

# MANITOBA HYDRO 2019/20 GENERAL RATE APPLICATION

## PUB INFORMATION REQUESTS OF AMC

April 5, 2019

**PUB/AMC - 1** Reference: AMC Evidence p.13

**Preamble:** In his evidence, Mr. Raphals concludes that energy poverty appears to be substantially higher on First Nations reserves than among the general population.

**Request:**

In Mr. Raphals' view, is the First Nations On-Reserve Residential customer class with the 0% rate increase for this class ordered in 59/18 an appropriate course of action to address the problem of on-reserve energy poverty identified in his evidence? If not an appropriate course of action, identify what changes or additional steps are required to address on-reserve energy poverty.

**Response:**

The following response was provided by Mr. Raphals:

In my view, the creation of a First Nations On-Reserve ("FNOR") Residential customer class in Order 59/18, and the assigning of a 0% rate increase thereto, was an appropriate response by the Board to the problem of on-reserve energy poverty identified in my evidence. That said, it is almost certainly not sufficient to resolve the problem. I would urge the Board to consult actively with AMC and other Indigenous organizations to identify additional measures that might be implemented.

As I noted on page 14 (p. 16 pdf) of my evidence in this proceeding, Manitoba Hydro made the assumption in an IR response that, after rate rebalancing, the FNOR rate would become equal to the residential rate.<sup>1</sup> Until the issue of energy poverty on-reserve and its underlying factors are addressed and rectified, any rate increases for the FNOR class will exacerbate the inequity in power burden for on-reserve ratepayers outlined in my evidence. I would recommend that in

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<sup>1</sup> PUB/MH 61a, Figure 2, page 3.

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order to avoid this, the 0% rate increase for FNOR in Order 59/18 be retained until the Board has had the opportunity to reflect more fully on this issue.