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July 15, 2015

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

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

Dear Mr. Christle:

**RE: CENTRA GAS MANITOBA INC. ("CENTRA")  
2015/16 COST OF GAS APPLICATION- CONSUMERS' ASSOCIATION OF  
CANADA (MANITOBA) ("CAC") REQUEST FOR ACCESS TO CONFIDENTIAL  
MATERIALS**

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Centra is in receipt of Mr. Meronek's letter of July 14, 2015, on behalf of CAC, with attachments, regarding confidentiality and procedural matters with respect to Centra's 2015/16 Cost of Gas Application.

CAC indicated that a meaningful intervention in this proceeding would not be possible without access to the confidential portions of Centra's Application and that Mr. Meronek was prepared to sign the revised form of Undertaking of Confidentiality that was attached to the correspondence. CAC further indicated its expectation that Ms. Gloria Desorcy and Mr. Mark Stauff would also sign the attached revised form of Non-Disclosure or Confidant Agreement. CAC further advised that once the PUB deliberated on this issue, CAC expected to be in a position to provide Information Requests ("IRs") to Centra within two weeks of receipt of an unredacted copy of the Application.

Centra has concerns regarding the involvement of Mr. Stauff in this proceeding due to his past, and any future, representation and involvement with one of Centra's counterparties (Tenaska Marketing) as part of TransCanada's regulatory proceedings before the National Energy Board on tolling matters. Notwithstanding that, for the limited purpose of the 2015/16 Cost of Gas Application and on a without prejudice and precedent basis to all other proceedings which Centra (and Manitoba Hydro) may be party to in the future, Centra accepts the approach and form of the Undertaking of Confidentiality and Confidant Agreement provided in CAC's correspondence for the above-named parties. In doing so, however, Centra's position is that this approach and forms of agreement may not be appropriate for materials filed in confidence with the PUB for other future proceedings of Centra (or Manitoba Hydro), and stresses that consideration of procedural matters for any future proceeding must be assessed specifically on a case by case basis.

Centra proposes that once Mr. Meronek, Ms. Desorcy and Mr. Stauff provide signed copies of the agreements to the writer, Centra will in turn execute the Confidant Agreements and courier hard

copies of the unredacted Application, on blue paper, directly to all three parties. Duly executed copies of the Agreements will be provided to the parties and PUB for their records in due course.

With respect to the timetable for this proceeding, Centra notes that all parties have had copies of the public redacted copy of the Application since June 15<sup>th</sup>. Centra proposes that interveners submit IRs on the public Application materials no later than July 27, 2015, with any CAC IRs on the confidential portions of the Application being due no later than two-weeks from the receipt of the unredacted Application as proposed by CAC.

Centra's position is that any IRs on the confidential portions of the Application should only be provided in confidence to Centra and the PUB by way of hard copy and by a memory stick or flash drive. Electronic mail should not be used so as to avoid inadvertent disclosure to the public.

Centra will endeavour to provide responses to all IRs by the due date contemplated in the draft timetable being August 21, 2015. However, Centra notes that this deadline may not be achievable if there is a delay in the receipt of CAC's IRs on the public portion of the Application beyond July 27, 2015 or the number of IRs submitted by CAC on the confidential portion of the Application are substantial such that three weeks would not allow sufficient time to respond.

Should you have any questions with respect to this submission, please contact the writer at 204-360-3257 or Shannon Gregorashuk 204-360-4270.

Yours truly,

**MANITOBA HYDRO LAW DIVISION**

Per:

*Jant Mayor*

*for*  
**Brent A. Czarnecki**  
Barrister and Solicitor

cc. Mr. B. Meronek, D'Arcy & Deacon LLP.  
Ms. N. Ruzycki, Just Energy Manitoba L.P.