



THOMPSON DOREMAN SWEATMAN LLP

COPY

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***DELIVERED BY COURIER &
VIA E-MAIL***

Mr. D. Christle
Secretary and Executive Director
Public Utilities Board
400 - 330 Portage Avenue
Winnipeg, MB R3C 0C4

Dear Mr. Christle:

Re: Manitoba Hydro 2015 GRA
Our Matter No. 0124393 AFH

MIPUG has reviewed Manitoba Hydro's two letters regarding Information Requests dated February 23, 2015 and February 25, 2015. MIPUG is sympathetic to the concerns of Hydro in regard to quantity of IRs, and expresses concern that when the quantity of the IRs overwhelms the ability to achieve quality responses to IRs, there can be a reduction to the efficiency and usefulness of the hearing process.

In an effort to address the Board's concerns noted in Order 18/15 regarding the increasing number of Information Requests, MIPUG reviewed the IRs prepared by the PUB, and greatly reduced the number of IRs asked compared to the 2012 GRA from 157 to 90 (including sub-parts). This is among the lowest number of IRs by any party even though MIPUG's approved scope for the review is among the widest. MIPUG made significant effort to ensure that IRs drafted to date were within the scope set by the Board. MIPUG also made efforts to coordinate responses with other parties to reduce duplication. Finally, MIPUG reserved almost all questions related to depreciation pending receipt and review of the response of Hydro to PUB Directives 8 and 9 of Order 43/13 (recently received, but not yet reviewed) in case the response to this directive eliminates or reduces the need for the questions.

For the reasons more fully set out in the attached documents, MIPUG believes the remaining IRs objected to by Manitoba Hydro are within the scope of this hearing and are required to fully investigate the 2015 GRA filing. As a result, except where MIPUG has noted below that it is willing to withdraw or re-word an IR, MIPUG expects substantial responses from Manitoba Hydro on the MIPUG Round 1 IRs.



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Consistent with the process proposed by the PUB, MIPUG approached Hydro and arranged a conference call on February 26, 2015 to discuss the disputed IRs in an attempt to resolve the disagreement directly with Manitoba Hydro. As a result of that call, MIPUG has agreed to withdraw two IRs and has reworded or repositioned a number of other IRs to reduce the complexity and work required to answer, as follows:

- MIPUG/MH-I-43(a) – MIPUG agrees to withdraw
- MIPUG/MH-I-10(c) – MIPUG agrees to withdraw
- MIPUG/MH-I-5 – MIPUG proposes to re-word (see enclosed). It is MIPUG's understanding Hydro similarly objects to the reworded question.
- MIPUG/MH-I-19(c) – MIPUG proposes to re-word (see enclosed). It is MIPUG's understanding that Hydro similarly objects to the reworded question
- MIPUG/MH-I-34(a) and (b) – MH proposed an alternative approach which is acceptable to MIPUG
- MIPUG/MH-I-7(a) – MH proposed a narrowed scope (excluding working papers) which is acceptable to MIPUG

Manitoba Hydro has not amended or withdrawn any of its original objections except where MIPUG accepted MH revised wording. MIPUG has shared its justifications as to why that the remaining responses were required and in-scope and has also attempted to deal with Manitoba Hydro concerns by proposed rewording of some IRs.

Unfortunately MIPUG has had limited success in dealing with Manitoba Hydro objections and seeks adjudication from the Board.

Enclosed is MIPUG's reply to the specific objections raised by Hydro.

Do not hesitate to contact the writer if you have any questions.

Yours truly,

THOMPSON DORFMAN SWEATMAN LLP

Per: ORIGINAL SIGNED BY
ANTOINE F. HACAULT

Antoine F. Hacault*

AFH/ab

Encls.

cc: Interveners of Record

*Services provided through Antoine F. Hacault Law Corporation