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Attorneys for Intervenors IBEW Locals 387, 640 & 769

BEFORE THE ARIZONA

CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE FOR A HEARING TO DETERMINE THE FAIR VALUE OF THE UTILITY PROPERTY OF THE COMPANY FOR RATEMAKING PURPOSES, TO FIX A JUST AND REASONABLE RATE OF RETURN THEREON, AND TO APPROVE RATE SCHEDULES DESIGNED TO DEVELOP SUCH RETURN.	Docket No. E-01345A-11-0224 **NOTICE OF FILING TESTIMONY OF G. DAVID VANDEVER IN SUPPORT OF SETTLEMENT AGREEMENT**

Pursuant to the Chief Administrative Law Judge's Procedural Order (p. 2) dated December 23, 2011, Intervenors Local Union 387, International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local 387"), Local Union 640, International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local 640"), and Local Union 769, International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local 769"), by and through undersigned counsel, hereby provide notice of their filing of the attached Testimony of G. David Vandever in Support of Settlement Agreement in this docket.

RESPECTFULLY SUBMITTED this 17th day of January, 2012.

LUBIN & ENOCH, P.C.

Jarrett J. Haskovec, Esq.
Attorney for Intervenors
IBEW Locals 387, 640 & 769

Original and thirteen (13) copies
of Intervenors' Notice filed
this 17th day of January, 2012, with:

Arizona Corporation Commission
Docket Control Center
1200 West Washington Street
Phoenix, Arizona 85007-2996

Copies of the foregoing
transmitted electronically or
via regular mail this same date to:

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Q1. PLEASE STATE YOUR NAME AND POSITION.

A1. G. David Vandever. I am the Business Manager of IBEW Local 387, which is, among other things, the exclusive bargaining representative of approximately one-thousand nine-hundred (1,900) non-managerial employees of APS.

Q2. ARE YOU THE SAME G. DAVID VANDEVER WHOSE DIRECT TESTIMONY WAS FILED IN THIS MATTER ON NOVEMBER 18, 2011?

A2. Yes.

Q3. DO YOU HAVE ANY REVISIONS, CORRECTIONS, OR UPDATES THAT YOU WOULD LIKE TO MAKE TO YOUR PREVIOUS TESTIMONY?

A3. Yes. Many of the figures and calculations contained in my direct testimony were based on numbers provided by APS in response to our first set of data requests. Since the time of the filing of my direct testimony, APS has served a supplemental response to items 6-10 in order to correct and/or update the figures originally provided. A copy of the supplemental response is attached hereto as Exhibit A. As a result, some of the figures and calculations originally included in my direct testimony may need to be revised. Be that as it may, I believe the revised numbers still demonstrate the need to address the pressing challenges associated with the "aging workforce" problem.

Q4. PLEASE TELL US MORE ABOUT IBEW LOCAL 640 AND THE TYPE OF WORK THE LOCAL'S MEMBERS PERFORM.

A4. Sure. Although I am not a member of that local, I am quite familiar with it. IBEW Local 640 has represented workers in the electrical construction industry for 87 years. IBEW Local 640 has the highest caliber of skilled and trained Inside Construction Journeyman Wiremen in the State of Arizona. The Local constantly proves that point on job sites throughout the State every day to the customers it

serves through the Local's approximately 75 small, medium, and large capacity signatory employers. IBEW Local 640's principal work is the construction and maintenance of commercial and industrial facilities.

Q5. PLEASE DESCRIBE IBEW LOCAL 640'S RELATIONSHIP WITH APS AND ANY VISION THE LOCAL HAS FOR ENHANCING THE RELATIONSHIP IN THE FUTURE.

A5. Historically, APS and IBEW Local 640 have had a relatively stable, mutually-beneficial relationship whereby the Local's members and their employers provided construction and maintenance services for many APS projects and facilities. From the statewide coal-fired plants to the Palo Verde Nuclear Generating Station to the many associated sub-stations and switching yards, IBEW Local 640's members have had a successful history of providing Arizona Public Service an outstanding level of quality and value in the construction of these facilities. In addition, a few years ago, the Local provided APS with qualified manpower for use in the Company's "residential taskforce" and stands ready to provide qualified solar installation manpower as well.

Unfortunately, at some point in the recent past, APS's interest in utilizing the services of the Local's highly-trained workforce and the associated contractors to meet its facility construction and maintenance needs seems to have waned. Although there are still a couple of associated contractors still bidding, and occasionally winning, APS work, it seems that many of the contractors no longer pursue this work due to the recent, statewide trend of awarding to the lowest "responsible" bidder. The Local acknowledges that the signatory contractors are seldom the rock-bottom, cheapest bid, but believes that, more often than not, one gets what one pays for with respect to the final product as well. IBEW Local 640 expresses its sincere hope that using the cheapest labor on every construction and

maintenance project will not become the "new norm" and cautions that the use of such labor may significantly impair APS's ability to provide safe and reliable power to its customers in the long-run.

IBEW Local 640 seeks to re-establish a working relationship with APS that redounds to their mutual benefit. IBEW Local 640 emphatically does not seek to be handed work, but rather to have APS advise the Local when projects arise so that it may provide APS with two or three qualified union contractors, whose size and scope are commensurate with the project at hand, to bid on the work. IBEW Local 640 would like the opportunity for its employers to prove to APS that value trumps price and that by using its highly-skilled and trained workforce, composed primarily of local residents who earn a decent wage and benefit package and many of whom are APS customers themselves, APS receives a greater value on their construction and maintenance projects and, in turn, provides a greater value to their customers. With a new, more flexible work model in the Local's collective bargaining agreement relating to quality, efficiency, and composite value in a skill-appropriate crew mix, the Local's family of signatory contractors have the tools needed to provide even better value to the customer's bottom line than ever before.

Q6. PLEASE PROVIDE SOME EXAMPLES OF APS PROJECTS IN WHICH IBEW LOCAL 769 MEMBERS HAVE BEEN RECENTLY ENGAGED.

A6. Certainly. As I noted previously, IBEW Local 769 is, among other things, the exclusive bargaining agent for all IBEW outside line workers in the State of Arizona and its scope of work also includes tele-data, street light and trenching. For example, IBEW Local 769 has provided outside line construction work for APS through Wilson Construction, Klondyke, NPL, Henkels & McCoy and Sturgeon Electric, among others. At any given time, IBEW Local 769 will have anywhere from five (5) to two-hundred (200) of its bargaining unit employees

working for subcontractors of APS. In the last quarter of 2011, IBEW Local 769 members and their respective employers have been contracted to provide services for APS projects across much of Arizona as follows:

- Agua Caliente Solar Project – 500 KV Switch Yard and Sub-Station, Dateland, Klondyke LLC (contractor);
- Bouse – 230 KV Harcuvar Grassroot Transmission Line, National Power Line (contractor);
- Perrin Ranch Windfarm – 500 KV Switch Yard and Sub-Station, Williams, Klondyke LLC (contractor);
- Pinnacle Peak – 500 KV-230 KV Switch Yard and Sub-Station Upgrade, Scottsdale, Wilson Utility Construction (contractor);
- 69 KV Re-Conductor, Hope, Atkinson Power (contractor); and
- several small distribution projects in Maricopa County.

Q7. DO IBEW LOCALS 387, 640 AND 769 SUPPORT THE ADOPTION OF THE JANUARY 6, 2012 SETTLEMENT AGREEMENT?

A7. Yes. On behalf of the more than one-thousand nine-hundred (1,900) non-managerial workers at APS who are represented by IBEW Local 387, I would like to express the Union's unqualified support for the proposed Settlement Agreement. In addition, I know that our two sister locals, IBEW Locals 640 and 769, are also fully supportive of the Settlement Agreement.

Q8. ARE THERE SPECIFIC PORTIONS OF THE SETTLEMENT AGREEMENT THAT IBEW LOCALS 387, 640 AND 769 ARE PARTICULARLY INTERESTED IN?

A8. Yes. While IBEW Locals 387, 640 and 769 support the adoption of proposed Settlement Agreement in its entirety, we are particularly interested in, and/or took an especially active role in negotiating or otherwise considering, the following

paragraphs of the proposed Settlement Agreement: ¶¶ 1.4 and 18.2.

Q9. PLEASE EXPLAIN WHY IBEW LOCALS 387, 640, AND 769 ARE PARTICULARLY INTERESTED IN ¶ 1.4.

A9. IBEW Locals 387, 640, and 769 note the inclusion of Paragraph 1.4. In it, the parties simply acknowledge the fact that Article XV, § 3 of the Arizona Constitution places the interests of public service employees on par with those of patrons. The interests of both constituencies, in turn, are of more importance than those of the corporation's shareholders.

Q10. ARE YOU AWARE OF ANY LEGAL AUTHORITY SUPPORTING THIS PROPOSITION?

A10. Certainly. In its 1984 decision in *Cogent Pub. Serv. v. Arizona Corp. Comm'n*, 142 Ariz. 52, 56-57, 688 P.2d 698, 702-03, Division One expressly, and in my opinion, correctly, held that "the jurisprudence of our State made it plain long ago that the interests of public-service corporation stockholders must not be permitted to overshadow those of the public served." In support of this quite unremarkable proposition, our Court of Appeals relied upon a series of U.S. and Arizona Supreme Court decisions dating back to 1896.[1] Beyond that, I would also point out that while Article XV, § 3 of the Arizona Constitution mentions "employees and patrons" as key stakeholders, it does not mention shareholders as such.

Q11. PLEASE EXPLAIN WHY IBEW LOCALS 387, 640, AND 769 ARE PARTICULARLY INTERESTED IN ¶ 18.2.

A11. In the Application to Intervene and Direct Testimony filed on their behalf in this

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[1] *See Salt River Valley Canal Co. v. Nelssen*, 10 Ariz. 9, 13, 85 P. 117, 119 (1906) [*citing Covington & Lexington Turnpike Road Co. v. Sanford*, 164 U.S. 578, 596 (1896)].

matter, IBEW Locals 387, 640, and 769 raised significant concerns related to APS's workforce planning moving forward and, in particular, the "aging workforce" problem that so many utilities, including APS, face and will continue to face in the years to come. Paragraph 18.2 highlights these concerns and serves to focus the parties' and the Commission's attention on these important matters – both now and going forward. The reporting requirements included in this paragraph will ensure that APS undertakes at least an annual review and assessment of its workforce planning for critical positions in light of these challenges and considers what sorts of recruitment and hiring efforts it must undertake to meet these challenges ahead of anticipated retirements. I can say, without exaggeration or hyperbole, that I firmly believe APS's ability to provide safe and reliable electric power in Arizona in the years to come depends to no small degree on the steps the Company takes to meet these impending challenges.

Q12. ARE THERE ANY PORTIONS OF THE PROPOSED SETTLEMENT AGREEMENT WITH WHICH IBEW LOCALS 387, 640, AND 769 ARE LESS PLEASED?

A12. Sure. We would have preferred that APS receive even more – potentially far more – rate relief than what is set forth in ¶ 3.1 of the Settlement Agreement. Notwithstanding these reservations, however, IBEW Local 387, 640, and 769 recognize that the consummation of a comprehensive Settlement Agreement among nearly two dozen different parties with often disparate and competing interests is no so small feat. It is for that reason that we fully and strongly support the Commission's adoption of the proposed Settlement Agreement *in toto*.

Q13. DO YOU HAVE ANY OTHER COMMENTS YOU WOULD LIKE TO SHARE WITH THE COMMISSION REGARDING THE INSTANT SETTLEMENT?

A13. Yes. I want to make it abundantly clear to the Commission and APS that, by agreeing to this Settlement Agreement, IBEW Local 387 has not, and does not, agree to any modification, express or implied, to the terms and conditions of its collective bargaining agreement with APS. That is not to say that I believe this will ever become a problem *vis-à-vis* IBEW Local 387's relationship with APS; in fact, I do not believe that is the case. Nevertheless, I just want to make certain that there is no confusion in this regard moving forward.

Q14. DOES THIS CONCLUDE YOUR TESTIMONY?

A14. Yes.

F:\Danette\IBEW L. 387 1445-100.Vandever Testimony#2.pld.wpd

JEFFREY W. JOHNSON
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December 5, 2011

Nicholas J. Enoch
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Phoenix, AZ 85003

RE: Arizona Public Service Company's 2010 Test Year Rate Case
Docket No. E-01345A-11-0224

Attached please find Arizona Public Service Company's Supplemental Response to IBEW's First Set of Data Requests, Questions 6-10 in the above-referenced matter.

If you have any questions regarding this information, please contact Zachary Fryer at (602)250-4167.

Sincerely,

Jeffrey W. Johnson

JJ/sl
Attachment

IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES DESIGNED TO DEVELOP A JUST AND REASONABLE RATE OF RETURN DOCKET NO. E-01345A-11-0224 OCTOBER 26, 2011

IBEW 1.6: Please state, for each the past five (5) calendar years, the share of retirement-eligible employees, both as a percentage and in absolute terms, in each of the job classifications referenced in the preceding data request, who opted to retire.

Supplemental Response to IBEW 1.6: Below are the percentages and number of individuals in each of the job classifications that retired from 2010 to present. The percentages have been updated to reflect the percent of actual to eligible retirements per job classification per year. Please disregard the previous submittal since there was erroneous data.

Retirements: 2006-2010

Job		2006	2007	2008	2009	2010
Auxiliary Operators	Oper Auxiliaries	0	0	0	1	1
Auxiliary Operators	Ops Tech Trainee T-1	0	0	0	0	0
Auxiliary Operators	OTTRNEET1 CONTROL OP/MECH MNTC	0	0	0	0	0
Auxiliary Operators	PS3T2 AO / MECH MNTC	0	0	0	0	1
Auxiliary Operators	PS3T2 MECH MNTC / AO	0	0	0	0	0
Control Operator	Control Operator	1	1	2	0	0
Control Operator	Oper Control	0	0	0	1	0
Control Operator	OPS TECH CONTROL OP/ INT INSTR	0	0	0	3	0
Control Operator	OPS TECH CONTROL OP/ MECH MNTC	0	0	0	0	1
Control Operator	OPS TECH CONTROL OP/PLATE WELD	0	0	0	0	0
Electrician-Journeyman	Electrician	1	7	6	0	0
Lineman-Journeyman	Lineman Hotstick	0	0	0	0	0
Lineman-Journeyman	Lineman Journeyman	1	2	4	2	2
Technician-E&I	E&I TECH ELECT / ADV INSTR	0	0	0	0	0
Technician-E&I	E&I TECH INSTR REPR/ADV ELECT	0	0	0	0	2
Technician-E&I	E&I Technician	3	2	2	1	1

Witness: Daniel T. Froetscher

IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS
REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES
DESIGNED TO DEVELOP A JUST AND REASONABLE RATE OF RETURN
DOCKET NO. E-01345A-11-0224
OCTOBER 26, 2011

Supplemental Response to IBEW 1.6 Continued:

Retirements: 2006-2010

Job		2006	2007	2008	2009	2010
Auxiliary Operators	Oper Auxiliaries	0%	0%	0%	33%	100%
Auxiliary Operators	Ops Tech Trainee T-1	0%	0%	0%	0%	0%
Auxiliary Operators	OTTRNEET1 CONTROL OP/MECH MNTC	0%	0%	0%	0%	0%
Auxiliary Operators	PS3T2 AO / MECH MNTC	0%	0%	0%	0%	14%
Auxiliary Operators	PS3T2 MECH MNTC / AO	0%	0%	0%	0%	0%
Control Operator	Control Operator	50%	25%	40%	0%	33%
Control Operator	Oper Control	0%	0%	0%	50%	0%
Control Operator	OPS TECH CONTROL OP/ INT INSTR	0%	0%	0%	33%	14%
Control Operator	OPS TECH CONTROL OP/ MECH MNTC	0%	0%	0%	0%	19%
Control Operator	OPS TECH CONTROL OP/PLATE WELD	0%	0%	0%	0%	0%
Electrician-Journeyman	Electrician	8%	24%	14%	0%	11%
Lineman-Journeyman	Lineman Hotstick	0%	0%	0%	0%	0%
Lineman-Journeyman	Lineman Journeyman	5%	5%	6%	3%	7%
Technician-E&I	E&I TECH ELECT / ADV INSTR	0%	0%	0%	0%	13%
Technician-E&I	E&I TECH INSTR REPR/ADV ELECT	0%	0%	0%	0%	40%
Technician-E&I	E&I Technician	100%	40%	67%	17%	33%

Witness: Daniel T. Froetscher

IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS
REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES
DESIGNED TO DEVELOP A JUST AND REASONABLE RATE OF RETURN
DOCKET NO. E-01345A-11-0224
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IBEW 1.7: Please state the share of employees, both as a percentage and in absolute terms, in each of the job classifications referenced in the preceding data request who are presently retirement eligible.

Supplemental Response to IBEW 1.7: Please disregard the previous submittal since there was erroneous data.

Retirement Eligibility Summary

Job		Current (9/30/11)	Current (9/30/11)
Auxiliary Operators	Oper Auxiliaries	0	0%
Auxiliary Operators	Ops Tech Trainee T-1	0	0%
Auxiliary Operators	OTTRNEET1 CONTROL OP/MECH MNTC	2	28%
Auxiliary Operators	PS3T2 AO / MECH MNTC	23	21%
Auxiliary Operators	PS3T2 MECH MNTC / AO	0	0%
Control Operator	Control Operator	0	0%
Control Operator	Oper Control	0	0%
Control Operator	OPS TECH CONTROL OP/ INT INSTR	7	29%
Control Operator	OPS TECH CONTROL OP/ MECH MNTC	13	26%
Control Operator	OPS TECH CONTROL OP/PLATE WELD	1	100%
Electrician-Journeyman	Electrician	11	10%
Lineman-Journeyman	Lineman Hotstick	4	27%
Lineman-Journeyman	Lineman Journeyman	22	12%
Technician-E&I	E&I TECH ELECT / ADV INSTR	13	45%
Technician-E&I	E&I TECH INSTR REPR/ADV ELECT	5	29%
Technician-E&I	E&I Technician	8	15%

Witness: Daniel T. Froetscher

IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES DESIGNED TO DEVELOP A JUST AND REASONABLE RATE OF RETURN
DOCKET NO. E-01345A-11-0224
OCTOBER 26, 2011

IBEW 1.8: Please state: (1) the share of employees, both as a percentage and in absolute terms, in each of the job classifications referenced in the preceding data request who will be retirement eligible between the present and December 31,2012; and (2) anticipated hiring and attrition levels for each of the job classifications referenced in the preceding data request between the present and December 31, 2012.

Supplemental Response to IBEW 1.8: APS provides the following information on retirement eligibility between September 30, 2011 and December 31, 2012 and does not have information to respond to anticipated hiring and attrition levels. Please disregard the previous submittal since there was erroneous data.

Retirement Eligibility Summary

Job		9/30/11 - 12/31/12	9/30/11 - 12/31/12
Auxiliary Operators	Oper Auxiliaries	0	0%
Auxiliary Operators	Ops Tech Trainee T-1	0	0%
Auxiliary Operators	OTTRNEET1 CONTROL OP/MECH MNTC	2	25%
Auxiliary Operators	PS3T2 AO / MECH MNTC	29	26%
Auxiliary Operators	PS3T2 MECH MNTC / AO	0	0%
Control Operator	Control Operator	0	0%
Control Operator	Oper Control	0	0%
Control Operator	OPS TECH CONTROL OP/ INT INSTR	9	38%
Control Operator	OPS TECH CONTROL OP/ MECH MNTC	15	30%
Control Operator	OPS TECH CONTROL OP/PLATE WELD	1	100%
Electrician-Journeyman	Electrician	13	12%
Lineman-Journeyman	Lineman Hotstick	4	27%
Lineman-Journeyman	Lineman Journeyman	27	15%
Technician-E&I	E&I TECH ELECT / ADV INSTR	15	52%
Technician-E&I	E&I TECH INSTR REPR/ADV ELECT	6	35%
Technician-E&I	E&I Technician	9	17%

Witness: Daniel T. Froetscher

IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES DESIGNED TO DEVELOP A JUST AND REASONABLE RATE OF RETURN DOCKET NO. E-01345A-11-0224 OCTOBER 26, 2011

IBEW 1.9: Please state: (1) the share of employees, both as a percentage and in absolute terms, in each of the job classifications referenced in the preceding data request who will be retirement eligible between January 1,2013, and. December 31, 2014; and (2) anticipated hiring and attrition levels for each of the job classifications referenced in the preceding data request between January 1,2013, and December 31, 2014.

Supplemental Response to IBEW 1.9: APS provides the following information on retirement eligibility between January 1, 2013 and December 31, 2014 and does not have information to respond to anticipated hiring and attrition levels. Please disregard the previous submittal since there was erroneous data.

Retirement Eligibility Summary

	Job	1/1/13 - 12/31/14	1/1/13 - 12/31/14
Auxiliary Operators	Oper Auxiliaries	1	100%
Auxiliary Operators	Ops Tech Trainee T-1	0	0%
Auxiliary Operators	OTTRNEET1 CONTROL OP/MECH MNTC	3	38%
Auxiliary Operators	PS3T2 AO / MECH MNTC	40	36%
Auxiliary Operators	PS3T2 MECH MNTC / AO	0	0%
Control Operator	Control Operator	0	0%
Control Operator	Oper Control	1	100%
Control Operator	OPS TECH CONTROL OP/ INT INSTR	12	50%
Control Operator	OPS TECH CONTROL OP/ MECH MNTC	21	42%
Control Operator	OPS TECH CONTROL OP/PLATE WELD	1	100%
Electrician-Journeyman	Electrician	26	23%
Lineman-Journeyman	Lineman Hotstick	4	27%
Lineman-Journeyman	Lineman Journeyman	40	22%
Technician-E&I	E&I TECH ELECT / ADV INSTR	17	59%
Technician-E&I	E&I TECH INSTR REPR/ADV ELECT	11	65%
Technician-E&I	E&I Technician	16	30%

Witness: Daniel T. Froetscher

IBEW LOCALS 387, 640 and 769 FIRST SET OF DATA REQUESTS
REGARDING THE APPLICATION TO APPROVE RATE SCHEDULES
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DOCKET NO. E-01345A-11-0224
OCTOBER 26, 2011

IBEW 1.10: Please state: (1) the share of employees, both as a percentage and in absolute terms, in each of the job classifications referenced in the preceding data request who will be retirement eligible between January 1,2015, and December 31,2016; and (2) anticipated hiring and attrition levels for each of the job classifications referenced in the preceding data request between January 1,2015, and December 31,2016.

Supplemental Response to IBEW 1.10: APS provides the following information on retirement eligibility between January 1, 2015 and December 31, 2016 and does not have information to respond to anticipated hiring and attrition levels. Please disregard the previous submittal since there was erroneous data.

Retirement Eligibility Summary

Job		1/1/14 - 12/31/16	1/1/14 - 12/31/16
Auxiliary Operators	Oper Auxiliaries	1	100%
Auxiliary Operators	Ops Tech Trainee T-1	0	0%
Auxiliary Operators	OTTRNEET1 CONTROL OP/MECH MNTC	5	63%
Auxiliary Operators	PS3T2 AO / MECH MNTC	51	46%
Auxiliary Operators	PS3T2 MECH MNTC / AO	0	0%
Control Operator	Control Operator	0	0%
Control Operator	Oper Control	1	100%
Control Operator	OPS TECH CONTROL OP/ INT INSTR	15	63%
Control Operator	OPS TECH CONTROL OP/ MECH MNTC	28	56%
Control Operator	OPS TECH CONTROL OP/PLATE WELD	1	100%
Electrician-Journeyman	Electrician	37	33%
Lineman-Journeyman	Lineman Hotstick	4	27%
Lineman-Journeyman	Lineman Journeyman	53	29%
Technician-E&I	E&I TECH ELECT / ADV INSTR	17	59%
Technician-E&I	E&I TECH INSTR REPR/ADV ELECT	13	76%
Technician-E&I	E&I Technician	25	46%

Witness: Daniel T. Froetscher