

Manitoba Hydro Undertaking #131

Manitoba Hydro to determine and respond as to whether the calculation process for doing the forecast is confidential.

Some of the elements included within the Revenue Forecast are confidential. Furthermore, as noted elsewhere, Manitoba Hydro's reluctance to provide live spreadsheets is due to a number of considerations, not only data confidentiality. Among these are the following:

- 1) Making live spreadsheets available may actually decrease, not improve, the efficiency of the review process. The models used by the Corporation are large and complex. Manitoba Hydro expects that an independent analyst, untrained with Manitoba Hydro's models, would need to invest a significant amount of time and effort to be capable of operating the model correctly. Allowing other parties to work in and modify spreadsheets and pose questions in Information Requests and on cross-examination based on the modified schedules, will also require Manitoba Hydro to invest a significant amount of time analyzing the changes made to the spreadsheets and to understanding their potential impacts. This approach is inefficient, would require additional time to be provided within the regulatory process and would make the regulatory process more cumbersome. Careful planning, process development, constraints, and information technology are required to assure that filing of live models improves, rather than reduces, the efficiency of the process.
- 2) Many spreadsheets contain metadata, which includes working notes and references made by the staff responsible for the files. In order to remove metadata, the file must be converted to an Adobe Acrobat portable document format (pdf) file. This is an electronic file format that is an open standard which is readable by many different operating systems, does not require specific software to read and allows all parties to access filed information.
- 3) Manitoba Hydro notes that some of the Corporation's models may be subject to intellectual property rights reserved by third parties and are not available to be shared in the regulatory process. In addition, some spreadsheets may contain competitive or commercially sensitive information which is not appropriate to be disclosed.

The implementation of electronic filing in other jurisdictions, such as Ontario, resulted from years of effort on the part of regulatory tribunals, applicants and other stakeholders of the regulatory process. The Corporation is of the view that it would take such a collaborative process in Manitoba to successfully implement any form of electronic filing.

In order to initiate this collaborative process, Manitoba Hydro is currently undertaking an assessment of the state of electronic filing in other jurisdictions used to support the regulatory process. Following this assessment, the Corporation intends on proposing an electronic filing

solution for Manitoba sometime in 2011. However, this process must occur outside of the current General Rate Application, since any discussion of the advancement of electronic filing practices would need to carefully and fully examine the information technology requirements and associated costs and the roles and responsibilities for developing, implementing and operating such a system. In addition, the intellectual property rights and third party proprietary rights related to the Corporation's models would need to be fully considered in the course of such investigations. The scheduling of a collaborative process needs to consider the initiatives of both Manitoba Hydro and Centra Gas Manitoba Inc., as well as the availability of PUB staff, PUB advisors and other Intervenors.