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October 22, 2021

THE PUBLIC UTILITIES BOARD OF MANITOBA  
400-330 Portage Avenue  
Winnipeg, Manitoba  
R3C 0C4

ATTENTION: Dr. D. Christle, Board Secretary and Executive Director

Dear Dr. Christle:

**RE: Manitoba Hydro Comments on Status Update Proceeding and Interim Rate Application**

On October 12, 2021, the Public Utilities Board of Manitoba (“PUB”) suspended the Status Update process to review an interim rate application filed by Manitoba Hydro, with a requirement that the application be filed by November 3<sup>rd</sup>. On October 13, 2021, Manitoba Hydro advised the PUB that the November 3<sup>rd</sup> deadline would not provide adequate time to properly and sufficiently prepare its application, and as such requested an extension to the filing date of its application to November 15, 2021.

By letter of October 19, 2021, the PUB extended the timeline for Manitoba Hydro to file its interim rate application to November 15, 2021, and requested all parties to provide written submissions, on or before October 22, 2021, as to the various process and procedural options and timelines available for each of the interim rate application and the Status Update Proceeding. Manitoba Hydro’s comments on process and procedural options and timelines for its interim rate application and the Status Update process are provided below.

**2021/22 Interim Rate Application**

On November 15, 2021, Manitoba Hydro will file its Interim Rate Application, including responses to the Minimum Filing Requirements (“MFRs”) approved by the PUB on October 19<sup>th</sup>. Manitoba Hydro will be requesting approval of an interim rate increase for 2021/22 effective January 1, 2022. In order to allow sufficient time to properly prepare its Interim Rate Application by November 15, Manitoba Hydro has determined that this Application will request an increase for 21/22 only.

Manitoba Hydro submits that its Interim Rate Application, including the answers to the list of PUB ordered MFRs of October 19, 2021, will satisfy the evidentiary onus of establishing a prima facie case for interim rate relief, such that the process should move directly to having the PUB receive written submissions from the interveners without additional procedural steps. Accordingly, Manitoba Hydro proposes that after its Interim Rate Application is filed on November 15, 2021, interveners be provided an opportunity to file written submissions on Manitoba Hydro’s Application by November 26, 2021, followed by a written reply submission by Manitoba Hydro by

December 8, 2021, culminating with a PUB Order to be effective as of January 1, 2022, to start addressing the financial impacts of the drought at the earliest opportunity.

Status Update Process

In Order 89/21, the PUB directed a Status Update process for Manitoba Hydro to provide evidence to assist the Board in its determination of whether Manitoba Hydro's rates are just and reasonable and its costs are fairly allocated among the various customer classes. Manitoba Hydro's Application to be filed on November 15, 2021, will serve to provide a fulsome and current "status update" of Manitoba Hydro, including answering all of the PUB MFRs requested in the context of the Status Update process, as well as all PUB approved MFRs from interveners.

Manitoba Hydro submits that the information contained in its Application, inclusive of responses to MFRs, will provide information to satisfy the PUB that current rates are just and reasonable and that costs are fairly allocated. As such, Manitoba Hydro reiterates its request for the PUB to discontinue the Status Update process permanently as Manitoba Hydro's Interim Rate Application effectively renders it moot.

In accordance with the September 22, 2021 directive from Crown Services, Manitoba Hydro intends to file a multi-year General Rate Application in 2022, which would include a request to finalize any interim rate relief approved by the PUB for 2021/22. Manitoba Hydro will engage with the PUB following the 2021/22 Interim Rate Application process, on the timing and parameters for its next General Rate Application.

Should you have any questions with respect to this submission, please contact the writer at 204-360-3257.

Yours truly,

**MANITOBA HYDRO LEGAL SERVICES**

Per:



**Brent Czarnecki**  
Barrister & Solicitor