

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf pages 18 and 280 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 18 of the Plan, Efficiency Manitoba states:

61 It is imperative that all Manitoba customer segments have representation within
62 Efficiency Manitoba's Plan. These segments have been defined within the Plan to
63 include residential customers; income-qualified residential customers; Indigenous
64 customers; and commercial, industrial, and agricultural customers. These customer
65 segments have been selected to be inclusive of all Manitobans and to capture their
66 unique customer behaviour characteristics and energy consumption patterns.

And at pdf page 280 of the Plan, Efficiency Manitoba states:

98 The residential customer segment is comprised of homeowners and tenants in
99 Manitoba. There are approximately 485,000 residential electric accounts in Manitoba
100 (excluding seasonal residences)

QUESTION:

In greater detail than that provided in Section A-6 of Appendix A of the Plan, please provide a detailed description of the "Indigenous customer segment" including:

- a) Which customers has Efficiency Manitoba included in the Indigenous customer segment?
- b) Does the "approximately 485,000 residential electric accounts in Manitoba" include First Nations On-Reserve Residential customers?
- c) Of those First Nations residential customers who Efficiency Manitoba has included in the Indigenous customer segment where do they reside? On-reserve or off-reserve?
- d) Are those First Nations residential customers who Efficiency Manitoba has included in the Indigenous customer segment also included in the residential customer segment?

- e) What is the criteria Efficiency Manitoba has used to determine whether a business is an “Indigenous business”?
- f) Of those businesses that Efficiency Manitoba has included in the Indigenous customer segment, where do they operate? On-reserve or off-reserve?
- g) Of those businesses that Efficiency Manitoba has included in the Indigenous customer segment, are those businesses Indigenous-run, or Indigenous controlled?
- h) How does Efficiency Manitoba propose to determine whether a business qualifies as an Indigenous business?

RATIONALE FOR QUESTION:

To determine how Efficiency Manitoba defines the Indigenous customer segment, and therefore whether the Plan is accessible to this customer segment, and which DSM programs may or may not be accessible to this customer segment.

RESPONSE:

- a) The Indigenous customers segment includes:
 - First Nation on reserve customers for the First Nation Insulation and Direct Install Program and the Community Geothermal Program.
 - First Nation on-reserve and off-reserve customers for the Indigenous Small Business Program.
 - Metis residential and commercial customers, with eligibility criteria to be defined in coordination with the Manitoba Metis Federation.
- b) Confirmed, the approximate 485,000 residential electric accounts include First Nations On-Reserve residential customers.
- c) The First Nations residential customers included in the Indigenous customer segment reside on-reserve.
- d) The First Nations residential customers included in the Indigenous customer segment are their own customer segment and not included in the residential customer segment. This does not prevent customers in the Indigenous customer segment from accessing the full suite programs or offers in the broader residential segment.
- e) The criteria to determine if a business is an Indigenous business is still in development, with potential eligibility including: a business on-reserve where the utility bill is paid for

by the Band or a First Nation community member, off-reserve buildings owned by a Band (including urban reserves), and majority-owned and operated Metis businesses with eligibility confirmation coordinated with the Manitoba Metis Federation.

- f) The businesses included in the Indigenous customer segment operate on-reserve and off-reserve.
- g) Criteria is still in development with potential eligibility including, Indigenous majority owned or operated. The objective is for an Indigenous business owner or operator to undertake energy efficiency initiatives for potential energy savings.
- h) Please see response to MKO/EM I-1e-g above.

Efficiency Manitoba looks forward to the ongoing engagement strategy to assist in finalizing program details and eligibility. See also MKO/EM I-2c which outlines Efficiency Manitoba's plans for ongoing engagement including an Indigenous Energy Efficiency Working Group with First Nation and Metis representation. Through ongoing engagement, Efficiency Manitoba anticipates receiving feedback on program development and delivery to serve all customer segments inclusive of First Nations in northern Manitoba.

REFERENCE:

The Path to Reconciliation Act; Efficiency Manitoba mandate letter dated April 24, 2019

PREAMBLE TO IR (IF ANY):

The Efficiency Manitoba Act, (C.C.S.M. c. E15), sets out at section 3(3) that:

Efficiency Manitoba is an agent of the Crown.

The Path to Reconciliation Act, (S.M. 2016, c. 5), sets out at section 1(1) that:

"Reconciliation" refers to the ongoing process of establishing and maintaining mutually respectful relationships between Indigenous and non-Indigenous peoples in order to build trust, affirm historical agreements, address healing and create a more equitable and inclusive society.

The April 24, 2019 framework letter from the Minister of Crown Services to the Chair of the Efficiency Manitoba Board of Directors states:

Government is committed to advancing reconciliation with Indigenous Manitobans through the renewal of its consultation framework to ensure respectful and productive consultations. All government organizations are expected to contribute to reconciliation in their interactions with Indigenous communities and individuals.

The word "reconciliation" does not appear in the Plan.

QUESTION:

Further to AMC/EM I-1:

- a) Please provide a detailed explanation of the ways in which Efficiency Manitoba, as an agent of the Crown, has considered reconciliation in the preparation of the Plan.

- b) Please provide the agenda, minutes and notes from the meetings that have taken place between Efficiency Manitoba and the Minister responsible for reconciliation, if any, as well as any planned meetings to come.
- c) In their interactions with Indigenous communities and individuals, how does Efficiency Manitoba propose to contribute to reconciliation?

RATIONALE FOR QUESTION:

To consider whether Efficiency Manitoba has complied, or plans to comply, with directions from government through mandate letters.

RESPONSE:

- a) The intention for ongoing, collaborative, mutually respectful dialogue is foundational for Efficiency Manitoba and directly aligned with reconciliation as defined in the Path to Reconciliation Act.

Through the creation of the Energy Efficiency Advisory Group (EEAG), Efficiency Manitoba was pleased to work collaboratively with Manitoba Keewatinowi Okimakanak Inc (MKO), the Southern Chiefs Organization (SCO), and the Manitoba Metis Federation to ensure First Nation and Metis perspectives were heard and incorporated into the Plan. The Assembly of Manitoba Chiefs (AMC) was also invited to participate. Delivery of the plan anticipates ongoing collaboration with the EEAG and other indigenous communities and groups throughout the province in a spirit of reconciliation.

- b) The start-up work of Efficiency Manitoba has been guided by the mandate and direction set for the organization through the Efficiency Manitoba Act and corresponding Regulation, the Crown Corporations Governance and Accountability Act, along with mandate and framework letters issued by the Premier and Minister responsible respectively. Efficiency Manitoba works through this framework and its responsible Minister to implement policy intentions of the Province of Manitoba including reconciliation.

To date, no meeting between Efficiency Manitoba and the Minister responsible for reconciliation has been planned or taken place.

- c) As noted in part a) above Efficiency Manitoba intends to contribute to reconciliation through ongoing, collaborative and mutually respectful dialogue directly with Indigenous communities and groups and through the EEAG, along with ongoing engagement to support opportunities for energy and associated bill savings. Efficiency Manitoba will aim to establish an Indigenous Energy Efficiency Working Group with First Nation and Metis representation as another avenue of engagement. Appendix A6 – Indigenous Programs outlines indigenous program offers, community-led demand side management, culturally relevant education resources, the establishment of strategic partnerships and community energy efficiency plans as the high-level focus areas of work with Indigenous customers during Efficiency Manitoba’s first three-year plan. As referenced in AMC/EM I-4, Efficiency Manitoba will also ensure all customer or technical support and third-party contractors, contracted by Efficiency Manitoba who deliver programs and services to First Nations customers, will have mandatory sensitivity and cultural awareness training.

See also AMC/EM I-1 which addresses budget allocation and cost-effectiveness relative to the topic of reconciliation.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf pages 18 and 280 of 591 Pdf pages 26-28 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 26 of the Plan Efficiency Manitoba states:

149 The results of the PACT indicate that Efficiency Manitoba's overall electric DSM
150 portfolio is expected to result in customers having lower costs for meeting their
151 electricity needs through this portfolio, on an aggregate basis [...].

At pdf pages 27-28 of the Plan Efficiency Manitoba states:

168 Efficiency Manitoba completed a simplified rate and bill impact analysis to provide a
169 directional indicator of the impacts that are associated with the Plan. Efficiency
170 Manitoba has used a lifecycle revenue impact (LRI) measure to indicate an equivalent
171 one-time change in rates (for both electric and natural gas) that is required to
172 establish a balance between the marginal benefits and the revenue
173 reductions/program investments of the Plan, on a net present value basis. LRI was
174 selected as it applies the standard DSM rate impact measure test components and is
175 consistent with the PACT.

Appendix A Section 2 of the Plan does not include information about bill impacts to each customer segment.

At pdf page 141, with respect to Electric Customer Bill Impacts, Efficiency Manitoba states that:

226 The estimated electric rate impacts will apply to all Manitoba electric customers as
227 summarized in Table 5.6. Customers that choose to participate in the programming
228 offered by Efficiency Manitoba will see the same rate impacts but will realize annual
229 bill reductions based on their respective energy savings.

QUESTION:

- a) Please confirm that the results of the PACT indicate that Efficiency Manitoba's overall electric DSM portfolio is expected to result in participating customers having lower costs for meeting their electricity needs through this portfolio.
- b) Please confirm that customer participation in programming offered by Efficiency Manitoba may be a product of availability of programs, and not entirely driven by customer choice.
- c) With respect to the electric DSM portfolio, please explain whether Efficiency Manitoba completed an analysis of the bill impacts associated with the Plan on each customer segment, including specifically the Indigenous customer segment.
 - I. Why or why not?
 - II. If yes to question 2, please provide the analysis completed;
 - III. If no to question 2, please prepare an analysis of the anticipated bill impacts of the Plan on each customer segment, including specifically the Indigenous customer segment.

RATIONALE FOR QUESTION:

To gain an understanding of the anticipated bill impacts of the Plan as proposed on each customer segment, including specifically the Indigenous customer segment

RESPONSE:

- a) As shown in the program administrator cost ratio (PACT) calculation shown in Section A2.3.1 of the 2020/23 Efficiency Plan ("Plan") (Appendix A2, p. 232 of 591), the PACT considers the present value of the marginal benefits against the present value of the program costs and incentives. As the overall electric DSM portfolio has PACT benefits exceeding the costs, means that based on this metric the electric portfolio over the 30-year time horizon considered will lower costs for the electric utility as compared to not pursuing any DSM. As summarized in Table 5.3 (Plan, Section 5.2, p. 135 of 591), the overall electric portfolio PACT is 3.27. Simply stated this means that based on the PACT, every \$1 spent realizes \$3.27 in benefits for electric ratepayers. The PACT does not

consider utility lost revenue impacts which are considered within the Lifecycle Revenue Impact (LRI) analysis discussed in the Plan (Appendix A2, p. 234 of 591). The PACT does not consider participating customer bill savings discussed in Section 5.5 of the Plan (beginning on p. 141 of 591).

- b) Confirmed.

- c) The Plan, Section 5.5.1 (Table 5.8, p. 142 of 591) provides a table that demonstrates the average electric customer bill savings, including specifically the Indigenous customer segment. This table has been subsequently revised within COALITION/EM I-102.
 - I. This analysis was completed in order to assist the Public Utilities Board with the mandatory considerations of its review of the Efficiency Plan as per the Efficiency Manitoba Regulation 119/2019 Section 11 (g) impact of the plan on rates and average customer bill amounts.
 - II. The analysis can be found in the Plan, Section 5.5.1 (Table 5.8, p. 142 of 591) and in Attachment 3 – Technical Tables (Annual bill Reduction Per Program Bundle (p. 517 of 591). These table has been subsequently revised within COALITION/EM I-102.
 - III. Not applicable.

Please see additional analysis in response to AMC/EM I-10a.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 37 of 591

PREAMBLE TO IR (IF ANY):

In the un-numbered Table at pdf page 37 of the Plan, Efficiency Manitoba sets out that, with respect to the Electric Portfolio, 3% of the budget is targeted at the Income Qualified customer segment and an additional 3% is targeted at the Indigenous customer segment.

QUESTION:

For the purposes of allocating the budget for the electric portfolio, are those customers that Efficiency Manitoba has included in the Indigenous customer segment also included in the Income Qualified customer segment?

RATIONALE FOR QUESTION:

To consider whether at least 5% of the DSM budget has been set aside for income qualified and hard-to-reach customers, and if so, whether these figures have been appropriately calculated.

RESPONSE:

The customers included in the Indigenous customer segment are not included in the Income Qualified segment. On page 79 of the Plan, Efficiency Manitoba indicates “Separating income qualified and Indigenous customers as overall distinct segments emphasizes the strategic importance and unique characteristics of these customers.” Together, and in accordance with Regulation, Efficiency Manitoba defines these customer segments as hard to reach. Each customer segment has a separate budget.

As shown in the table below, the Indigenous customer segment and the Income Qualified customer segment budgets each comprise approximately 3% of the overall electric budget for a combined 6% of the overall three-year Efficiency Manitoba electric budget. Additionally, the Indigenous customer segment budget comprises approximately 2% of the overall natural gas

budget and the Income Qualified customer segment budget comprises 30% of the overall three-year Efficiency Manitoba natural gas budget.

Hard to Reach Cumulative 3 Year Budget and %	Electric		Natural Gas	
	\$	%	\$	%
Indigenous	\$ 3,600,000	3%	\$ 984,000	2%
Income Qualified	\$ 4,485,000	3%	\$ 18,532,000	30%
Total Hard to Reach	\$ 8,085,000	6%	\$ 19,516,000	32%
Overall three-year Efficiency Manitoba Budget	\$146,681,000		\$62,965,000	

Note: Percentages may not be exact due to rounding in the Plan.

REFERENCE:

Efficiency Manitoba Regulation; Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 65 of 591

PREAMBLE TO IR (IF ANY):

Section 5 of the Efficiency Manitoba Regulation sets out that:

Efficiency Manitoba may, at the request of Manitoba Hydro and at Manitoba Hydro's expense, undertake initiatives to reduce the demand for electrical power in areas of Manitoba that experience or may experience capacity constraints. But if those initiatives are not intended primarily to reduce the consumption of electrical energy, they are not to form part of an efficiency plan and Part 3 of the Act does not apply to them.

At pdf page 65 of the Plan, Efficiency Manitoba states:

305 Electrical energy savings resulting from electric demand savings initiatives are outside
306 the scope of the Plan as prescribed in Section 5 of the Regulation.

QUESTION:

- a) Please confirm that, per the legislation, electrical energy savings resulting from electric demand savings initiatives are not necessarily outside the scope of a Plan that could be submitted by Efficiency Manitoba, if those initiatives were intended to primarily reduce the consumption of electrical energy.
- b) Please provide a detailed explanation of whether or not Efficiency Manitoba considers First Nations in northern Manitoba to be an area of Manitoba that experience or may experience capacity constraints.
- c) Please explain whether Manitoba Hydro has requested that Efficiency Manitoba undertake initiatives to reduce the demand for electrical power in any areas of Manitoba that experience or may experience capacity constraints.

- d) Please explain whether Efficiency Manitoba and Manitoba Hydro have engaged in any discussions to date with respect to initiatives to reduce the demand for electrical power in areas of Manitoba that experience or may experience capacity constraints.
- I. If yes, please explain whether First Nations in northern Manitoba have been included in those discussions. Why or why not?

RATIONALE FOR QUESTION:

To understand whether Efficiency Manitoba has complied with the Regulation, and to understand how and to what extent issues specific to northern First Nations have been considered in the preparation of the Plan.

RESPONSE:

- a) The Information Request asks for EM's interpretation of the applicable legislation rather than raising an inquiry based on the Plan as presented. Accordingly, this question does not properly form the subject matter of an Information Request.
- b) Manitoba Hydro is responsible for planning and operating the electric transmission system. As such, Efficiency Manitoba does not have information as to transmission capacity or constraints on the Manitoba Hydro system.

Response to parts c and d):

Efficiency Manitoba has not received any requests from Manitoba Hydro to undertake initiatives to reduce the demand for electrical power, nor has it held any discussions in regard to this matter.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission; The Efficiency Manitoba Act;
Efficiency Manitoba Regulation Pdf pages 66-67

PREAMBLE TO IR (IF ANY):

At pdf pages 66-67 of the Plan, Efficiency Manitoba sets out a number of fuel switching possibilities which Efficiency Manitoba considers to be either in line with the Act and Regulations, and thus included in the Plan, or not aligned with both the Act and Regulations and thus not included in the Plan. Neither list includes converting from diesel to electric.

The four communities in the “Diesel Zone” are Barren Lands First Nation, Northlands Denesuline First Nation, Sayisi Dene First Nation, and Shamattawa First Nation, all of which are MKO member First Nations.

QUESTION:

- a) Please provide a detailed explanation as to whether Efficiency Manitoba considers conversion from a diesel heating system to grid electricity to be aligned with or not aligned with the Act and Regulations.
- b) With respect to the “Diesel Zone”, why was the possibility of conversion from a diesel heating system to grid electricity not considered in the Plan?
- c) Please explain whether Efficiency Manitoba discussed fuel switching with First Nations in the Diesel Zone, and if so, what came of those discussions.

RATIONALE FOR QUESTION:

To understand whether Efficiency Manitoba considered fuel switching in the Diesel Zone, or whether Efficiency Manitoba considers this to be outside of their mandate.

RESPONSE:

- a) Efficiency Manitoba does not consider conversion from a diesel heating system to grid electricity, where grid connection does not exist, to be aligned with the Act and Regulation. Grid connection is a supply side initiative and is not considered a demand side management initiative as defined under section 2 of the Act.
- b) Please see response to MKO/EM I-6a above.
- c) Although Efficiency Manitoba did not discuss fuel switching as it pertains to grid electricity as per MKO/EM I-6a above, the Efficiency Manitoba Regulation 119/2019 Section 14 provides for the use of the Affordable Energy Fund to realize improvements in home heating fuels other than electric energy and natural gas therefore a fuel switch to an alternative, such as biomass, would be an a retrofit option that would be within the mandate of Efficiency Manitoba.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf pages 79, 80 and 84-85 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 79 of the Plan, Efficiency Manitoba states that:

47 Efficiency Manitoba has targeted residential, residential income qualified, Indigenous,
48 and commercial, industrial and agricultural customer segments. Separating income
49 qualified and Indigenous customers as overall distinct segments emphasizes the
50 strategic importance and unique characteristics of these customers

At pdf page 80 of the Plan, Efficiency Manitoba states that:

70 Efficiency Manitoba has identified the need to reach a larger Indigenous
71 market. This segment may have similarities to other residential or hard-to
72 reach customers, but, in the case of First Nations specifically, an additional
73 layer of complexity can exist due to geography, homeownership structure,
74 and availability of resources.

At pdf pages 84-85 of the Plan, Efficiency Manitoba includes Table 3.3 which provides a
summary of the programs, initiatives, and offers in the residential sector, and states that:

149 These offers are designed to increase awareness of energy-efficient
150 technologies and practices and provide customers with rebates, incentives, and
151 information to encourage them to make their homes more energy efficient.

QUESTION:

- a) Please explain whether the full suite of programs, initiatives and offers in the residential sector, including product rebate offers, home renovation offers, new homes and major renovation offers, home energy efficiency kits and education are available to First

Nations Residential On-Reserve customers, including those customers in northern First Nations, which includes those in the Diesel Zone. Why or why not?

- b) If not, please explain the rationale behind making available less, rather than more DSM programs to this hard to reach customer group?
- c) Please explain whether the offers to the Indigenous customer segment are designed to increase awareness of energy-efficient technologies and practices and provide customers with rebates, incentives, and information to encourage them to make their homes more energy efficient. If not, why not? And if not, what are the offers to the Indigenous customer segment designed to do?

RATIONALE FOR QUESTION:

To understand whether the programs available to residential customers are available to residential First Nations customers, and if not whether such an approach complies with the Act and Regulations.

RESPONSE:

- a) First Nations Residential On-Reserve customers, including those in northern First Nations and those in the Diesel Zone are welcome to access the full suite of residential programs. Some initiatives will have a separate, specific First Nations approach, such as the education initiative, and Efficiency Manitoba would like to work with MKO and AMC, along with other potential Indigenous partners, to establish energy efficiency education pieces that are culturally relevant.
- b) Not applicable as per response to MKO/EM I-7a.
- c) As outlined in the Plan on page 331 of 591, Efficiency Manitoba aims to establish an Indigenous education initiative designed to increase awareness of energy-efficient technologies and practices.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 90 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 90 of the Plan, Efficiency Manitoba states that:

230 The Stakeholder Engagement Model will structure and guide Efficiency Manitoba's
231 engagement activities and decisions towards the corporate strategic goal of "building
232 and sustaining meaningful partnerships with a customer focus."

Efficiency Manitoba includes a three-ring model of engagement:

1. program design and delivery partners;
2. engagement and partnerships with customer and industry associations and social enterprises to assist in outreach to get direct feedback on types of services to offer or to identify potential additional funding sources; and
3. the Energy Efficiency Advisory Group.

QUESTION:

Given that First Nation customers are considered hard-to-reach customers, including specifically those in northern Manitoba and the Diesel Zone due to geographical issues, please explain why First Nations partners, and specifically those in northern Manitoba and the Diesel Zone are not represented in all three rings of the Stakeholder Engagement Model.

RATIONALE FOR QUESTION:

To consider whether engagement opportunities that could make the work of Efficiency Manitoba more efficient have perhaps been missed.

RESPONSE:

The Stakeholder Engagement Model is a representation of how Efficiency Manitoba's engagement activities will be informed and guided by both customers and delivery partners (contractors, installers, customer associations).

The rings in the Model are separated for illustrative purposes to recognize Efficiency Manitoba's potential engagement points and, in the case of the Energy Efficiency Advisory Group, the legislated structure and roles that particular groups fulfill. For efficiency, the perspectives shared through the Model need not be duplicated/represented in each ring to be given full consideration by Efficiency Manitoba. The three rings of the Stakeholder Engagement Model work fluidly and with similar/integrated purpose of providing Efficiency Manitoba with an informed vantage point from which programs can be designed and implemented to meet the diverse needs of those that Efficiency Manitoba works with and serves.

Through continued partnership with the EEAG, Efficiency Manitoba will be seeking to identify any additional engagement partners that can assist with ensuring that First Nations programming is designed to meet the needs of the customer segment and enables improved access to the program.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf pages 100-101 of 591

PREAMBLE TO IR (IF ANY):

At pdf pages 100-101 of the Plan, Efficiency Manitoba states that:

STAKEHOLDER ENGAGEMENT SUMMARY

445 Manitoba Hydro staff at the request of Efficiency Manitoba documented the many
446 facets of public engagement with various stakeholders throughout spring of 2019.
447 Discussions about existing programming offered by Manitoba Hydro took place and
448 were tracked, as well as detailed conversations and research related to possible
449 program enhancements and new opportunities. This summary of stakeholder
450 engagement and ongoing future engagement will help Efficiency Manitoba to
451 continuously improve its offerings through this and successive three-year plans.

452 Examples of the engagement activities that took place include:

- 453 • in-person meetings, phone conversations;
- 454 • “lunch and learns”;
- 455 • association meetings;
- 456 • site visits;
- 457 • presentations; and
- 458 • webinars.

The MKO member First Nations that receive services from Manitoba Hydro are the Nisichawayasihk Cree Nation, Tataskweyak Cree Nation, God's Lake First Nation, Pimicikamak Cree Nation, Mosakahiken Cree Nation, War Lake First Nation, Bunibonabee Cree Nation, Fox Lake First Nation, York Factory First Nation, Sayisi Dene First Nation, Wuskwi Sipiik Cree Nation, Misipawistik Cree Nation, Manto Sipi Cree Nation, Opaskwayak Cree Nation, Norway House First Nation, Mathias Colomb Cree Nation, Shamattawa First Nation, Barren Lands First Nation, Sapotaweyak Cree Nation, Northlands Denesuline First Nation, Chemawawin First Nation, Marcel Colomb First Nation, O-Pipon-Na-Piwin Cree Nation, Granville Lake First Nation, and Sherridon First Nation.

QUESTION:

Please prepare and provide a table showing the public engagement that Manitoba Hydro staff conducted at the request of Efficiency Manitoba throughout spring of 2019 with each of the MKO member First Nations. Please include the type of engagement (for example, in-person or webinar), the number of community participants, the topics discussed, the issues raised by community members and Efficiency Manitoba's plans for addressing those issues raised, as well as Efficiency Manitoba's continued engagement planned and scheduled already to take place with MKO member First Nations.

RATIONALE FOR QUESTION:

To understand Efficiency Manitoba's engagement efforts and strategy with customers in northern First Nations.

RESPONSE:

Please see the response to AMC/EM 1-9 for the engagement conducted by Manitoba Hydro staff at the request of Efficiency Manitoba, as well as Efficiency Manitoba's engagement with MKO member First Nations.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 116 of 591

PREAMBLE TO IR (IF ANY):

Many facets of the Plan are planned to be delivered by third-party providers.

At pdf page 116:

111 Program delivery budgets include private sector providers that are contracted to
112 provide third-party program implementation services.

and

125 Efficiency Manitoba will use a transparent and competitive public procurement
126 process, in accordance with trade agreements, to select third-party service providers
127 that may be required as set forth in the Plan.

QUESTION:

- a) Please provide a copy of Efficiency Manitoba's Procurement Policy for third-party service providers.
- b) Please explain whether preference will be given to First Nation owned or operated third-party service providers.
- c) Please explain the level of oversight and management of third-party service providers Efficiency Manitoba will provide, and if service is provided in a remote area, how Efficiency Manitoba foresees providing that oversight and management.
- d) What will the complaints process be with respect to third-party service providers, and will Efficiency Manitoba be held accountable for issues arising from the conduct of contractors?
- e) When contractors are deployed to remote northern First Nations, how will Efficiency Manitoba ensure the safety of residents?

RATIONALE FOR QUESTION:

To obtain information regarding the procurement and management of third-party service providers.

RESPONSE:

- a) Efficiency Manitoba's Procurement Policy is under development and is expected to receive board of director's approval at the December 2019 meeting. Efficiency Manitoba has been procuring based on guidelines and consultation with Manitoba Hydro's procurement policies and personnel during the transitional period. This has included using Manitoba Hydro's online procurement tools, such as MERX to procure for services. The process was used, for example, with the procurement of a service provider to assist in the development of Efficiency Manitoba's Evaluation Framework.
- b) Efficiency Manitoba intends to include procedures in its Procurement Policy on when and how to weight First Nation's individuals and organizations as third-party providers of goods and services while recognizing required alignment with trade agreements to which Manitoba is a signatory.
- c) All contracts entered into to provide service on behalf of Efficiency Manitoba will detail respective responsibilities, specific oversight and management, performance expectations and issues management protocols.
- d) While a formal complaints process has not been established, there are many avenues to provide Efficiency Manitoba with feedback concerning third party providers. Complaints and feedback can be received by Efficiency Manitoba's customer service representatives. This feedback will be escalated to the relevant Efficiency Manitoba employees to address the concerns.
- e) All contractors, regardless of their intended work location or assignment, will undergo a Personnel Risk Assessment (PRA), which includes a criminal record check. Contractors

and their employees who do not pass the requirements of the PRA will not be engaged to provide services on behalf of Efficiency Manitoba.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 142 of 591

PREAMBLE TO IR (IF ANY):

TABLE 5.8 at pdf page 142 of the Plan sets out the following data:

ANNUAL AVERAGE ELECTRIC CUSTOMER PARTICIPATION & BILL SAVINGS

Customer segment / program bundle	Annual average electric bill savings	Total annual electric bill savings
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Indigenous Homes	\$260/house	
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Small business	\$900/business	\$147,000
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QUESTION:

In calculating the total annual electric bill savings for the Indigenous customer segment:

- I. How many participating houses were estimated?
- II. How many participating businesses were estimated?
- III. Of those estimated houses and businesses, what percentage are estimated to be in northern Manitoba?

RATIONALE FOR QUESTION:

To determine the reasonableness of Efficiency Manitoba's estimates and calculations with respect to potential electric bill savings for the Indigenous customer segment.

RESPONSE:

Please see the revised Table 5.8 (2020/23 Efficiency Plan, Section 5.5.1, p.142 of 591) in COALTION/EM I-102.

- I. The 3 year average of an estimated 250 participating homes was used to calculate the total annual electric bill savings. The estimated participation per year is below.

INDIGENOUS PROGRAMS	Units	2020/21	2021/22	2022/23	3 year average
Insulation and Direct Install	No. of retrofits	100	150	180	143
Community Geothermal	No. of systems	50	90	90	77
Metis Income Qualified	No. of homes	30	30	30	30
Total	No. of homes	180	270	300	250

Note: Metis Income Qualified in revised Table 5.8 (2020/23 Efficiency Plan, Section 5.5.1, p.142 of 591) in COALTION/EM I-102, references number of retrofits whereas this question pertains to participating homes. As such, the table above is responsive specifically to this question. It's anticipated that a home will have multiple retrofits thus the retrofits number in COALTION/EM I-102 is higher than homes.

- II. The 3 year average of an estimated 33 participating businesses was used to calculate the total annual electric bill savings. The estimated participation per year is below.

INDIGENOUS PROGRAM	Units	2020/21	2021/22	2022/23	3 year average
Small Business	No. of businesses	30	30	40	33

Note: Bill savings averages may not be exact compared to Table 5.8 (2020/23 Efficiency Plan, Section 5.5.1, p.142 of 591) due to rounding.

- III. Efficiency Manitoba does not have a percentage estimated to be in Northern Manitoba. The Indigenous customer segment is designed to work with and capture energy efficient opportunities with Manitoba's Indigenous communities including those in Northern Manitoba.

REFERENCE:

The Efficiency Manitoba Act Section 7(c)

PREAMBLE TO IR (IF ANY):

The Efficiency Manitoba Act, Section 7(c) mentions that Efficiency Manitoba may develop and implement programs to improve building designs, building techniques and building technologies to increase energy efficiency.

QUESTION:

- a) Please describe whether Efficiency Manitoba plans to develop and implement programs to improve building designs, building techniques and building technologies to increase energy efficiency of buildings on First Nation reserves, including those in northern Manitoba.
- b) Why or why not?

RATIONALE FOR QUESTION:

Comparing the Efficiency Manitoba Act with the proposed Plan.

RESPONSE:

- a) Efficiency Manitoba's New Homes Program will work with First Nations communities to support their efforts of building better homes with improved building design, building techniques, and building technologies to ensure homes are built energy efficient at the start. In addition, Efficiency Manitoba has had preliminary conversations with the Manitoba Indigenous Housing Capacity Enhancement and Mobilization Initiative (MIHCEMI) Working Group to support their objective of creating a First Nations Building Code. This working group has representation from all 63 First Nations, including Northern Manitoba First Nations, and the Tribal Councils.
- b) Efficiency Manitoba wants to support First Nations communities in their efforts to be energy efficient and have improved building design, building techniques and building

technologies that are decided upon by First Nations. There is value in having a building code created for First Nations by First Nations, which can take traditional way of life into consideration as well as the northern climate.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 158 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 158 of the Plan, Efficiency Manitoba states that:

17 Efficiency Manitoba has grouped activities, savings and costs by customer segment.
18 As detailed in Section 3.1.1, Efficiency Manitoba has identified residential, residential
19 income qualifying, Indigenous, and commercial, industrial, and agricultural (CIA)
20 customer segments. These customer segments have been selected to be inclusive to
21 all Manitobans and to capture unique customer characteristics and energy
22 consumption patterns.

QUESTION:

Further to DAY/EM I-3

Please provide all data on which Efficiency Manitoba has relied to capture energy consumption patterns for the Indigenous customer segment. Please also provide the sources of data, including whether those sources are from the Indigenous customer segment.

RATIONALE FOR QUESTION:

Current consumption patterns of the Indigenous customer segment must be thoroughly understand in order to consider the cost-effectiveness of electric DSM program bundles and portfolio and the reasonableness of the methodology to evaluate cost-effectiveness

RESPONSE:

Efficiency Manitoba has relied on energy consumption data from Manitoba Hydro for First Nation on-reserve energy consumption patterns. Please see MKO/EM I-13-Attachment 1 for residential on-reserve energy consumption information.

Information can be extracted by First Nation on-reserve consumption, however, this level of detail for other customers within the Indigenous customers segment cannot be identified the same way.

In addition to Manitoba Hydro data, Efficiency Manitoba has also considered qualitative and anecdotal data provided by First Nation customers and communities to energy efficiency staff. While the qualitative/anecdotal data is not formalized in a report, Efficiency Manitoba understands that First Nation on-reserve may consume energy differently than First Nation off-reserve customers. Efficiency Manitoba aims to create a formal documentation process regarding First Nation on-reserve energy consumption as it works with the Manitoba Indigenous Housing Capacity Enhancement and Mobilization Initiative (MIHCEMI) Working Group, as it pertains to a First Nations Building Code.



**Manitoba Hydro 2019/20 Electric Rate Application
 AMC/MH I-8a-b**

REFERENCE:

GRA 2017, AMC/MH I-1

PREAMBLE TO IR (IF ANY):

The response provides average usage and average bills for each First Nation community for 2016/17.

QUESTION:

- a) Please provide similar data for 2017/18;
- b) Please provide similar data for 2019/20, assuming that consumption is identical to 2017/18 and that the requested 3.5% rate increase is approved.

RESPONSE:

- a) Please see the following table for the average usage and average monthly bill for Residential First Nations customers on reserves for 2017/18.

Residential On First Nation Reserves				
First Nation Community	Active Elec Services	Electric Space Heat	2017/18 Avg Usage (kW.h)	2017/18 Avg Monthly Bill
Barren Lands First Nation	142	0	13,598	\$99
Berens River First Nation	321	208	26,360	\$186
Birdtail Sioux Nation	118	113	27,388	\$193
Bloodvein First Nation	200	177	27,292	\$192
Brokenhead Ojibway First Nation	185	183	26,612	\$188
Buffalo Point First Nation	181	149	19,249	\$139
Bunibonibee (Oxford House) First Nation	414	177	33,656	\$236
Canupawkpā Dakota First Nation	109	108	26,327	\$186
Chemanwawin Cree Nation	317	268	35,038	\$245



Manitoba Hydro 2019/20 Electric Rate Application
 AMC/MH I-8a-b

Residential On First Nation Reserves				
First Nation Community	Active Elec Services	Electric Space Heat	2017/18 Avg Usage (kW.h)	2017/18 Avg Monthly Bill
Dakota Plains First Nation	39	38	23,931	\$169
Dakota Tipi First Nation	54	50	30,216	\$212
Dauphin River First Nation	76	74	22,339	\$159
Ebb And Flow First Nation	405	379	30,191	\$212
Fisher River First Nation	484	405	24,767	\$175
Fox Lake First Nation	81	72	29,986	\$211
Gamblers First Nation	35	34	24,826	\$176
Garden Hill First Nation	525	272	30,189	\$212
Gods Lake First Nation	296	128	31,378	\$220
Hollow Water First Nation	197	168	28,134	\$198
Keeseekoowenin First Nation	167	159	26,569	\$188
Kinonjeoshtegon First Nation	87	61	26,907	\$190
Lake Manitoba First Nation	248	228	32,868	\$230
Lake St Martin First Nation	153	150	11,261	\$80
Little Black River First Nation	196	185	25,516	\$180
Little Grand Rapids First Nation	276	187	29,816	\$209
Little Saskatchewan First Nation	142	141	27,773	\$196
Long Plains First Nation	370	366	29,033	\$204
Manto Sipi Cree Nation	133	64	39,959	\$278
Marcel Colomb First Nation	14	14	40,517	\$282
Mathias Colomb First Nation	415	394	37,575	\$262
Misipawistik (Grand Rapids) First Nation	248	230	30,882	\$217
Mosakahiken Cree Nation	259	217	33,882	\$238
Nischawayaksihk Cree Nation	513	486	38,177	\$266
Northlands Dene First Nation	149	0	12,692	\$94
Norway House Cree Nation	1201	1138	35,152	\$246
O-Chi-Chak-Ko-Sipi First Nation	136	126	28,267	\$199
O-PIPON-NA-PIWIN	217	198	32,594	\$228
Opaskwayak (OCN) Cree Nation	738	639	30,803	\$216
Pauingassi First Nation	135	92	23,886	\$169
Peguis First Nation	851	745	31,365	\$220
Pimicikamak Cree Nation	950	935	38,444	\$268
Pinaymootang (Fairford) First Nation	314	262	30,110	\$211



Manitoba Hydro 2019/20 Electric Rate Application
 AMC/MH I-8a-b

Residential On First Nation Reserves				
First Nation Community	Active Elec Services	Electric Space Heat	2017/18 Avg Usage (kW.h)	2017/18 Avg Monthly Bill
Pine Creek First Nation	212	199	29,547	\$208
Poplar River First Nation	226	150	28,884	\$203
Red Sucker Lake First Nation	208	98	30,029	\$211
Rolling River First Nation	145	141	22,049	\$157
Roseau River First Nation	201	163	32,907	\$231
Sagkeeng First Nation	663	644	27,481	\$194
Sandy Bay First Nation	559	550	37,177	\$260
Sapotaweyak Cree Nation	247	244	31,331	\$220
Sayisi Dene First Nation	122	0	10,253	\$77
Shamattawa First Nation	174	0	16,196	\$117
Sioux Valley First Nation	361	344	24,449	\$174
Skownan First Nation	131	120	28,275	\$199
St Theresa Point First Nation	631	338	35,048	\$245
Swan Lake First Nation	157	150	23,556	\$167
Tataskweyak (Split Lake) First Nation	401	376	39,109	\$273
Tootinaowaziibeeng (Valley River) First Nation	115	106	35,425	\$248
War Lake First Nation	36	30	27,095	\$191
Wasagamack First Nation	271	129	34,448	\$241
Waywayseecappo First Nation	440	401	30,737	\$216
Wuskwi Sipiik First Nation	37	35	27,704	\$195
York Factory First Nation	133	122	34,404	\$240

b) The information provided in part (a) are 2017/18 actuals which are not weather adjusted and as such utilizing the information to project a rate increase of 3.5% may not be reflective of an expected annual average bill for the 2019/20 fiscal year.

Name of First Nations	Cumulative number of participating customers in the Indigenous Energy Efficiency Program to June 30, 2017	Cumulative number of participating customers in the Indigenous Energy Efficiency Program to January 31, 2019	Cumulative number of customers retrofitted with Insulation to January 31, 2019	Cumulative number of customers retrofitted with Direct Install to January 31, 2019	Average Weather Adjusted Annual Consumption per residential customer (kWh)										
					2007/08*	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Barren Lands First Nation(Brochet)	52	52	52	0	-	13,821	13,550	13,643	12,750	15,342	12,488	12,616	12,799	13,833	12,969
Beren's River First Nation	15	74	74	0	-	25,367	26,969	26,461	25,708	27,456	24,873	28,753	27,640	26,676	25,503
Birdtail Sioux First Nation(Beulah)	20	20	20	0	-	30,717	28,967	29,069	28,864	27,278	27,849	28,808	26,291	27,588	26,509
Bloodvein First Nation	43	63	63	0	-	27,878	28,552	28,909	28,266	28,486	26,464	32,060	30,194	29,256	26,977
Brokenhead Ojibway Nation (Scanterbury)	85	85	85	0	-	25,462	26,942	26,249	27,149	25,502	26,792	28,744	27,974	25,358	25,807
Buffalo Point First Nation	0	0	0	0	-	30,376	35,343	31,307	30,065	32,052	29,140	30,570	30,782	31,808	29,695
Bunibonabee Cree Nation (Oxford House)	45	86	45	46	-	27,287	28,837	29,333	27,961	27,133	27,612	28,688	26,350	26,390	25,530
Canupawakpa Dakota (Oak Lake) First Nation (Pipestone)**	110	109	36	100	-	31,812	33,844	34,272	32,238	33,035	32,115	35,040	33,132	34,308	34,019
Chemawawin Cree Nation (Easterville)	45	45	45	0	-	36,433	39,391	36,607	37,831	34,785	35,675	39,872	38,365	36,503	37,437
Cross Lake First Nation	96	114	114	0	-	25,813	25,141	24,859	26,568	24,867	27,917	27,242	21,533	19,531	23,462
Dakota Plains First Nation (Portage la Prairie)	35	35	32	31	-	39,094	36,816	35,372	34,056	30,953	36,685	34,978	31,183	32,057	29,635
Dakota Tipi First Nation	51	51	20	50	-	28,116	27,980	25,921	23,491	23,582	22,800	19,711	24,070	20,563	22,839
Dauphin River First Nation (Gypsumville)	0	0	0	0	-	33,523	32,974	32,766	31,475	31,121	31,386	32,224	30,010	30,116	29,482
Ebb & Flow First Nation	20	20	20	0	-	31,487	32,109	30,211	29,365	29,111	28,753	31,854	29,613	28,735	28,997
Fisher River Cree Nation (Koostatak)	165	181	98	101	-	28,973	33,898	30,005	31,012	29,202	28,977	29,362	26,322	25,380	24,042
Fox Lake First Nation (Gillam)	40	58	20	40	-	32,172	33,161	31,487	30,153	30,922	30,938	32,810	32,067	30,745	29,628
Gamblers First Nation (Binscarth)**	33	32	13	21	-	25,510	27,577	26,621	27,411	26,331	27,164	29,116	26,496	25,817	24,399
Garden Hill First Nation (Island Lake)	67	67	65	35	-	23,576	25,207	25,753	26,508	26,523	27,796	30,943	31,101	30,827	29,506
God's Lake First Nation (God's Lake Narrows)	118	137	101	60	-	26,751	28,784	28,002	28,991	28,556	29,847	32,120	31,265	30,438	30,627
Hollow Water First Nation (Wanipigow)	0	0	0	0	-	32,272	33,537	33,608	33,214	32,013	30,668	31,721	31,736	31,783	30,444
Keeseekoowenin Ojibway Nation (Elphinstone)	136	136	47	89	-	27,992	29,527	28,372	29,561	28,274	29,129	31,045	28,459	27,127	27,533
Kinonjeoshtegon First Nation (Jackhead)	67	67	60	40	-	28,745	27,938	29,799	28,951	27,924	27,128	29,304	27,004	27,864	26,393
Lake Manitoba First Nation (Dog Creek)	119	172	81	141	-	31,591	33,324	32,568	31,218	31,213	26,562	29,664	29,331	27,994	25,956
Lake St. Martin First Nation	0	0	0	0	-	32,627	33,441	32,545	32,833	32,038	32,204	34,275	32,576	32,684	31,797
Little Black River First Nation (O'Hanley)	68	68	68	0	-	29,812	28,998	30,275	12,781	18,026	15,497	19,017	27,241	29,422	23,706
Little Grand Rapids First Nation	18	58	45	43	-	27,811	28,970	27,132	27,614	26,503	25,690	28,935	25,824	24,876	24,790
Little Saskatchewan First Nation	0	0	0	0	-	27,962	30,183	28,952	29,972	30,395	29,274	36,188	29,131	28,060	29,649
Long Plain First Nation	124	124	96	37	-	31,408	32,604	30,607	27,621	27,075	24,134	22,124	21,155	24,429	26,320
Manto Sipi Cree Nation (God's River)	86	86	62	40	-	30,321	33,142	32,038	31,891	30,448	31,994	31,292	29,875	28,336	28,680
Marcel Colomb First Nation Black Sturgeon (Lynn Lake)	0	0	0	0	-	38,575	37,743	40,219	39,739	37,413	40,794	41,678	40,369	40,303	39,281
Mathias Colomb Cree Nation (Pukatawagan)	55	80	80	0	-					32,260	35,301	42,060	38,273	38,575	39,118
Misipawistik (Grand Rapids)	126	126	25	120	-	36,916	38,491	35,067	36,676	36,671	37,145	37,289	37,168	36,713	36,997
Mosakahiken (Moose Lake)	29	29	29	0	-	32,202	33,296	33,484	32,544	32,967	33,599	35,599	34,257	34,498	34,243
Nisichawayasihk (Nelson House)	380	450	19	445	-	37,520	39,451	38,392	39,441	38,478	37,066	39,215	37,931	37,399	37,364
Northlands Dene (Lac Brochet)	47	47	47	0	-	13,256	13,557	13,169	13,421	13,756	13,349	16,173	11,180	14,846	12,509
Norway House	15	15	15	0	-	34,551	34,323	34,347	35,042	33,076	33,177	35,751	35,134	34,910	34,094
O-Chi-Chak-Ko-Sipi (Crane River)	60	60	9	52	-	30,898	33,416	32,042	31,645	32,046	32,417	34,097	31,521	28,856	28,537
Opaskwayak (OCN)Pas	214	274	215	132	-	32,462	33,294	32,080	33,294	31,776	31,813	33,693	30,047	32,392	30,870
O-Pipon-Na-Piwin (South Indian Lake)	25	25	20	9	-	29,381	30,788	30,584	30,464	30,038	29,978	31,148	30,280	29,758	30,100
Pauingassi (Pauingassie)	0	63	63	0	-	28,921	28,425	29,477	29,048	28,255	29,283	32,374	33,041	32,583	32,840
Peguis	165	197	142	60	-	23,175	25,184	22,954	24,427	25,119	26,422	31,378	25,234	24,482	24,261
Pinaymootang (Fairford)	11	24	11	13	-	35,453	36,893	35,958	35,086	33,509	32,957	35,356	31,347	31,046	30,854

Name of First Nations	Cumulative number of participating customers in the Indigenous Energy Efficiency Program to June 30, 2017	Cumulative number of participating customers in the Indigenous Energy Efficiency Program to January 31, 2019	Cumulative number of customers retrofitted with Insulation to January 31, 2019	Cumulative number of customers retrofitted with Direct Install to January 31, 2019	Average Weather Adjusted Annual Consumption per residential customer (kWh)										
					2007/08*	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Pine Creek (Camperville)	111	111	45	68	-	29,633	32,333	31,339	29,876	29,863	28,835	30,259	28,925	29,262	28,313
Poplar River (Negginan)	128	171	140	106	-	29,470	29,698	29,206	30,612	28,597	27,991	29,972	29,216	25,236	28,593
Red Sucker Lake (Island Lake)	142	142	107	99	-	24,644	25,091	25,312	26,869	28,089	28,110	31,188	29,076	29,950	29,386
Rolling River (Erickson)	20	74	20	61	-	22,336	23,240	22,665	22,295	21,360	21,246	22,118	21,683	22,025	21,511
Roseau River (Anishinabe)	106	106	95	40	-	32,870	34,774	34,458	33,740	32,187	32,590	33,677	32,224	32,895	31,741
Sagkeeng (Fort Alexander)	459	499	224	445	-	30,197	30,696	30,059	29,885	29,145	28,732	29,836	28,577	27,829	26,721
Sandy Bay (Marius)	479	485	204	474	-	36,871	38,589	38,591	38,322	38,112	37,569	39,969	37,659	37,290	35,997
Sapotaweyak (Pelican Rapids)	61	61	61	0	-	28,684	29,979	31,219	31,452	30,666	30,415	31,890	32,229	29,885	30,729
Sayisi Dene (Tadoules Lake)	67	107	27	80	-	10,396	10,488	10,271	10,684	10,629	11,374	10,133	10,210	11,341	9,404
Shamattawa	15	15	15	0	-	15,693	16,505	17,152	17,476	17,144	18,255	19,036	18,983	17,506	15,967
Sioux Valley (Griswold)	360	360	285	302	-	26,821	27,735	27,770	27,202	27,012	26,946	27,611	25,801	25,581	24,123
Skownan (Waterhen)	40	40	40	0	-	30,050	32,665	30,690	32,754	29,400	29,256	33,073	28,975	28,854	27,273
St. Theresa Point (Island Lake)	90	153	108	117	-	40,240	39,584	40,632	41,349	40,278	40,157	41,992	41,207	38,632	38,011
Swan Lake	0	0	0	0	-	25,564	24,411	30,863	29,757	29,150	31,367	35,026	35,441	35,307	34,209
Tataskweyak (Split Lake)	39	56	56	0	-	26,331	26,728	26,705	26,309	23,938	24,766	26,809	24,763	24,233	23,351
Tootinaowaziibeeng (Valley River)	46	46	46	0	-	32,498	32,472	33,176	32,811	33,431	32,723	35,636	34,213	33,481	34,073
War Lake (Ilford)	0	0	0	0	-	29,677	34,440	33,141	33,033	29,582	31,581	31,894	33,446	29,539	26,998
Wasagamack	45	61	61	0	-	21,987	23,021	24,678	24,638	25,523	27,078	32,085	32,949	33,850	33,447
Waywayseecappo	289	289	129	238	-	33,354	34,762	33,715	32,497	32,894	32,275	33,746	31,418	32,263	29,745
Wuskwi Sipihk (Birch River)	24	24	8	21	-	26,911	30,978	36,573	33,937	34,718	34,593	34,180	29,321	29,587	26,615
York Factory (York Landing)	52	52	52	0	-	32,489	32,582	33,427	33,035	31,651	32,193	33,118	31,378	34,845	34,077
TOTAL	5358	6182	3760	3756	-	29,109	30,215	29,874	29,434	28,966	29,030	30,923	29,413	29,115	28,471

*Consumption data for 2007/08 is unavailable.
 ** Duplicate record found. Participation adjusted

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 407 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 407 of the Plan Efficiency Manitoba states:

21 Beginning in the last fiscal year of Efficiency Manitoba’s 2020/23 Efficiency Plan (the
22 “Plan”), incentives will be available to customers who install an approved grid
23 connected solar photovoltaic (PV) system to an existing building or premise.
24 Approved customers will receive a prescribed financial incentive based on the direct
25 current (DC) rating of the system. The program enables customers to displace a
26 portion of their electricity requirements with solar energy.

QUESTION:

- a) Please confirm whether, in the last fiscal year of the Plan, the solar photovoltaic incentive program will be available to the Indigenous customer segment. If not, why not?
- b) Given that customers in the “Diesel Zone” are not connected to the Manitoba Hydro grid, will these customers not have available to them the solar photovoltaic incentive program?

RATIONALE FOR QUESTION:

To consider whether the Plan is accessible to all Manitobans.

RESPONSE:

- a) Yes, the Indigenous customer segment will be eligible for solar photovoltaic (PV) incentives. All customer segments are eligible for this program, as well as the Customer Sited Bioenergy Program.

- b) Customers in the diesel zone, who are connected to the diesel grid, will be eligible for the Solar Energy Program. Training on program guidelines and code requirements will be made available to contractors interested in installing solar PV throughout the province.

REFERENCE:

The Efficiency Manitoba Act Section 7 Section 4(3)(a)

PREAMBLE TO IR (IF ANY):

Section 4(3)(a) of The Efficiency Manitoba Act sets out that:

In fulfilling its mandate, Efficiency Manitoba may specifically target, where appropriate, particular locations or areas of Manitoba or particular fuel choices.

QUESTION:

- a. Please explain whether, in preparing the Plan, Efficiency Manitoba specifically targeted northern Manitoba. If not, why not? If so, how?
- b. Please explain whether, in preparing the Plan, Efficiency Manitoba specifically targeted First Nations in northern Manitoba. If not, why not?

RATIONALE FOR QUESTION:

To consider whether Efficiency Manitoba has complied with the Act, and to consider whether specific consideration was given to customers living in northern First Nations.

RESPONSE:

- a. In preparing the Plan, Efficiency Manitoba has designed an inclusive and diverse portfolio targeting all Manitobans while capturing unique customer characteristics. Efficiency Manitoba was able to design a plan meeting the mandated energy savings targets in a cost-effective manner specifically targeting customer segments including Industrial, Agricultural, Commercial, Residential, Income Qualified and Indigenous. Each of these customer segments would include customers residing in Northern Manitoba.
- b. The Indigenous customer segment is designed to work with and capture energy efficient opportunities with Manitoba's First Nations communities including those in Northern

Manitoba. See also MKO/EM I-2c which outlines Efficiency Manitoba's plans for ongoing engagement including an Indigenous Energy Efficiency Working Group with First Nation and Metis representation. Through ongoing engagement, Efficiency Manitoba looks forward to receiving feedback on program development and delivery to serve all customer segments inclusive of First Nations in northern Manitoba.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 178 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 178, Efficiency Manitoba states:

12 Section 12(5) within the Act allows Efficiency Manitoba to modify the Plan as deemed
13 necessary during any approved three-year period, provided these changes maximize
14 the amount or cost-effectiveness of net savings and do not exceed approved costs
15 for the three-year plan in place.

QUESTION:

Assuming a 3-year plan is approved, please explain whether and how Efficiency Manitoba will notify the Board and consumers, including First Nation consumers, of modifications, if any, made to an approved Plan throughout the three-year period. Please include an explanation of the timeframe within which notification of such modifications, if any, will be made.

RATIONALE FOR QUESTION:

To understand if the Plan is modified, how and when First Nation consumers will be notified.

RESPONSE:

In section 7.4.1, pdf pages 189-192 of the three-year plan submission, Efficiency Manitoba outlines the process that will be utilized to acquire time sensitive and cost-effective energy savings through use of the contingency fund. This specific process has been established pertaining to the contingency fund recognizing the value of the contingency fund (10 percent of the overall annual average budget, or an overall cap of \$7 million across all three Plan years). Using the contingency fund and the process for use is thus envisioned for major revisions

and/or additions that were not specifically contemplated at the time of Plan preparation and approval.

MKO/EM I-2a and c and MKO/EM I-8 outline Efficiency Manitoba's commitment to ongoing engagement to ensure program design and implementation are guided with input of those who will be served by the Plan. Section 12(5) of the Act permits flexibility to make input-informed adjustments as the Plan is implemented. In this manner, rather than notification which may be carried out after adjustments are implemented, Efficiency Manitoba is fully committed to working collaboratively with communities on any adjustments that may be required.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 181 of 591

PREAMBLE TO IR (IF ANY):

Figure 7.2 on pdf page 181 of the Plan suggests that the Customer Relationship Management Interface is planned to be largely, if not entirely, social media based.

QUESTION:

- a) Please provide a detailed explanation of the way(s) in which the Customer Relationship Management Interface will be modified to account for the poor, or lack of, internet connectivity and availability for customers in northern Manitoba First Nations.
- b) With respect to customers in northern Manitoba First Nations, if not through a social media interface, how will the DSM Reports and Dashboards arising from the work of the CRM program incorporate data from customers in northern Manitoba First Nations?

RATIONALE FOR QUESTION:

To consider whether Efficiency Manitoba has appropriately considered the realities of poor internet connectivity on First Nations in northern Manitoba, and the potential impacts to the Plan arising from issues related to this reality.

RESPONSE:

- a) Equity and access is a Guiding Principle for Efficiency Manitoba as an organization, aligned with key elements of the Act and Regulation as outlined in section 2.3 on pdf page 16 of the three-year plan.

Manitoba First Nations will benefit from enhanced levels of support provided by Efficiency Manitoba staff. Complementary to web-based engagement facilitated through the Customer Relationship Management (“CRM”) system, First Nation communities will be engaged by Efficiency Manitoba staff through direct

communication to the First Nation and in coordination with other Indigenous organizations such as, but not limited to, MKO.

Where poor, or lack of, internet connectivity and availability for customers in northern Manitoba First Nations exists, customer engagement will be supplemented through Efficiency Manitoba staff dealing directly with First Nation communities, disseminating promotional information in a variety of accessible formats, including but not limited to brochures, posters, or other mediums.

Similarly, customers will be provided the necessary support and resources to participate in Efficiency Manitoba's programs, initiatives, and offers. Online applications can be submitted on behalf of the First Nation, or its members, completed by Efficiency Manitoba staff, or alternatively when preferred, paper applications will be available to ensure access to information and programming. This more traditional customer experience, including face-to-face or telephone support from Efficiency Manitoba staff, will also be available to customers that cannot, or prefer not to, engage online.

- b) The ongoing monitoring and evaluation of DSM program energy savings and results will be tracked through reporting and dashboard functions in the CRM system. Both customer applications completed online on behalf of the customer by Efficiency Manitoba staff, as well as paper applications, will ultimately reside in the CRM system. Accordingly, all participation, through any means, will appear in all reporting and dashboard functions ensuring accurate and transparent reporting of results associated with any and all customer segments.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 184 of 591

PREAMBLE TO IR (IF ANY):

Regarding the Evaluation, Measurement and Verification Framework proposed by Efficiency Manitoba

84 The following five principles have been identified within the DSM evaluation
85 framework:

86 • Results-focused: Evaluation should be an integral component of the ongoing
87 DSM planning process;

88 • Independent: Results should be unbiased and independent;

89 • Transparent: Assumptions, methodologies and calculations used should be
90 clearly and thoroughly documented;

91 • Appropriate rigor: An appropriate level of rigor should be used based on
92 common industry practices and Efficiency Manitoba's evaluation priorities; and

93 • Efficient: Evaluation activities should be carefully planned and prioritized to
94 maximize the value of the evaluation.

QUESTION:

- a) Please provide a detailed explanation of evaluation priorities that Efficiency Manitoba considers to be common industry practices, as well as a detailed explanation of Efficiency Manitoba's evaluation priorities.
- b) If Efficiency Manitoba's priorities differ from common industry practice, please provide the rationale for the deviation.

RATIONALE FOR QUESTION:

To understand Efficiency Manitoba's proposed evaluation framework and to consider whether it is appropriate.

RESPONSE:

- a) Efficiency Manitoba's evaluation priorities are outlined in the three-year 2020/23 Efficiency Plan, Attachment 5, p. 558-559 of 581. These are based on industry best practices evaluation priorities.

- b) Not applicable as per response to MKO/EM I-18a.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 190 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 190 of the Plan, with respect to a “contingency budget” in the event of unanticipated DSM opportunities:

189 Efficiency Manitoba has assumed that assigning 10
190 percent of the overall annual average budget, or an overall cap of \$7 million across all
191 three Plan years will sufficiently address this risk. This contingency budget has not
192 been included within the overall portfolio budget or cost-effectiveness analysis
193 included within the Plan.

QUESTION:

Given that the contingency budget has not been included within the overall portfolio budget, In the event EM does not utilize the “contingency budget”, how does EM propose to reflect and report on the unused moneys?

RATIONALE FOR QUESTION:**RESPONSE:**

Please see 2020/2023 Efficiency Plan submission Section 7 (page 191 of 591) for the process that has been established for the contingency budget.

If the contingency budget is not accessed that implies that the Plan was delivered as approved by the Minister and therefore there are no specific reporting requirements outlined for its non-use.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 213 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 213 of the Plan, Efficiency Manitoba states:

178 A developed network of retail locations is essential to ensure energy-efficient
179 products and offers are accessible throughout the province. Manitoba retailers vary in
180 size and scope from big box home improvement centres to smaller independent
181 hardware and appliance shops. Establishing partnerships with retailers is a key
182 strategy for engaging with and delivering programs and initiatives to consumers.
183 Efficiency Manitoba will seek partnerships with Manitoba retailers to promote its
184 campaigns and program offers in flyers, on retailer websites, and through in-store
185 promotions.

And

186 In addition to retailers, a large network of contractors across Manitoba is essential to
187 the success of energy efficiency programs in Manitoba. Buy-in from contractors will
188 ensure Efficiency Manitoba has a well-trained network to educate customers on
189 energy-efficient technologies.

QUESTION:

- a) How will Efficiency Manitoba ensure energy-efficient products and offers are accessible in northern Manitoba First Nations that may not have retailers such as either big box home improvement centres or small independent hardware and appliance shops? Will Efficiency Manitoba rely entirely on contractors?
- b) How is Efficiency Manitoba seeking to secure the “buy-in” of contractors across Manitoba?

RATIONALE FOR QUESTION:

To consider whether customers in northern First Nations will have access to rebate programs.

RESPONSE:

- a) As the three-year plan is implemented, Efficiency Manitoba welcomes opportunities for collaboration and engagement with First Nations communities and MKO to determine means to access available distribution channels and resources while moving increasingly towards equity in access and opportunities for participation across the province. As details are still in development, Efficiency Manitoba does not anticipate relying entirely on contractors. However, many of the energy efficient products that will be available during the limited time retail rebate campaigns, will be available to First Nations on a year-round basis and free of charge through the First Nations Direct Install program.

- b) Efficiency Manitoba has formulated a comprehensive strategy to secure the buy-in of contractors across Manitoba. Leveraging Manitoba's experience in offering energy efficiency initiatives will be imperative to Efficiency Manitoba's success. A robust existing network of private sector delivery partners, including but not limited to contractors, is already established in Manitoba. Maintaining and continuing to strengthen these relationships is paramount to ensure the success of Efficiency Manitoba. In addition, many of the existing efficiency programs in Manitoba continue to experience high participation and energy savings. Efficiency Manitoba acknowledges these achievements and therefore plans to carry initiatives forward for sustained success of both Efficiency Manitoba and its contractors.

Efficiency Manitoba will utilize the Stakeholder Engagement Model to structure its engagement activities and decisions towards the corporate strategic goal of "building and sustaining meaningful partnerships with a customer focus". This process will include engagement activities specifically with contractors.

To their benefit, these parties will have the opportunity to enhance their existing product and service offerings with programs available through Efficiency Manitoba. Using Efficiency Manitoba promotional materials and highlighting offers alongside their

own advertisements, contractors can attract new customers and gaining additional business.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf pages 213-14 of 591

PREAMBLE TO IR (IF ANY):

At pdf pages 213-214 Efficiency Manitoba states that:

196 Third party service providers will be procured to work on behalf of Efficiency
197 Manitoba for a variety of key programming initiatives. Some advantages of utilizing
198 service providers include the following:

[...]

203 • service providers can be deployed into geographic locations with limited
204 access to qualified trades, where they can, in turn, partner with local trades
205 or community members seeking employment opportunities to deliver
206 programming;

QUESTION:

To deliver programs on behalf of Efficiency Manitoba, how will Efficiency Manitoba ensure the timely, efficient and safe deployment of independent third-party contractor service providers into hard to reach geographic locations – such as isolated First Nations in northern Manitoba, including the 4 First Nations in the “Diesel Zone”?

RATIONALE FOR QUESTION:

To consider whether “all Manitobans” will be able to access the programs offered by Efficiency Manitoba if they so choose.

RESPONSE:

Please see the response to MKO/EM I-10e which addresses Efficiency Manitoba's planned Personnel Risk Assessment process for contractors. Please also see the response to AMC/EM I-4a-c which outlines Efficiency Manitoba's plans for mandatory sensitivity and cultural awareness training for contractors. Please see response to DAYMARK/EM I-13 for information on the procurement schedule that has been planned for program delivery.

Efficiency Manitoba's three-year plan savings projections require timely and efficient use of resources to meet targets. There is shared customer and Efficiency Manitoba interests in effectively deploying resources across the province including to isolated First Nations in northern Manitoba.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 219 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 219 of the Plan, with respect to program design, modelling, management, technical support and customer support, Efficiency Manitoba states:

311 Efficiency Manitoba will maintain and
312 expand the expertise required to assess opportunities, optimize knowledge of the
313 local market, design programs and initiatives, forge long term relationships and
314 partnerships, and ensure delivery of the programs and initiatives needed to meet
315 savings targets. Efficiency program design require nuanced and detailed
316 understanding of the technology and its application within the customer's business.
317 The establishment of strong customer relationships through customer and technical
318 support can help customers participate in efficiency programming where sensitive
319 customer information exists; such is the case with income qualified programs and
320 large industrial projects.

And

321 Technical staff within Efficiency Manitoba will provide technical expertise and advice
322 to program staff, customers, and industry on matters related to energy efficiency.

QUESTION:

- a) With respect to program design, modelling, management, technical support and customer support, please provide an explanation of Efficiency Manitoba's understanding of what constitutes a "local market".
- b) Regarding technical staff, given that customers in northern Manitoba First Nations face issues particular to their specific circumstances, please provide a detailed description of the level of understanding of those particular issues that will be required of Efficiency Manitoba technical staff in order to provide technical expertise and advice.

RATIONALE FOR QUESTION:

To consider whether opportunities exist in northern First Nations to assist Efficiency Manitoba to efficiently design and deliver programs.

RESPONSE:

- a) Efficiency Manitoba considers the “local market” to be but not limited to, service providers, delivery partners, contracted third parties, and trade allies serving the Manitoba energy efficiency market.

- b) Efficiency Manitoba technical staff and program support staff understand that First Nations in northern Manitoba face issues particular to their specific circumstances. These circumstances include but are not limited to, geographic isolation with limited access, over-crowding in homes, limited capital resources to perform energy efficiency upgrades, availability of First Nations community members to perform maintenance on HVAC systems. Efficiency Manitoba’s technical staff provides guidance on a technology and its application and takes the issues facing First Nations communities into consideration when providing that guidance. As an example, technical staff are aware that homes with higher occupancy require higher rates of ventilation and that heat recovery ventilator (HRV) maintenance has been a challenge in northern communities. As a result, staff are tracking the development of a new residential size dual core exchanger HRVs that are aiming to prevent freeze up and therefore will be a more reliable option than existing products available.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 261 of 591

PREAMBLE TO IR (IF ANY):

FIGURE A3.7 in Appendix A Section A3 at pdf page 261 sets out the ELECTRIC PACT LEVELIZED COST SUMMARY – PROGRAM BUNDLE BY CUSTOMER SEGMENT

QUESTION:

Please provide the electric PACT levelized cost Efficiency Manitoba has calculated for the emerging technology program bundle to the Indigenous customer segment?

RATIONALE FOR QUESTION:

To consider whether, with respect to emerging technology, Efficiency Manitoba is planning to exclude the Indigenous customer segment.

RESPONSE:

The electric PACT levelized costs were allocated amongst the customer segments with the highest anticipated participation. Efficiency Manitoba did not calculate the electric PACT levelized cost for the emerging technology program bundle for the Industrial, Indigenous, or Income Qualified customer segments. All customer segments are welcome to access the full suite of programs under the emerging technology bundle, including the Indigenous customer segment.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 273 of 591

PREAMBLE TO IR (IF ANY):

In Appendix A – Section A4, at pdf page 273 of the Plan, regarding Residential Programs, Efficiency Manitoba states that

1 Programs, offers, and initiatives in the residential sector are designed to increase
2 awareness of energy-efficient technologies and practices and provide consumers with
3 information and incentives to encourage them to make their homes more energy
4 efficient. The main objectives are as follows:

- 5 1) to encourage the adoption and installation of energy-efficient
- 6 products/technologies and behaviours in the residential sector in Manitoba;
- 7 2) to accelerate market transformation of cost-effective energy-efficient
- 8 products/technologies in the residential market;
- 9 3) to develop a robust suite of offerings that is beneficial to the
- 10 homeowner/tenant and the private sector;
- 11 4) to provide homeowners and tenants with tools and information to effectively
- 12 make decisions about their home energy use;
- 13 5) to initiate integrated energy efficiency marketing campaigns involving
- 14 participating retailers, suppliers, and contractors;
- 15 6) to reduce the initial cost of new technologies by providing rebates and
- 16 incentives; and
- 17 7) to provide an avenue for Manitobans to feel empowered in their efforts to save
- 18 energy and reduce their carbon footprint.

QUESTION:

- a) Please provide a detailed explanation as to whether Efficiency Manitoba considers that all of these objectives apply equally to the residential Indigenous customer segment.
- b) If not, why not?

RATIONALE FOR QUESTION:

To consider the accessibility of the Plan to all Manitobans, and to consider whether the full suite of programs available to the residential customer segment should be made available to the Indigenous customer segment, if this is not already the case.

RESPONSE:

- a) With the exception of the objective of “to initiate integrated energy efficiency marketing campaigns involving participating retailers, suppliers, and contractors”, Efficiency Manitoba considers all these objectives to apply equally to the residential Indigenous customer segment.

- b) The objective of “to initiate integrated energy efficiency marketing campaigns involving participating retailers, suppliers, and contractors” is more difficult to achieve in Northern First Nations due to reduced access to retailers, suppliers and contractors. As the three-year plan is implemented, Efficiency Manitoba welcomes opportunities for collaboration and engagement with First Nations communities and MKO to determine means to access available distribution channels and resources while moving increasingly towards equity in access and opportunities for participation across the province. In addition, please see response to MKO/EM I-20a.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 273 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 275 of the Plan, Efficiency Manitoba states:

45 Rebates for energy-efficient lighting, insulation incentives, refrigerator and freezer
46 retirement, and the distribution of free water and energy saver kits to Manitobans
47 have been available through Manitoba Hydro for many years and have seen high
48 levels of participation. Due to the high market penetration of these initiatives, the
49 incremental acquisition cost to reach customers who have not yet participated may
50 be higher than previous initiatives.

QUESTION:

Please explain how Efficiency Manitoba determined that the incremental acquisition cost to reach customers who have not yet participated in the well-established Rebates for energy-efficient lighting, insulation incentives, refrigerator and freezer retirement, and the distribution of free water and energy saver kits may be higher, and not lower, than previous initiatives?

RATIONALE FOR QUESTION:

To understand the reasonableness of Efficiency Manitoba's methodology to evaluate cost-effectiveness.

RESPONSE:

Rebates for various residential energy efficient technologies have been available through Manitoba Hydro's energy efficiency programs for many years as described in the submission (PDF page 275). These programs have seen high levels of participation and as a result, the associated products and technologies have experienced high market penetration.

Due to this high market penetration, the remaining market potential is on the decline as many of these products are in the maturity phase of the product life cycle. Generally, customer participation for these programs have been in decline year over year as many customers have already adopted these energy efficient technologies. As a result, it is expected that the acquisition cost to reach customers may increase considering the declining total remaining market, as more targeted (and therefore potentially more costly) methods of reaching these customers must be undertaken.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 282 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 282 of the Plan, Efficiency Manitoba states:

129 There are various factors that determine product eligibility such as energy
130 consumption, market forces, product availability, building code requirements, and
131 product performance.

QUESTION:

Please explain the specific building codes that Efficiency Manitoba considered when determining product eligibility for First Nations on-reserve residential customers.

RATIONALE FOR QUESTION:

To determine whether Efficiency Manitoba considered appropriate and accurate information when preparing the Plan, and specifically the DSM programs available to the Indigenous customer segment.

RESPONSE:

The text referenced at page 282 of the Plan pertains to the overall residential market. For this market, if products are required by code when the home was built, these products are not eligible for program incentives if they are installed at a later date. As an example, a home built after 1998 would not be eligible for the insulation offer in the Home Renovation Program, as it is assumed the insulation levels in the home exceeded the minimum requirements of the code at the time of construction and therefore the home is not considered under-insulation for the purpose of receiving a retrofit rebate.

This same eligibility requirement will be not applied to on-reserve residential customers due to factors such as irregular enforcement of building code or modifications made to the home since the time of construction. Efficiency Manitoba will work with First Nations Communities to obtain appropriate and accurate information on the housing stock to determine which homes can be deemed eligible for DSM programs available to the Indigenous customer segment.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf pages 285-86 of 591

PREAMBLE TO IR (IF ANY):

175 Efficiency Manitoba will provide full-service Direct Install Offers for homeowners,
176 beginning with a basic Home Energy Check-Up of their home. The Home Energy
177 Check-Up will identify opportunities, recommend upgrades, and enable customers to
178 take the next step towards a more energy-efficient home through a direct install
179 option, rebates and incentives on eligible products.

180 Homeowners may complete a basic energy check-up of their home through two
181 streams: the Online Home Energy Questionnaire and/or the in-person Home Energy
182 Check-Up.

QUESTION:

With respect to band-owned housing on-reserve, who does Efficiency Manitoba consider to be the “homeowner”?

RATIONALE FOR QUESTION:

To consider how the Direct Install program for residential customers will apply on-reserve.

RESPONSE:

Efficiency Manitoba considers the band to be the “homeowner” of band-owned on-reserve housing. The First Nation Insulation and Direct Install Program is a dedicated First Nation Program that will work with the band to implement energy efficiency upgrades. First Nation on-reserve homes will receive a walk through by a dedicated Efficiency Manitoba First Nation Energy Advisor to identify opportunities. In the First Nation Direct Install Program, items such as LEDs are provided for free, instead of only an incentive to cover a portion of the cost. The Online Home Energy Questionnaire can also be completed by any First Nation on-reserve customer as it is not restricted to a homeowner.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf pages 289-90 pf 591

PREAMBLE TO IR (IF ANY):

With respect to retail rebates, at pdf pages 289-90 of the Plan, Efficiency Manitoba states:

232 Efficiency Manitoba will provide instant rebates on a variety of energy-saving
233 technologies such as lighting and air sealing products. To take part, customers will
234 visit a participating retailer and purchase an eligible product to receive an instant
235 rebate at the checkout. Instant rebate campaigns will be offered in spring and fall
236 annually starting in spring 2020.

237 Online rebates will available on technologies with higher upfront costs including
238 appliances and smart thermostats. Customers will participate by purchasing an
239 eligible product either in-store or online and then completing an online form on
240 Efficiency Manitoba's website to claim their rebate. Online rebates will be offered
241 year-round.

242 Retail rebates provide residential customers with a channel to purchase energy
243 efficient products at accessible and competitive prices. By providing rebates on
244 energy-efficient products, Efficiency Manitoba aims to reduce market barriers and
245 ensure that all customers are able and encouraged to choose energy-efficient
246 products over their inefficient counterparts. In addition, due to its low barriers to
247 participation, this initiative serves as a gateway for customers to make additional
248 energy-efficient improvements to their homes.

QUESTION:

- a) Does Efficiency Manitoba consider a lack of internet availability and connectivity to be a barrier to participation in the online rebates program for technologies with higher upfront costs?
- b) If so, how does Efficiency Manitoba propose to address this barrier to accessibility?

RATIONALE FOR QUESTION:

To consider how the retail rebate program for residential customers will apply for customers living on-reserve in northern Manitoba First Nations with limited internet availability.

RESPONSE:

- a) Yes, Efficiency Manitoba has recognized and anticipated that a lack of internet availability may be a barrier to participation in online rebates offers particularly in remote and northern areas of the province. Equity and access is a Guiding Principle for Efficiency Manitoba and as such, the organization has taken steps within the three-year plan to mitigate anticipated barriers to participation.

- b) As indicated in the 2020/23 Efficiency Plan, Section A4.4.3, p.293 of 591: “A paper version of the application form will be available for customers that do not have access to the internet or customers that choose not to apply online.” Customers without access to the internet may call Efficiency Manitoba to request a paper application form, which will then be mailed to them. The customer may fill out the form and mail it back to Efficiency Manitoba for submission and review.

In addition, to further promote accessibility, Section A6.3 (p.337-339 of 591) of the Plan outlines how two out of five online rebate products (smart thermostats and clothes washers) will be made available to on-reserve First Nations customers through the Insulation and Direct Install Offers.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf pages 329-20 of 591

PREAMBLE TO IR (IF ANY):

At Pdf pages 329-30 of the Plan, Efficiency Manitoba states:

13 The energy efficiency implementation barriers specific to First Nations have
14 historically stemmed from a lack of available resources, including First Nation
15 individuals to oversee and complete the work, as well as the availability of capital
16 funds. The quality of the housing stock can also present a challenge as other home
17 upgrades may be required before energy efficiency upgrades can occur. Other issues
18 such as a lack of homeownership and higher than average occupancy can also affect
19 both the rate at which participation occurs as well as the time it takes to complete
20 upgrades. Efficiency Manitoba has considered these barriers and aims to address
21 them through program design and delivery in partnership with First Nations.

QUESTION:

For customers living on First Nation reserves in northern Manitoba, how does Efficiency Manitoba propose to address through program design and delivery each of the following:

- a. a lack of available resources, including First Nation individuals to oversee and complete the work, as well as the availability of capital funds?
- b. the quality of the housing stock?
- c. home upgrades that may be required before energy efficiency upgrades can occur?
- d. a lack of home ownership?
- e. higher than average occupancy?
- f. the rate of participation and the time it takes to complete upgrades?

RATIONALE FOR QUESTION:

To consider barriers to DSM uptake on northern Manitoba First Nations, and to understand how Efficiency Manitoba is proposing to address these barriers.

RESPONSE:

- a. Efficiency Manitoba plans to address the availability of capital funds to perform upgrades by offering programs with incentives budgeted to cover the cost of the upgrade, such as the Indigenous Small Business Program and the First Nations Insulation and Direct Install Program, in which labour dollars are also provided to local community members to perform the work. Understanding that there may be a lack of available resources to also oversee the work, Efficiency Manitoba will work to remove administrative barriers and be flexible with requirements for timelines and work within schedules that are convenient for First Nations on reserve.
- b. Through the First Nations Insulation and Direct Install program, Efficiency Manitoba aims to improve the quality of the housing stock by providing incentive dollars for materials and labour to First Nations communities to perform building envelope upgrades. In addition to this, Efficiency Manitoba will also work with First Nations communities to ensure the awareness and access to Efficiency Manitoba's New Homes Program so better homes are being built from the beginning. Efficiency Manitoba has also been in preliminary discussions with the Manitoba Indigenous Housing Capacity Enhancement and Mobilization Initiative (MIHCEMI) Working Group to assist in their objective to create a First Nations Building Code.
- c. As some of these homes may be requiring upgrades prior to the energy efficiency initiatives through Efficiency Manitoba, such as a roof repair, Efficiency Manitoba understands the need for flexibility regarding timelines to complete energy efficiency upgrades. As some required upgrades may fall outside of the scope of energy efficiency, it's Efficiency Manitoba's intent to offer support if needed to a First Nations to complete the work by way of coordination between other levels of government or letters of support or intent.
- d. Efficiency Manitoba realizes the unique situation First Nations on-reserve customers are in with respect to band owned housing. It's Efficiency Manitoba's intent to work within the existing housing framework within a community to access homes. Efficiency Manitoba understands the need to be flexible and accommodating. If a First Nations on-reserve residential customer wants to access a program outside the

- Indigenous customer segment portfolio and homeowner consent is required, Efficiency Manitoba will work with the band for approval.
- e. Efficiency Manitoba understands that homes in First Nations communities have a much higher occupancy rate than homes off-reserve, due to housing shortages. Overcrowding can lead to poor indoor air quality and potentially early degradation of components of the home. Please see response to barrier c. above for how Efficiency Manitoba intend to address this barrier. In addition, as per the 2020/2023 Efficiency Plan p. 303 of 591, the New Homes program offers incentives towards the design and construction of a home that improves energy performance and affordability as well as comfort and durability. As per the response to MKO/EM I – 22b, Efficiency Manitoba is tracking the development of a new heat recovery ventilator that will operate better in cold climate and that will assist in ensuring that homes are properly ventilated.
 - f. While the rate of participation and time it takes to complete upgrades can be slower in First Nation communities, Efficiency Manitoba understands flexibility will be an important consideration. Efficiency Manitoba will work within the constructs of a First Nations schedule and be mindful of imposing deadlines for energy efficiency upgrades.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 330 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 330 of the Plan, with respect to a “DATA DRIVEN APPROACH”, Efficiency Manitoba states:

32 Efficiency Manitoba will work with First Nations on-reserve to provide energy use
33 data to assist in targeting homes for energy efficiency upgrades. This information will
34 be a starting point to identify the highest energy users. Identifying the highest users
35 will then allow Efficiency Manitoba to assist the First Nation in addressing the “why”
36 as it pertains to higher energy use. Understanding whether the high consumption is
37 behaviour based, occupancy driven, or related to the condition of the home will then
38 determine what energy efficiency upgrade(s) should be undertaken and what would
39 be most beneficial to reduce energy use. Efficiency Manitoba will also use this
40 exploratory opportunity to work with First Nations and see if the programs being
41 offered are meeting their needs.

QUESTION:

- a) With whom on northern First Nations will Efficiency Manitoba work to provide energy use data? Chiefs and Councils or band members?
- b) Under what category of the Plan will First Nations individuals and families living off-reserve be categorized?
- c) Please confirm that the participation of “First Nations on-reserve” in Efficiency Manitoba’s data driven approach will be voluntary.

RATIONALE FOR QUESTION:

To understand the approach that Efficiency Manitoba is proposing with respect to moving forward collaboratively regarding reduction in energy consumption, etc.

RESPONSE:

- a) As per the Efficiency Manitoba Act Section 34(1)(a) and 34(2)(a), it is Efficiency Manitoba understanding that energy use data for the purposes of designing and delivering programs will be provided by Manitoba Hydro. Efficiency Manitoba anticipates working with Chiefs and Councils or whomever they delegate, on how the available information can best be used to assist their community members.
- b) First Nation individuals and families living off-reserve could fall into one of two customer segments: the overall residential customer segment or the income qualified customer segment.
- c) Confirmed. All participation in the data driven approach will be voluntary. Efficiency Manitoba anticipates beginning energy efficiency initiatives at the band level, beginning with Leadership in addition to the Housing Manager or band member responsible for housing.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 331 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 331 of the Plan, Efficiency Manitoba discussed “community-led DSM” and states:
45 A community-led approach consists of two things: Indigenous partners defining
46 energy efficiency goals/objectives and finding a champion within the community to
47 lead.

And at the same page regarding “Support through education” states:

57 With respect to First Nations, the objective will be to collaborate with First Nations
58 and interested First Nation organizations and agencies to create culturally relevant
59 energy efficiency education resources.

QUESTION:

- a) Please explain Efficiency Manitoba’s rationale for a focus on community-led DSM initiatives.
- b) In the event a First Nation chooses not to partner with Efficiency Manitoba, how will DSM programs be made available to the First Nation On-Reserve residents?
- c) Will “Indigenous partners” be expected to define energy efficiency goals/objectives prior to or after Efficiency Manitoba has provided energy efficiency education?
- d) In the event a First Nation’s energy efficiency goals/objectives do not align with Efficiency Manitoba’s goals/objectives, which party’s goals/objectives will drive the community-led DSM programs?
- e) Please provide a detailed explanation of the criteria that will be used by Efficiency Manitoba for a person or people to qualify as a “champion within the community to lead” a community-led approach to DSM.
- f) Please explain whether the anticipated “champion within the community to lead” a community-led approach to DSM will be a remunerated position.
- g) Will the expenditures related to the position of a “champion within the community to lead” a community-led approach to DSM be included under “enabling strategies” for program budgets?

RATIONALE FOR QUESTION:

To understand Efficiency Manitoba's Plan as it specifically relates to customers living on First Nation reserves.

RESPONSE:

- a) The rationale for a focus on community-led DSM initiatives is to create a collaborative relationship for First Nations communities to have an active and engaged voice in energy efficiency that is not solely influenced by Efficiency Manitoba. As the plan is implemented, understanding the goals and objectives of a First Nations community will help Efficiency Manitoba assess if the current programs are meeting needs and, if not, work with the First Nations communities to see how delivery or design can be modified and supported within the constructs of the Efficiency Manitoba Act and Regulation
- b) In the event a First Nation chooses not to partner with Efficiency Manitoba through the Indigenous program portfolio, First Nation On-Reserve residents can access the suite of available residential programs. It is Efficiency Manitoba's objective that through partnering with First Nations communities, program design and delivery can evolve to better suit a community's energy efficiency needs.
- c) Efficiency Manitoba's objective is to have the Indigenous partners decide how they want to access the suite of Indigenous programs. When or if at all, First Nations communities want to define goals and objectives that will be up to them. Efficiency Manitoba will not impose prerequisites or conditions that energy efficiency educational materials be read before goals and objectives are set or read prior to accessing programming.
- d) Efficiency Manitoba will work within the constructs of the Efficiency Manitoba Act and Regulation to assist First Nations communities with their energy efficiency goals and objectives. In the event, the goals and objectives do not completely align; Efficiency Manitoba would still like to support First Nations communities and assist them with pursuing those goals and objectives through other potential funding sources and additional partners where applicable. Please see p. 344 of 591 of the 2020/23 Efficiency

Plan (Appendix A – Section A6) for an explanation of the Community Driven Outcomes Contract Model which is a mechanism that works to leverage multiple partners to meet diverse community objectives.

- e) A position description and qualifications for a community champion have not yet been defined. However, Efficiency Manitoba anticipates that these criteria would be best decided on together with a community.
- f) Efficiency Manitoba does anticipate there will be a need for remunerated positions for some community-led DSM initiatives.
- g) Confirmed. The expenditures related to remunerated positions for some community-led DSM initiatives is included under “enabling strategies” for program budgets.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 333 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 333 of the Plan, Efficiency Manitoba states:

86 Efficiency Manitoba also aims to establish an ongoing volunteer working
87 group with First Nation and Metis representation to discuss and address the unique
88 energy efficiency needs in this customer segment.

QUESTION:

Please provide the rationale as to why the “working group with First Nation and Metis representation to discuss and address the unique energy efficiency needs in this customer segment” will be a volunteer rather than remunerated position.

RATIONALE FOR QUESTION:

To understand Efficiency Manitoba’s Plan for going forward with the Indigenous customer segment in a collaborative manner and in a good way.

RESPONSE:

Efficiency Manitoba is a new Crown Corporation with legislated targets and a mandate to operate at a lower cost to offer energy efficiency programs than were previously offered through Manitoba Hydro. Given the budgetary constraints, Efficiency Manitoba is proposing a volunteer working group with First Nations and Metis representation to discuss and address the unique energy efficiency needs of this customer segment. Efficiency Manitoba welcomes the opportunity to discuss the proposed working group and other potential solutions with MKO to address any concerns.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 333 of 591

PREAMBLE TO IR (IF ANY):

At pdf page 333, Efficiency Manitoba states:

92 Energy efficiency can assist communities with sustainability goals and resiliency to
93 climate change

QUESTION:

Please provide a detailed explanation of the ways in which Efficiency Manitoba understands that energy efficiency can assist communities, and specifically First Nations in northern Manitoba, with resiliency to climate change.

RATIONALE FOR QUESTION:

To understand the statement made by Efficiency Manitoba.

RESPONSE:

It is commonly acknowledged that climate change has led to more frequent severe storms that can lead to an increase in extended power outages. In Manitoba and especially in colder climate Northern communities, energy efficient, specifically well insulated and airtight buildings, reduce heat escape in the colder months. These energy efficient measures protect homes against the elements for longer, thus allowing residence to remain in their homes for lengthier periods and help protect their buildings from the elements during extended power outages.

The concept of energy efficiency and climate change resiliency is outlined in the factsheet *Resilience Strategies for Power Outages* released by The Center for Climate and Energy Solutions:

“Efficient buildings retain their space conditioning (cooling or heating) longer during power outages, making building occupants more resilient to severe storms... Energy efficiency projects that increase resilience to storm-induced power outages include increasing building insulation, window caulking, and repairing roofs.”

RESILIENCE STRATEGIES FOR POWER OUTAGES. (2018, August). Retrieved from <https://www.c2es.org/site/assets/uploads/2018/08/resilience-strategies-power-outages.pdf>.

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REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 335 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 335 of the Plan, Efficiency Manitoba states:

103 Within the overall Manitoba Indigenous customer segment, there are 63 First Nations
104 in Manitoba, with approximately 15,500 homes/houses and 2,310 businesses or
105 commercial buildings

At Pdf page 334 of the Plan, Efficiency Manitoba states:

101 As of 2016, the most recently completed census, 18 percent of Manitoba's population
102 identified as Indigenous with the majority identifying as First Nation and or Metis.

And TABLE A6.2 on the same page sets out INSULATION & DIRECT INSTALL OFFER ENERGY &
GREENHOUSE GAS EMISSIONS SAVINGS SUMMARY including the following:

2020/21 2021/22 2022/23

No. of houses 100 150 180

QUESTION:

- a) Please confirm that the number of houses Efficiency Manitoba estimates will benefit from the insulation and direct install offer under the Indigenous customer segment for the three years of the plan is only 100, 150 and 180 respectively out of 15,500 houses.
- b) If confirmed, please provide a detailed explanation of the reason why these numbers are expected to be so low, including Efficiency Manitoba's understanding of the barriers to uptake for this program, and how Efficiency Manitoba intends to address these barriers.

RATIONALE FOR QUESTION:

To consider Efficiency Manitoba's estimates and to consider whether Efficiency Manitoba has a plan to address the barriers to uptake of a potentially beneficial DSM program.

RESPONSE:

- a) Confirmed. Efficiency Manitoba has estimated that 100, 150, and 180 houses will benefit from insulation and direct installs in the first three years of the Plan.

- b) In order to estimate the market, Efficiency Manitoba looked at historical participation and data from similar programs previously offered through Manitoba Hydro. As of the 2019/20 Demand Side Management Plan, Manitoba Hydro had estimated that only 152 (3.8%) of homes that required insulation upgrades were remaining to be completed. Efficiency Manitoba used this as a reference point to forecast participation. As Efficiency Manitoba works with First Nation communities, projected participation numbers may increase as better information is available.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 337 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 337 of the Plan, Efficiency Manitoba states:

For the First Nation Insulation and Direct Install Program

138 Identified homes will receive a walk through by a dedicated Efficiency Manitoba

139 Indigenous Energy Advisor to determine which energy efficiency measures to

140 implement in efforts to reduce energy bills. Efficiency measures identified from the

141 walk through will include insulation, smart thermostats, and ENERGY STAR® certified

142 clothes washers for homes with inefficient washers and over four occupants.

QUESTION:

- a) Please confirm whether under the residential direct install program the availability of the program is limited or not limited to homes with over four occupants.
- b) Please provide a detailed explanation of the rationale for the availability of the First Nation Direct Install Program to be limited to homes with over four occupants.

RATIONALE FOR QUESTION:**RESPONSE:**

- a) Availability of the residential Direct Install program is not limited to homes with over four occupants.
- b) The First Nation Direct Install Program is available to First Nation homes regardless of the number of occupants. All homes can receive: a low-flow showerhead, faucet aerators, hot water tank pipe wrap, and up to 10 LED bulbs. Smart thermostats will be available in year two for homes that have Wi-Fi access and are interested in receiving the upgrade. Also, in year two, ENERGY STAR certified front load clothes washers will be available for First Nation homes with inefficient top load clothes washer and more than

four occupants. The rationale for this is that savings attributed to the replacement of a top load clothes washer under this occupancy scenario are estimated to be 25% higher than a home with fewer occupants.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 338 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 338 of the Plan, Efficiency Manitoba states:

145 In order to maximize incentive dollars, Efficiency Manitoba will work with the Federal
146 government to leverage federal funding where ever possible. Doing so, will help
147 ensure the costs to First Nations to participate will be minimal, as the cost of
148 technologies and local First Nation labour to execute the installs will be provided
149 through an incentive from Efficiency Manitoba or a potential cost sharing model.

QUESTION:

- a) Has Efficiency Manitoba already engaged the federal government in discussions regarding potential cost sharing models or leveraging federal funding with respect to Efficiency Manitoba's First Nation Insulation and Direct Install Program?
- b) If so, please explain whether those discussions have included representatives from MKO member First Nations. Why or why not?

RATIONALE FOR QUESTION:

To understand whether Efficiency Manitoba is appropriately engaging with customers who may be directly affected by discussions Efficiency Manitoba may be having "on their behalf".

RESPONSE:

- a) Efficiency Manitoba has not engaged with the federal government in discussions regarding potential cost sharing models with respect to Efficiency Manitoba's First Nation Insulation and Direct Install Program. Efficiency Manitoba is aware that there may be opportunities to leverage federal programs and the need for First Nation

representation when discussing programming on their behalf with the federal government.

b) Not applicable as per response to MKO/EM I-36a.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 339 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 339 of the Plan, Efficiency Manitoba states:

170 Efficiency Manitoba will work with a First Nation to identify homes with the highest
171 energy consumption and will collaborate to gain access to these homes to perform
172 walk throughs that will determine efficiency opportunities. Once efficiency
173 opportunities are identified, qualifying upgrades will be pursued at little to no cost to
174 the resident of the home. The goal of this program is to have the upgrades performed
175 by a qualified local community member. Where needed, Efficiency Manitoba will offer
176 technical support and training to ensure proper installation.

QUESTION:

- a) Within the context of band-owned housing, will access to a home with high energy consumption on-reserve require the consent of the resident?
- b) In the event efficiency opportunities are identified, and there may be some cost to the resident, will it be the decision of the resident whether qualifying upgrades will be pursued?

RATIONALE FOR QUESTION:

To understand whether Efficiency Manitoba has appropriately considered the realities faced by customers living on First Nation reserves.

RESPONSE:

- a) Efficiency Manitoba will follow the existing framework used by the First Nations Housing Manager or band member responsible for the housing portfolio to enter and gain access to a home for energy efficiency initiatives. However, Efficiency Manitoba will not access a home if the resident does not want it to be entered.

- b) While Efficiency Manitoba may identify energy efficiency opportunities within a home, the decision to pursue those opportunities will be at the discretion of the band and resident.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 340 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 340 of the Plan, Efficiency Manitoba discusses Small business offers to the Indigenous customer segment. At the same page Efficiency Manitoba sets out TABLE A6.4 SMALL BUSINESS OFFERS ENERGY & GREENHOUSE GAS EMISSIONS SAVINGS SUMMARY, including the following data:

2020/21 2021/22 2022/23

No. of buildings 30 30 40

QUESTION:

- a) Please confirm that the number of small businesses estimated by EM to benefit from the insulation and direct install offer under the Indigenous customer segment for the three years of the plan is only 30, 30 and 40 respectively out of 2,310 businesses.
- b) If confirmed, please provide a detailed explanation of the reason why these numbers are expected to be so low including EM's understanding of the barriers to uptake, and how EM intends to address those barriers.

RATIONALE FOR QUESTION:

To consider Efficiency Manitoba's estimates and to consider whether Efficiency Manitoba has a plan to address the barriers to uptake of a potentially beneficial DSM program.

RESPONSE:

- a) Efficiency Manitoba estimates that 30, 30, and 40 small businesses will benefit from the Indigenous Small Business Program under the Indigenous customer segment for the three years of the plan. Insulation is not currently an eligible technology offered through

this program. The list of technologies offered under this initiative is shown in the 2020/23 Efficiency Plan, Appendix A – Section A6, p.341 of 591.

- b) As this is Efficiency Manitoba’s first three-year plan and the Indigenous Small Business program is a new offer, anticipated participation is just an estimate and there will be no cap imposed on the number of participants. It is Efficiency Manitoba’s expectation that as interest for the program increases, participation and projected participation will increase and budgets may be adjusted.

A common barrier to energy efficiency upgrades for small businesses is the capital cost of the upgrade, under this offer, Efficiency Manitoba has budgeted incentives to cover the full cost of the upgrades.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 343 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 343, Efficiency Manitoba states:

223 The Community Geothermal Program helps retrofit First Nations homes using electric
224 furnaces to energy efficient geothermal heat pumps

The MKO member First Nations that receive services from Manitoba Hydro are the Nisichawayasihk Cree Nation, Tataskweyak Cree Nation, God's Lake First Nation, Pimicikamak Cree Nation, Mosakahiken Cree Nation, War Lake First Nation, Bunibonibee Cree Nation, Fox Lake First Nation, York Factory First Nation, Sayisi Dene First Nation, Wuskwi Sipiik Cree Nation, Misipawistik Cree Nation, Manto Sipi Cree Nation, Opaskwayak Cree Nation, Norway House First Nation, Mathias Colomb Cree Nation, Shamattawa First Nation, Barren Lands First Nation, Sapotawayak Cree Nation, Northlands Denesuline First Nation, Chemawawin First Nation, Marcel Colomb First Nation, O-Pipon-Na-Piwin Cree Nation, Granville Lake First Nation, and Sherridon First Nation.

QUESTION:

- a) Please explain whether the Community Geothermal Program is expected to be available to MKO member First Nations, including the four "Diesel Communities".
- b) If not, why not?
- c) How does Efficiency Manitoba plan to address any barriers to uptake of the Community Geothermal Program?

RATIONALE FOR QUESTION:

To consider whether Efficiency Manitoba has a plan to address the barriers to uptake of a potentially beneficial DSM program.

RESPONSE:

- a) As shown in the 2020/23 Efficiency Plan, Appendix A – Section A6, p.344 of 591 Community Geothermal Program is currently based on a Community Driven Outcomes model (CDOC) and First Nations are being onboarded by Aki Energy, an Indigenous Social Enterprise (ISE). As this concept is relatively new, it is only being offered in three First Nations communities. If this model is proven successful, it is Efficiency Manitoba's intent to work with Aki Energy to expand this model to other First Nations communities, including MKO member First Nations who express interest. For more information regarding the CDOC model, please see response to PUB/EM I-6.

With respect to the Diesel Communities, Efficiency Manitoba notes that any conversion of residential heating load from fuel oil to geothermal heating systems increases the load on Manitoba Hydro's diesel-powered generating system and may have significant implications on generation and distribution capacity requirements in that Diesel Community. Any consideration of implementing a Community Geothermal Program in Diesel Communities will therefore need to be reviewed in coordination with Manitoba Hydro and the respective community.

- b) Please see response to MKO/EM I-39a.
- c) The largest barrier for geothermal is the capital cost to purchase and install the system. In this current CDOC model, the cost of the system and installation is covered through the private sector investment. This alleviates the barrier to participate. As mentioned above in MKO/EM I-39a, Efficiency Manitoba's intent is to work with Aki Energy to broaden the program to all interested First Nations communities.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 407 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 407 Efficiency Manitoba states:

34 Efficiency Manitoba will provide financial and technical support for installed wood
35 pellet and wood chip heating systems to grid-connected Manitoba Hydro customers.
36 In addition to an upfront capital incentive, support will be provided on an annual basis
37 to ensure standardized bulk wood pellet or chip fuel supply.

QUESTION:

Given that the four First Nations in the Diesel Zone are not connected to the Manitoba Hydro grid, please explain whether Efficiency Manitoba will provide financial and technical support for installed wood pellet and wood chip heating systems to customers in the Diesel Communities. If not, why not?

RATIONALE FOR QUESTION:

To consider potential fuel switching options for the Diesel Zone.

RESPONSE:

As per the response to COALITION/EM I-28b, Efficiency Manitoba anticipates opportunities with respect to fuel oil furnaces and will work with the diesel communities to identify what they are and how they can best be supported within the constructs of the Efficiency Manitoba Act and Regulation including the use of the Affordable Energy Fund.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf pages 408-09 of 591

PREAMBLE TO IR (IF ANY):

At Pdf pages 408-09 of the Plan, with respect to the solar energy program, Efficiency Manitoba states:

54 Financial incentives will help alleviate the cost barrier of purchasing and installing
55 solar PV systems. The target market for this technology is existing grid-connected
56 residential, small commercial, and agricultural customers who have a desire to
57 displace a portion of their electricity requirements with their own on-site renewable
58 energy. Any policies or contracts for the potential purchase of excess energy
59 generated by the customer will be at the discretion of Manitoba Hydro.

QUESTION:

Given that the four First Nations in the Diesel Zone are not connected to the Manitoba Hydro grid, please explain whether Efficiency Manitoba considers the Diesel Communities to be the target market for solar PV systems. If not, why not?

RATIONALE FOR QUESTION:

To consider potential fuel switching options for the Diesel Zone.

RESPONSE:

Please see response to MKO/EM I-14b.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 409 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 409 of the Plan, Efficiency Manitoba states:

60 The solar PV incentive will be promoted through earned advertising and a
61 combination of paid and organic social media that will drive interested customers to
62 the Efficiency Manitoba website.

QUESTION:

- a) Please explain the rationale for promoting the solar PV incentive through earned advertising and social media rather than traditional advertising.
- b) Please provide a detailed explanation of the ways in which the solar PV incentive will be advertised to the MKO member First Nations, many of whom have limited access to internet connectivity.

RATIONALE FOR QUESTION:

To consider the accessibility of the Plan to First Nations in northern Manitoba who may experience issues with respect to availability of the internet.

RESPONSE:

- a) The solar photovoltaic incentive will be promoted through earned advertising and social media rather than traditional advertising because it is the most cost-effective means of promoting this offering. Ideally, all offerings would be promoted through this cost effective means but few other offerings garner anywhere near similar earned advertising or social media attention as solar photovoltaic initiatives therefore it would be ineffective for other offerings. If awareness of, or take up in, the solar PV program is less than anticipated, the marketing and promotion strategy will be adjusted.

- b) In addition to promoting offerings through earned advertising and social media, Efficiency Manitoba will work to promote and encourage all energy efficiency initiatives and offers through Efficiency Manitoba's proposed Indigenous Energy Efficiency Working Group. Which energy efficiency programs or offers First Nations and Indigenous customers choose to pursue will be based on their energy efficiency needs and wants. Efficiency Manitoba will assist First Nations through the application process and provide information, as needed, to assist with decision making.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 429 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 429 of the Plan, Efficiency Manitoba states:

270 Efficiency Manitoba’s approach to affect change in codes and standards involves
271 being an active participant in several national energy efficiency building codes and
272 performance standards committees. Standards are subsequently referenced in
273 national and provincial regulations that mandate minimum energy performance levels
274 for a variety of appliances, equipment, and other energy-consuming measures.
275 Efficiency Manitoba’s efforts on these committees is to represent the Manitoba
276 climate and market to advance the progress of product efficiency improvements and
277 building codes proposed by national and provincial regulators.

QUESTION:

- a) When representing “the Manitoba climate and market to advance the progress of product efficiency improvements and building codes proposed by national and provincial regulators”, does Efficiency Manitoba anticipate taking a “whole of Manitoba” approach or certain segments and cross-sections of the population?
- b) Please provide a detailed explanation as to whether Efficiency Manitoba considers themselves to be best placed to represent First Nations in Manitoba at the national level with respect to energy efficiency building codes and performance standards committees.
- c) Please provide a detailed explanation of the ways in which Efficiency Manitoba will seek to respectfully include the perspective of First Nations in Manitoba at energy efficiency building codes and performance standards committees, including the distinct perspective of northern First Nations, and specifically those First Nations in the “Diesel Zone”.

RATIONALE FOR QUESTION:**RESPONSE:**

- a) Energy efficient building codes are divided into climate zones to reflect unique requirements of each region. Manitoba has three zones so that the population in each region can be best served with requirements applicable to the specific climate. Efficiency Standards are specific to the materials or products, independent of location or end user. Efficiency Manitoba acts within the respective parameters set out by Code and Standard committees.
- b) Membership in Building Code and Standards committees is open to individuals from a broad range of backgrounds. The memberships of many of these committees are heavily weighted with members from larger population centers in regions with warmer climates. Efficiency Manitoba has taken the opportunity to actively participate on several Codes and Standards committees, committed to act in the best interest of all Manitobans. In the absence of other individuals from Manitoba, Efficiency Manitoba is often the only representative from Manitoba ensuring that the unique needs of the diverse province, inclusive of First Nations are considered. Efficiency Manitoba notes that these committees are continually seeking individuals with diverse perspectives to participate in the creation and continued development of codes and standards. As such, there is nothing to limit MKO from approaching the various committees to seek membership and participation on their own behalf, should they choose.
- c) The membership of Codes and Standards committees tends to be more heavily weighted with members representing larger population centers in regions with warmer climates. Efficiency Manitoba brings a unique perspective to these committees, representing a province with many northern and remote communities in cold climates. Energy efficiency Codes and Standards not only bring energy savings and reduced utility bills but have the added benefit of improving the comfort and durability of the First Nations housing stock, an ongoing challenge in these communities. More energy efficient buildings reduce reliance on diesel fuel in off-grid communities, which result in significant social and environmental benefits. Efficiency Manitoba will work to include and respect the diverse perspectives of First Nations through Efficiency Manitoba's

proposed Indigenous initiatives, programs and the Indigenous Energy Efficiency Working Group. In addition to the items noted above, the knowledge gained from these interactions will be reflected in Code and Standards discussions.

REFERENCE:

Efficiency Manitoba 2020/2023 Efficiency Plan Submission Pdf page 249 of 591

PREAMBLE TO IR (IF ANY):

At Pdf page 249 of the Plan, Efficiency Manitoba includes Figure A3.1 which:

11 illustrates the annual electric energy savings at generation for each customer segment
12 inclusive of all program bundles, and the relative contribution of savings related to
13 codes and standard.

At other points throughout the Plan Efficiency Manitoba refers to electric energy and capacity savings being determined at generation.

QUESTION:

- a) Given that electric energy savings are determined at generation, please provide a detailed explanation of the ways in which Efficiency Manitoba will separately quantify electric energy savings by customer segment.
- b) How does Efficiency Manitoba propose to determine whether energy savings are a result of Efficiency Manitoba or another outside entity or deciding factor?

RATIONALE FOR QUESTION:

To understand Efficiency Manitoba's methodology for measuring success by customer segment.

RESPONSE:

- a) Savings at generation refers to the measurement of electricity savings at the generating station. This measurement of savings is higher than the measurement of savings at the meter as it does not consider the losses in electricity that occur when the generated electricity is transmitted and distributed to the customer's meter. The definition of at generation and at meter are provided in the 2020/23 Efficiency Plan ("Plan"),

Attachment 1, p. 438-439 of 591. Stating savings at generation does not have an impact on Efficiency Manitoba's ability to quantify electric energy savings by customer segment.

- b) The independent evaluation of energy efficiency ensures that only savings for which a program administrator is responsible for or has had a material impact in, are claimed as savings. As per Section 16 (1) of the Efficiency Manitoba Act;
- “Efficiency Manitoba must appoint an independent assessor to assess the following and prepare a report on the assessment:
- a. The results obtained by Efficiency Manitoba under an approved efficiency plan;
 - b. The cost-effectiveness of obtaining those results;
 - c. Any other matter prescribed by regulation.”

Efficiency Manitoba's Evaluation, Measurement and Verification Framework and Plan summarized in the Plan (Section 7.3, beginning p. 183 of 591) and provided in full in the Attachment 5 of the Plan, p.549-591 of 591 outlines industry-accepted evaluation guidelines, best practices and a portfolio evaluation plan that will inform the selection of the independent assessor.