

October 13, 2021

Public Utilities Board
400-330 Portage Avenue
Winnipeg, Manitoba R3C 0C4

Via Email: publicutilities@gov.mb.ca

RE: Manitoba Hydro Status Update Proceeding and Interim Rate Application

On October 12, 2021, the Public Utilities Board (the “PUB”) suspended the current Status Update Proceeding until November 3, 2021, pending Manitoba Hydro’s filing of an interim rate application by that date. The PUB also requested that all Interveners review and edit their proposed Minimum Filing Requests (the “MFRs”) to identify those that are specifically relevant to an expected interim rate increase application and are not duplicitous of the PUB’s MFRs.

The AMC Opposes Discontinuing the Status Update Proceeding

The AMC is opposed to Manitoba Hydro’s request to discontinue the Status Update Proceeding. As MIPUG noted in its submissions of April 12, 2021, Manitoba Hydro has not had a true comprehensive rate review for 4-6 years. The effect of allowing Manitoba Hydro’s September 29, 2021 request would only further delay a comprehensive rate review. In addition to discontinuing the Status Update Proceeding in favour of an expedited interim rate application for 2021/22 and 2022/23, Hydro is proposing that a fulsome rate review be delayed until it files a General Rate Application in 2023, which would be 6-8 years following the most recent comprehensive rate review.

In effect, it appears that Manitoba Hydro is using the excuse of an emergency interim rate application covering two years to avoid completing a fulsome rate review. Aside from the interim rate applications, Hydro’s reasons for delaying the comprehensive rate review until 2023, regulatory planning considerations, were already rejected by the PUB when it ordered the Status Update Proceeding.

The AMC’s Revised MFRs

The AMC provides its MFRs in adherence to the PUB’s instructions of October 12, 2021, without prejudice to the right to make further submissions regarding a continuance of the Status Update Proceeding. The AMC’s revised MFRs for the purpose of the interim rate applications are as follows:

1. Information and data regarding energy accounts held in arrears by Manitoba Hydro, including separate information and data for on-reserve energy accounts.

assistant@foxfraserlaw.com | www.foxfraserlaw.com
t 403.910.5392 | f 403.407.7795 |

HEAD OFFICE: 79 Redwood Meadows Dr. Redwood Meadows, AB T3Z 1A3

2. Any further residential energy use survey(s) completed since the 2017 Residential Energy Use Survey.
3. Table(s) setting out the bill impacts for each of the proposed rate increases for 2021/22 and 2022/23.
4. Comparison of Manitoba Hydro's rates with neighbouring jurisdictions showing current rates, as well as the proposed rate increases.

The above requested minimum filing requirements are relevant to a status update proceeding.

Sincerely,



FOX FRASER LLP
Carly Fox and Emily Guglielmin

cc:

B. Peters, PUB Counsel

Shannon Gregorashuk, Darryl Martin and Brent Czarnecki, Manitoba Hydro

Byron Williams and Chris Klassen, Consumers Coalition

Antoine Hacault, MIPUG

Markus Buchart, MKO

