

April 22, 2014

Doreen Friis
Regulatory Affairs Officer/Clerk
Nova Scotia Utility and Review Board
1601 Lower Water Street, 3rd Floor
P.O. Box 1692, Unit "M"
Halifax, NS B3J 3S3

Re: case number M06180: P-401.32 - Nova Scotia Power Inc.—Power Line Technician Staffing Levels and Reliability of Service at Nova Scotia Power 2014 Report.

Dear Ms Friis,

Please find attached a memo to the Utility and Review Board that raises concerns about the Nova Scotia Power's reporting and the UARB's regulation of current PLT staffing levels at NSP.

Respectfully,

Jeff Richardson

To: Nova Scotia Utility and Review Board

From: Jeff Richardson, Business Manager, IBEW Local 1928

Subject: Potential Inaccuracies in NSP UARB Report re: PLT Staffing Numbers and Implications

CC: The Honourable Andrew Younger, Minister of Energy

The Honourable Kelly Regan, Minister of Labour & Advanced Education

John Merrick, QC, Consumer Advocate, Water, Gas & Electric Power Rate Applications

Context: The Power System Outage Response, LLC Report Recommendations of February 26, 2007 address three main areas of concern with regard to adequate service and outage response by the provincial electrical utility, Nova Scotia Power Inc. (Directly from the recommendations:)

- 1) *monitor PLT staffing and reductions to ensure that no deterioration of performance results...Additionally, the report should contain statistics concerning changes in PLT staffing and NSPI conclusions as to the relationship, if any, of these staffing changes and the performance results mentioned.*
- 2) *NSPI should aggressively pursue the Customer Operations Work Force planning initiative in managing PLT staffing levels. An annual status report should be made to the Board reflecting the base (target) PLT staffing level, current PLT staffing, actual attrition as compared to 5 year window projection, replacements/additions since previous report, and revised total of required replacements.*
- 3) *NSPI should conduct emergency drills on an annual basis, focusing on those areas that offer the greatest opportunity, and should invite Board staff to observe the drills.*

Concerns: The reported number of Powerline Technicians (PLTs, formerly “linemen”) at NSP 1) for 2013 is inaccurate due to resignations, retirements and attrition, and 2) has been and will continue to be impacted by uncertainty around job outsourcing. This will have a consequence for the province because these PLTs are *permanently leaving Nova Scotia for other employers* 3) the UARB should not permit NSP to withhold projections for future staffing, given the UARB order (2007) to supply these projections.

Brief Methodology: IBEW Local 1928 represents unionized employees at Nova Scotia Power, including PLTs. Local 1928 is able to monitor staff attrition by comparing company-provided seniority lists from one year to the next (this is a contractual obligation). Union members generally notify Local 1928 when they 1) resign to take other jobs and 2) retire. Further, the union office is often privy to individual employee decisions before NSP, particularly when those employees have secured work with other employers (there are implications for union members when they travel to another Local). Many NSP employees have made decisions to leave during the period of uncertainty that has followed NSP’s major outsourcing announcement (250 unionized jobs to be eliminated) of October 17, 2013. At the time, NSP said decisions and announcements about outsourcing were expected Q1 of 2014. The union has received no further official communication about decisions and timelines.

The Number of PLTs at NSP: NSP's report to the UARB says that in 2013 NSP had 185 power line technicians. As of April 10, 2014, when the union's comparison was made, NSP has 174 working red seal linemen (See Attachment A.). Of those 174, 9 PLTs have indicated that they are completing negotiations with or have accepted an offer from an out-of-province employer and will leave NS over the next three months (they have houses to sell and children in school). That brings us down to 165. Then there are 15 red seal linemen who were hired by NSP as apprentices and who have not secured regular full-time jobs with the company since their certification, although NSP has kept them working full-time. They are *de facto* temporary labour—they start their four-year apprenticeship understanding that upon certification they must apply for a posted vacancy with NSP, but few vacancies have been posted since 2012 contract negotiations. (Some of these Powerline Technicians have been trying to win a job for two years and have been working for NSP for six years without a permanent position). These 15 mobile PLTs are invaluable to other employers; they have no job security. If you remove those 15 journeymen from the available PLTs because of their irregular status, NSP then will have 150 red seal linemen. Further, there are ten Powerline Technicians who can leave with an unreduced pension over the next year, and likely will go, given their uncertain future at NSP; and one PLT who must retire because he's reached 65. Over the next year, that could bring the number of NSP PLTs down to 139. The second phase apprentices, strictly speaking, don't qualify as PLTs, nor do they have regular jobs. If NSP suffers all of these projected losses, that is 135 PLTs by the end of 2014—50 fewer bodies than was reported by NSP as the annual staff complement of PLTs over the past four years.

Conclusions: After Hurricane Juan and White Juan, the UARB's order set up an ongoing reporting process to ensure that Nova Scotians have future acceptable electrical service, with an emphasis on maintaining PLT staffing. The UARB should be aware that, after a number of stable years, PLT staffing and the outlook for PLTs has changed dramatically at NSP over the last six months. Further, the PLT apprenticeship program has been wound down and even those who went through the NSP program cannot get permanent jobs at NSP. This is not because of a technology change or new efficiencies; this is NSP stretching resources. But the slow bleed of qualified PLTs to other provinces is becoming a steady flow as the weeks go by. There would be unpleasant consequences to service if we were to have a major storm event now (consider that the other week, some customers in Cape Breton were without power for 88 hours during a relatively ordinary ice/snow storm).

Implications: We are losing trained Nova Scotian PLTs permanently to other regions. At the same time, other Nova Scotia-based utility services employers, like John Risley's new acquisition, PowerTel, and Emera's own EUS are hunting for qualified PLTs in the province and coming up short (but don't forget NSP has 15—soon-to-be 22—certified, jobless PLTs; how will those PLTs be leveraged and will they stay here?). Consider also the number of qualified PLTs who will be required to complete the Maritime Link project (at its peak, over 200). If employers have to raise wages and benefits to attract our skilled Nova Scotian workers back from Alberta, how will that drive up costs for projects like the Maritime Link, for which Nova Scotia ratepayers are on the hook for 20%?

ATTACHMENT A

NAME	LOC	CLASSIFICATION
1		RED SEAL PLT
2	<i>We accept that there are</i>	RED SEAL PLT
3	<i>135 (somewhat) secure red seal PLTs</i>	RED SEAL PLT
4	<i>employees at NSP.</i>	RED SEAL PLT
5	RED SEAL PLT
130	RED SEAL PLT
131	<i>Therefore PLTs 6 to 129 are excised from</i>	RED SEAL PLT
132	<i>this list so that it is easier to view</i>	RED SEAL PLT
133		RED SEAL PLT
134	<i>* NAMES/LOCATIONS REMOVED TO PROTECT</i>	RED SEAL PLT
135	<i>EMPLOYEES *</i>	RED SEAL PLT
136		TECH POWERLINE APP 3RD 6MOS
137		TECH POWERLINE APP 3RD 6MOS
138		TECH POWERLINE APP 3RD 6MOS
139		TECH POWERLINE APP 3RD 6MOS
140	WORKING AS REGIONAL PLANNER NOT PLT	CAN RETIRE 2014
141	WORKING AS REGIONAL PLANNER NOT PLT	CAN RETIRE 2014
142	CAN RETIRE 2014	
143	CAN RETIRE 2014	
144	CAN RETIRE 2014	
145	CAN RETIRE 2014	
146	CAN RETIRE 2014	
147	CAN RETIRE 2014	
148	CAN RETIRE 2014	
149	CAN RETIRE 2014	
150	CAN RETIRE 2014	
151	NO JOB	
152	NO JOB	
153	NO JOB	
154	NO JOB	
155	NO JOB	
156	NO JOB	
157	NO JOB	
158	NO JOB	
159	NO JOB	
160	NO JOB	
161	NO JOB	
162	NO JOB	
163	NO JOB	
164	NO JOB	
165	NO JOB	
166	WILL RESIGN	
167	WILL RESIGN	
168	WILL RESIGN	
169	WILL RESIGN	
170	WILL RESIGN	
171	WILL RESIGN	
172	WILL RESIGN	
173	WILL RESIGN	
174	WILL RESIGN	
175	RESIGNED - ENMAX	
176	SECONDED TO IBEW - NOT IN FIELD	
177	RETIRED	
178	RETIRED	
179	TOOK JOB IN DCC - NOT IN FIELD	
180	RESIGNED - VALLARD	
181	RESIGNED - VALLARD	
182	RESIGNED - ENMAX	
183	RESIGNED - VALLARD	
184	RETIRED	
185	RESIGNED - VALLARD	
186	RESIGNED - VALLARD	
187	RESIGNED - VALLARD	
188	RETIRED	
189	RESIGNED - MID-LITE	
190	RESIGNED - VALLARD	
191	LTD - NOT WORKING	
192	LTD - NOT WORKING	

-  → Resigned or Retired
-  → Eligible to retire in 2014 with unred
-  → Accepted job elsewhere; still here
-  → Not a permanent employee of NSP
-  → LTD---both eligible also for full retire