



SOCIETY *of*  
UNITED PROFESSIONALS  
IFPTE 160

# **PUBLIC SECTOR CONSULTATION SUBMISSION ENERGY SECTOR**



## INTRODUCTION:

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In preparation for this consultation, the government provided us with a series of questions. The Society of United Professionals (the Society) has prepared a response to each of these questions, and is also submitting a series of questions in return, to which we seek further clarification. At the meeting held on May 10, 2019, The Society presented these questions, which were taken under advisement by legal counsel representing the Government. Hours before the submission deadline, the Government provided a response to some of these questions. It is the Society's view that the Government's response to the questions presented at the May 10 meeting are inadequate in generating a dialogue, due to the content of the answers provided as well as the questions they failed to address.

The Society is of the view that the matters that the government wishes to discuss are matters for collective bargaining under the Labour Relations Act. The Society's participation in these discussions should not be viewed as a waiver of the rights of The Society and/or its members to challenge the legality of any government decisions and/or actions, which may prejudice or infringe upon our statutory or constitutional rights. Any government decisions and/or actions resulting from the consultation process which affect the Society and/or its members will be viewed as circumvention of our statutory rights and a violation of our constitutional rights.

## THE SOCIETY OF UNITED PROFESSIONALS ENERGY SECTOR MEMBERSHIP:

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The Society represents members at four energy sector workplaces participating in this consultation – Ontario Power Generation, the Independent Electricity System Operator, the Electrical Safety Authority, and the Ontario Energy Board. Each of these workplaces are unique among the broader public sector in that they receive no funding from the provincial government, they have no impact on the provincial budget, and their costs are not paid for out of the provincial revenue base.

### **ONTARIO POWER GENERATION (OPG):**

OPG is a Crown Corporation wholly owned by the Government of Ontario. OPG generates revenue through its electricity generation business segments – nuclear generation, hydroelectric, and contracted and other generation.

Through the payments of dividends to its sole shareholder, the province of Ontario, OPG is a revenue generator for the Ontario government.



### **INDEPENDENT ELECTRICITY SYSTEM OPERATOR (IESO):**

The IESO is an independent, not for profit, Crown Corporation. The IESO's operating revenues are fully funded by usage fees charged to electricity market participants, and are set and regulated by the Ontario Energy Board.

### **ELECTRICAL SAFETY AUTHORITY (ESA):**

The ESA is a private, not for profit administrative authority of the Province of Ontario. It administers four electrical safety regulations on behalf of the province and is funded through fees that it charges for regulatory services. ESA is financially sound which can be attributed to the effective working relationship of the employer and the represented bargaining units.

ESA provides revenue in excess of \$650,000 to the government for the privilege of being the Provincial safety regulator in the electrical sector. It should also be understood that ESA has not subjected those it regulates to any fee increases for a number of years, and has funded any compensation growth through increased efficiency.

### **ONTARIO ENERGY BOARD (OEB):**

The OEB is a Crown Agency, a non-share capital corporation, and is self-funding. The ability to self-fund is given in the Ontario Energy Board Act, 1998.

Certain businesses have to be licensed by the OEB under the OEB Act: gas marketers, distributors, transmitters, generators or sellers and providers of ancillary services, unit sub-meterers, electricity retailers, and the market operator (IESO). Licensees must pay an annual fee to maintain their licence.

In addition, applicants before the OEB, whether for licenses, approval of rates, authorization to build transmission over 2 km, authorization to sell distribution or transmission assets (including mergers), gas franchise renewals, IESO fees case, and some policy initiatives are assessed and billed the cost of those applications including the costs of public interest intervenors. The intervenor applies and the OEB decides whether an intervenor represents an interest, primarily customer but also environmental, that would otherwise not be able to participate.

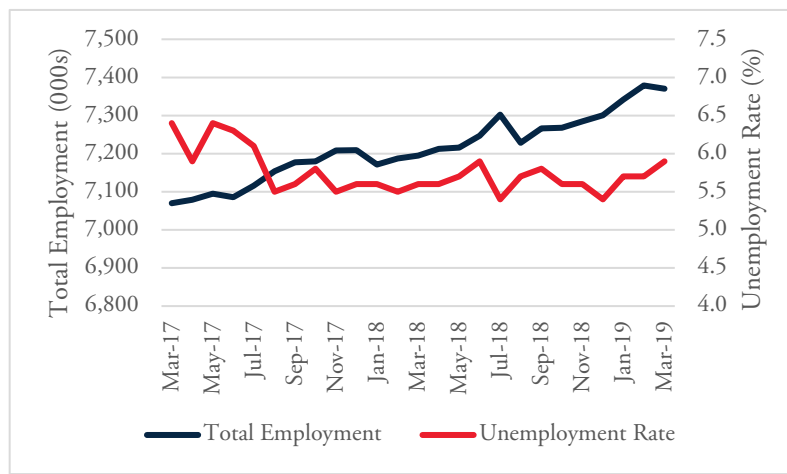
Finally, the OEB has the ability under legislation to assess the remainder of its costs to those identified in regulation, primarily gas and electricity utilities. The costs are typically allocated based on the number of customers each utility has. Assessments are usually sent out quarterly.



## GENERAL ECONOMIC CONDITIONS:

Ontario is currently experiencing the strongest labour market in recent memory. Over the last twelve months, the province has added over 185,000 net-new jobs, and the unemployment rate has remained consistently below the 6 per cent mark since August of 2017. The tightness in the labour market recently led RBC Economic Research to declare that the province is “effectively at full employment”<sup>1</sup>.

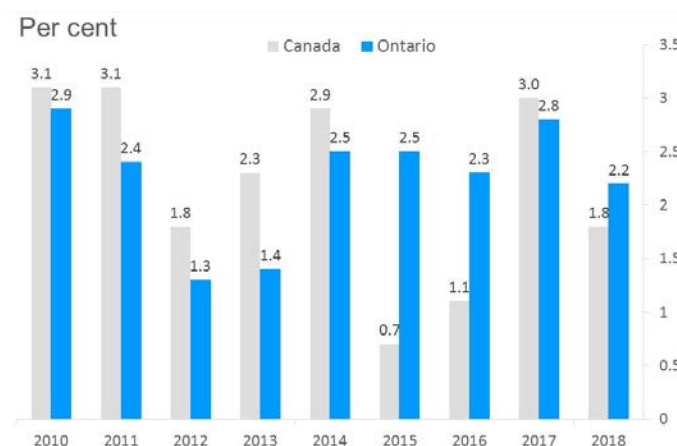
**FIGURE 1: ONTARIO TOTAL EMPLOYMENT AND UNEMPLOYMENT RATE**



Source: Statcan Table 14-10-0287-01

Additionally, the province has averaged 2.5 per cent real GDP growth over the last five years<sup>2</sup>, far surpassing the average national real GDP growth rate during the same time period.

**FIGURE 2: ONTARIO AND CANADA ANNUAL REAL GDP GROWTH**



Source: Ontario Ministry of Finance. Ontario Economic Accounts, Fourth Quarter 2018.

<sup>1</sup> RBC Economic Research. Provincial Outlook. September, 2018.

<sup>2</sup> Source: Ontario Ministry of Finance. Ontario Economic Accounts, Fourth Quarter 2018. <https://www.fin.gov.on.ca/en/economy/ecacctts/>



In fact, the Financial Accountability Office of Ontario recently issued a report stating that “given Ontario’s tight labour markets, public sector employers will likely need to continue offering higher wages to compete for available workers.”<sup>3</sup>

Which brings us to our first question: By all accounts, Ontario’s economy and labour market are the strongest they have been in years. The collective bargaining process is working as intended, providing fair wage settlements that reflect the strength of the provincial economy, as well as the employer’s ability to pay. Given the current economic climate, and the fact that the collective bargaining process continues to work, what is the purpose of these consultations?

## THE SOCIETY QUESTION 1:

*By all accounts, Ontario’s economy and labour market are the strongest they have been in years. What is the purpose of these consultations?*

The Government provided us with a series of questions in preparation for the consultation process. The Society has prepared a response to each of the questions presented by the Government, and has also posed a series of questions of our own, to which we seek a response from the Government.

## GOVERNMENT QUESTION 1:

*Elements of collective agreements could help or hinder our overall ability to achieve sustainable levels of compensation growth; and collective agreement provisions that work well in one sector may have unintended consequences in another. Are there any aspects of the collective agreement(s) in your organization(s) that affect the ability to manage overall compensation costs?*

## THE SOCIETY RESPONSE:

*On the Issue of Sustainability:*

It is unclear what the government means when it refers to “sustainable levels of compensation growth”, and the Society is seeking further clarification on this statement.

From the Society’s perspective, compensation growth has certainly been sustainable. If we consider the last five years of negotiated wage settlements among the four Society represented locals participating in this consultation, we see weighted average increases ranging between 1.0 to 1.8 per cent over this time period.

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<sup>3</sup> Financial Accountability Office of Ontario. Assessing Ontario Government Employment and Wage Expense. July, 2018. <https://www.fao-on.org/en/Blog/Publications/Gov-Employment-and-Wage-Expense>



TABLE 1: THE SOCIETY NEGOTIATED WAGE INCREASES, 2014 - 2018

YEAR	OPG	IESO	ESA	OEB	THE SOCIETY WEIGHTED AVERAGE
<b>2014</b>	1.75%	2.00%	2.75%	3.00%	1.83%
<b>2015</b>	1.75%	1.75%	1.75%	1.75%	1.75%
<b>2016</b>	1.00%	1.75%	1.75%	1.75%	1.13%
<b>2017</b>	1.00%	1.00%	1.50%	2.00%	1.04%
<b>2018</b>	1.00%	1.00%	2.25%	2.50%	1.06%

Source: The Society Calculations based on Collective Agreements

Furthermore, when compared to increases to the Ontario Consumer Price Index (CPI) and the unionized wage settlements in the private sector during the same time period, we see that save for one year (2015), The Society's negotiated wage settlements have consistently trailed those of the private sector, and CPI inflation.

FIGURE 3: THE SOCIETY WAGE INCREASES VS. PRIVATE SECTOR VS. CPI



Source: Ontario Ministry of Labour Collective Bargaining Review, Statcan Table 18-10-0005-01, The Society Calculations based on Collective Agreements

The only real threat to the sustainability posed by recent compensation growth would be if wage growth continues to lag behind the private sector and CPI inflation. Any definition of sustainable compensation growth needs to reflect the need for employers in the broader public sector to recruit and retain qualified workers. The



aforementioned Financial Accountability Office of Ontario report identified the difficulty the broader public sector faces in recruitment and retention given Ontario’s tight labour market.

However, even more pressure to recruit and retain will be placed on employers in the electricity sector. Workers in this sector – like those The Society represents – are in high demand across the country. The most recent labour market report by Electricity Human Resources Canada (EHRC) identified the increased competition for these skilled workers, stating:

*“Most electricity occupations share skill sets that are highly transferable, both within the industry and to other industries. As a result, electricity employers are competing directly with other employers, especially for engineers, construction workers, and information and communications technology (ICT) staff. Their ability to hire will therefore be affected by market conditions in other industries that rely on these types of workers.”<sup>4</sup>*

Furthermore, the EHRC report identifies an increased need to recruit new employees to the sector to meet retirement growth and expansion demand:

*“The sector will need to recruit more than 20,000 new employees. Employment in Canada’s electricity and renewable energy industry is expected to increase at an annual rate of approximately 0.4%, with a cumulative increase of 2% from 2017 to 2022 ... Between 2017 and 2022, the industry will need to recruit 20,578 new employees (20% of the existing workforce): 15,414 to replace retiring employees and 2,875 to meet expansion demand.”<sup>5</sup>*

In short, compensation growth that does not remain competitive with employers in the private sector will make it difficult for broader public sector employers in the electricity sector to recruit and retain qualified workers, especially given increased demand for this specialized labour.

## THE SOCIETY QUESTION 2:

*What does the government mean when it refers to “sustainable levels of compensation growth”? Specifically, with regards to the electricity sector, how does it weigh the need to recruit and retain a highly skilled, in-demand workforce?*

*Impact on Ontarians:*

As outlined earlier, the compensation of the Society’s members participating in this consultation have absolutely no impact on the government’s budget, and are not paid for by the province’s revenue base.

The compensation costs for Society members at Ontario Power Generation, the Independent Electricity System Operator, and the OEB do have direct or indirect impacts on the province’s electricity rates. However, the Electrical Safety Authority is fully funded by fees charged for regulatory services, and the compensation cost of Society members has no impact on electricity ratepayers.

<sup>4</sup> Electricity Human Resources Canada. Workforce in Motion – Labour Market Intelligence Study, April 2019.

<sup>5</sup> *ibid*



But even if the government is concerned with the Society's members negotiated wage increases impacting electricity rates in the province, the reality is that total compensation costs of Society members represent a rather insignificant portion of the total electricity market.

**TABLE 2: TOTAL COMPENSATION BURDEN**

	Total Salary	Total Compensation Burden
<b>OPG</b>	\$398,993,210	\$530,660,969
<b>IESO</b>	\$65,957,748	\$87,723,805
<b>OEB</b>	\$14,963,519	\$19,901,480
<b>Total:</b>	\$479,914,477	\$638,286,255

Source: The Society Calculations

According to the IESO, the total wholesale electricity market in Ontario amounts to approximately \$17 billion in financial transactions per year.<sup>6</sup>

The simple fact is the total compensation burden of Society members working in electricity in the broader public sector amounts to less than 4 per cent of the total electricity market, and the impact of any annual wage increase on electricity rates would be counted in the hundredths of a cent.

Further evidence that the Society's recent negotiated wage increases are sustainable within the sector, and have little impact on electricity rates, can be found in the IESO's 2019 business plan. The plan highlights that they have not deemed it necessary to increase fees since 2011, stating that it has "kept our core revenue requirements at the same levels since 2011, representing about 0.1 cent/KWh for the average residential consumer in Ontario."<sup>7</sup>

Additionally, the current government has pointed out that past government decisions have been extremely expensive. While these decisions may have provided benefits outside the energy sector, the reality is that government policy decisions have had, and will continue to have, a greater impact on electricity rates than the compensation of the Society's members ever will. From \$1 billion for the gas plant cancellation to \$133 million in penalties after government meddling ended Hydro One's Avista deal, the cost of future wage increases will pale in comparison to the impact these government policies have had on electricity rates in Ontario.

*Arbitration Language Provides Sustainability:*

Finally, the Society's interest arbitration language provides arbitrators the ability to make sustainable awards. Several of The Society's collective agreements have clear language outlining the criteria that a mediator-arbitrator

<sup>6</sup> <http://www.ieso.ca/Corporate-IESO/Media/Overview>

<sup>7</sup> IESO Business Plan, 2019-2021. <http://www.ieso.ca/-/media/Files/IESO/Document-Library/corporate/financial/IESO-2019-2021-Business-Plan.pdf?la=en>





shall consider. The following language is taken from the OPG agreement, but identical language can be found in the IESO agreement as well:

*“Future contract negotiations disputes shall be resolved by binding arbitration.*

*The dispute resolution process shall be mediation-arbitration using the same individual as both the mediator and arbitrator. The negotiating process is set out in full in Appendix VII.*

*The mediator-arbitrator shall consider the following issues as relevant to the determination of the award on monetary issues:*

- a) a balanced assessment of internal relativities, general economic conditions, external relativities;*
- b) OPG’s need to retain, motivate and recruit qualified staff;*
- c) the cost of changes and their impact on total compensation;*
- d) the financial soundness of OPG and its ability to pay.*

*A mediator-arbitrator shall have the power to settle or decide such matters as are referred to mediation-arbitration in any way he/she deems fair and reasonable based on the evidence presented by representatives of OPG or The Society in light of the criteria in items (a) to (d) and his/her decision shall be final and binding.”<sup>8</sup>*

The mediation-arbitration language negotiated in our collective agreements state that an arbitrator must consider internal and external relativities, general economic conditions, the impact of changes on total compensation costs, the employer’s need to recruit and retain qualified staff, as well as the employer’s ability to pay.

These are the very criteria required to reach sustainable wage increases that are mutually beneficial to both the employer and The Society’s members.

#### *Negotiating Efficiencies:*

The Society is concerned that the government may be looking for language that provides management the right to unilaterally impose changes to terms and conditions in the pursuit of efficiencies. We do not believe we have language that limits efficiencies over time, in fact it is quite the opposite.

While we have language to protect our members from arbitrary changes by employers, normal collective bargaining processes under the Labour Relations Act provide both parties to the agreement opportunities to bargain language which reflects changes in the market, an occurrence that happens routinely. For example, while we may have language related to the use of non-bargaining unit workers in our jurisdiction, different companies have negotiated different means of ensuring efficient workplaces.

For instance, in our agreement with the IESO, The Society has negotiated contracting out language that requires the employer to provide a business case for any desired contracting out:

#### *65.1 Principles:*

*... The IESO agrees that it will not normally contract out work that is part of its core functions, unless:*

<sup>8</sup> Collective Agreement Between Ontario Power Generation Inc. and The Society of United Professionals, Article 15.



- *the contracting out is required to meet the IESO's peak requirements, or*
- *the contracting out is required to cover emergencies.*

#### *65.4 Business Criteria:*

*The parties agree that, subject to the principles outlined above, the appropriateness of any proposal to contract out will be evaluated on a "business case" basis.<sup>9</sup>*

However, The Society has negotiated significantly different contracting out language with the OPG, which provides the employer with a set envelope of funds to be used for Purchased Services Agreements.

*3. The Parties agree that there shall be three PSA Envelopes for OPG as a Company in the total amount of 165 Million dollars for each year of this Agreement.*

- *A maximum 17 Million dollar envelope can be used for base work in Nuclear.*
- *A maximum 4 Million dollar envelope can be used for base work in Corporate.*
- *The remaining 144 Million dollar envelope is for OM&A projects, non-standard projects, capital projects, provisional projects and non-nuclear base work (excluding Corporate base work).<sup>10</sup>*

In both of these cases, The Society worked with the employer through a free collective bargaining process and negotiated language that responded to each employer's unique needs, while still being satisfactory to The Society. This could only have been achieved through a free and fair collective bargaining process, where all items – including compensation growth – were on the table. Any attempts by the government to interfere with this process can only hinder both parties' abilities to negotiate creative solutions that work in the interest of both the employer and Society members.

## GOVERNMENT QUESTION 2:

*Potential opportunities to manage compensation growth could take different forms, for example, growth-sharing or gains-sharing, as identified in the September 2018 line-by-line review of government spending. Are there any tools to manage compensation costs that you believe the government should consider?*

## THE SOCIETY RESPONSE:

### *Concerns with Identified Tools:*

Growth-sharing and gains-sharing, which was mentioned in the September 2018 line-by-line review, have both been used to limit public sector negotiations in British Columbia. The Society believes neither tool would be acceptable to impose on collective bargaining in Ontario.

Both tools start by mandating a base wage increase, with additional wage increases coming as a result of various productivity metrics, or economic growth metrics. The "economic stability dividend" growth-sharing in BC, for

<sup>9</sup> Collective Agreement Between the Independent Electricity System Operator and The Society of United Professionals, Article 65.

<sup>10</sup> Collective Agreement Between Ontario Power Generation and The Society of United Professionals, Letter of Understanding #193



example, provides for an additional increase of 50 per cent of the difference between actual real GDP growth and forecast real GDP growth – meaning workers benefit from strong growth only if that growth rate was unpredictable.

More importantly, these models mandate low base wage increases. The Society is concerned that any such model would remove the primary tool both parties have to negotiate collective agreements that are mutually beneficial to both parties – namely, monetary bargaining.

It is the Society's view that the government should allow free and fair collective bargaining to occur at the lowest level possible. This leads not only to fair and sustainable outcomes, but allows the parties closest to the work to make appropriate trade-offs to ensure efficient outcomes. Government interference in bargaining with imposed settlements shuts down creative problem solving by both labour and employers, and leads to inefficient outcomes.

The Society has already provided an example of such creative bargaining solutions that work for both parties in the previously mentioned example of contracting out language with the IESO and OPG. The fact is, all of the Society's collective agreements have several examples where the free and fair collective bargaining process, where all items – including compensation – were on the table, led to negotiated language that provided fair, sustainable, and efficient outcomes for both parties.

### THE SOCIETY QUESTION 3:

*What specific tools is the government considering? How will these tools impact the ability of both parties to reach fair, sustainable, and efficient agreements through the bargaining process?*

#### *Role of the Regulator:*

Unlike the rest of the broader public service, the electricity sector already has a body to manage compensation costs. The province's utility regulator, the Ontario Energy Board, provides such a role.

In setting the rates charged by energy utilities in the province, the OEB determines whether compensation packages are reasonable, based on considerations for present and future ratepayers:

*“Ontario energy utilities, such as electricity and natural gas distributors and Ontario Power Generation, recover their labour costs in the rates or charges their customers pay. ... It is not the role of the OEB to design or require a particular compensation package that utilities must offer. It is the role of the OEB to ensure that the costs that go into the rates paid by customers are reasonable. In deciding what is reasonable, the OEB has to consider present and future ratepayers, as well as the financial health of the utilities.”<sup>11</sup>*

In doing so, the OEB ensures that through the rate setting process, the total compensation provided by utilities in the sector – including wages, pensions, and benefits – are sustainable to the utility and for ratepayers.

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<sup>11</sup> Ontario Energy Board. Report of the Ontario Energy Board – Regulatory Treatment of Pension and Other Post-Employment (OPEBs) Costs. September, 2017



## THE SOCIETY QUESTION 4:

*How does the government see the process it is proposing interacting with the role of the regulator (the Ontario Energy Board)?*

## GOVERNMENT QUESTION 3:

*While no decisions have been yet made, the government is considering legislated caps on allowable compensation increases that can be negotiated in collective bargaining or imposed in binding arbitration. We wish to engage with you in good faith consultations on this option and invite your feedback. What are your thoughts on this approach?*

## THE SOCIETY RESPONSE:

### *Process and Charter Concerns:*

At the meeting held on May 10, 2019, the bargaining agents in attendance, including the Society, asked a number of questions which were taken under advisement by legal counsel representing the Government. Hours before the submission deadline, the Government provided a response to some of these questions. It is the Society's view that the Government's response to the questions presented at the May 10 meeting are inadequate and do not further any dialogue, due to the content of the answers provided as well as the questions they failed to address. Further, it should be noted that the law firm representing the Government in what purports to be a good faith consultation is the same law firm that represented two of the four employers involved in the consultation (Ontario Power Generation and the Electrical Safety Authority) in the interest arbitrations that determined the collective agreements currently in effect with each of those employers. The Society has serious concerns about fairness given that the law firm advising the Government and representing its interests through this process also acts for the employers.

The Society was clear prior to the consultation process that it was not waiving its Charter and statutory rights, and reiterated this at the meeting earlier this month. The Society is concerned that what the Government is contemplating will amount to substantial interference with The Society's ability to exert meaningful influence over the working conditions of the employees it represents in collective bargaining. The consultation process to which The Society was invited was presumably a step in that process. It is apparent that what was described as a "dialogue" by legal counsel to the Government was nothing of the sort. The Society answered each of the four questions posed by the Government. Following each answer there was no meaningful discussion with the Government, and there was no response by the Government to any of the issues or questions raised by the Society. In particular, no explanations, questions, clarifications or reactions of any kind were put forward by the Government, with the exception of an email sent on May 23, 2019 which did not adequately address most of the questions put forward by the Society. In sum, what took place was not good faith consultation.

### *Impact on Competitiveness:*

Any imposed wage cap would limit the employer's ability to remain competitive in the labour market, and would impact their ability to recruit and retain qualified employees.



The Society has already cited the recent Financial Accountability Office of Ontario's report, which states the need for wage increases in the broader public sector to remain competitive in the current labour market. We have also highlighted the Electricity Human Resources Canada report, which highlighted that this need is even more pronounced within the highly competitive electricity labour market.

Any attempt by the government to impose a mandated wage increase on the Society's members would hinder our employer's ability to remain competitive within such a highly qualified workforce, and would seriously limit their ability to recruit and retain qualified employees.

Electricity is the life blood of the province and its economy. The women and men of the sector are responsible for operating one of the most sophisticated electricity sectors in the world and require high levels of education, training and skills.

Further, as we stated previously, the Society believes that imposing outcomes at the government level destroys the ability for parties to find efficient and innovative outcomes specific to their corporate needs.

Finally, and most importantly, the Society does not believe that consultation of this nature replaces our members Charter rights to collective bargaining. We strongly assert our rights to bargain directly with our employers without a pre-determined outcome imposed upon both parties.

#### **THE SOCIETY QUESTION 5:**

*Given the highly competitive electricity labour market, how does imposing wage caps allow employers within the sector to compete with the private sector? What impact will this have on recruitment and retention? How is this sustainable?*

#### **GOVERNMENT QUESTION 4:**

*Many different approaches to managing compensation growth and overseeing collective bargaining are in place in other jurisdictions, including other Canadian provinces. Are there any tools applied in other jurisdictions which you think would work in Ontario? If so, what is the proposal and how would it work?*

The Society does not believe there are tools from other jurisdictions that would work in Ontario.

As we have stated, we believe that the best outcomes are completed through free and fair bargaining at the lowest level. While the current system under the Labour Relations Act is not perfect, it does represent a balance between competing interests and overall has served the people of Ontario well. The Society has participated in consultations on improvements to the LRA in the past, and we would be happy to do so again.

As we have stated throughout this consultation, there is little need for the government to interfere with the bargaining process, specifically within the energy sector.

The province is currently experiencing one of the strongest economies and labour markets in recent memory.

The electricity labour market is seeing particularly high demand, and will continue to in the coming years. The Society and its employers need to be able to negotiate wage settlements that allow for the recruitment and retention of qualified workers in this high-demand sector.



The process that is in place has allowed the Society and its employers to negotiate fair, sustainable, and efficient collective agreements that work for both parties. These agreements have provided for creative language that is mutually acceptable to both parties. These agreements have only been reached because of the ability to negotiate all aspects of the collective agreement, including wage settlements.

The Ontario Energy Board, through its role as the regulator in the electricity sector, already serves as a tool to manage compensation costs by ensuring all costs are reasonable to present and future ratepayers.

Finally, the ability to freely and fairly negotiate our collective agreements with our employers is a critical charter right of the Society's membership.

## THE SOCIETY QUESTION 6:

*Why does the government feel it is necessary to interfere with the free collective bargaining process?*



## SUMMARY OF THE SOCIETY'S QUESTIONS:

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### THE SOCIETY QUESTION 1:

*By all accounts, Ontario's economy and labour market are the strongest they have been in years. What is the purpose of these consultations?*

### THE SOCIETY QUESTION 2:

*What does the government mean when it refers to "sustainable levels of compensation growth"? Specifically, with regards to the electricity sector, how does it weigh the need to recruit and retain a highly skilled, in-demand workforce?*

### THE SOCIETY QUESTION 3:

*What specific tools is the government considering? How will these tools impact the ability of both parties to reach fair, sustainable, and efficient agreements through the bargaining process?*

### THE SOCIETY QUESTION 4:

*How does the government see the process it is proposing interacting with the role of the regulator (the Ontario Energy Board)?*

### THE SOCIETY QUESTION 5:

*Given the highly competitive electricity labour market, how does imposing wage caps allow employers within the sector to compete with the private sector? What impact will this have on recruitment and retention? How is this sustainable?*

### THE SOCIETY QUESTION 6:

*Why does the government feel it is necessary to interfere with the free collective bargaining process?*