

Efficiency Manitoba 2020/23 Efficiency Plan – Pre-hearing Conference #2

Consumers Coalition issues to be addressed in oral evidence

December 16, 2019

Issue from PUB Order 162/19	Whether issue requires oral evidence and why
1. Reasonableness of projected electric and natural gas net savings to meet prescribed saving targets:	Yes, for the reasons outlined below.
a. Reasonableness of methodology to project net savings including participant and Manitoba Hydro benefits	Yes, especially as it relates to methodology, risk and credibility.
b. Electric and natural gas net savings compared to savings targets (both near-term and cumulative)	Yes, as it relates to methodology, risk and credibility.
c. Appropriateness of the methods to select or reject demand-side management initiatives	Yes, as it relates to Efficiency Manitoba's plan development process (consideration of options, evaluation and selection), appropriateness of residential program offerings, consideration of the climate crisis and opportunities for electrification.
d. Consideration of new and emerging technologies that may be included in a future Efficiency Plan	Yes, as it relates to the 2020/21 Efficiency Plan (e.g. heat pumps) and also setting up the market for opportunities for future electrification in light of the climate crisis.
2. Cost-effectiveness of electric and natural gas demand-side management program bundles and portfolio:	Yes, for reasons outlined below.
a. Reasonableness of methodology to evaluate cost-effectiveness	Yes, especially as it relates to marginal values and discount rate.
b. Comparison of levelized cost to Efficiency Manitoba of	No, assuming use of

electricity energy net savings to levelized marginal value to Manitoba Hydro – limited to the marginal value as determined by Manitoba Hydro in its resource planning process	marginal values included in 2 a).
c. 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	No, assuming use of marginal values included in 2 a).
d. Rate impact and customer bill impacts for both participants and non participants and whether the bill impacts are reasonable - limited to lifecycle revenue impact analysis (one-time equivalent change in rates)	Yes, especially as it relates to marginal values, rate increase assumptions and discount rate.
e. Reasonableness of Efficiency Manitoba’s overhead budget, including the apportionment of Efficiency Manitoba’s overhead costs not specifically related to gas initiatives and electric initiatives – limited to 2020/21 to 2022/23 planning horizon	Yes, especially as it relates to the allocation for electricity versus natural gas.
f. Consideration of the total resource costs of the initiatives proposed in the Efficiency Plan	Yes, as it relates to evaluation criteria and 1 c).
3. Accessibility of Efficiency Plan to Manitobans, including consideration of:	Yes, especially as it relates to residential program offerings and public engagement.
a. the interests of residential, commercial and industrial customers, as well as hard-to-reach customers who may have disabilities or be Indigenous, rural, newcomers, renters, customers living in multi-unit residences, or older customers, including consideration of customer investments,	Yes, especially as it relates to residential program offerings and public engagement.
b. barriers to demand-side management uptake for Indigenous customers, including First Nations customers, and	Yes, especially as it relates to residential program offerings and public engagement.
c. the engagement strategy for low income and hard-to-reach customers, including First Nations customers	Yes, especially as it relates to residential program offerings and public engagement.
4. Consideration of the appropriate percentage of the demand-side management budget for income qualified and hard-to-reach customers, including specifically for Indigenous and First Nations customers, and whether, if practical, at least 5% of the demand-side management budget is set aside for these customers	Yes, especially as it relates to residential program offerings and public engagement.
5. Consideration of non-energy benefits of electric and natural gas demand-side management portfolios including environmental, economic development (including use of private	Yes, especially in light of opportunities for electrification in light of the

sector and non-government organizations to deliver demand-side management initiatives)	climate crisis.
6. Compliance of Efficiency Manitoba with directions from government through mandate and framework letters	No.
7. Consideration of the demand-side management evaluation framework and plan proposed by Efficiency Manitoba	Yes, especially as it relates to Codes and Standards.
8. The mandate for Efficiency Manitoba's activities and recommendations to government regarding net savings targets	No.
9. Marketing of, and intake of participating customers for, loans or financing programs related to energy efficiency and energy conservation	No.
10. Comparison of the costs and savings forecasts and achievements of past Manitoba Hydro or Centra Gas programs and budgets to Efficiency Manitoba's plan	Yes, especially as it relates to differences in costs/budgets that may be linked to differences in programming.
11. Manitoba Hydro distributed generation (solar or other) net metering policies or prices relating to marketing of, and intake of participating customers for, distributed generation (solar or other) net metering policies or prices – limited to their impact on the take-up of distributed generation by customers	No.