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**VIA EMAIL**

August 21, 2015

Mr. Brent Czarnecki  
Law Department  
Manitoba Hydro  
22<sup>nd</sup> Floor  
360 Portage Avenue  
Winnipeg, MB R3C 2P4

Dear Mr. Czarnecki:

**RE: Centra Gas Manitoba Inc. – 2015/16 Cost of Gas Application**

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On May 25, 2015, Centra filed its 2015/16 Cost of Gas Application in confidence with the Board, citing its commercially sensitive nature. On June 2, 2015, the Board directed Centra to re-file the Application, redacting only those portions constituting commercially sensitive information (CSI). On June 12, Centra filed a redacted version of the Application and pre-filed Information Requests. The Board subsequently advised Centra that it would conduct a review of the redactions to determine whether additional information should be disclosed.

The Board and its advisors have now reviewed the redacted version of Centra's 2015/16 Cost of Gas Application and are of the view that certain information that Centra deems CSI can be disclosed without harm to Centra's or its ratepayers' interests. To that extent, this letter attaches a list setting out what currently redacted information the Board expects Centra to file on the public record. The Board intends to conduct a similar review of Centra's responses to current Information Requests.

The Board conducts its proceedings in a transparent and public manner. Withholding information from the public should be a last resort and only done in situations where Centra can demonstrate commercial harm to its own interests or to the interests of its ratepayers. Confidence in the Board's processes is enhanced when those processes are subject to public review and participation. In the case of the Cost of Gas Application, Centra is requesting approval of the recovery of in excess of \$35 million of previously incurred costs from ratepayers, as well as approval of rates to collect in excess of \$200 million of gas costs over the coming year. These are substantial amounts that call for a high level of transparency.

...2

The Board is cognizant of the current situation with TransCanada Pipelines' (TCPL) Mainline and the unlimited pricing discretion afforded to it by the National Energy Board (NEB). The Board accepts that details of Centra's supply, storage, and pipeline transportation portfolio, peak demand, and the correlation between weather and demand are all details that could provide TCPL, or secondary market participants, with a competitive advantage over Centra when setting short term or interruptible tolls or in selling natural gas to Centra. However, in the Board's view, Centra's redactions to its Application exceed what is necessary and include information that is not CSI.

The Board directs Centra to file a revised version of its Application that reverses the redactions identified as "public" on the attached table. If Centra disagrees with any of the Board's directed disclosures, the Board expects a further explanation from Centra as to why this information could harm the commercial interests of Centra or its ratepayers.

The Board is prepared to make its advisors available to meet with Centra to discuss any objections from Centra and determine whether Centra and the Board's advisors can reach a consensus and make a joint recommendation to the Board. Otherwise, the Board directs Centra to file any formal submissions by Friday, September 4, 2015.

Please note that an electronic marked-up version of Appendix 7.4 will be couriered to your office.

Yours truly,

*"Original Signed By:"*

Kurt Simonsen  
Associate Secretary

KS/dv

c.c. Sven Hombach, Board Counsel  
Greg Barnlund, Manitoba Hydro  
Brian Meronek/Tomas Masi, CAC  
Nola Ruzycki, Just Energy

## List of Suggested Redactions and Disclosures in 2015/16 COG Application

Note: The pagination is not the same in the redacted and unredacted versions of the Application. The page references in this document refer to the unredacted version of the Application. Centra did not redact any of Tabs 5, 6, or 7 with the exception of Appendices 7.3 and 7.4.

**Tab 2**

Page	Disclose	Redact	Justification for Disclosure
1	Lines 27-29	-	General info
2	Lines 1-27	Lines 28-34	General info, public info
3	-	All	-
4-11	Already disclosed	-	-
12	Lines 1-2, 11-13, 15-17	Lines 4-10,14	Previously disclosed
13	Lines 1-9, Fig 2.7	Lines 10-20	Public info, previously disclosed
14	Lines 13-16	Lines 1-12	General info
15-16	Already disclosed	-	-

**Tab 3**

Page	Disclose	Redact	Justification for Disclosure
1	All	-	Aggregate numbers, no SS&T detail
2	All	-	Previously disclosed
3	All text, aggregate numbers in table (right-most column)	Lines 2 and 4 in Fig 3.2	Aggregate numbers, no SS&T detail
4	All	-	Aggregate numbers, no SS&T detail
5	All with exceptions	Specific % and prices; volume in line 12	Fig 3.4 aggregated numbers, 10.9 million GJ previously disclosed, PGVA balance previously disclosed
6	All with exceptions	Lines 14-20, 26, 31	Previously disclosed
7	-	All	-
8	Lines 26-34	Lines 1-25	Public information about NEB proceeding
9	Lines 1, 2, 7, 8, 19 to 22	All with exceptions, Lines 2 and 4 in Fig 3.6	Aggregate numbers
10	Lines 1-14	Lines 15-34	Previously disclosed
11	Lines 15-28	Lines 1-14	Previously disclosed, general information

Page	Disclose	Redact	Justification for Disclosure
12	Lines 1-14, Fig 3.7	Lines 16-27	Cannot use this info to learn SS&T portfolio details
13	Lines 1-25	Lines 26-33	No details on SS&T (lines 1-14) SaskEnergy agreement is unrelated to TCPL (lines 15-25)
14	Lines 8-18	Lines 1-7 Fig 3.8	No SS&T details, describes how any utility operates
15	Lines 1-12	Lines 13-34	Generic info publicly known
16	Lines 7-16	Lines 1-6, 17-34	No SS&T details
17,18,19	-	All	-
20	Lines 1-8, 19-26	Lines 9-18, 27-34	Generic info, publicly available info on NEB decision
21	-	All	-
22	Lines 7-34	Lines 1-6	Generic info on capacity management activities
23	Lines 1-30	Lines 31-34	Generic info on capacity management activities, previously disclosed
24	Lines 6-10, 16-32	Lines 1-5, 10-15	Aggregate info, generic and previously disclosed info
25-31	All	-	Public info on NEB proceedings
32	Lines 1-9, 14-26, 31-34	Lines 10-13, 26-29	Public info on NEB proceedings
33	All	-	Public info on NEB proceedings; aggregate info
34, 35	All	-	Aggregate info
36	All with exceptions	Costs, prices, and volumes in lines 21-34	Aggregate info, previously disclosed
37	Lines 1-15 with exceptions, lines 17-19, 24-27	Costs in Fig 3.11 except total; costs, prices, and volumes in lines 1-15	Aggregate info
38	Lines 1-5, 13-24. Lines 25-34 with exceptions	Lines 6-12; Costs, prices, and volumes in lines 25-34	Public info, previously disclosed info, no SS&T details
39	Lines 1-28 with exceptions; Lines 29-32	Costs, prices, and volumes in lines 1-28	Aggregate info, no SS&T details
40	Lines 4-26 with exceptions	Costs in Fig 3.12 except total; costs, prices, and volumes in lines 15-26	Aggregate info, no SS&T details
41	Lines 1-27 with exceptions	Costs in Fig 3.13 except total; costs, prices, and volumes in lines 1-6; "Cdn and US pipeline systems" and "leasing	Aggregate info, no SS&T details

Page	Disclose	Redact	Justification for Disclosure
		US''	
42	Lines 20-22; Lines 1-13 and 23-34 with exceptions	Costs, prices, and volumes in lines 1-13, 23-34; all of lines 14- 19	Aggregate info, previously disclosed info
43	Lines 1-5 with exceptions; Lines 6-20	Costs in lines 1-5; lines 22-25; Fig 3.14 - "Exchange Rate" line and costs except Capacity Management and Total	Aggregate info, no SS&T details
44	-	All	-
45	Lines 8-34 with exceptions	Lines 1-7; costs, prices, and volumes in lines 8-34	Public info, no SS&T details
46	Lines 1-6, 12-20	Lines 21-22, Fig 3.15 - lines 1-7, costs except Capacity Management and Total	Aggregate info, no SS&T details
47	-	All	-
48	Lines 21-34 with exceptions	Lines 1-20; costs, prices, and volumes in lines 21-34	Aggregate info, no SS&T details
49	Lines 1-7 with exceptions, Lines 8-11, 16-22	Cost, prices, and volumes in lines 1-7; Fig 3.16 – lines 1-8, costs except Capacity Management and Total	Aggregate info, no SS&T details
50-53	All	-	No SS&T details – downstream function
54	All	-	No SS&T details – downstream function; aggregate and public info
55	All	-	Previously disclosed info
56	All	-	Previously disclosed or aggregate info
57	All	-	Aggregate info
58-60	All	-	Public info
61	Lines 1-30, 33, 34	Lines 30-32	Aggregate info, no SSS&T details, downstream function info
62	All	-	Public info, downstream operation info
63	Lines 1-7, 17-26	Lines 8-16	Aggregate info
64	Lines 1-3, 9-34 with exceptions	Lines 4-8, reference to exchange rate in line 20	Aggregate info
65	All	-	Disclosed in Tab 2

Appendix	Disclose	Redact	Justification for Disclosure
3.1	All		Previously disclosed
3.2, 3.3		All	
3.4	All		Public info
3.5, 3.6		All	
3.7, 3.8		All	
Schedule			
3.0.0	All		Previously disclosed
3.1.1		All	
3.1.2 a & b	All		Previously disclosed
3.1.3 a & b	All		Previously disclosed
3.1.4 a & b	All		Previously disclosed
3.2.0	All		Previously disclosed
3.3.0		All	
3.4.1, 3.4.2		All	
3.4.3 a & b	All		No SS&T details
3.5.0	All		No SS&T details
3.6.0		All	
3.7.1, 3.7.2		All	
3.7.3, 3.8.0	All		No SS&T details
3.9.0, 3.10.0	All		Aggregate info
3.11.0	All		Aggregate info
3.12.1, 3.12.2		All	
3.12.3		All	
3.12.4	All		Aggregate info

#### Tab 4 – Appendix 4.1

No additional redactions recommended for Tab 4 or Tab 4 Schedules. Disclosures are recommended for Appendix 4.1. Note: Appendix 4.1 does not have page numbers. This table assumes page 1 is the title page and page numbers continue sequentially.

Page	Disclose	Redact	Justification for Disclosure
1-4	All with exceptions	Specific volumes, average use, degree days heating, and percentages	General info, customer numbers previously disclosed
5	Table 1 with exceptions	Volumes	
6-10	All	-	General info
11	All with exceptions	Specific volumes, 2 <sup>nd</sup> last paragraph referring to weather	General info
12	All with	Specific volumes	General info, disclosed elsewhere in

Page	Disclose	Redact	Justification for Disclosure
	exceptions		Application
13	Table 2	Table 3, 4	Disclosed elsewhere in Application
14	HV Adjustment section except volume	Table 5, Weather Adjustment section, HV and Weather Adjustment section	General info, public info
15	-	Tables 6, 7, 8	-
16	All with exceptions	Specific volumes and average use, percentages related to volumes and avg use	General info, disclosed elsewhere in Application
17	Table 9	Tables 10, 11	Disclosed elsewhere in Application
18	All with exceptions	Specific volumes and average use, percentages related to volumes and avg use; except for <u>forecast</u> volumes and average use	General info, disclosed elsewhere in Application
19	Table 12, 13, 14	-	Disclosed elsewhere in Application
20	All with exceptions	Specific volumes and average use, percentages related to volumes and avg use	General info, disclosed elsewhere in Application
21	Table 15 with exceptions	Volume columns	Disclosed elsewhere in Application, previously disclosed
22	All with exceptions	Specific volumes and average use	General info, disclosed elsewhere in Application
23	Table 16 with exceptions	Volume columns	Disclosed elsewhere in Application, previously disclosed
24	All	-	General info
25	All with exceptions	Average use and percentages, Figure 2	Disclosed elsewhere in Application, previously disclosed
26	All with exceptions	Volumes and percentages, Figure 3	General info
27	All	-	General info, disclosed elsewhere in Application
28	All with exceptions	Specific volumes and average use, percentages related to volumes and avg use; Fig 6, 7, 8	General info
29	All with exceptions	Specific volumes and average use, percentages related to volumes and avg use; Fig 9, 10, 11	General info
30	All with exceptions	Fig 13	General info, disclosed elsewhere in Application

Page	Disclose	Redact	Justification for Disclosure
31	All	-	Info related to T-service customers unrelated to Centra's SS&T portfolio
32	All with exceptions	Volumes and percentages, Figure 17	General info, disclosed elsewhere in Application
33	All with exceptions	Actual volumes	General info, disclosed elsewhere in Application
34	All with exceptions	Specific volumes and average use, percentages related to volumes and avg use	General info, disclosed elsewhere in Application
35	All	-	General info
36	Table 17	-	Totals disclosed elsewhere in Application
37	-	Table 18	-
38	-	Table 19	-
39	-	Table 20	-
40	Table 21	-	Totals disclosed elsewhere in Application
41	-	Table 22	-
42	-	Table 23	-
43	-	Table 24	-
44	Table 25	-	Totals disclosed elsewhere in Application
45	Table 26 with exceptions	2014/15 column	Disclosed elsewhere in Application; Centra appears to agree that future year forecasts may be disclosed
46	Table 27 with exceptions	2014/15 column; Top Consumers rows	Disclosed elsewhere in Application; Centra appears to agree that future year forecasts may be disclosed
47, 48	-	All	-
49	All with exceptions	2014/15 row	General info, Centra appears to agree that future year forecasts may be disclosed
50	-	All	-
51	All with exceptions	Rows 2013 and 2012 in Table 31, Rows 2012 and 2011 in Table 32	Previously disclosed
52	All	-	General info
53	HV and DSM Sections	Normal Weather section	General info, public info
54,55	All	-	General info
56	All	-	Customer numbers not CSI
57	All	-	Customer numbers not CSI; general info
58	All	-	General info



Page	Disclose	Redact	Justification for Disclosure
59	Monthly customers	Monthly Volumes	Customer numbers not CSI
60,61	All	-	General info

### Appendix 7.3

Page	Disclose	Redact	Justification for Disclosure
1-3	All	-	Public info
4	Lines 1-5	Centra's AMA Experience section	Public info
5-7	-	All	
8	AMA Experience of Other Canadian LDCs; Risks Managed by Centra	Lines 1-12	Previously disclosed info, general info
9	All	-	General info, no SS&T details
10	Lines 1-12	Operational Risk section	General info, no SS&T details
11	-	All	-
12	-	All	-
13	Conclusions section	Lines 1-21	Previously disclosed, general info
14	All	-	General info

### Appendix 7.4

It is recommended to disclose the majority of Appendix 7.4. A marked-up version with recommended redactions has been prepared.

### Appendix 7.5

PUB/Centra INT-002(a) Att. 1 p. 6-12	Disclose all – previously disclosed
PUB/Centra INT-003(a)	Disclose all except 2013/14 and 2014/15 – previously disclosed
PUB/Centra INT-003(c)	Disclose 2012/13 table – previously disclosed
PUB/Centra INT-005(a)	Disclose numbers of customers – previously disclosed
PUB/Centra INT-006(c)	Disclose text but not attachment – general info
PUB/Centra INT-007(g)	Disclose text and Volume table – these are forecast volumes which Centra continues to disclose (see also Schedules 4.4.4 and 4.4.5)

PUB/Centra INT-012(b),-013(a),-014,-016	Disclose – no CSI in responses
PUB/Centra INT-019(b)	Disclose 2006/07 to 2012/13 data – previously disclosed
PUB/Centra INT-019(c),020	Disclose – no CSI in responses
CAC/Centra INT-001(a),(b)	Disclose – not originally filed in confidence with PUB
CAC/Centra INT-003(a),-004(a)-(d)	Disclose – no CSI in response
CAC/Centra INT-005(c)	Disclose – disclosed by Centra in RH-001-2014 proceeding
CAC/Centra INT-007(a),(b)	Disclose except for attachment – no CSI in text of responses
CAC/Centra INT-008(a)(i)	Disclose – no CSI in response
CAC/Centra INT-008(a)(ii)	Disclose – these are based on forecast volumes which Centra continues to disclose (see also Schedules 4.4.4 and 4.4.5)
JEMPLP/Centra INT-006,-007(a)	Disclose – no CSI in response
JEMPLP/Centra INT-007(b)	Disclose – breakdowns of numbers of customers are being disclosed by Centra elsewhere in the Application
JEMPLP/Centra INT-008	Disclose – no CSI in response