

August 22, 2017

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VIA EMAIL

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

Attention: Darren Christle

Dear Sir:

**Re: 2017/2018 and 2018/2019 General Rate Application Intervention of
General Service Small and General Service Medium Customer
Classes ("GSS/GSM") and Keystone Agricultural Producers ("KAP")
Our File: 17118**

Dave Hill
Bob Sokalski
Sherri Walsh
Derek M. Olson
Christian Monnin
Kevin D. Toyne
Michael J. Weinstein
Jennifer L. Gaba
Brett A. Steidl
Amy J. MacAngus

Counsel:

Hon. Peter S.
Morse, Q.C. (Retired)

Hon. Richard J.
Scott, O.C. O.M. Q.C.

Our firm acts for the GSS/GSM intervenor in this matter.

Prior to the Pre-Hearing Conference held on June 30, 2017, the Board received written applications for intervenor status from GSS/GSM and KAP. At that time, the Board sought to identify and approve appropriate Intervenor status to assist it in the hearing of the application. In addition, the Board also sought to identify issues that would be included in the scope of the public hearing. Pursuant to Board Order No. 70/17, both GSS/GSM and KAP were granted intervenor status. I am writing to advise that after careful consideration, GSS/GSM and KAP have decided to combine their interventions.

While the proposed intervention of GSS/GSM is indeed broader in scope than that proposed by KAP, it is suggested that there exists a sufficient community of interest between these two intervenors that would enable participation in the hearing in a responsible and cooperative manner. In addition, it is further suggested that combining these two interventions will provide for the ability to maintain all of the issues identified for these respective interventions, avoid duplication and, at the same time, achieve a significant reduction in the costs associated with two interventions.

Regarding the issues in scope, there are three (3) of the five (5) issues identified in KAP's intervention which are also identified in the GSS/GSM. Those three (3) issues are as follows:

- Rate Increases and Rate Impacts:

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- i. Impact of increase on consumers, including intergenerational impacts;
- ii. Macro Economic (Provincial Economy impacts); and,
- iii. Impact on production / industry / businesses, and any resulting impact on other classes of consumers.

The two (2) issues identified in KAPs proposed intervention that are not currently identified in GSS/GSM's intervention are the following:

- Under the heading of Economic Outlook/Forecast Assumptions: Provincial Carbon Pricing; and,
- Under the heading of OM&A: Service Levels and Quality


It is submitted that there is sufficient alignment with the KAP issues and those identified in the GSS/GSM intervention that the blending of these interventions will not affect or compromise the anticipated positions and/or the evidence that will be submitted. It is proposed that the firm of Hill Sokalski Walsh Olson LLP will act as legal counsel for this combined intervention.

Should the Board be supportive and approve this proposal, I will need to submit a revised proposed budget for its consideration. Provided that the Board is indeed supportive, I expect to be in a position to provide this revised budget by Thursday of this week.

Do not hesitate to contact me should you have any questions.

Yours truly,

HILL SOKALSKI WALSH OLSON LLP

For Per: 

Christian Monnin*

CM/jm

c.c. Board Counsel (via email)

James Battershill, General Manager, KAP (via email)

** services provided by Christian Monnin Law Corporation*