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VIA EMAIL & ORIGINAL TO FOLLOW

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

Attention: Ms. Rachel McMillin, Assistant Associate Secretary

Dear Ms. McMillin:

Re: Centra Gas Manitoba Inc. (Centra)
2019/20 General Rate Application
Matter No. 0163483 AFH

The Industrial Gas Users (IGU) is in receipt of the Public Utilities Board's (PUB) letter dated May 10, 2019 but circulated on May 14, 2019 granting an extension for Centra to file its outstanding Information Request (IR) responses, totaling 97 of 984 total requests by May 17, 2019.

Implications of Delayed Responses to Round 2 questions

IGU is waiting on 5 of its 28 IRs to be answered by Centra ((IGU/CGM I-9,IGU/CGM I-17, IGU/CGM I-21, IGU/CGM I-27, IGU/CGM I-28). There are also a number of responses to other parties that still require responses. If the responses are received by Friday, May 17, 2019 and with May 20, 2019 being a statutory holiday, the current schedule does not leave time to consult with IGU clients prior to submitting round 2 questions. IGU does not believe it would be efficient or cost-effective to submit a partial set of round 2 IRs on the current schedule with further questions to follow. IGU therefore believes an extension of at least one week (to May 28th) to file its second round questions is necessary.

Issues Related to Access to CSI

The IGU is still awaiting a response from the PUB regarding its April 11, 2019 motion for disclosure of Centra's CSI. Centra has repeatedly declined to provide access to the CSI material to IGU legal counsel and consulting team. IGU noted in its motion for disclosure that this inhibits its ability to meaningfully participate in the hearing on the scope of issues approved in PUB Order 24/19. This issue is exacerbated by the further redaction of responses to IGU round 1 information requests.

One example of this issue impairing IGU's involvement is IGU/Centra I-14(a). IGU requested that Centra quantify and explain the rationale for the changes in forecast demand levels for each customer class. All of the 2019/20 information, as well as the paragraph below the table in the response was redacted, making the response unusable to IGU. Material portions of the responses to



IGU/Centra I-12; IGU/Centra I-13; and IGU/Centra I-15 are also redacted. An initial count indicates responses to 7 of IGU's 28 questions include redacted information and 1 further response (IGU/CENTRA I-20) where information was not provided at all (not even redacted) because it was deemed confidential, and Centra noted the IGU does not have access to confidential information.

IGU is concerned that until these confidentiality issues are resolved, maintaining the current schedule will result in procedural unfairness to IGU. The CAC experts have had access to cost allocation information that IGU counsel and consultants cannot see. In cost of service issues, often residential interests and demand uses are in contest to those of large users. This places IGU at a considerable procedural disadvantage.

Considering both the delayed responses and redacted responses, 13 of IGU's 28 questions cannot be fully reviewed at this time. The IGU believes there must be a way forward for it to proceed within the CSI-related process of this hearing and is hopeful the PUB will make a ruling on this in due course. Until this occurs, the IGU requests the Centra Gas GRA process be suspended. Following an Order on this motion, the IGU requests adequate time to be delivered CSI materials (if granted) and review before filing Round 2 IRs.

Even in the event the Board does not grant IGU access to the CSI material, at a minimum, the IGU is requesting an extension of at least one week (the length granted for Centra) to May 28, 2019 to file Round 2 IRs contingent upon receiving the complete set of responses from Centra on May 17, 2019.

The IGU legal counsel and consulting staff has spent considerable time both trying to gain access to CSI materials in discussions with Centra and filings thereafter. Review of partial disclosures, and trying to understand if there is enough useable information on the record to understand, test and develop positions on areas of interest to IGU members is causing substantial time inefficiencies and IGU is providing notice to the PUB that it may not be able to meet its original time estimates for process and discovery related tasks as a result.

Yours truly,

THOMPSON DORFMAN SWEATMAN LLP

Per: *Antoine F. Hacault*

Antoine F. Hacault*

AFH

cc:

Bob Peters, Board Counsel

Dayna Steinfeld, Board Counsel

Brent Czarnecki, Centra Gas Counsel

All Intervenors of Record

*Services provided through A. F. Hacault Law Corporation