators,
5 and that seems like a low number of comparators to be
6 using to determine a very large component of your
7 OM&A costs.

8 And just before you answer that, just to follow
9 on which came first? Which is what I -- I am not
10 trying to be condescending here, but did the Gartner
11 study say, here is the average spent based on revenue
12 on IT. So did you say, oh, okay, let's make sure we
13 hire enough people and do enough hire that we meet
14 that?

15 Like, that's my concern. Which came first? The
16 bottom up and then a check, and then if a check was
17 done by somebody else, did you lower or did you raise
18 the number?

19 A. WILLIS: We simply engaged Gartner to come in
20 and perform the benchmarking exercise that they do
21 for many utilities in Ontario and others across the
22 globe. And at that time we gave them our 2023
23 actuals, they gave us, you know, as a standard with
24 this type of engagement, there were templates and
25 data, and we filled out -- you know, Gartner based on
26 Gartner's methodology, they went back, they generated
27 the report based on the information from Hydro
28 Ottawa, and we received that report with a number of

1 multidimensional metrics and insights.

2 COMMISSIONER DODDS: And what were those metrics
3 besides percentage of revenue costs? Just summarize
4 it, just a few of them.

5 A. WILLIS: Yeah, there was, you know, IT
6 spending as a percentage of revenue, IT spending as a
7 percentage of operating expense. They certainly
8 looked at, you know, our sourcing spend, our
9 technology spend, cost per employee, number of
10 employees.

11 COMMISSIONER DODDS: See, you are making my
12 point. They didn't do it on the basis of what you
13 really need. Just based on a percentage of revenue.
14 And it's very tempting when that happens to say, oh,
15 wait a second, on our bottoms up, we needed \$5
16 million or -- in the -- on FTE costs. But Gartner
17 said, well, wait, the industry average is 6 million.

18 There is a great temptation to move up which is
19 one of the issues I have with these benchmarking
20 studies. I will explain a little later on. That --
21 but so all they did was see if your costs are
22 aligned. They weren't telling you if you were doing
23 the right things that are required for the operation.

24 A. WILLIS: This report was designed to be a
25 point-in-time analysis. We consider it like a pulse
26 of where we are relative to peers. And we consider
27 it -- there is some very useful metrics for us in
28 there, and we consider it a key input into our

1 planning process. But it needs to be looked at
2 holistically, it needs to be contextualized.

3 And, you know, there are many other parameters
4 that go into our decisions around, you know, what we
5 are spending, where we are spending it, and how we
6 craft our budgets.

7 COMMISSIONER DODDS: Okay. My question, though,
8 in the end, which came first, did you do the bottom
9 up first and then check with Gartner or the other way
10 around? Like, what...

11 A. COLLIER: Yes. So, like, IT, like all our
12 other programs, the bottom up is done first. And I
13 share some of your concerns sometimes with these
14 external studies. But, you know, it does seem to be
15 part of our application that it is something we do
16 every five years to do a gut check. But it's always
17 after we have determined our own needs and our own
18 analysis.

19 The other thing I would just like to add just
20 with respect to IT, as we talked about, we did, as
21 part of our initiative to reduce our OM&A, cut out
22 our ERP system, which is needed, and moved to a
23 strategy to just go forward with the EAM only. So
24 just -- I wanted to add that to the record as well.

25 COMMISSIONER DODDS: Okay. Thank you very much.

26 Just moving on to another topic. I pulled this
27 from CCC 55, Table B, Hydro Ottawa Holding Inc.
28 executive management team members responsibilities

1 for Hydro Ottawa Limited. Are you able to pull that
2 up? Oh, that's it right there. That's good, thank
3 you.

4 Just a few questions. Have any new positions
5 been added since 2020?

6 A. BARRIE: Yes, new positions have been -- not
7 the -- so we were speaking to it yesterday, so I
8 don't know if it would be helpful to bring up that
9 head count.

10 COMMISSIONER DODDS: I am not looking for head
11 count, I just want new positions. Just any new
12 titles.

13 A. BARRIE: So there have been changes
14 throughout that, and we did undertake to provide a
15 list of --

16 COMMISSIONER DODDS: Yeah.

17 A. BARRIE: -- the number of positions that are
18 there in 2026.

19 COMMISSIONER DODDS: Okay, thank you. So that
20 will come up as an undertaking.

21 The chief engineer and technology office, where
22 did I see that? Yeah, it's part of the IT budget, I
23 believe; is that right? There is a title in there
24 called "Chief Information and Technology Officer".

25 A. WILLIS: Yes. That's my boss, actually, Mr.
26 Mark Fernandez.

27 COMMISSIONER DODDS: Oh, okay. Okay.

28 And you're a direct report?

1 A. WILLIS: Yes, I report to Mark.

2 COMMISSIONER DODDS: Thank you.

3 This came about on another one. What does the
4 chief customer officer do?

5 T. FREEMAN: Our chief customer officer oversees
6 all customer engagement related areas. So that would
7 be our billing team, customer contact, key accounts,
8 our conservation teams, customer experience team.
9 And the communications team, sorry. Thank you to my
10 colleagues.

11 COMMISSIONER DODDS: Okay. And you don't have a
12 level in between like a --

13 T. FREEMAN: There -- yes. Sorry. There are
14 director levels in between. So we have a director of
15 customer service, we have a director of meeting
16 communications, and we have a director of -- you are
17 putting me on the spot with his exact title -- energy
18 transition and conservation services, I think, who
19 oversees our key accounts and conservation demand
20 management teams.

21 COMMISSIONER DODDS: Okay. Thank you very much.

22 Another chart I would like to bring up is Table
23 A, "Percentage of Corporate Costs Allocated From HOHI
24 to HOL (Services That Include Members of the
25 Executive Management Team)".

26 L. HEUFF: Do you recall where the exhibit was?

27 COMMISSIONER DODDS: It might have been SEC 77I
28 might have pulled it from. Or CCC 1. I am not sure

1 which -- CCC 1, Exhibit 1, Tab 2, Schedule 5. I
2 think it was also in CCC 57.

3 A. BARRIE: So CCC 57 has the percentages of
4 executive time spent.

5 COMMISSIONER DODDS: Yes, that's the one I
6 wanted. Thank you very much.

7 A. BARRIE: Yeah.

8 COMMISSIONER DODDS: Just before I delve into
9 that, compensation levels for executives, I guess
10 this is a case where you brought in an outside
11 consultant, Mercer, I think, in to examine whether or
12 not the executive compensation levels are adequate,
13 proper, within a certain range; is that correct?

14 A. COLLIER: No. The Mercer study did not --
15 did not analyze the executive salaries. You can get
16 some information on our executive salaries in our
17 annual report which is in the record.

18 COMMISSIONER DODDS: Yeah, I wasn't looking for
19 the salaries themselves. I am looking as to how they
20 were established.

21 A. COLLIER: How they were established?

22 COMMISSIONER DODDS: Yeah. Like, you pay your
23 CEO a certain amount. When you hired that CEO, or
24 whatever you are hiring, you have a competition you
25 have to go to get this person the right salary range
26 and what you pay them. Like, how did you establish
27 those salary ranges that the executives are paid?
28 How are those established?

1 A. COLLIER: So I think for the CEO himself, I
2 think it's our Board of Directors that would be
3 hiring the CEO. They are working with an outside
4 recruiting firm to find the new executive officer. I
5 think in consultation with them and negotiations,
6 that's how those salaries are decided.

7 COMMISSIONER DODDS: Yeah, but you go in -- even
8 if you hire outside people, you go in with a range
9 you think it's going to cost you to get a CEO for a
10 certain position based on number of customers, quite
11 often all kinds of other parameters with regulated
12 utilities?

13 A. COLLIER: Just a second.

14 I think -- I am representing HR, but I don't
15 work in HR, so I apologize. I think periodically HR
16 does do a review of salary range for executives, so -
17 -

18 COMMISSIONER DODDS: Okay. Well, it is nothing
19 you can change now, anyways, so it's probably a bit
20 immaterial.

21 If you want to go back and just look in that
22 chart in front of you is the allocation of the costs
23 of the executive team to the Hydro Ottawa. And as I
24 understand from the testimony, I think, you gave
25 yesterday, you based these percentages on calendars
26 and conversations.

27 Has there ever been -- ever been a timesheet
28 study done, like, to say, here is the base, and when

1 was the base last checked, or, you know, like, not
2 the base, but the percentage of allocation?

3 A. BARRIE: So how we were attempting to do that
4 time study was through the calendar checks because we
5 had been doing it off of conversations prior to that,
6 and so it was to ensure they were aligned.

7 So we have not done an official one with an
8 external consultant to look at our executive time
9 spent. So that was done, I believe, in 2018, and
10 then subsequently -- and I think it was to the end of
11 '18. And then subsequently, we do those
12 conversations to refresh to ensure that we are
13 capturing any changes in business and how the
14 executives are spending their time.

15 And we do that both in order to set up budgets,
16 and then we -- at the end of the year, we just have
17 conversations with executives to ensure that the year
18 did align with what the expectations were, because,
19 obviously, things can change as we go throughout the
20 year.

21 COMMISSIONER DODDS: Were these that are in
22 there -- were they ever changed? Like, 2021 -- so
23 they are changed from time to time as time is going
24 on, as I see, and that's based on, as you say,
25 calendar studies and so on.

26 I would submit to you that if you are providing
27 services to a third party, just like any other
28 consultant, if you kept timesheets, you would be

1 surprised on how your time is spent and where it is
2 spent. Unfortunately, a lot of this is anecdotal.
3 So would you agree that it could be higher or lower?
4 Like, if you did a timesheet study, maybe you should
5 be charging -- maybe you should be allocating more,
6 maybe you should be allocating less; would that be
7 correct?

8 A. BARRIE: That is what we were attempting to
9 do with our 2018 review, was to look at more defined
10 information by looking at the calendars to be able to
11 gauge if what people felt like they were spending
12 their time on is accurate.

13 So -- and I don't think it was just calendars
14 that individuals were looking at. They were looking
15 at other things that they review on a regular basis
16 like what are the metrics in reviewing reports that I
17 am looking at, you know, exercises I am involved
18 with, and try to make sure that the calendars were
19 also reflective of things that people are doing
20 outside of their calendars.

21 COMMISSIONER DODDS: Okay. That's fair enough.
22 And it's good that's being done. But you would admit
23 there is some elasticity in there? It could be
24 higher; it could be lower?

25 A. BARRIE: There is elasticity when somebody is
26 not tracking every minute because, you know -- or by
27 the hour or you define what is that period of time.
28 So, yes, when people are gauging from their general

1 understanding, which is why we did try to do a more
2 evidence-based approach in terms of looking at
3 whether or not what the executives were feeling where
4 they were spending their time was, in fact, where
5 they were spending their time.

6 COMMISSIONER DODDS: Okay. Thank you.

7 I don't know if I asked this before.

8 Distribution leadership, that wasn't there before.
9 It's moved down from another level. Like, it's there
10 in 2025 and 2026.

11 What is distribution leadership, and why is it
12 added in 2025? I think this might have been asked
13 and answered before.

14 L. HEUFF: So previous -- so the distribution
15 leadership is the position I report to. The chief
16 operating officer previous to 2025 was entirely
17 within the distribution company, and his position was
18 subsequently moved into the holding company in 2025,
19 which is why you see it showing up starting in 2025.

20 COMMISSIONER DODDS: Why wouldn't you report
21 directly to the COO, as you did before?

22 L. HEUFF: I still do report directly to the
23 COO.

24 COMMISSIONER DODDS: Okay. Well, then why is
25 that --

26 A. COLLIER: He has taken on some additional
27 responsibility. So previously, his salary was 100
28 percent in Hydro Ottawa Limited; and, therefore, he

1 was an employee of Hydro Ottawa Limited. Once he
2 took on a smaller portfolio outside of Hydro Ottawa
3 Limited, he was moved to the holding company; and,
4 therefore, only 75 percent of his salary is allocated
5 to Hydro Ottawa.

6 COMMISSIONER DODDS: Okay. Thank you very much.
7 Chief Commissioner, I have three more questions.
8 Do I have time?

9 PRESIDING COMMISSIONER DUFF: Please proceed.

10 COMMISSIONER DODDS: This is on the
11 compensation, staff compensations. Just correct me
12 if I am wrong. I am taking this from testimony that
13 came the last couple of days.

14 In the evidence, there was a table based on
15 Mercer Canada's benchmarking results showing that
16 some of the positions' base salary and target total
17 cash compensation are notably higher than the market
18 median (between 125 percent to 150 percent, which
19 means 25 percent to 50 percent higher than the
20 marketing median); is that correct? I am reading
21 from a quote of somebody's testimony in the last few
22 days.

23 A. COLLIER: Was that Mr. Rubenstein's
24 statement? I just -- could we pull up the
25 transcript?

26 COMMISSIONER DODDS: I think it was yours, Mr.
27 Rubenstein.

28 A. COLLIER: So maybe we could pull up --

1 COMMISSIONER DODDS: But just while you are
2 doing that, I am not -- I don't need the exact
3 figures. I am just making a point that --

4 A. COLLIER: Yeah, yeah.

5 COMMISSIONER DODDS: -- it was higher, I think.

6 A. COLLIER: Maybe let's pull up Exhibit 1-3-3
7 (f) -- just I want to make sure the record is clear -
8 - in the original evidence.

9 So let's go to page 6 first. Can we zoom out so
10 you can see the -- okay. Yes.

11 So we did engage Mercer to conduct a
12 compensation study. We did the study in the same
13 format as we did for our last rate application. This
14 is their executive summary. They did find certain
15 positions to be slightly -- to be above P50. They do
16 consider positions to be comparable to market if it's
17 within that plus or minus of P50.

18 So now, Lianne, if we could go to maybe page 9
19 because it gives at least all three.

20 So you will see their colour-coding on the top,
21 the red, the blue, and the green, which is how they
22 identify those positions and how they compare to that
23 plus or minus 10 percent.

24 So if you look at the middle of the page, the
25 management accountant is red. That suggests that we
26 are underpaying that position. But then if you look
27 at the system designer, there is two benchmarking
28 that they are using. They are using the MBD

1 database, which is the national Canadian Mercer
2 database, and the MEARIE. So if we look at system
3 designer against the MBD, it is 132 versus MEARIE;
4 it's 112. So you'll see that it's more comparable to
5 MEARIE, which is kind of closer to our peers.

6 COMMISSIONER DODDS: And that's fine. I am not
7 looking for the exact numbers, but what I want to
8 make a point is, though, that you have limited
9 ability on a compensation cost because these are
10 unionized positions, most of them, are they not?

11 A. COLLIER: Oh, 100 percent, and I think I made
12 that statement on the record.

13 COMMISSIONER DODDS: Yeah. So -- so this is
14 based on collective agreement settlements?

15 A. COLLIER: Exactly.

16 COMMISSIONER DODDS: This leads to my -- that is
17 the point I was trying to make to my question. How
18 many -- how many unions are you dealing with at this
19 level?

20 A. COLLIER: At HOL, just one.

21 COMMISSIONER DODDS: Just one.

22 A. COLLIER: Yeah.

23 COMMISSIONER DODDS: And what's the current
24 status of the current collective agreement? What's
25 the -- when is the start and end?

26 A. COLLIER: It expires in March of '27.

27 COMMISSIONER DODDS: So if it's March of '27,
28 you are already in negotiations, I would presume?

1 A. COLLIER: We are preparing.

2 COMMISSIONER DODDS: Or you should be?

3 A. COLLIER: We are preparing.

4 COMMISSIONER DODDS: Just to give you some --
5 you already know that.

6 Okay. So in that -- so you -- did you factor in
7 an expected increase based on what that collective
8 settlement agreement will be into your projections?

9 A. COLLIER: Well, for -- because we are talking
10 about the base year OM&A, which is 2026, we know from
11 the collective agreement what the increase is for
12 2026.

13 COMMISSIONER DODDS: Yeah, you knew that.

14 A. COLLIER: For '27 to '30, obviously, we don't
15 know because we have not yet concluded those
16 negotiations.

17 COMMISSIONER DODDS: No, I agree. But -- and
18 you -- but have you factored in -- you don't have to
19 tell me what the number is because you shouldn't tell
20 me but --

21 A. COLLIER: Yeah. I mean, we have in our outer
22 year --

23 COMMISSIONER DODDS: Yeah.

24 A. COLLIER: -- projections. But then with the
25 reduction of our settled OM&A factor, that's where
26 some of the IT spend becomes important because we are
27 going to have to find productivity in other areas.

28 COMMISSIONER DODDS: Okay.

1 So when you get into your collective bargaining,
2 what's the incentive? Like, if the prices go up,
3 ratepayers pay. Like -- like, and there's no upper
4 limit. I know some regulatory jurisdictions they
5 will tell you what the settlements are in the area
6 for comparable facilities, and they will also advise
7 you that if you go over that, it's to the
8 shareholder's account.

9 A. COLLIER: So maybe a couple things to unpack
10 there. But maybe I am just going to -- could you
11 pull up Table 24 of Exhibit 1-2-5, page 31.

12 So while Lianne is pulling that up, within the
13 rate period, the ratepayers will not pay for any
14 difference if we, you know, paid more than what we
15 are talking about today, right.

16 COMMISSIONER DODDS: That's good. Thank you.

17 A. COLLIER: It will only kind of come back at
18 the next time.

19 But what I wanted to show here with this table
20 is the first row is Hydro Ottawa's labour rate
21 increases, and this is both management and union
22 weighted and combined over the historical period and
23 includes our forecast bridge year.

24 COMMISSIONER DODDS: Okay.

25 A. COLLIER: Compared to the OEB labour
26 escalation that's released each year.

27 So you can see over time, we've -- we are
28 trending below the OEB inflation with respect to our

1 labour. We do realize it's our largest cost. We
2 negotiate pretty hard through -- through this process
3 to control that as much as we can, and I think we
4 have a pretty good success story here on the --

5 COMMISSIONER DODDS: Okay. Well, thank you very
6 much for that.

7 I have one last question. This is not all that
8 important, in a way, though. But what percentage of
9 your bills that you sent out -- what percentage are
10 mailed, and what percentage go out electronically?

11 T. FREEMAN: So we currently have approximately
12 83 percent of our billed customers on electronic
13 billing, which would leave the remaining 17 percent
14 as paper billing.

15 COMMISSIONER DODDS: Okay.

16 And on -- on the payment, how many -- or you
17 don't have to tell me exact numbers. Are many of
18 them automatic deductions from the bank account?

19 T. FREEMAN: We do have a preauthorized payment
20 program. I, unfortunately, don't have the stats of
21 how many --

22 COMMISSIONER DODDS: Okay.

23 T. FREEMAN: -- accounts would be on that.

24 COMMISSIONER DODDS: I've -- now, in your
25 customer surveys and so on, the only survey that
26 counts in the end is your first batch of bills with
27 the new rates, which you probably know from
28 experience.

1 Are you -- in electronic bills, are you
2 including any inserts or advisement to the customers
3 that -- of the pending rate increase?

4 T. FREEMAN: So we do have a fairly
5 comprehensive customer engagement strategy among a
6 number of different things including the proposed
7 rate increases that does include bill inserts when we
8 do rate increases.

9 COMMISSIONER DODDS: But the only engagement
10 that is going to count in the end -- and as you
11 probably know, 90 percent of your customers, they are
12 not going to engage -- they only engage when they see
13 their bill. Is there any way that you try to bridge
14 that?

15 T. FREEMAN: So we do include -- when we have a
16 rate increase, we do include that on the bill. I
17 think that's a requirement.

18 COMMISSIONER DODDS: So you put inserts with the
19 bill? No, no. But beforehand -- like, say, a couple
20 of billing cycles beforehand, do you put any
21 advisements in?

22 T. FREEMAN: I am going to get my colleague Ms.
23 Barrie to respond to that.

24 A. BARRIE: So typically, the deciding -- the
25 timing of the decision and the timing of the bills
26 going out, it usually doesn't give -- like, so some
27 customers may get a notice on the bill prior, but it
28 really has to do with the timing of the bill and the

1 timing of the decision and the timing of the
2 effective date.

3 So even when you look at a normal January 1 rate
4 increase, like, the last increase that usually --
5 where an adjustment happens on the bill would be the
6 wholesale-related charge, which usually comes out
7 slightly before Christmas. So it's difficult to
8 provide that timing.

9 So what we do as a result is we have key
10 messages, our website is updated January 1 with all
11 that, with examples of different changes, and so we
12 try to provide as much notice as possible.

13 They also get the notice, like as Mr. Freeman
14 mentioned, when we do our customer survey. When the
15 rate application starts, there is the notice that
16 goes out to the customers at that time.

17 So there is several stages in which -- but to
18 your point, a lot of customers will notice on that
19 first bill.

20 COMMISSIONER DODDS: Yes.

21 A. BARRIE: But typically, the timing of the
22 decision and the effective date are very close.

23 COMMISSIONER DODDS: And in anticipation of that
24 first round of bills going out, probably a facetious
25 question here, do you buff up your customer service
26 because you will get a bunch of calls? Has that
27 happened in the past?

28 T. FREEMAN: So we prepare key messages, as Ms.

1 Barrie said, and we prepare our frontline customer
2 staff with the relevant details so they are able to
3 respond when calls do come in.

4 COMMISSIONER DODDS: Okay. Thank you very much.
5 Those are all my questions. Thank you very much.

6 PRESIDING COMMISSIONER DUFF: Commissioner
7 Sword.

8 **CROSS-EXAMINATION BY COMMISSIONER SWORD**

9 COMMISSIONER SWORD: Thank you. I realize going
10 last a lot of the stuff I have perhaps would have
11 been covered, so sometimes I will ask you just to
12 summarize it just for a degree of clarity.

13 You have made mention of the 2023 strike, in
14 terms of that and some of the learnings you gained
15 from it, could you just summarize about three to four
16 of them of what the main buckets of those learnings
17 would be?

18 And the second part would be -- is how did that
19 manifest itself in what we see before us, the
20 learnings and what we have in terms of your
21 application?

22 Just marry the two together, if you could,
23 please.

24 A. COLLIER: Thanks. That's a great question,
25 not one that we have clearly summarized.

26 The main learnings, I think as we have in the
27 evidence, though, are about ensuring we are doing the
28 work safely, ensuring the workload is adequate on a

1 per employee basis, mental health because of those
2 workload pressures was also key, and then
3 compensation and benefits kind of round out that --
4 those -- the key items from the strike.

5 You'll -- the table that I just put up on the
6 screen, obviously compensation was, I think, a
7 smaller component of the reason for the strike. So I
8 think that does inform a large part of our
9 application, and our head count request is because of
10 that sense of feeling from the employees that the
11 workloads just became unmanageable with the growth
12 that we are seeing in all the programs that Ms. Heuff
13 talked about.

14 COMMISSIONER SWORD: Okay, thank you.

15 Between the president and the frontline person,
16 whoever that may be -- I use the word "linemen", but
17 what have you -- what are the levels that you have?
18 Typical. Like, I realize it's different from inside
19 the office and outside the office.

20 A. BARRIE: So if you can pull up 1-6-1. Page
21 4.

22 L. HEUFF: And so I believe the graphic that she
23 is pulling up would go from director up, so perhaps I
24 will start at the power line technician, the front
25 line staff.

26 So a power line technician, typically there is -
27 - they would have another -- a construction
28 technician who does not have necessarily supervision,

1 they don't supervise them; however, they are kind of
2 a crew lead, I would say. So they would have a
3 construction technician.

4 The direct supervision is provided by a
5 supervisor level. There is a manager level above
6 that. Director. And then above the director, vice
7 president. And then vice president to the COO.

8 COMMISSIONER SWORD: It's hard to delineate, but
9 the average manager, how many people would they
10 supervise?

11 L. HEUFF: We actually do have an interrogatory
12 -- or an undertaking response on the record, but just
13 give me a moment. I can pull it up and give you a
14 good...

15 COMMISSIONER SWORD: Okay, sure.

16 L. HEUFF: It's JT1.13, please, Lianne.

17 So if you scroll down to Table A on page 3,
18 please.

19 So you'll see within the operations team, the
20 distribution operations team, which is where the PLTs
21 would reside. As of 2024, the average number of
22 direct reports would be nine, engineering and design
23 is slightly lower. Technical, they are required to
24 oversee from a technical perspective, so it's at six.
25 And then metering again, which is more of an
26 operational style team, is again at nine.

27 COMMISSIONER SWORD: I would imagine at times,
28 you would have managers that manages an issue but not

1 people, perhaps, as well; correct?

2 L. HEUFF: So I wouldn't -- the construction
3 technicians, I would say they are, like, crew leads
4 who are responsible for the overall site but not
5 responsible. They are also union members. They are
6 just a higher paid union position. They are a
7 unionized position, yeah.

8 COMMISSIONER SWORD: Okay, thank you.

9 With respect to locates on that, what are you
10 seeing in terms of locates now and in the future?
11 Are they driven by growth and also awareness of "dial
12 before you dig"? What sort of -- what are you
13 facing?

14 L. HEUFF: So there is -- yeah. There is a
15 couple different drivers. So the -- obviously the
16 growth in the city has driven up the volumes of the
17 locates. Also as a result of some of the efforts
18 that were done under the -- what does the "GOCA"
19 stand for?

20 GOCA is the one that I know, connections -- the
21 connections faster act, essentially. So there was
22 some changes that were made by the government in
23 terms of the amount of time locate providers had to
24 provide the locates so that they weren't impeding
25 construction. We did see a large upswing in the
26 overall volume of locates as a result as well as the
27 costs of the locates went up as a result as well.

28 Since then, I would say '24 and '25 have been

1 relatively stable in terms of volume in terms of how
2 many locates we have seen. 2026 is likely to be a
3 little higher as a result of some of the federal home
4 building and some of the other initiatives that are
5 taking place.

6 COMMISSIONER SWORD: And you do some of those
7 yourselves or through third-party contractors?

8 L. HEUFF: We do all of our locates through
9 third-party contractors. We are part of the Locate
10 Alliance Consortium, the LAC. We do have damage
11 prevention inspectors on staff, however, that do our
12 own internal locates. So if we need to do our own --
13 if we are doing work on our own property, we do have
14 damage prevention inspectors who would do those
15 locates for us.

16 And then we also have the damage prevention
17 inspectors who ensure compliance and to ensure that
18 the locate provider is doing --

19 COMMISSIONER SWORD: Is doing it --

20 L. HEUFF: Yeah.

21 COMMISSIONER SWORD: Yeah. So there is a level
22 of supervision associated with it for sure.

23 With your physical plant, how much is above
24 ground or below ground? I know you had that figure
25 out there, I just haven't committed it.

26 L. HEUFF: We do have that on the record. Just
27 a second.

28 A. COLLIER: Maybe just for the transcript,

1 while she is pulling that up, GOCA, G-O-C-A, is the
2 *Getting Ontario Connected Act*.

3 COMMISSIONER SWORD: *Getting Ontario Connected*.

4 A. COLLIER: Yeah.

5 L. HEUFF: Of course I can't find it. It's
6 about 50/50. I am just trying to find the exact.

7 COMMISSIONER SWORD: That's close enough, that's
8 close enough. Okay.

9 Thank you. I didn't have any other further
10 questions, Commissioner -- Chief Commissioner.

11 PRESIDING COMMISSIONER DUFF: Okay. Thank you
12 very much.

13 I have no questions.

14 Ms. Coban, any redirect?

15 D. COBAN: You will be pleased to know I have no
16 redirect, thank you.

17 **PROCEDURAL MATTERS**

18 PRESIDING COMMISSIONER DUFF: Okay, thank you.

19 At this stage, I like to do some process
20 planning. We finished the oral phase. If anybody is
21 online -- and I would appreciate it if you put your
22 camera on. I have no idea -- I am not able to tell
23 if anybody is online. Mr. Ladanyi, Mr. Garner, Mr.
24 Harper and Mr. Gluck. Thank you very much. And Mr.
25 Li.

26 The process planning is just what happens next.
27 There are a few factors, and I am going to be very
28 inclusive about planning the next stages, that's my

1 objective, and to understand what people's needs are
2 and perhaps wants.

3 The first issue, I think, is also a date for
4 when we could perhaps have undertaking responses.
5 One week? Two weeks?

6 D. COBAN: Yes, we are just -- I just want to
7 confirm with Ms. Barrie. I think the overall volume
8 of undertakings has been pretty manageable. I know
9 we have got a more extensive undertaking we gave SEC
10 with respect to the Mercer benchmarking study.

11 Just looking at Ms. Barrie to confirm that our
12 kind of initial sense of timeline is still correct?

13 A. BARRIE: Yeah.

14 D. COBAN: Yeah. So about a week.

15 PRESIDING COMMISSIONER DUFF: And on that basis,
16 if we have -- we have three unsettled issues,
17 basically, that will be requiring some written
18 submissions. If parties had -- if we get the answers
19 in a week, starting with the applicant, are you
20 planning to file a written argument in-chief?

21 D. COBAN: We are planning to file a written
22 argument in-chief. We would like for that argument
23 in-chief to go in after the undertaking timeline so
24 that we could have the benefit of those responses in
25 our submissions.

26 PRESIDING COMMISSIONER DUFF: Okay.

27 And if we are looking at a week for the
28 responses, how much time would you like for the

1 filing of the argument in-chief?

2 D. COBAN: We will certainly get started on
3 that, so maybe just one additional week after the
4 undertaking responses.

5 PRESIDING COMMISSIONER DUFF: Thank you.

6 Parties, and including OEB Staff, any
7 suggestions regarding how to handle the filing of
8 your submissions? And is there -- would all the
9 submissions be filed together? Mr. Rubenstein?

10 M. RUBENSTEIN: The only -- with respect to the
11 second question about if all the submissions will be
12 filed at the same time from intervenors and Staff,
13 it's SEC's position we would like to see Staff's
14 argument first, particularly -- it's really only in
15 the issue with respect to the issue that's going
16 directly to the written hearing, the shared savings
17 mechanism.

18 We have had some discussions with Staff, and
19 some of their concerns are of a -- of the proposal
20 are of a policy nature. And since this is the first
21 time, I believe, the Board will actually adjudicate
22 this specific issue in the application of some of the
23 more recent policies, we would like SEC, and I assume
24 all the other intervenors, would like an ability to
25 review Staff's and be able to comment on that
26 component, which makes it a bit different than the
27 issues that we have been discussing in the oral
28 portion.

1 PRESIDING COMMISSIONER DUFF: Okay. Those
2 online, did anybody want to comment on that? I take
3 it Mr. Rubenstein consulted with you?

4 M. RUBENSTEIN: No, I have not, not with my
5 friends.

6 PRESIDING COMMISSIONER DUFF: Oh, I shouldn't
7 assume so.

8 Mr. Garner, your --

9 M. GARNER: It's Mark Garner for VECC. He
10 hasn't, but I do agree with him. I think he is
11 absolutely right.

12 PRESIDING COMMISSIONER DUFF: And in that, Mr.
13 Garner, are you thinking that you would kind of
14 bifurcate the three issues and hear one first? I am
15 not too sure I understand the position.

16 M. GARNER: I thought, from my own perspective,
17 it would be better to just have it all. I mean, if
18 Staff was willing to put their entire argument
19 slightly ahead of everybody else's, that's fine also
20 with me. It is just they often have a very detailed
21 view of the evidence, so it's often interesting to
22 read.

23 PRESIDING COMMISSIONER DUFF: Anyone else want
24 to comment?

25 T. LADANYI: Yes. Tom Ladanyi here for CCMBC
26 and Energy Probe. To save costs and time and money,
27 after I see the Staff's argument, I may just agree
28 with it. I will not then draft a different argument.

1 If I don't agree with it, then I -- of course I
2 would. And I have done this in past proceedings. So
3 I think it would be very efficient to have Staff file
4 their argument first.

5 PRESIDING COMMISSIONER DUFF: Other comments? I
6 mean to the contrary.

7 C. LI: Clement Li for BOMA, I support that too,
8 what Mr. Ladanyi had just said.

9 PRESIDING COMMISSIONER DUFF: Okay. Thank you
10 very much.

11 Mr. Millar, it seems that there is some wish,
12 desire for you to file first.

13 M. MILLAR: Thank you, Madam Chair.

14 In respect of the SSM, we could do that. We
15 appreciate that -- I mean, there were -- without
16 getting into the settlement discussions, there were
17 some very high-level discussions about what Staff's
18 issues were, but we appreciate that not all parties
19 have seen that or had a chance to consider it. So
20 certainly if it's helpful, we can file the SSM
21 argument prior to the other parties.

22 Understanding that that leaves us no opportunity
23 to respond to what they have to say on it, but I
24 think that since the Staff has these high-level
25 policy concerns, it would be helpful for parties to
26 see those before they file their own argument.

27 In terms of whether we file the SSM and then
28 later file the rest of the argument with the rest of

1 the parties, we are, to some extent, in the Board's
2 hands. I don't have a strong objection to us filing
3 everything first. The issue, of course, is the
4 timing on that.

5 We can prepare the SSM argument. It's
6 completely distinct from the rest of the argument, so
7 it's totally standalone. We don't want to be
8 squeezed and find ourselves having only -- having
9 significantly less time to write our argument than
10 the other parties will.

11 So, again, if time were no object, we would be
12 happy to file everything before, and they can have --
13 to be helpful to the parties, it doesn't help if
14 Staff files just a couple days before everyone else,
15 and we have had this problem in the past where Staff
16 has filed their entire argument three days before the
17 parties, and it just wasn't helpful because they had
18 already written 90 percent of their argument. So I
19 don't know that there is much efficiency to be
20 gained.

21 So my short proposal would be -- and we haven't
22 talked about how long the parties want for their
23 argument. If it were, say, three weeks from the
24 argument-in-chief, Staff would be happy to file the
25 SSM argument five or seven days earlier than that,
26 but our preference would be to not be squeezed with
27 the rest of our argument and file that with the rest
28 of the parties.

1 If time is no object and we can still have the
2 three weeks and then there is still time for the
3 parties to file after that, we can do that as well,
4 but I am just trying to think of efficiency of the
5 process.

6 PRESIDING COMMISSIONER DUFF: Any comments to
7 that?

8 D. COBAN: Madam Chair, if I just may, the
9 three-week timeline that you are referring to, Mr.
10 Millar, you would agree with me that that's the
11 typical timeline we would see in a full proceeding
12 with all of the issues before us? It does seem a bit
13 long for the limited scope we have here.

14 M. MILLAR: I threw out three weeks as an
15 example, frankly. I didn't hear anyone give a
16 proposal. So whatever the time is, I don't think --
17 especially if we are only talking two weeks, then
18 Staff really does not want to get squeezed on its
19 main argument.

20 PRESIDING COMMISSIONER DUFF: This is an
21 interesting proposal. I have never had Staff file
22 two separate submissions, but why not. And I am in
23 the hands --

24 M. MILLAR: Yeah, I am not aware of that either.
25 But I think -- I believe it's just this single
26 completely separate issue that the parties have the
27 concern about, and if splitting our argument helps,
28 we can do that.

1 PRESIDING COMMISSIONER DUFF: Well, there is no
2 undertakings related to the SSM issue; correct? I
3 mean --

4 M. MILLAR: That's right. We have already
5 started writing it. You will be familiar there are
6 approval processes here which can take some time,
7 but, yes, we have already started writing it.

8 PRESIDING COMMISSIONER DUFF: Okay. And by
9 three weeks, I think you were saying, like, from now?

10 M. MILLAR: No. I --

11 PRESIDING COMMISSIONER DUFF: Or three weeks
12 after argument --

13 M. MILLAR: So if you look at -- so if
14 undertaking responses are due the 23rd, which is a
15 week from today, and then Ms. Coban suggested a week
16 from then, that would be January 30th for their
17 argument-in-chief, if you are -- let's imagine it's
18 two weeks from then for parties to file their
19 argument, that's February 13th -- and I am just doing
20 this as an illustration -- Staff could probably file
21 the SSM argument -- I would probably say on the
22 Monday, on the 9th or something like that, so that's
23 five days before the 13th. And then we would file
24 the balance of our argument on the 13th with the
25 other parties.

26 PRESIDING COMMISSIONER DUFF: That's a lot of
27 information. Do parties want to digest that or
28 comment? Do the five days help you at all, given

1 your own processes of determining whether -- what to
2 include in your own submission?

3 M. GARNER: Mark Garner here for VECC again.
4 And I hear what Staff is saying, and so I don't feel
5 strongly as to whether they file the entire or not.
6 I hear what they are saying.

7 Can I just make this one singular point now that
8 we are getting close to dates. If it's at all
9 possible, just for my -- purely the ineptitude of the
10 way I work, I would prefer not to have arguments due
11 on the ends of Fridays rather than the beginnings of
12 Mondays, and that's Family Day weekend as you get
13 into February. And just so that you were aware of
14 that as we get toward date ideas.

15 PRESIDING COMMISSIONER DUFF: I think that's a
16 good point. Thank you for mentioning it.

17 Mr. Ladanyi.

18 T. LADANYI: Five days is more than enough for
19 me. I am not expecting to spend five days writing
20 argument in this case, considering we are only
21 arguing three issues. So probably it would be more
22 like three days, so I would be happy to see anything.

23 PRESIDING COMMISSIONER DUFF: I appreciate your
24 honesty.

25 Mr. Gluck, you have been notably quiet.

26 L. GLUCK: From my perspective, certainly if OEB
27 Staff is willing to file their submission in advance
28 that -- or on the limited issue, that's great.

1 I have a similar view as Mr. Garner, though,
2 just in terms of the deadline of the submission from
3 intervenors and OEB Staff on the -- on OM&A really.
4 And I would prefer more time, and that would get us
5 into the week of February 16th, and perhaps a
6 deadline of the 18th or 19th is more reasonable.

7 PRESIDING COMMISSIONER DUFF: Thank you.

8 D. COBAN: The applicant would also find it
9 helpful not to have the deadline set on a Friday, as
10 we tend to work through things over the weekend. So
11 we are supportive of pushing those sort of Friday
12 deadlines to the following Monday, or if it's a
13 statutory holiday, the Tuesday.

14 PRESIDING COMMISSIONER DUFF: Duly noted.

15 Well, I am going to take this back, the Panel
16 will, and we will set up some dates and issue a
17 procedural order, but I value your input, and you
18 have mentioned some factors we hadn't considered and
19 some new ideas. So thank you, Mr. Millar, for
20 suggesting some dates so that people could react to
21 that.

22 I guess the other big issue also is a draft rate
23 order, and we all know that the settlement had agreed
24 to an effective date, so we have the issue of forgone
25 revenue and all of that to flush out on the record.

26 D. COBAN: Yes. And in the normal course, we
27 would address those matters as part of the draft rate
28 order and final rate order processes. Yeah.

1 PRESIDING COMMISSIONER DUFF: Yeah. Just adds
2 on to the process. I am just measuring the whole.

3 D. COBAN: It does. And I guess the one item we
4 did not talk about is the applicant's reply and the
5 timelines around that reply. Certainly we would
6 welcome as much time and perhaps a little bit more
7 time than the intervenors, recognizing that we have
8 to thoughtfully respond to the submissions of all of
9 the parties, which does take some time to first
10 triage and put that together and then be able to
11 respond meaningfully.

12 PRESIDING COMMISSIONER DUFF: Is that one or two
13 weeks --

14 D. COBAN: It is --

15 PRESIDING COMMISSIONER DUFF: -- or more?

16 D. COBAN: In my experience, it's minimum two,
17 but three weeks would probably be better. It does
18 depend on the extent of the submissions we receive
19 and how many claims there are within there.

20 PRESIDING COMMISSIONER DUFF: Okay. Fair
21 enough.

22 Any more input on the process? Thank you very
23 much.

24 This ends the oral phase of our proceeding of
25 the unsettled issues.

26 I did want to thank everyone. My opening
27 statement, I appreciate Hydro Ottawa coming in to
28 Toronto, the Commissioners' ability to interface

1 directly with the parties that it regulates. It's
2 important to meet people and have the interaction
3 that's enabled by face-to-face hearings, so thank you
4 for making the effort and coming to Toronto and for
5 those in the room.

6 And actually, I am going to mention, Ms. Barrie,
7 I appreciate you being on the Panel. I find that
8 sometimes as head of regulatory, you answered many
9 questions and other -- I have been in situations
10 where a utility said, oh, no one on the Panel has
11 that expertise, can we take an undertaking, and you
12 ventured and tried to answer every one of our
13 questions, so I do appreciate that.

14 In terms of -- I am just full of thank yous
15 right now. No. Just I do -- I think it needs to be
16 said, the importance of having Commissioners involved
17 and meeting parties face to face. I think that has
18 great value.

19 Thank you to the court reporter. You did an
20 excellent job.

21 And with that, this hearing is adjourned.

22 --- Whereupon matter adjourned at 12:19 p.m.