
From: Fernandes, Odette <ofernandes@hydro.mb.ca>
Sent: February-26-19 12:21 PM
To: Simonsen, Kurt (PUB); Christle, Darren (PUB)
Cc: Jared Wheeler; Schubert, Kristen (PUB); Boyd, Marla; Carriere, Liz; Gregorashuk, Shannon; 'BobPeters@FillmoreRiley.com'; 'Senwung Luk'; 'Corey Shefman'; Byron Williams; Katrine Dilay; Antoine Hacault; Markus Buchar; 'Amanda Beaumont'
Subject: RE: Manitoba Hydro 2019-20 GRA - Revised Information Requests

Manitoba Hydro is in receipt of the Coalition's revised Information Requests ("IRs") which were provided late on Friday, February 22. Manitoba Hydro's response to the PUB's request for comments on the Coalition motion filed on Thursday Feb. 21 (prior to receiving the revised IRs) included Manitoba Hydro's advice that it would respond to Intervenor IRs using the information filed in its Supplement of February, 2019 and that a revision to IRs would not be necessary as the responses would address and incorporate the updated information.

While the parties await the decision of the PUB, Manitoba Hydro has now had an opportunity to review the revised information requests sent by the Coalition and can advise that should Manitoba Hydro be required to respond to the Coalition's IRs included in its email of February 22, 2019, it will not be in a position to meet a deadline of March 7, 2019 as the comments in Manitoba Hydro's letter did not contemplate receiving IRs which include new requests not solely driven by the Supplement. The approximately 20 revised IRs include additional questions which could have been requested when the Coalition filed its IRs on February 8, and in some cases change the question being posed. The additional time required to respond to these additional and amended IRs will not allow Manitoba Hydro to complete the responses to IRs as contemplated in its letter of February 22.

Manitoba Hydro submits that Manitoba Hydro should be permitted to provide responses to IRs as posed, incorporating the information included in Manitoba Hydro's Supplement, rather than permitting Coalition to amend and add to the IRs posed in accordance with the PUB's timetable.

We would appreciate receiving the PUB's direction on this matter at its earliest convenience in order that staff can continue to work with an understanding of which IRs they are expected to respond to.

Thank you.

Odette Fernandes
Legal Counsel
Manitoba Hydro Law Division
Telephone: (204) 360-3633
Facsimile: (204) 360-6147
Email: ofernandes@hydro.mb.ca

This email message (including attachments) is a privileged and confidential solicitor-client communication and all rights and privileges are expressly claimed and not waived. Any use, dissemination, distribution, copying or disclosure of this message and any attachments, in whole or in part, to any person other than the intended recipient(s) is strictly prohibited without the express written consent of the sender. If you are not the addressee indicated in this message (or Responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email.