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November 26, 2019

Dr. D. Christle
Secretary and Executive Director
Public Utilities Board
400-330 Portage Avenue
Winnipeg, Manitoba
R3C 0C4

Dear Dr. Christle:

RE: CENTRA GAS MANITOBA INC. ("Centra") – REVIEW AND VARY APPLICATION OF ORDER 49/95

On October 11, 2019, the Public Utilities Board ("PUB") issued Order 152/19 in which the PUB found "that Centra has not been compliant with prior Board direction as articulated in Order 49/95" with respect to the Customer Equipment Problem Program ("CEPP"). As a result, the PUB directed Centra to either amend its internal procedures to comply with Order 49/95 or apply to vary Order 49/95 by November 30, 2019.

Pursuant to Order 152/19 and sections 44 and 129 of *The Public Utilities Board Act*, Centra requests the PUB to review and vary Order 49/95 as it relates to the CEPP by setting aside the list of components on gas furnaces, hot water heaters and ranges that Centra may replace under the CEPP as set out on page 120 of Order 49/95. Varying Order 49/95 in this way will properly reflect the current reality that certain parts on the parts list identified in Order 49/95 are redundant and/or proprietary on newer mid and high efficiency furnaces making it impractical or in some cases impossible for Centra to stock the plethora of different parts and configurations used by manufacturers.

Available in accessible formats upon request

The scope of the CEPP is set out in Section IV. E c) of Centra's Terms and Conditions:

E) OTHER SERVICES

The Company may provide the following services:

...

c) Provide safety inspections, safety related adjustments and/or repairs to the natural gas burning portion of stoves, ranges, and all primary space and water heating residential and commercial appliances under 400,000 Btu/h (422 MJ/h). This includes, but is not limited to, repair of minor gas leaks, and the adjustment and replacement of controls and control parts. The Small General Class Customer will be responsible for the cost of parts. All other Customers will be responsible for the cost of parts and labour.

Centra is not seeking to alter the scope or nature of the CEPP through this Application. As acknowledged in Order 49/95, the CEPP's focus is on safety and advice to customers. Centra always has and will continue to respond to all customer calls under the CEPP to ensure safety. Where possible, Centra will diagnose the problem, make immediate safety repairs, provide operating advice and advise the customer to contact their preferred heating dealer who carries the manufacturer's proprietary parts necessary to complete the repairs where repairs cannot be completed by Centra. Centra will continue to stock and replace standard parts of natural gas appliances where such parts are common to a large number of brands and models of the appliance. For the PUB's information, a copy of Centra's current Customer Equipment Service procedure is attached hereto.

As acknowledged by the PUB in Order 152/19, over time as a result of advances in technology of natural gas appliances, natural gas burning stoves, ranges, primary space and water heating appliances have grown in complexity and variety. These technological advancements have improved the safe operation and reliability of natural gas appliances. However, the wide variety and complexity of the appliances have rendered numerous parts specified in Order 49/95

obsolete, or unique to each manufacturer and model of appliance. As a result, it is no longer possible for Centra to stock and replace all the parts identified in Order 49/95. Varying Order 49/95 to remove the list of parts will recognize the current reality of the technological advancements and changes in the natural gas appliance industry.

For all of the above reasons, Centra respectfully requests that the PUB grant Centra's request contained herein to review and vary Order 49/95. If you have any questions with respect to this submission, please contact the writer at 204-360-3257 or Liz Carriere at 204-360-3591.

Yours truly,



MANITOBA HYDRO LEGAL SERVICES DIVISION

Per:



BRENT A. CZARNECKI
Barrister & Solicitor

cc: Bob Peters, PUB Counsel

 Natural Gas Procedure	Approved:  K. Korchak Manager-Winnipeg East Engineer's Approval N/A	Effective Date:	2018 01 15	Page 1 of 3	Procedure Number:	4.003.02
		Title:	Customer Equipment Service			
		Administering Department:	Customer Service Operations			
		Departments Affected:	CSO – Customer Service			

Scope

Applicable to Manitoba Hydro natural gas service

Definitions

BTU/h - British Thermal Units/hour

FVIR - Flammable Vapour Ignition Resistant

MJ/h - Mega Joules/hour

Related Documentation

Procedure #4.003.01 - Customer Service Priority Schedule

Procedure #4.003.09 - Schedule of Chargeable Services Provided by Manitoba Hydro Gas Operations

Gas and Oil Burner Act and Regulations

Procedure

1.0 Emergency Response

- 1.1 The Company maintains a 24-hour emergency response system to immediately respond to the following emergencies:
 - 1.1.1 Odours or fumes and carbon monoxide alarms
 - 1.1.2 Natural gas leaks or blowing gas
 - 1.1.3 Over pressure or under pressure of natural gas equipment
 - 1.1.4 Overheating natural gas equipment
 - 1.1.5 Explosions or fires
 - 1.1.6 Other situations as deemed emergencies by Manitoba Hydro customers.

2.0 Equipment Problems

- 2.1 The Company responds to customer equipment problems for all residential or Commercial primary space heating and water heating appliances providing they are under 400,000 BTU/h (422 MJ/h).
- 2.2 The Company responds to customer equipment problems for all residential stoves and ranges.

Procedure Number	4.003.02	Effective Date	2018 01 15
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Risk Assessment Score: 1

Assessment Cycle: Every three years

 Natural Gas Procedure	Approved:	Effective Date:	2018 01 15	Page 2 of 3	Procedure Number:	4.003.02
	<i>KKM</i>	Title:	Customer Equipment Service			
	K. Korchak Manager-Winnipeg East	Administering Department:	Customer Service Operations			
	Engineer's Approval N/A	Departments Affected:	CSO – Customer Service			

2.3 While service to equipment over 400,000 BTU/h (422 MJ/h) is not normally undertaken, the Company responds to commercial and industrial emergencies such as re-light calls where a customer's business may be adversely affected by the prolonged interruption of service.

2.4 The service for equipment under 400,000 BTU/h (422 MJ/h) includes a safety inspection of the problem equipment and related venting. Problems are diagnosed and either:

- Repaired
- an Inspection Notice issued or
- Customers are advised to contact a licensed contractor for repairs requiring part replacement when parts are not on the company replacement list. (Refer to Schedule 1, Page 3 for a listing of parts that the Company will replace under normal circumstances.)

3.0 Service Charge

3.1 Small general service (SGS) customers are charged for parts only.

3.2 Large general service (LGS) customers are charged for parts and labour.


4.0 Equipment Inspections

4.1 The Company inspects the installation of new and replacement natural gas appliances as required under the Gas and Oil Burner Act Regulations.

Procedure Number	4.003.02	Effective Date	2018 01 15
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Schedule 1

Components on Natural Gas Furnaces, Hot Water Heaters and Ranges/Stoves

COMPANY WILL REPLACE

- Ignitors
- Flame sensors
- Thermocouples
- Pilot Generator
- Pilot Burner
- Gas Valves (Standing Pilot only)
- Transformers
- Millivolt Relays
- Heat Only Thermostats (non- digital)

COMPANY WILL NOT REPLACE

- Circulating Pumps and Controls
- Condensate Traps and Components
- Fan Motors, Blowers and Components
- Drain Cocks or Dip Tubes
- Circuit Boards or Modules
- Gas Valves (non-Standing Pilot)
- Heat Exchangers
- Toggle or Door Switches
- Venting
- Relief Valves
- FVIR Components
- Fan Controls or Fan Centre Relays
- Induced Draft Motors and Relays
- Limit, Rollout or Spill Switches
- Burners
- Prepurge Switches
- Heat/A.C. Thermostats

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