

INTERVENER APPLICATION FORM

Application re Hearing:			
Efficiency Manitoba 3-Year Energy Efficiency Plan (2020/21-2022/23) Application			
Name of Prospective Intervener (Organization Name or Individual):			
MANITOBA KEEWATINOWI OKIMAKANAK INC. ("MKO")			
Prospective Intervener Contact Information			
Organization or Individual Address:			
SUITE 1601-275 PORTAGE AVENUE, WINNIPEG, MANITOBA, R3B 2B3			
Organization Contact Person(s) (if applicable):			
KELVIN LYNXLEG			
Contact Information:	Business:	Other Phone:	
	(204) 677-1600		
	Fax Number:	Email:	
	(204) 778-7655	kelvin.lynxleg@mkonorth.com	
Representative Contact Information:			
Counsel or Representative Name(s):			
JARED WHEELER / MARKUS BUCHART			
Organization (if different from above):			
P. MICHAEL JERCH LAW CORPORATION ("JERCH LAW")			
Address (if different from above):			
22 EDMONTON STREET, WINNIPEG, MANITOBA, R3C 1P7			
Contact Information (if different from above):	Business:	Other Phone:	
	(204) 774-8300		
	Fax Number:	Email:	
	(204) 774-8349	jwheeler@jerchlaw.com / mbuchart@jerchlaw.com	
Counsel Seniority:			
Years of Experience	3 / 20+ Years	Tariff Rate	\$100.00 / 285.00
Also representing (if applicable):			
N/A			

Additional Information

(For organizations only) Please describe the mandate of your organization and provide a description of the membership, including the number of members. Please also confirm whether the organization's intervention in this proceeding is supported by a resolution of the governing body, if any. Please enclose the resolution, if any, with your Application, along with supporting documentation of your mandate and membership

MKO is a non-profit advocacy organization that has been in existence for more than 35 years and provides a collective voice for more than 65,000 treaty First Nation citizens in northern Manitoba.

MKO is governed by the elected Chiefs of 26 First Nations and receives its mandate by resolution of the MKO Chiefs in General Assembly. The Grand Chief, elected for a three-year term, serves as the principal spokesperson of MKO, and a regionally representative Executive Council of Chiefs provides ongoing direction between General Assemblies.

The Mission Statement of MKO is: to maintain, strengthen, enhance, lobby for and defend the interests and rights of First Nation people within its jurisdiction and to promote, develop and secure a standard quality of life deemed desirable and acceptable by its First Nations without limiting the generality of the foregoing and the objectives of MKO.

MKO explores ways to strengthen and promote the interests of First Nations in northern Manitoba with respect to all areas that affect the lives of northern First Nations' citizens.

Please state your reasons for intervening in this proceeding:

All citizens of the MKO First Nations, the MKO First Nation government facilities, and all entities operated by MKO First Nations receive electrical service solely from Manitoba Hydro. All of the entities under the MKO purview may benefit from increased energy efficiency efforts. These consumers are all situated in northern Manitoba.

MKO seeks to intervene in this process to ensure that the distinct interests of the MKO First Nations, entities and citizens, are properly considered, and appropriately factored in to Efficiency Manitoba's initial 3-year plan. In addition, MKO seeks to intervene in this proceeding to ensure that the relationship between the new Crown corporation and First Nations in northern Manitoba commences in a good way.

Please state how you are directly affected by the Board's decision in this matter:

If approved, the proposed 3-year efficiency plan will directly affect MKO First Nations, all of which are in northern Manitoba. The majority of MKO citizens are in the low-income category and the general service customers represented by MKO have limited, if any, ability to absorb any additional costs. Energy efficiency efforts must specifically address the distinct needs of MKO member First Nations and citizens.

Please explain whether and how you represent a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding:

MKO represents a substantial number of ratepayers: over 65,000 citizens of 26 sovereign First Nations, all in northern Manitoba.

The citizens of MKO First Nations are residential ratepayers, the majority of which are in the low-income category. The First Nation governments are general service ratepayers. The four First Nations in Manitoba currently serviced by diesel power are also MKO member First Nations.

There are no other approved interveners in this proceeding that represent First Nation On-Reserve residential, general service, and diesel serviced customers, all of whom are in northern Manitoba.

The distinct perspective of First Nation consumers in northern Manitoba is not otherwise represented within this proceeding.

Please describe your experience, information, or expertise relevant to this matter that would contribute to the Board's decision making, including any other prior interventions in regulatory matters before this Board or other decision-makers:

MKO has regularly intervened in regulatory matters before this Board and many other decision-makers, including matters relating to Manitoba Hydro, bringing forward the distinct perspective of First Nations in northern Manitoba. As such, MKO has experience relevant to this matter that would contribute to the Board's decision making.

Please list the key issues you intend to address in the proceeding. Please be specific.

In this proceeding, based on the Applicant's preliminary issues list, MKO intends to address the following issues:

1. 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
 - (ii) Electric 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 DSM program bundles and portfolio:
 - (i) Reasonableness of methodology to evaluate cost-effectiveness

(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 DSM portfolios including environmental, economic development (including use of private sector and nongovernment 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

MKO intends to address all matters and issues listed above as they specifically relate to First Nation consumers in northern Manitoba, notwithstanding that Efficiency Manitoba has not included First Nation specific issues in its proposed list of issues. Specifically, MKO intends to address the potential impacts of the proposed 3-year plan on First Nations and First Nation citizens in northern Manitoba, including those serviced by diesel, as well as Efficiency Manitoba's strategy for effective engagement with First Nations in northern Manitoba, including those serviced by diesel. In separate and attached correspondence MKO has suggested the following additional issues for consideration in this hearing:

- Accessibility of Efficiency Plan to First Nations and First Nation citizens in Manitoba, including consideration of interests of First Nation On-Reserve Residential, commercial and industrial customers;
- 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
- Consideration of barriers to DSM uptake on-reserve;
- 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.

Do you intend to participate fully and actively, including attendance at hearings, submission of evidence, and testing of evidence and cross examination of witnesses? If yes, please describe your intended participation.

MKO intends to participate fully and actively in this hearing by testing Efficiency Manitoba's evidence as well as evidence submitted by other approved interveners through the Information Request process, cross-examination and argument. MKO does not anticipate submitting evidence or calling expert witnesses. In addition, MKO anticipates coordinating with other interveners, especially but not limited to the Assembly of Manitoba Chiefs and the Consumers' Coalition, to avoid duplication.

Do you intend to request an award of costs for your participation? Please explain how you meet the criteria for an award of costs.

Yes, MKO intends to submit a request for a cost award pursuant to the Board's Intervener Costs Policy for this proceeding. MKO has a substantial interest in the outcome of the proceeding, intends to make a significant contribution to the proceeding, and intends to participate in a responsible manner, including cooperating with other interveners with common objectives.

Do you intend to retain experts or consultants? **No.** If yes, please attach copies of the *curriculum vitae* for any expert and/or consultant, as well as the following:

Expert Consultant #1:

Name:	Experience	Evidence to be provided on issues in scope:
	_____ Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or Organization:	Brief explanation of experience relevant to evidence to be provided:

Expert Consultant #2:

Name:	Experience:	Evidence to be provided on issues in scope:
	_____ Years	
Telephone #:	Tariff Rate:	
	\$ _____	
Address and Email:	Firm or organization:	Brief explanation of experience relevant to evidence to be provided:
Expert Consultant #3:		
Name:	Years of Experience:	Evidence to be provided on issues in scope:
	_____ Years	
Telephone #:	Tariff Rate:	
	\$ _____	
Address and Email:	Firm or organization:	Brief explanation of experience relevant to evidence to be provided:

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Do you intend to provide evidence from witnesses other than experts and/or consultants? Perhaps – please see below. If yes, please provide:	
Witness #1:	
Name:	Evidence to be provided on issues in scope:
Email:	Brief explanation of relevant experience and/or knowledge to issues in scope:
Address and Phone number:	
Do you intend to seek approval for any other form of participation or provision of evidence, including for which you intend to seek an award of costs? If yes, please provide details and an explanation of the relation to issues in scope in the proceeding.	
<p>Legal counsel to MKO and legal counsel to the Consumers Coalition have had preliminary discussions about presenting a panel of ratepayers to provide evidence regarding their lived experience as it relates to energy efficiency and demand-side management.</p> <p>The presentation of a panel of ratepayers would be subject to client instructions, as well as the ability to put together this panel within the compressed timeframe of this proceeding.</p> <p>The panel of ratepayers may relate to issues of:</p> <ul style="list-style-type: none"> • Rate impact and customer bill impacts; • Accessibility of Efficiency Plan to Manitobans; • Consideration of non-energy benefits of DSM portfolios; 	

- Consideration of the appropriate percentage of the DSM budget for low income and hard to reach customers;
- Consideration of barriers to DSM uptake; and
- Consideration of the engagement strategy with respect to low income and hard to reach customers.