

Kevin T. Williams

Professional Services Provided Through
Kevin T. Williams Law Corporation
Direct Line: 204.988.0309
Direct Fax: 204.953.7228
Email: kwilliams@tmlawyers.com
Assistant: Jill Kovnats
Direct Line: 204.988.0471

November 4, 2019

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

Dear Mr. Christle:

**RE: Efficiency Manitoba Inc. ("Efficiency Manitoba") 2020/23 Three-Year Plan
Efficiency Manitoba Response - Applications for Intervenor Status
Pre-hearing Conference**

Efficiency Manitoba has reviewed the five applications for Intervenor Status to the Public Utilities Board of Manitoba ("PUB") with respect to Efficiency Manitoba's 2020/23 Three-Year Efficiency Plan (the "Plan") and provides its comments in this submission.

Subject to the PUB's views, Efficiency Manitoba has no objection to the PUB granting Intervenor Status to the following parties:

- Manitoba Branch of the Consumers' Association of Canada and Winnipeg Harvest (collectively, the "Consumers Coalition")
- Manitoba Industrial Power Users Group ("MIPUG")
- Assembly of Manitoba's Chiefs ("AMC")
- Manitoba Keewatinowi Okimakinak Inc. ("MKO")

Efficiency Manitoba recommends that the Council of Canadians Winnipeg Chapter ("CoC") not be approved for Intervenor Status based on Efficiency Manitoba's comments set out later in this submission.

While Efficiency Manitoba does not object to the four participants above being granted intervenor status, it is concerned about the scope of the intended interventions and the number of experts being proposed by these parties. In total, the intervenor applications identified twelve separate expert witnesses that have been proposed to participate in this review process. Efficiency

Manitoba supports the PUB's interest in efficient and effective regulatory processes and wishes to ensure that overlap and redundancy between experts and areas of examination are minimized. To that end, Efficiency Manitoba is of the view that the intended scope and the number of experts needs to be addressed to ensure that the already challenging timelines can be achieved in this review process.

It is important at the outset to address the proposed scope of the public review, which then informs the requirement for expert evidence. When establishing the scope of the review process, one has to recognize and respect the delineation of mandate and responsibilities between Efficiency Manitoba, Manitoba Hydro/Centra Gas and the Government of Manitoba in several of the topic areas identified by interveners in their submissions and applications for intervener status.

Planning inputs and targets developed outside of Efficiency Manitoba:

Certain inputs into Efficiency Manitoba's planning and development process are the responsibility of Manitoba Hydro and Centra Gas. Data, forecasts and analyses such as electricity and natural gas load forecasts, marginal values of both electricity and natural gas, and the resource planning process undertaken by Manitoba Hydro, are in the exclusive domain of Manitoba Hydro and/or Centra Gas and not Efficiency Manitoba. Therefore, Efficiency Manitoba is not in a position to provide evidence on those matters.

Efficiency Manitoba notes that MIPUG wishes to review the calculation and/or preparation of the inputs referenced above. The examination, discovery, analysis and review associated with those inputs is more properly examined in the context of regulatory proceedings for both Manitoba Hydro and Centra Gas, and accordingly, consideration of such inputs is not appropriate for the review process that is currently underway in relation to the Plan.

*The Efficiency Manitoba Act*¹ has established energy savings targets that Efficiency Manitoba is required to achieve. In order to achieve those targets, Efficiency Manitoba has developed a portfolio of electric and natural gas demand side management ("DSM") initiatives, as identified in the Plan. Efficiency Manitoba also notes that MIPUG proposes to examine the level of the energy savings targets that have been set in the Act. From Efficiency Manitoba's perspective, such a review of the overall energy conservation target is out of scope in this proceeding given Efficiency Manitoba does not have the jurisdiction to establish those savings targets.

Decarbonization and electrification:

Both the Consumers Coalition and the Council of Canadians indicated a desire to examine the role of Efficiency Manitoba in terms of provincial greenhouse gas reduction policy. The Efficiency Manitoba Regulation currently limits matters such as the electrification of transportation and fuel switching between fossil fuels (other than natural gas) and electricity from an efficiency plan and Part 3 of the Act would not apply to those activities².

¹ *THE EFFICIENCY MANITOBA ACT* (C.C.S.M. c. E15), Part 3 "Savings Targets and Efficiency Plans", Section 7(1) Initial Savings Targets. Page 9.

² *THE EFFICIENCY MANITOBA REGULATION 119/2019, ADDITIONAL POWERS OF EFFICIENCY MANITOBA, "Fossil fuels other than natural gas", Section 6. Page 3.*

Socio-economic issues, bill affordability and energy burden:

Efficiency Manitoba notes that the AMC intends to provide expert evidence on socio-economic matters and that AMC and MKO both reference bill affordability and energy burden in their proposed intervention. Energy efficiency programs play an important role in reducing consumption and bills for customers that participate in them. However, matters such as bill affordability and energy burden are extremely broad topics that encompass many factors beyond the provision of energy efficiency measures, and in and of themselves, ought to be considered as out of scope for this review process. Furthermore, Efficiency Manitoba notes that in both Section 11(4) of the Act and Section 11 of the Regulation that the PUB is not explicitly directed to consider socio-economic factors in the scope of their review.³

Efficiency Manitoba Comments on Issues Raised by Interveners:

The following is Efficiency Manitoba’s assessment and comments on each proposed intervention, the issues identified and whether these issues are in scope or not.

Consumers Coalition

Issues	Efficiency Manitoba Position
Assessment of whether there was a consideration of resource planning principles and whether adequate exploration and consideration of alternatives was undertaken.	<p>Out of Scope</p> <p>Integrated resource planning is within Manitoba Hydro’s mandate.</p> <p>Efficiency Manitoba has developed its portfolio to satisfy the prescribed savings targets.</p>
Assessment of the reasonableness of the projected savings in Efficiency Manitoba's 3-year plan, including an assessment of the methodology used to determine the net savings.	In Scope
<p>An examination of Efficiency Manitoba's proposed plan to reach the savings target,</p> <p>including:</p> <p>a) the appropriateness of the methodologies used by Efficiency Manitoba to select or reject demand-side management initiatives;</p>	<p>a) In Scope</p> <p>b) In Scope</p> <p>c) In Scope</p> <p>d) Out of Scope - The intent of this item or issues associated with long-term versus short-lived DSM initiatives is not clear.</p> <p>e) In Scope</p>

³ THE EFFICIENCY MANITOBA ACT (C.C.S.M. c. E15), Part 3 “Savings Targets and Efficiency Plans”, Section 11(4) Mandatory Considerations. Page 13 and THE EFFICIENCY MANITOBA REGULATION 119/2019, REVIEW OF EFFICIENCY PLANS, “Additional factors to be considered by PUB”, Section 11. Page 6.

<p>b) whether the plan adequately considers the interests of residential customers;</p> <p>c) the accessibility of initiatives in the plan to residential customers, including low income and other hard-to-reach or vulnerable groups, including but not limited to, Indigenous customers, rural customers, customers with disabilities, newcomers, renters and residents of multi-units residential buildings and older customers;</p> <p>d) an examination of the use of long-term versus short-lived initiatives; and</p> <p>e) whether the efficiency plan adequately considers new and emerging technologies that may be included in a future efficiency plan.</p>	
<p>Analysis of Efficiency Manitoba's proposed evaluation framework.</p>	<p>In Scope</p>
<p>The cost-effectiveness of programs, including an analysis of the inputs and methodology for calculating the cost effectiveness metrics (i.e. Program Administrator Test, Rate Impact and Bills Impacts) used to assess Efficiency Manitoba's proposed</p> <p>plan, including the use of the levelized marginal value to Manitoba Hydro in the determine the levelized benefits from DSM savings.</p>	<p>In Scope only as relating to Efficiency Manitoba's use of marginal values as provided by Manitoba Hydro, not the derivation of the marginal values.</p>
<p>The efficiency plan's impact on rates and average customer bill amounts and whether that impact is reasonable.</p>	<p>In Scope only as relating to the Efficiency Manitoba lifecycle revenue impact analysis (one-time equivalent change in rates).</p>
<p>The level of consumer engagement conducted in developing the efficiency plan in light of section 9(h) of the Efficiency Manitoba Act and whether best practices in consumer engagement were implemented.</p>	<p>In Scope with limitations related to the proposed expert (see below).</p>
<p>Compliance of Efficiency Manitoba with directions from government through mandate and framework letters.</p>	<p>In Scope</p>

Consumer choices available in the efficiency plan and whether the range of choices in energy efficiency programs/initiatives is reasonable.	In Scope
Whether the Efficiency Manitoba administrative budget is reasonable and an examination of the allocation of Efficiency Manitoba's administration and/or overhead budget to gas and electricity customers.	In Scope
An examination of the impact of decarbonization and electrification on the way Efficiency Manitoba savings goals are defined, and the role Efficiency Manitoba could/should play in supporting decarbonization and electrification, in the context of initiatives introduced to counter the impacts of climate change, including a discussion of best practices and trends in other jurisdictions.	Out of Scope – Please see Efficiency Manitoba's comments on decarbonization and electrification above.

The Consumers Coalition has proposed to have four experts participate in this proceeding. While the hourly rate is identified for each witness, there is no draft budget available for review in relation to this intervention.

In accordance with the Act, Efficiency Manitoba created the Energy Efficiency Advisory Group ("EEAG") which met with stakeholders in 2019 prior to the filing of this submission, and which is intended to continue its work on an ongoing basis. The issue of ongoing customer engagement will be addressed with the EEAG in its ongoing operations. Efficiency Manitoba questions the need to provide expert evidence on consumer engagement practices within this hearing.

Efficiency Manitoba also questions the requirement for three experts to examine the 3-Year Plan and the evaluation framework. Two of the witnesses are identified as addressing the impact of decarbonization and electrification. Those matters are viewed by Efficiency Manitoba as outside of the scope of this proceeding and therefore expert testimony is not required on this topic area.

One witness is identified as addressing issues aligned with resource planning and the use of levelized marginal values in determining the benefits from DSM savings. Efficiency Manitoba cautions that issues associated with resource planning and the determination of marginal values is more properly in the domain of Manitoba Hydro and not in the scope for this proceeding to consider the Plan.

Manitoba Industrial Power Users Group

Issues	Efficiency Manitoba Position
Development and implementation of a Framework for Review of EM's Plans in this proceeding and as a template for future reviews.	Out of Scope – Efficiency Manitoba would participate in a separate framework development process however, is of the view that this is not in scope for this proceeding.
Determination of the Reasonableness of the Efficiency Manitoba Regulations, including Targets, and the need for any recommendations and improvements, as may be expected during the first review of an entirely new regulated entity under new legislation and regulations.	Out of Scope – If a separate regulation review is considered by the Manitoba Government, Efficiency Manitoba would participate in a separate process.
Reasonableness and Achievability of the Plan, which includes considerable financial investment and contribution from MIPUG members, and the industrial sector generally, that extend well beyond costs for programming illustrated in the Plan.	In Scope
The impact that 30 years of DSM programming in Manitoba may have on the remaining opportunity for efficiency gains in the Province and achievement of aggressive targets included in the Plan.	In Scope but only relating to the consideration of future participation in DSM initiatives proposed by Efficiency Manitoba.
Cost-Effectiveness of the Plan and potential Rate Impacts that may arise as a result of expenditures required to fulfill the mandate of the Plan cannot be adequately addressed at a level appropriate to the measures and programming intended for each sector with the available information provided in the Plan.	Out of Scope – Efficiency Manitoba does not assess rate impacts by customer sector and analysis is limited to the lifecycle rate impact analysis. Rate class impacts of Efficiency Manitoba are the responsibility of Manitoba Hydro and are considered by the PUB as part of future General Rate Applications.
Appropriate Testing of the Information Provided by Manitoba Hydro under the Efficiency Manitoba Regulation section 12(1)(b), including testing whether the value of energy saved by Efficiency Manitoba has appropriately been determined by Manitoba Hydro based on a methodology consistent	Out of Scope – cost-effectiveness of electric and natural gas DSM initiatives is limited to the marginal value as provided by Manitoba Hydro as outlined in Efficiency Manitoba Regulation. Derivation of marginal values is the responsibility of Manitoba Hydro and

<p>with its resource planning process, taking into account the timing and duration of the savings.</p>	<p>has been previously discussed with the PUB as part of Manitoba Hydro and/or Centra Gas General Rate Applications.</p>
<p>Access to relevant and meaningful information deemed confidential or sensitive is challenged by the proposed scope, which may limit discussion and possible access to this information.</p>	<p>Refer to the CSI section of this submission.</p>
<p>Past Manitoba Hydro energy efficiency plans, which set an important baseline for achieved savings and identification of potential future savings. Excluding the impacts of those plans from the review, challenges Intervener's ability to consider the reasonableness and achievability of the Plan and mandated savings targets.</p>	<p>Out of Scope – the reasonableness of the Efficiency Manitoba Plan can be assessed without review of past Manitoba Hydro DSM plans. Past Manitoba Hydro DSM plans were considered by the PUB as part of previous Manitoba Hydro and/or Centra Gas General Rate Applications.</p>
<p>Economic adoption of distributed energy resources such as Solar PV is heavily dependent on net metering or net billing policies adopted by Manitoba Hydro. Excluding these considerations from the hearing negatively impacts Intervener's ability to gauge potential market response to such programs.</p>	<p>Out of Scope – Efficiency Manitoba does not count any energy savings subject to Manitoba Hydro net metering policies towards achievement of the energy savings targets. Efficiency Manitoba only considers energy savings due to customer electric load reduction. Manitoba Hydro is responsible for establishment of net metering policies.</p>
<p>Effectiveness of financing programs designed to support adoption of energy efficiency measures will remain with Manitoba Hydro. These plans may be crucial for the widespread adoption of energy efficiency measures proposed in the Efficiency Manitoba Plan.</p>	<p>In Scope only as relating to the marketing and intake of participating customers. for Manitoba Hydro financing offers. Out of scope – Manitoba Hydro decisions with respect to interest rates, credit eligibility and terms and conditions.</p>

MIPUG has proposed to bring forth three experts for this proceeding. Efficiency Manitoba does not question the qualification of these witnesses, but it raises the concern as to whether all three are required for the review of this submission.

As noted in the table above, Efficiency Manitoba suggests that several of the topic areas that MIPUG intends to address would be considered out of scope for this proceeding. If the PUB limits the scope to exclude those topic areas, Efficiency Manitoba would suggest fewer than three experts would be required by MIPUG.

Council of Canadians

Issues	Efficiency Manitoba Position
The planning linkages between Efficiency Manitoba, Manitoba Hydro and Centra Gas	Out of scope - Matters that are either part of Manitoba Hydro/Centra Gas mandate or considered by the PUB as part of Manitoba Hydro and Centra Gas General Rate Applications in the normal course, including Manitoba Hydro Integrated Resource Planning, Load Forecast and Integrated Financial Forecast.
The appropriateness of incentive structures that continue to support growth in or continued use of natural gas in residential and commercial heating.	Out of scope – The Plan focuses on reductions in electric and natural gas consumption.
How success in reducing GHG will be assessed particularly in respect of the differences between reducing actual aggregate emissions and aggregate emissions referencing business as usual projections.	Out of scope – Manitoba Climate and Green Plan or Provincial energy strategy or policy matters that are not part of the prescribed mandate of Efficiency Manitoba or part of the PUB review the Plan.

Efficiency Manitoba has reviewed the application made by the CoC and notes that this applicant does not represent a group that is not already represented by other intervenors. Efficiency Manitoba further suggests that the issues identified by this applicant are out of scope for this proceeding.

Consequently, Efficiency Manitoba does not support the application for intervener status nor the need for the CoC to provide expert testimony in this proceeding.

Manitoba Keewatinowi Okimakinak Inc.

Issues	Efficiency Manitoba Position
Reasonableness of projected electric net savings to meet prescribed saving targets: (i) Reasonableness of methodology to project net savings including participant and Manitoba Hydro benefits	(i) In Scope (ii) In Scope (iii) In Scope (iv) In Scope

<p>(ii) Electric net savings compared to savings targets (both near-term and cumulative)</p> <p>(iii) Appropriateness of the methods to select or reject demand side management (DSM) initiatives</p> <p>(iv) Consideration of new and emerging technologies that may be included in a future Plan</p>	
<p>Cost-effectiveness of electric DSM program bundles and portfolio:</p> <p>(i) Reasonableness of methodology to evaluate cost-effectiveness</p> <p>(ii) Rate impact and customer bill impacts — limited to lifecycle revenue impact analysis (one-time equivalent change in rates)</p> <p>(iii) Reasonableness of Efficiency Manitoba's overhead budget — limited to 2020/21 to 2022/23 planning horizon</p>	<p>(i) In Scope</p> <p>(ii) In Scope</p> <p>(iii) In Scope</p>
<p>Accessibility of Plan to Manitobans including consideration of interests of residential, commercial and industrial customers and if practical, at least 5% of DSM budget for low income and hard to reach customers</p>	<p>In Scope</p>
<p>Consideration of non-energy benefits of electric DSM portfolios including environmental, economic development (including use of private sector and nongovernment organizations to deliver DSM initiatives)</p>	<p>In Scope</p>
<p>Compliance of Efficiency Manitoba with directions from government through mandate and framework letters</p>	<p>In Scope</p>
<p>Consideration of the DSM evaluation framework and plan proposed by Efficiency Manitoba</p>	<p>In Scope</p>
<p>Accessibility of Plan to First Nations and First Nation citizens in Manitoba, including consideration of interests of First Nation On-Reserve Residential, commercial and industrial customers;</p>	<p>In Scope</p>

Consideration of the appropriate percentage of the DSM budget for low income and hard to reach customers, with specific consideration of the DSM budget for First Nation customers and customers living on-reserve, including those serviced by diesel; and	In Scope
Consideration of barriers to DSM uptake on-reserve	In Scope
Consideration of the engagement strategy with respect to low income and hard to reach customers, with specific consideration of the engagement strategy with respect to First Nation customers and customers living on-reserve, including those serviced by diesel.	In Scope

Efficiency Manitoba has reviewed MKO's proposed intervention and is of the view that its areas of interest are in scope for this proceeding. MKO expects to test Efficiency Manitoba's evidence and rely on the evidence of other interveners in providing its argument.

Efficiency Manitoba encourages MKO to collaborate with AMC on matters of common interest to facilitate regulatory efficiency.

Assembly of Manitoba Chiefs

Issues	Efficiency Manitoba Position
Whether Efficiency Manitoba is reasonably achieving the aim of providing initiatives that are accessible to all Manitobans	In Scope
The appropriateness of the methodologies used by Efficiency Manitoba to select or reject demand-side initiatives	In Scope
The benefits and cost-effectiveness of the initiatives proposed in the Plan	In Scope
Whether the Plan adequately considers the interests of residential, commercial and industrial customers	In Scope
The impact of the Plan on rates and average customer bill amounts	In Scope

Whether, if it is practical to do so, at least 5% of Efficiency Manitoba's budget for demand side management initiatives is allocated to initiatives targeting low-income or hard-to reach customers	In Scope
Consideration of non-energy benefits of electric and natural gas DSM portfolios, including environmental, economic development (including use of private sector and non-government organizations to deliver DSM initiatives).	In Scope
Consideration of the appropriate percentage of the DSM budget for low income and hard to reach customers, with specific consideration of the DSM budget for First Nation customers and customers living on-reserve, including those serviced by diesel	In Scope
Consideration of barriers to DSM uptake on-reserve	In Scope
Consideration of the engagement strategy with respect to low income and hard to reach customers, with specific consideration of the engagement strategy with respect to First Nation customers and customers living on-reserve, including those serviced by diesel.	In Scope

Efficiency Manitoba encourages AMC to collaborate with MKO on areas of common interest. While the issues identified above in the table are largely within the scope of this proceeding, Efficiency Manitoba has expressed its concerns earlier in this submission regarding socio-economic matters including broader bill affordability and energy poverty topics. As such, Efficiency Manitoba does not support the suggested need for evidence from AMC's proposed expert witness.

Green Action Centre ("GAC")

Issues	Efficiency Manitoba's position
Manitoba's Climate and Green Plan, the contingent Efficiency Manitoba mandate to reduce fossil fuel in transportation, the prohibition against using replacement fossil fuels to achieve efficiencies, the tracking of GHG reductions in evaluating the performance of Efficiency Manitoba, and the permission and empowerment of Efficiency Manitoba to contract to reduce other fossil fuels in	Out of Scope – Manitoba Climate and Green Plan or Provincial energy strategy or policy matters that are not part of the prescribed mandate of Efficiency Manitoba or part of the PUB review the Plan.

Manitoba even if they are not a mandated part of its plan	
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Efficiency Manitoba recognizes that GAC did not apply for intervenor status but acknowledges the valuable contribution to DSM matters that GAC has provided with participation in the EEAG. Efficiency Manitoba will continue to collaborate with GAC on DSM issues in the future.

Issues List

Efficiency Manitoba has attached, as Attachment 1, the draft issues list circulated by PUB council on September 19, 2019 with Efficiency Manitoba’s comments contained directly within. Efficiency Manitoba position remains unchanged on in-scope topics as was previously presented.

Commercially Sensitive Information

Efficiency Manitoba appreciates that components of the Plan are based upon information either derived by or provided by Manitoba Hydro, which Manitoba Hydro deems to be commercially sensitive information (“CSI”). Efficiency Manitoba appreciates Manitoba Hydro’s position to protect its CSI, and to that end, Efficiency Manitoba is subject to a Non-Disclosure Agreement (“NDA”) to protect the CSI inputs upon which Efficiency Manitoba relies for the design and development of the Plan.

Efficiency Manitoba has agreed to a process that has been employed at other applications before the Board whereby issues requiring the consideration and analysis of CSI is tested through an Independent Expert Consultant (“IEC”) retained by the PUB. The IEC is subject to an NDA and can serve to provide expert information to both the PUB and Intervenors in relation to issues that require analysis that involves CSI.

Timeline

Efficiency Manitoba has reviewed the draft timetable as set forth in Attachment 2 and provided comments where applicable. Efficiency Manitoba recognizes that the timelines are very challenging for the review of this submission, and notes that the Efficiency Manitoba Regulation requires the commencement of Efficiency Manitoba’s Plan on April 1, 2020⁴. The Act also states that “The PUB must make its report and recommendations to the minister within the time specified by the minister”⁵.

Efficiency Manitoba endorses the timetable provided the comments made within this submission regarding scope/issues, intervenor status, the number of expert witnesses to participate and commercially sensitive information are duly considered and form the basis for the PUB’s procedural order.

⁴ THE EFFICIENCY MANITOBA REGULATION 119/2019, ADMINISTRATIVE MATTERS, Section 2 “Commencement Date”. Page 2.

⁵ THE EFFICIENCY MANITOBA ACT (C.C.S.M. c. E15), Part 3 “Savings Targets and Efficiency Plans”, Section 11(3), “Timing of PUB review”, page 13.

If you have any questions or comments with respect to the submission, please contact the writer at 204-988-0309 or Kyla Kramps at 204-805-0496.

Yours truly,

TAYLOR McCaffrey LLP

Per:



Kevin T. Williams

Partner

Taylor McCaffrey LLP

2200-201 Portage Avenue, Winnipeg, MB R3B 3L3

Direct Line: 204.988.0309 | Direct Fax: 204.953.7228

Public Utilities Board (PUB)

Review of Efficiency Manitoba 2020/23 Efficiency Plan

Preliminary Issues List (Efficiency Manitoba Draft September 18, 2019)

The following issues are considered to be within the scope of the PUB review of the Efficiency Manitoba 2020/23 Efficiency Plan:

1. Reasonableness of projected electric and natural gas net savings to meet prescribed saving targets:
 - (i) Reasonableness of methodology to project net savings including participant and Manitoba Hydro benefits
 - (ii) Electric and natural gas net savings compared to savings targets (both near-term and cumulative)
 - (iii) Appropriateness of the methods to select or reject demand side management (DSM) initiatives
 - (iv) Consideration of new and emerging technologies that may be included in a future Efficiency Plan
2. Cost-effectiveness of electric and natural gas DSM program bundles and portfolio:
 - (i) Reasonableness of methodology to evaluate cost-effectiveness
 - (ii) Comparison of levelized cost to Efficiency Manitoba of electricity energy net savings to levelized marginal value to MH – limited to the marginal value as determined by MH in its resource planning process
 - (iii) Comparison of levelized cost to Efficiency Manitoba of natural gas net savings to levelized marginal value to Centra Gas – limited to the marginal value as determined by Centra Gas
 - (iv) Rate impact and customer bill impacts – limited to lifecycle revenue impact analysis (one-time equivalent change in rates)
 - (v) Reasonableness of Efficiency Manitoba's overhead budget – limited to 2020/21 to 2022/23 planning horizon
3. Accessibility of Efficiency Plan to Manitobans including consideration of interests of residential, commercial and industrial customers and if practical, at least 5% of DSM budget for low income and hard to reach customers
4. Consideration of non-energy benefits of electric and natural gas DSM portfolios including environmental, economic development (including use of private sector and non-government organizations to deliver DSM initiatives)
5. Compliance of Efficiency Manitoba with directions from government through mandate and framework letters
6. Consideration of the DSM evaluation framework and plan proposed by Efficiency Manitoba

The following issues will be deferred for consideration until the PUB review of the next (2024/26) Efficiency Manitoba Efficiency Plan:

1. Plans to address any existing saving targets shortfalls
2. Cost-effectiveness review of any DSM initiatives in excess of prescribed savings targets
3. Reasonableness of Efficiency Manitoba's retrospective performance assessments

The following issues are considered to be out of scope of the PUB review of the 2020/23 Efficiency Manitoba Efficiency Plan:

1. Matters that are not part of the prescribed mandate of Efficiency Manitoba or part of the PUB review the Efficiency Plan:
 - (i) Provincial energy strategy
 - (ii) Made in Manitoba Climate and Green Plan
 - (iii) Electrical demand response programming
 - (iv) Potable water or fossil fuel DSM programming
 - (v) Electric vehicles
 - (vi) Eligibility criteria, interest rates and monthly charges related to energy efficiency/energy conservation loan or financing programs
 - (vii) Affordable Energy fund (AEF) analysis or details of historical Manitoba Hydro reports
2. Matters that are either part of Manitoba Hydro/Centra Gas mandate or considered by the PUB as part of Manitoba Hydro and Centra Gas general rate applications (GRA) in the normal course:
 - (i) Manitoba Hydro's integrated resource planning and derivation of marginal values/avoided costs in accordance with resource planning processes (electric and natural gas)
 - (ii) Derivation of electric load forecast or natural gas volume forecast – including analysis of Manitoba Hydro's end-use surveys or other load forecasting methodologies used by Manitoba Hydro
 - (iii) Impact of the Efficiency Plan on the electric and natural gas integrated financial forecasts/revenue requirements and the treatment of DSM costs and benefits in the cost of service/cost allocation studies
 - (iv) Past Manitoba Hydro/Centra Gas DSM programs and budgets and Efficiency Manitoba transitional budgets and activities for 2018/19 and 2019/20
 - (v) Manitoba Hydro distributed generation (solar or other) net metering policies or prices
 - (vi) Customer bill affordability including accounts in arrears and customer payment information

Public Utilities Board (PUB)

Review of Efficiency Manitoba 2020/23 Efficiency Plan

Timeline

Item	Date	Efficiency Manitoba
Efficiency Manitoba submission including PHC comments submission (written)	Friday, October 25	
Intervenors applications	Thursday, October 31	
Efficiency Manitoba comments to PUB on Intervenor Applications	Monday, November 4	
Procedural Order issued	Wednesday, November 6	
Information requests to Efficiency Manitoba	Monday, November 11, 2019	Given November 11 may be a holiday for some participants, Efficiency Manitoba is willing to accept information requests until noon on November 12
Efficiency Manitoba to file information request responses	Friday, November 29, 2019	
Intervenors to file evidence	Wednesday, December 4, 2019	
Information requests to intervenor evidence	Wednesday, December 11, 2019	
Pre-hearing conference	Monday, December 16	
Intervenor information request responses	Friday, December 20	Wednesday, December 18
Efficiency Manitoba rebuttal evidence	Friday, January 3	

Public hearing	Monday January 6 to 28	Efficiency Manitoba's expert witness is only available to testify on January 8 or 9 th . Please include this information when setting the hearing schedule.
PUB issues recommendations to government	Monday, March 2	