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**200 – 393 PORTAGE AVE  
WINNIPEG, MANITOBA  
R3B 3H6**

**TEL: 204.985.8540**

**FAX: 204.985.8544**



**E-MAIL: [centre@pilc.mb.ca](mailto:centre@pilc.mb.ca)**

Writer's direct line: (204) 985-5220  
Email: [kadil@legalaid.mb.ca](mailto:kadil@legalaid.mb.ca)

December 5, 2019

Public Utilities Board of Manitoba  
Darren Christle  
Executive Director & Board Secretary  
400-330 Portage Avenue  
Winnipeg, MB R3C 0C4

Dear Mr. Christle:

**Re: Efficiency Manitoba 2020/23 Efficiency Plan – Consumers Coalition  
Motion for Extension of Time on Intervener Evidence**

This motion requests an extension of time to file portions of Mr. Bill Harper's evidence, due to revisions being made to certain Consumers Coalition information request ("IR"), which are expected to be filed on or about December 5 or 6, 2019. Our understanding is that Efficiency Manitoba will be consenting to this motion for extension of time and the proposed timeline.

The Consumers Coalition filed its information requests on November 12, 2019. It received responses to its information requests on Wednesday November 27 and Friday November 29, 2019. Responses to Manitoba Industrial Power Users Group and PUB information requests were also filed Saturday November 30 and Tuesday December 3, 2019.

Recognizing the timeline set for this proceeding in Public Utilities Board ("PUB") Order 162/19, the Consumers Coalition compiled a list of ten (10) IRs where the information requested (i) was not provided, and (ii) is critical to the development of the Consumers Coalition evidence.

In the spirit of collaboration and efficiency, the Consumers Coalition reached out to counsel for Efficiency Manitoba on December 3, 2019 to inquire as to their position on the IRs identified, in anticipation of the possible need to file a motion to compel full and adequate answers.

Through correspondence and discussions between the Consumers Coalition and Efficiency Manitoba, the Consumers Coalition has determined that it will be unnecessary to file a motion to request full and adequate answers, based on our understanding that Efficiency Manitoba will be filing revised responses to IRs identified by the Consumers Coalition on or about December 5 or 6, 2019.

The majority of the IRs identified by the Consumers Coalition, and which will be revised by Efficiency Manitoba, are directly relevant to issues 1.c. and 2 of PUB 162/19, namely the appropriateness of the methods to select or reject demand-side management initiatives and the cost-effectiveness of electric and natural gas demand-side management bundles and programs. These IRs relate directly to the development of the independent evidence of Mr. Bill Harper, who is exploring:

- i. the approach taken by Efficiency Manitoba to develop its plan, including whether there was a consideration of resource planning principles and whether adequate exploration and consideration of alternatives was undertaken; and
- ii. 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 plan, including the use of the levelized marginal value to Manitoba Hydro in the determine the levelized benefits from DSM savings.

Given that the revised IRs will be directly relevant to the development of Mr. Harper's evidence, we are requesting an extension of time for Mr. Harper to file certain portions of his evidence. We would propose the following amended timeline:

- Mr. Harper to file evidence on Monday December 9, 2019, with specific sections identified as "placeholders" where IR responses are being revised;
- Additional portions of Mr. Harper's evidence to be filed Friday December 13, 2019;
- IRs only on portions of Mr. Harper's evidence that are filed December 13, 2019 to be filed by Wednesday Dec 18, 2019; and
- Responses to IRs on portions of Mr. Harper's evidence that are filed December 13, 2019 to be filed by Monday December 23, 2019.

Our understanding is that Efficiency Manitoba will be consenting to this motion for extension of time and the timeline proposed above.

### **Conclusion**

Thank you for your consideration of this motion.

For purposes of this motion, CAC Manitoba is prepared to rely on its written submissions. However, counsel remains available to appear in person, subject to the Board's discretion.

Please contact me or Mr. Byron Williams at (204) 985-8533, should you have any questions.

Yours truly,



Katrine Dilay  
Attorney  
KD/ab