



May 10, 2022

Our file 10146-09
Reply to Markus Buchart
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E-mail MBuchart@jerchlaw.com

RACHEL McMILLIN
Assistant Associate Secretary
Public Utilities Board of Manitoba (PUB)
400-330 Portage Avenue
Winnipeg, Manitoba
R3C 0C4

Dear Ms McMillin:

**Re: Submission of Manitoba Keewatinowi Okimakanak Inc. (MKO)
Proposal for Combined Electricity & Natural Gas General Rate Application in Fall 2022**

We are the lawyers for Manitoba Keewatinowi Okimakanak Inc. (MKO). We are writing further to your letter to interested parties dated April 26, 2022. In your letter, you invited past intervenors to submit comments regarding Manitoba Hydro's and Centra Gas Manitoba Inc.'s proposal for a combined electricity and natural gas General Rate Application ("*combined GRA*") in fall 2022.

MKO is the organization of Chiefs that represent the citizens of 26 First Nations in northern Manitoba who are signatories to Treaties 4, 5, 6, and 10. MKO therefore provides the collective voice for about 65,000 treaty First Nation citizens the vast majority of whom live in northern Manitoba. As such, they receive electricity service from Manitoba Hydro but do not receive natural gas service from its Centra Gas subsidiary.

From MKO's perspective, there are no advantages to a combined GRA. MKO's interest is in electricity pricing only. It does not have an interest in natural gas regulation because its northern citizens are not natural gas customers.

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From MKO's perspective, the disadvantage to a combined GRA is the devotion of time relating to natural gas issues in which MKO has no interest and will not actively participate in. A combined GRA would be longer in duration in terms of sitting days and the hearing time for natural gas issues would not be of interest to MKO. Likewise information requests relating to natural gas issues would not be of interest to MKO. To the extent that natural gas issues are intermingled with electricity rate issues, MKO's lawyers would spend significantly more time on a combined GRA than they would have on an electricity-only GRA.

Your letter solicited parties' thoughts regarding process to follow and alternative approaches. From MKO's perspective, if it were possible to separate and compartmentalize, at least to the extent possible, the electricity and gas regulation portions of the combined GRA so that parties without an interest in electricity or gas could participate only in the one that they are interested in. That might mean separate hearing days and separating information requests for electricity and gas issues.

In conclusion, MKO's strong preference would be against a combined GRA, but if the Board orders such a proceeding, MKO's suggestions above would apply.

We thank the Board for the affording us this opportunity to make a submission.

Yours truly,

JERCH LAW

Per: 

Markus Buchart

MB/mb

By e-mail to:

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