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Public Utilities Board
330 Portage Avenue
Winnipeg, Manitoba
R3C 0C4

TRANSMITTED ELECTRONICALLY
Commercially Sensitive Information

Attention: Dr. Darren Christle/Ms. Rachel McMillan

Dear Dr. Christle and Ms. McMillan

Re: Commercially Sensitive Information - PUB/EM I-1, PUB/EM I-10, and PUB/EM I-31

Efficiency Manitoba confirms that its answers to the Information Requests for PUB/EM I-1, PUB/EM I-10 and PUB/EM I-31 contain commercially sensitive information that should be protected as outlined in Rule 13.

PUB/EM I-1 and PUB/EM I-10

In terms of PUB/EM I-1 and PUB/EM I-10, essentially, the program measure specific PACT values combined with the program administrative and incentive costs allow for a direct calculation of a program specific measure marginal value. A person knowledgeable in the subject matter has a very good idea of the shape and seasonal characteristics of the savings from the program measure. For example, solar thermal pool heaters are a summer only product, whereas commercial refrigeration equipment is more uniform throughout the years. Providing program measure specific PACTs therefore allows for determination of the marginal value for identifiable products. By comparing PACT values for a range of program measures, it is possible to directly compare to Manitoba Hydro's export products which can have a similar shape and seasonal characteristics and the disclosure of this information would be a breach of Efficiency Manitoba's obligations.

Export customers may consider a range of supply options including Manitoba Hydro's export products of up to a 30 year duration.

Efficiency Manitoba has advised that subsequent to previous applications, Manitoba Hydro has become aware that its export customers monitor PUB and regulatory filings to obtain information regarding Manitoba Hydro's operations, costs of supply, and supply and demand balance in an attempt to obtain maximum leverage in negotiations with Manitoba Hydro on export sales. Given that this information, if disclosed publicly could cost the utility millions of dollars in future negotiated contracts, Manitoba Hydro has increased its efforts to keep such information confidential. Accordingly, Efficiency Manitoba requests that commercially sensitive information set out in these two Information Request responses should not be disclosed pursuant to Rule 13 and the Board's Order 166/19.

As it pertains to the income qualified furnace replacement initiative and for the same reasons above, there is concern with respect to disclosing information regarding the underlying natural gas forecast information. Efficiency Manitoba is advised that Manitoba Hydro is subject to a non-disclosure agreement with the suppliers of this information.

Efficiency Manitoba, for the reasons set forth above, confirms its request that this information be treated as commercially sensitive information.

PUB/EM I-31

With respect to PUB/EM I-31, Efficiency Manitoba confirms that this information request response contains commercially sensitive information in the form of customer specific information and should not be disclosed pursuant to Rule 13. Efficiency Manitoba submits that both Rule 13(2)(a) and (b) would apply.

Firstly, Efficiency Manitoba submits that the disclosure of the information set out in its response to Information Request PUB/EM I-31 contains, without limitation, financial and commercial information for these identified customers; Efficiency Manitoba is advised that this information has been consistently treated by Manitoba Hydro, and Efficiency Manitoba can confirm on its own behalf that it has treated the subject information consistently as confidential and plans to continue to do so. Building and maintaining trust with customers is important to Efficiency Manitoba in order to effectively continue to offer programs and achieve energy savings with customers to meet its legislated targets.

Given the nature of the customer specific information included in the information request response, and the significant financial and commercial details included in the response, the disclosure of this information could reasonably be expected to result in undue

financial loss to the identified customers and to harm significantly the competitive position of those customers.

Should any further comment or clarification be required concerning any of the above, we would be pleased to provide same.

Yours truly,

TAYLOR McCAFFREY LLP

Per: *Transmitted electronically*

Nicole D.S. Merrick

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Encl.