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July 18, 2017

The Public Utilities Board of Manitoba
Attention: Mr. Kurt Simonsen
Associate Secretary
400-330 Portage Avenue
Winnipeg, MB R3C 0C4

Dear Mr. Simonsen:

I am writing to request permission from the Public Utilities Board to make some accounting language edits to the 18 July 2017 Power Point of the Consumers Coalition as well as the 14 July 2017 written submissions of the Coalition.

The proposed language relates to the Consumers Coalition description of one aspect of the accounting treatment related to the Updated IFF16. Our clients are concerned that the language may be confusing to the Board and to other Interveners.¹

No numbers, conclusions or recommendations are changed.

Background

On Tuesday, 11 July 2017, Manitoba Hydro filed an update to its 2016 Integrated Financial Forecast. The Consumers Coalition reviewed the documents referenced in Manitoba Hydro's 11 July 2017 letter² including new Appendices 3.6 and 3.7 as well as updated Appendix 7.4 and updated responses to 11 Minimum Filing Requirements.

The covering email of Manitoba Hydro of 11 July 2017, also referenced the Tab 3 Supplement to the Hydro Application. That document was not reviewed by the Consumers Coalition until its analysts received a paper copy today. Section 2.7 of the Supplement, lines 10 – 14 describes a treatment of the ELG regulatory deferral balance that is different from IFF16 for the 2017/18 and 2018/19 years.

The language of the Consumers Coalition in its written submission suggests that the treatment of the ELG regulatory deferral balance in IFF16 and Updated IFF16 is the same. The Consumers Coalition wishes to avoid any potential confusion by correcting its description of the accounting treatment.

As indicated previously, no numbers, conclusions or recommendations have changed.

¹ For ease of reference, the changes we propose to the 18 July 2017 Power Point presentation are at pages 10, 35, 48, 51. The changes we propose to the written submissions are at pages 5, 21, 22, 24, 25, 28.

² From Ms Fernandes to D. Christle.

Proposed Process

The Consumers Coalition shared a copy of this letter and its proposed "track changes" version of its 14 July 2017 written submission and its 18 July 2017 oral submission with registered Interveners the evening of 18 July 2017.

It will file a "track changes" version of its July 14, 2017 written submission and its 18 July 2017 oral submission for the Board's review on 19 July 2017.

Should the PUB determine it is appropriate, the Consumers Coalition would then propose that the versions of its written submission and power point be replaced with the corrected language.

The Consumers Coalition does not propose to bill for the modest amount of time incurred in correcting the language.

Conclusion

Thank you for your consideration of this proposal.

Yours truly,



Byron Williams
Director
Public Interest Law Centre

BW/KD/km

Enclosures

cc Consumers Coalition
Manitoba Hydro
Interveners in the Manitoba Hydro General Rate Application