

**Attachment B: Issues list**

	Issues	Considerations in Coalition research	Expert / Legal team	Lead / Collaboration / Monitoring
1.	Interim Rate Request		Legal Team, with assistance from Bill Harper and Morrison Park Advisors (Pelino Colaiacovo)	The Consumers Coalition expects to co-lead on this issue in collaboration with MIPUG. Draft arguments have been shared to minimize duplication.
2.	Rate increases and rate impacts	<p>What are the impacts of rate increases of this magnitude for customer usage and provincial economic health?</p> <p>Impact of rate increases on consumers, firms and the Manitoba economy</p> <p>Are the revenue requirement estimates defensible in light of these impacts?</p> <p>Problematic precedential value of rate increases</p>	Wayne Simpson and Janice Compton (University of Manitoba)	<p>The Consumers Coalition expects to lead on this issue as it relates to residential consumers, in close collaboration with organizations such as the Assembly of Manitoba Chiefs, Manitoba Keewatinowi Okimakanak and Keystone Agricultural Producers who will take the lead on cross-examination and evidence specific to their communities.</p> <p>The Consumers Coalition evidence will feed options and data into the ultimate Manitoba Keewatinowi Okimakanak analysis, which may be undertaken by another expert separately retained by Manitoba Keewatinowi Okimakanak.</p> <p>Given the many trade-offs involved, there is the potential for conflicts with all other interveners.</p>
3.	Financial Targets / Capital Structure	<p>Financial targets and overall health of the corporation</p> <p>Access to capital</p> <p>Parameters for inter-generational impacts of financial and rate-making decisions</p> <p>Risk and an evidence based approach to risk</p>	Morrison Park Advisors (Pelino Colaiacovo)	<p>The Consumers Coalition intends to jointly retain Morrison Park Advisors with the Manitoba Industrial Power Users Group for expert evidence on these issues.</p> <p>It has been agreed between the Consumers Coalition and the Manitoba Industrial Power Users Group that the Consumers Coalition will take the lead on guiding the work of Morrison Park Advisors.</p>

DRAFT ISSUES LIST OF THE CONSUMERS COALITION  
 MANITOBA HYDRO 2017/18 & 2018/19 GENERAL RATE APPLICATION

	Issues	Considerations in Coalition research	Expert / Legal team	Lead / Collaboration / Monitoring
4.	Debt and debt management	Shorter term maturity for new debts  Financing cost projections	Morrison Park Advisors (Pelino Colaiacovo)	The Consumers Coalition intends to jointly retain Morrison Park Advisors with the Manitoba Industrial Power Users Group for expert evidence on these issues.  It has been agreed between the Consumers Coalition and the Manitoba Industrial Power Users Group that the Consumers Coalition will take the lead on guiding the work of Morrison Park Advisors.
5.	Economic Outlook – Forecast Assumptions		Bill Harper (Econalysis Consulting Services)	Consumers Coalition expects to co-lead on this issue in collaboration with MIPUG with an efficient division of tasks.
6.	Export revenues	Export price forecasting and changes in expert price forecasting methodology	Dr. Doug Gotham (Purdue University)	The Consumers Coalition expects to lead on this issue.
7.	Load forecast	Load forecasting including the reliability of DSM estimates	Dr. Doug Gotham (Purdue University)	The Consumers Coalition expects to lead on this issue in collaboration with MIPUG with an efficient division of tasks (i.e. large industrials evidence led by MIPUG).
8.	Major new capital	Is planning and management reasonable and justified?  Reliability and justification for contingencies and finance costs estimates  Overall capital management and planning within the context of integrated resource planning	METSCO	The Consumers Coalition expects the independent expert of the Public Utilities Board to lead on this issue but intends to participate extensively in collaboration with MIPUG, with an efficient division of tasks.

DRAFT ISSUES LIST OF THE CONSUMERS COALITION  
 MANITOBA HYDRO 2017/18 & 2018/19 GENERAL RATE APPLICATION

	Issues	Considerations in Coalition research	Expert / Legal team	Lead / Collaboration / Monitoring
9	Major and Base/Sustaining Capital	<p>Capital expenditure and forecasting assumptions</p> <p>Capital asset planning and implementation inefficiencies</p> <p>Asset health/condition data</p> <p>Reliability planning and tracking</p> <p>Capital data governance and management tools framework</p> <p>Targeted versus actual capital work forecasts</p> <p>Consideration of need, prudence, or alternatives to planned projects in the context of Integrated Resource Planning</p>	METSCO	The Consumers Coalition expects to lead on this issue, in close collaboration with MIPUG.
10.	Operation, Maintenance and Administration costs	<p>Reasonableness and justification</p> <p>Appropriate planning and targets</p> <p>Implications of 15 percent staffing reduction on quality of service</p> <p>Parameters for consideration of efficient staffing levels</p>	Bill Harper (Econalysis Consulting Services)	The Consumers Coalition expects to co-lead on this issue with MIPUG, with an efficient division of tasks.
11.	Regulatory deferral Accounts	Deferred overheads	Bill Harper (Econalysis Consulting Services)	The Consumers Coalition expects MIPUG to lead on this issue and will fill in as necessary.

DRAFT ISSUES LIST OF THE CONSUMERS COALITION  
 MANITOBA HYDRO 2017/18 & 2018/19 GENERAL RATE APPLICATION

	Issues	Considerations in Coalition research	Expert / Legal team	Lead / Collaboration / Monitoring
12.	Bill affordability	<p>Looking beyond the results of the Bill Affordability Collaborative Process</p> <p>Options to alleviate energy poverty</p>	Dr. Wayne Simpson (University of Manitoba)	<p>The Consumers Coalition expects to lead on this issue as it relates to residential consumers, in close collaboration with organizations such as the Assembly of Manitoba Chiefs, Manitoba Keewatinowi Okimakanak and Keystone Agricultural Producers who will take the lead on cross-examination and evidence specific to their communities.</p> <p>The Consumers Coalition evidence will feed options and data into the ultimate Manitoba Keewatinowi Okimakanak analysis, which may be undertaken by another expert separately retained by Manitoba Keewatinowi Okimakanak.</p> <p>Given the many trade-offs involved, there is the potential for conflicts with all other interveners.</p> <p>The Consumers Coalition expects to be adverse in interest on this issue to the Green Action Centre. It appears that the Green Action Centre is committed to a bill assistance program paid by ratepayers, where the Consumers Coalition believes that there are still live issues associated with such a program, including significantly lower than 50% penetration rates, which would suggest that bill assistance may increase the energy burden for more than half of consumers. There are also public policy considerations, which suggest that this issue may be more appropriately addressed through taxpayers.</p>

DRAFT ISSUES LIST OF THE CONSUMERS COALITION  
 MANITOBA HYDRO 2017/18 & 2018/19 GENERAL RATE APPLICATION

	Issues	Considerations in Coalition research	Expert / Legal team	Lead / Collaboration / Monitoring
		Focus groups with consumers	TBD	The Consumers Coalition expects to lead on this issue.
13.	Rate design	Implementation of Cost of Service decision	Bill Harper (Econalysis Consulting Services) and Dr. Wayne Simpson	<p>The Consumers Coalition expects to lead on this issue as it may affect its interests.</p> <p>The Consumers Coalition expects to be adverse in interest on this issue to the Green Action Centre. While the Coalition will be focused on cost-recovery, fairness and efficiency principles consistent with the long-run marginal costs. The Coalition also believes there is potential to be adverse in interest to other ratepayers with regard to Cost of Service Study implementation.</p> <p>The Consumers Coalition expects there may be a possibility of collaborating with the Assembly of Manitoba Chiefs and Manitoba Keewatinowi Okimakanak on this issue.</p>
14.	DSM			The Consumers Coalition expects to monitor this issue and for the Assembly of Manitoba Chiefs and Manitoba Keewatinowi Okimakanak to lead.
15.	Depreciation	Recovery of difference between ASL and ELG	Bill Harper (Econalysis Consulting Services)	The Coalition expects MIPUG to lead on this issue and will fill in as necessary.
16.	Diesel zone			The Consumers Coalition expects to monitor this issue

DRAFT ISSUES LIST OF THE CONSUMERS COALITION  
 MANITOBA HYDRO 2017/18 & 2018/19 GENERAL RATE APPLICATION

	Issues	Considerations in Coalition research	Expert / Legal team	Lead / Collaboration / Monitoring
17.	Risk and uncertainty analysis		Morrison Park Advisors and Dr. Wayne Simpson (University of Manitoba)	The Consumers Coalition expects to co-lead on this issue in close collaboration with MIPUG and an efficient division of tasks.
18.	Review of special rates and rate programs			The Consumers Coalition expects to monitor this issue