

## Cases 08-E-0887 & 08-G-0888- Central Hudson Rates

### Staff Response to Interrogatory/Document Request

Request No.: CH-2  
Date of Request: November 26, 2008  
Reply Date: December 8, 2008  
Responding Witness: Accounting Panel  
Subject: Labor

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Q. 2) The following question relates to page 11, lines 20 through page 12, line 9 of the Accounting Panel testimony, which states "Exhibit\_\_ (TCB-1) and the Company's response to Staff interrogatories DPS-512-518, provided in Exhibits\_\_ (AP-4-10)" led the Panel to the conclusions that "1) the duties of the proposed additional employees are already being performed by employees of Central Hudson now or fall within current employees' job scope; or 2) the duties are related to planning for possible future attrition by the Company."

- a) Please confirm that no written analysis to support the Accounting Panel's two conclusions has been included by the Accounting Panel in its testimony, exhibits or workpapers.
- b) If the Accounting panel has performed a written analysis that is contained in its testimony, exhibits or workpapers, identify specifically all parts of that analysis.
- c) To the extent not included in the Panel's exhibits or workpapers, please explain in detail how the information presented in "Exhibit\_\_ (TCB-1) and the Company's response to Staff interrogatories DPS-512-518, provided in Exhibits\_\_ (AP-4-10)" led the Panel to the conclusions that "1) the duties of the proposed additional employees are already being performed by employees of Central Hudson now or fall within current employees' job scope; or 2) the duties are related to planning for possible future attrition by the Company."
  - i) In your response to this question, address separately each position proposed by the Company.
  - ii) In your response to this question, identify separately which portion(s) of TBC-1 and IR 512-518 responses led to conclusion 1) and which portion(s) led to conclusion 2) in relation to each proposed position.
  - iii) In your response addressing the Panel's conclusion 1), specify exactly which current employees of Central Hudson are performing the duties on a proposed position by proposed position basis.
  - iv) In your response addressing the Panel's conclusion 2), specify exactly how the proposed position's duties are related to possible future attrition on a proposed position by proposed position basis.
  - v) Provide all related workpapers.

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Answer)

- a) As stated in our testimony on page 11, line 24 through page 12, line 9 the Accounting Panel reached its conclusions based upon a review of the Company's Exhibit\_\_ (TCB-1) and the Company's response to Staff interrogatories DPS 512-518.
- b) Please see response to a.
- c)

#### Manager of Human Resources

As stated in Exhibit\_\_ (TCB-1) at page 1, the Company requested a Manager of Human Resources to manage and supervise the daily operations and responsibilities of the department, since the Vice President of Human Resources role has grown to include responsibilities related to serving as the Chief Ethics and Compliance Officer. **Staff based its conclusion that the duties of the proposed Manager of Human Resources are already being performed by an employee of Central Hudson based on the Company's response to Staff interrogatory DPS-512.** In the response the Company stated, "The Vice President of Human Resources began serving in the role of Chief Ethics and Compliance Officer on March 1, 2005." Therefore, for over three years the Vice President of Human Resources not only was involved in the daily operations of the Human Resources department, as stated in Exhibit\_\_ (TCB-1) at page 1, but served as the Chief Ethics and Compliance Officer.

#### Employee Benefit Analyst

As stated in Exhibit\_\_ (TCB-1) at page 2, the Company requested an Employee Benefit Analyst to support the planning and administration of the increasingly complex benefit plans. **Staff based its conclusion that the duties of the proposed Employee Benefit Analyst are already being performed by an employee of Central Hudson based on the Company's response to Staff interrogatory DPS-513.** In the response, the Company stated, "The planning and administration of the benefit plans is primarily managed by a committee of company personnel. The committee consists of 5 individuals that function as the policy making committee of the Company. The work that is generated by the committee is typically managed and implemented by one individual in Human Resources the Director of Compensation and Benefits." In addition, in the same interrogatory response, the Company informed Staff that the Vice President of Accounting, who also functions as the Chairwoman of the Company's benefits committee and the Director of Compensation and Benefits, currently interacts with various providers of the VEBAs, the defined benefit plan, and the defined contribution plan.

#### Systems Analyst

As stated in Exhibit\_\_ (TCB-1) at page 3, the Company requested two System Analysts: one related to the enhancement to the Customer Service Representative interface with the Customer Information System and one related to technical support. **Staff based its**

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**conclusion that the duties of the proposed System Analysts are either already being performed by employees of Central Hudson or fall within current employees job scope based on the Company's response to Staff interrogatories DPS-514, DPS-515, DPS-516, and DPS-517.** In response to Staff interrogatory DPS-514, regarding how many employees currently are assigned to above responsibilities, the Company stated, "There are 34 employees currently assigned to the Information Technology Department." In response to Staff interrogatory DPS-515, regarding new IT projects, the Company stated, "For those projects that are underway there are six employees assigned on an intermittent basis to be accomplished together with other day to day responsibilities these individuals are assigned to...The new projects work related to installing and configuring the new application software is performed by the contractors." In response to Staff interrogatory DPS-516, regarding enhancement to the CSR interface, the Company stated, "Ongoing maintenance and support of the enhancement to the CSR interface to our Customer Information System does indeed fall within the scope of the job requirements of CIS support analysts." .” In response to Staff interrogatory DPS-517, regarding additional technical support resources, the Company stated, "Ongoing technical support and systems administration of computer systems does indeed fall within the scope of the requirements of the technical support analysts, but these requirements are growing."

### Treasury Analyst

As stated in Exhibit\_\_ (TCB-1) at page 3, the Company requested a Treasury Analyst to assist the current Cash Management Specialist in managing the Company's daily cash flow and coordinating its financial activities. **Staff based its conclusion that the duties of the proposed Treasury Analyst are already being performed by an employee of Central Hudson or fall within current employees' job scope based on the statement above that the new position would assist the current employee in performing their role.**

### Financial Planning

As stated in Exhibit\_\_ (TCB-1), the Company requested two Financial Planning Positions to handle the responsibilities described at page 5 and continued at page 6. **Staff based its conclusion that the duties of the proposed Financial Planning Positions are either already being performed by employees of Central Hudson or fall within current employees job scope of Central Hudson based on the Company's response to Staff interrogatory DPS-520.** In the response the Company stated, "The work described on page 5 and 6 of Exhibit TCB-1 is an expansion of the current financial planning staff's responsibilities."

### Customer Services

As stated in Exhibit\_\_ (TCB-1) at page 6, the Company requested ten customer service employees to fill vacancies in Lineman, Splicer, and Gas Mechanic positions related to the retirement of employees in those positions. **Staff based its conclusion that the duties of the proposed customer service employees are related to the possible future attrition, which may not occur in the rate year, by the Company based on Exhibit\_\_ (TCB-1) in**

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**which the Company stated, “The Company maintains an apprentice program whereby employees in these job classifications are trained....Consequently, providing for the reasonably anticipated retirement of those employees in a manner that accommodates the training/transition process without impairment of the completion of related work by adequately trained and skilled employees ...”**

#### Operations Services

As stated in Exhibit\_\_ (TCB-1) at page 6, the Company requested three positions related to electric substation operations. **Staff based its conclusion that the duties of the proposed positions are either already being performed by an employee of Central Hudson or fall within current employees’ job scope based on the Company’s response to Staff interrogatory DPS-521.** In the response the Company stated, “The current staffing for Electricians and Foreman is 22 and 3 respectively.” Although the Company contends this level to be insufficient according to their long-term work plan, which is a three year plan, described in the above interrogatory response, Staff took into consideration that the increase in employee level for these positions would not be a sustained level, upon completion of the long-term work plan.

#### GIS Database Administrator

As stated in Exhibit\_\_ (TCB-1) at page 7, the Company requested a GIS Database Administrator. **Based on the job description position provided by the Company in Exhibit\_\_ (TCB-1) at page 7 and continued at page 8, Staff concluded the duties fall within the job scope of the current IT department employees and views the GIS database as an additional job responsibility.** Staff also took into consideration the IT Staffing level and the Company’s response to Staff interrogatory DPS-514 to arrive at its opinion that the current IT department staffing level is sufficient to sustain the additional responsibility.

#### Distribution Engineer

As stated in Exhibit\_\_ (TCB-1) at page 8, the Company requested a Distribution Engineer. **Staff based its conclusion that the duties of the proposed Distribution Engineer are already being performed by employees of Central Hudson based on the Company’s response to Staff interrogatory DPS-522.** Staff inquired as to whom in the Company currently handles this responsibility and the Company responded that the distribution engineering department which reports to David Dittmann.

#### Accounting

As stated in Exhibit\_\_ (TCB-1) at page 9, the Company requested four positions related to the Accounting Department. **Staff based its conclusion that the duties of the proposed accounting staff are either already being performed by employees of Central Hudson or**

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**fall within current employees' job scope based on the job description position provided by the Company in Exhibit\_\_ (TCB-1) at page 9 and continued at page 10.**