



# Consumers' Association of Canada Association des consommateurs du Canada Manitoba

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## Organization Background

This document provides the responses of the Manitoba branch of the Consumers' Association of Canada (CAC Manitoba) to questions regarding the organization's background found on the Intervener Application Form relating to Centra Gas Rate Rebundling Application. Questions to be addressed include:

- Background information regarding CAC Manitoba
- Reasons for proposed intervention
- How CAC Manitoba is directly affected by the Board's decision in this matter
- How CAC Manitoba represents a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding
- CAC Manitoba's experience, information, or expertise relevant to this matter that would contribute to the Board's decision-making

## About CAC Manitoba

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

CAC Manitoba is a volunteer, non-profit, independent organization working to inform and empower consumers, and to represent the consumer interest in Manitoba. Formed in 1947, the organization is governed by a volunteer Board of Directors, elected annually at a general meeting of the organization's membership.

CAC Manitoba is a branch of the national Consumers' Association of Canada, but

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is financially separate and separately incorporated. The organization's policy is guided by its understanding of generally accepted consumer rights, which consist of:

- The right to satisfaction of basic needs - To have access to basic, essential goods and services: adequate food, clothing, shelter, health care, education, public utilities, water and sanitation.
- The right to safety-to be protected against products, production processes and services that are hazardous to health or life.
- The right to be informed - To be given the facts needed to make an informed choice, and to be protected against dishonest or misleading advertising or labeling.
- The right to choose - To be able to select from a range of products and services, offered at competitive prices with an assurance of satisfactory quality.
- The right to be heard - To have consumer interests represented in the making and execution of government policy, and in the development of products and services.
- The right to redress - To receive a fair settlement of just claims, including compensation for misrepresentation, shoddy goods or unsatisfactory services.
- The right to consumer education - To acquire knowledge and skills needed to make informed, confident choices about goods and services, while being aware of basic consumer rights and responsibilities and how to act on them.
- The right to a healthy environment -To live and work in an environment that is nonthreatening to the well-being of present and future generations.

The Manitoba Branch of the Consumers' Association of Canada is also guided by the following consumer responsibilities:

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- Critical awareness - consumers must be awakened to be more questioning about the provision of the quality of goods and services.
  - Involvement or action - consumers must assert themselves and act to ensure that they get a fair deal.
  - Social responsibility - consumers must act with social responsibility; with concern and sensitivity to the impact of their actions on other citizens, in particular, in relation to disadvantaged groups in the community and in relation to the economic and social realities prevailing.
  - Ecological responsibility - there must be a heightened sensitivity to the impact of consumer decisions on the physical environment, which must be developed to a harmonious way, promoting conservation as the most critical factor in improving the real quality of life for the present and the future.
  - Solidarity - the best and most effective action is through cooperative efforts through the formation of consumer/citizen groups who together can have the strength and influence to ensure that adequate attention is given to the consumer interest.

CAC Manitoba represents the interests of consumers across Manitoba in a number of areas including food safety and security, patient rights and health care, financial services, access, and inclusion, environmental sustainability, and regulatory review of utilities and Crown's delivering services and products to consumers. The organization seeks input on its policy positions from consumers through the innovative use of surveys, focus groups, social media, and through its ongoing programs and services to the public. In addition, the organization seeks other perspectives on relevant issues through the use of policy community advisory committees and interviews, and contacts with its network of community groups and organizations working with underrepresented consumers.

There is no resolution of the Board of Directors of CAC Manitoba supporting the intervention in this proceeding. Rather, the decision to participate is made by

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senior management, following the organization's established policies and past practice.

### **CAC Manitoba's Reasons for Participation and Impact on Consumers**

*Please state your reasons for intervening in this proceeding.*

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

Natural gas costs, rates, billing, and Centra's operations, have a significant impact on many residential consumers in Manitoba, especially as they pay for their own energy bills, as well as that of producers, processors, and retailers of the products they purchase. Residential ratepayers rely on vigorous, independent regulation to hold Crown Corporations, including Centra Gas, accountable. For CAC Manitoba, bringing the voice of consumers directly to the Public Utilities Board is of primary importance in the independent rate-setting process.

The focus of this particular hearing (rate rebundling) has the potential to impact costs to consumers and the way they are calculated, but it also may potentially change the way consumers view and access information about their costs. Centra Gas has a monopoly on many aspects of gas provision in this province, and this process before the Public Utilities Board acts a proxy for the marketplace, ensuring fairness, just and reasonable rates, and transparency, in a public proceeding.

### **Representing Residential Natural Gas Consumers in Manitoba**

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

CAC Manitoba will seek to protect the interests of Centra Gas's largest customer class, with approximately 266,000 residential natural gas customers by presenting an evidence based intervention guided by a principled consideration of the consumer Interest. The organization places a priority on direct consumer Input using various forms of consumer engagement and stakeholder panels. CAC Manitoba strives to protect and reconcile the Interests of all Manitoba residential consumers, including low and fixed-income consumers, the working poor, and other groups of consumers that are more vulnerable in the marketplace. These customers are not otherwise represented in the scope of this proceeding.

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In reviewing the operations of Centra Gas, and specifically the rate rebundling issue, the PUB must balance two concerns "the Interests of the utility's ratepayers, and the financial health of the utility. Together, and in the broadest Interpretation, these Interests represent the general public Interest." While Manitoba Hydro represents the interests of the utility, CAC Manitoba proposes to represent the Interests of the large class of residential ratepayers, as it has done in previous rate applications.

### **CAC Manitoba's Experience in Regulatory Proceedings**

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

CAC Manitoba has a mandate to provide Manitoba consumers with unbiased information. Through interventions at rate hearings, the organization represents the consumer interest on prices and quality of service. Over the past 30 years, CAC Manitoba has been active in rate regulation matters relating to Manitoba Hydro, Centra Gas, Efficiency Manitoba, Manitoba Public Insurance, government cheque cashing and payday lending rates.

In addition, the organization has extensive and intersecting regulatory experience at the Canadian Radio-television and Telecommunications Commission, the Manitoba Clean Environment Commission, and the National Energy Board. It takes pride in its long-standing record of quality, evidence-based advocacy.

Regarding natural gas, CAC Manitoba participated in proceedings when Centra Gas was still a privately-owned corporation, those regarding the acquisition of Centra Gas by Manitoba Hydro, the entrance of natural gas brokers into the Manitoba marketplace, and the development of a feasibility test for gas expansion to new parts of the province, in addition to general rate applications, such as the 2019-2020, to name just a few.