

GCH

GANGE COLLINS HOLLOWAY

Barristers
& Solicitors

William S. Gange
Jacqueline G. Collins
R. Ivan Holloway*
David M. Cordingley
Kalyn B. Bomback
Thomas K. Reimer

Writer's Name: William S. Gange
Writer's Direct: 204-953-5401
Writer's Email: wsg@gchlaw.ca
Assistant's Name: Lynne Cooke
Assistant's Direct: 204-953-5411
Assistant's Email: lec@gclaw.ca

*Services through R.I. Holloway Law Corporation
*Also of the Alberta Bar

June 8, 2017

VIA E-MAIL

Manitoba Public Utilities Board
400 - 330 Portage Avenue
Winnipeg, MB R3C 0C4

Attention: Kurt Simonsen
Associate Secretary

Dear Sirs/Mesdames:

Re: Green Action Centre's Position on Issues List
Our File No. 17161 WSG

I am assuming that the designation "Yes" on the issues list reflects an interest by the intervener in the topic listed. I am attaching the GAC response to the Issues List with our comments in red showing those issues that GAC intends to explore at the hearing. GAC accepts that all 18 topics are properly within scope if any party, including the PUB, has concerns to explore that have some relation to the setting of just and reasonable rates in the context of the health and prospects of Manitoba Hydro and its customer, social and environmental impacts over time. GAC will at least monitor evidence and recommendations in all categories and reserves the right to cross-examine and comment on these in our final submission.

GAC's approach to the provision of evidence is to provide added value by focusing on public interest issues related to sustainability and justice where we think the evidence from other parties might be lacking or insufficient. Thus, although we are keenly interested in the health of Manitoba Hydro, financial and otherwise, we do not now plan to provide evidence on the determinants of the revenue requirement, except incidentally to our other concerns. These remarks apply to topics 3-11, 15, and 17. We believe that the review should be primarily forward-looking, given the current circumstances of the corporation, using the past for lessons learned and relevant historic commitments and directives.

GAC has a particular interest in the following topics for comment and potentially for the provision of evidence.

1. 2017 interim rate request (linked to provision of mitigating measures for most vulnerable)
2. Rate increases and rate impacts (immediate and over time), especially on lower-income residential customers.
3. Financial targets and capital structure. The issue of pacing to achieve financial targets is linked to “rate shock and pacing” under 2 and is part of the impact + mitigation package.
6. GAC wishes to review MH export prospects and strategies in addition to price forecasts
7. GAC wishes to review domestic utilization prospects and strategies affecting load (e.g. electrification of transportation) in addition to the listed sub-topics.
12. Bill Affordability. This a central issue for rate impacts. We intend to provide evidence and hope to participate in a side-process of collaboration to identify, analyse and evaluate a range of strategies (including rate design) to facilitate affordability, which can be introduced to the regulatory process.
13. GAC has long-standing concerns (shared by the PUB) that rate designs be optimized for both efficiency and affordability. We intend to provide evidence on these matters and are proponents of a side-process to develop a range of options for adjudication by the PUB (see above). Regarding the COSS review, Bill Harper identified residual issues pending which he recommended for consideration in the GRA. We agree with his recommendation.
14. DSM. GAC is interested in most sub-topics under DSM. We recognize DSM as an alternative to generation and a mitigation measure for customers. Also relevant are DSM policies and planning in relation to implementation of Bill 19, The Efficiency Manitoba Act, which provides for the divestment of DSM to a new crown corporation.

Yours very truly,

GANGE COLLINS HOLLOWAY

Per:



WILLIAM S. GANGE

WSG

Attachment