

“APPENDIX I”

INTERVENER REQUEST FORM

1. Application Re Hearing:		
2015/16 & 2016/17 General Rate Increase		
2. Name of Requesting Party:		
Manitoba Keewatinowi Okimakanak Inc. (MKO)		
3. Address of Requesting Party:		
6-338 Broadway Avenue, Winipeg, MB R3C 0T2		
4. Phone Number:	Business:	Residence
	204-927-9184	
	Fax Number:	E-mail:
	204-927-7509	manderson@mkonorth.com
5. Contact Person(s):		
Michael Anderson (MKO) ; George J. Orle Q.C. Legal Counsel		
6. Address:		
Michael Anderson same as # 3; George J. Orle Q.C. 280 Stradbrook Ave. Winnipeg, MB R3L 0J6		
7. Phone Number:	Business:	Residence:
	M. Anderson 949-9184 G. Orle 989-2764	
	Fax Number:	E-mail:
	M. Anderson 949-9185; G. Orle 989-2774	manderson@mkonorth.com; gorle@odgb.mb.ca
8. State reasons for the proposed intervention (please be specific).		
See Schedule A		

9. State nature of proposed intervention.		
a) Do you intend	Yes	No
(i) to appear throughout the hearing:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) to participate in the production of evidence:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) to participate in the testing of evidence:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) to present final argument:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Do you intend to call witnesses:	Yes	No
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) If yes to No. 9b), please provide witness':		
(i) Name:		
(ii) Address:		
(iii) Qualifications:		
(iv) Subject of submission (please note date for filing submission):		
<p>MKO will be sharing expert witnesses with other Intervenors.</p>		
10. Will you be applying for costs under Board Order No. 163/87:		
	Yes	No
	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>If yes: Refer to Section 43 of Rules of Practice and Procedure. Provide detailed budget as per the attached Appendix II.</p>		
11. Comments and other information:		
<p>MKO will be providing witnesses on the effects of rate increases on MKO communities and residents. This will be done by a rate payers panel comprising 2-4 witnesses, the identities which have not yet been determined.</p>		



“APPENDIX II”

INTERVENER BUDGET AND COST SUMMARY SHEET

To be used to prepare a budget for the Intervener Request Form, Item 10, and to make a claim for an Award of Costs.

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Prepared by:		Date:
George J. Orle Q.C.		February 3, 2015
Hearing:		
2015/16 & 2016/17 General Rate Application		
Period Covered:		
January 2015 to June 2015		
Intervener's Name:		
MKO		
Contact Person or Persons:		
George J. Orle Q.C.		
Address:		
280 Stradbrook Ave, Winnipeg, MB R3L 0J6		
Phone Number:	Business:	Residence:
	989-2764	
Fax Number:	Fax Number:	E-mail:
	989-2774	gorle@odgb.mb.ca

See Costs on Page 2.

FEES - to be competed for legal counsel or experts

	Hours	Days	Rate	Costs
Preparation	120 - 160	15 - 20	\$221.00	\$ 26,520.00 - \$35,360
Appearance	120 - 160	15 - 20	\$221.00	\$ 26,520.00 - \$35,360
Argument & Reply	24	3	\$221.00	\$5,304.00
FEES TOTAL				\$ 58,374.00 - \$76,024
DISBURSEMENTS	Rate Panel			estimated cost \$6000.00 to \$8,000.00
EXPERTS	Share experts and one potential witness			Estimated \$50,000.00
Consultant Michael Anderson				Estimated \$15,000.00
TOTAL FEES & DISBURSEMENTS				

## **SCHEDULE A** To Intervener Application of MKO

MKO represents more than 65,000 treaty First Nation citizens in northern Manitoba. MKO has been in existence for over 33 years and is a nonprofit advocacy organization governed by the elected Chiefs of the 30 sovereign First Nations in northern Manitoba.

All citizens of the MKO First Nations and the MKO First Nation government facilities receive electrical service solely from Manitoba Hydro. The citizens of MKO First Nations are residential ratepayers and the First Nation governments are general service ratepayers. The three diesel First Nations which pay electricity bills for the schools are also First Nation education rate customers. In the past MKO has been the only intervener which represents both residential and general service customers.

The proposed rate increases will disproportionately affect MKO First Nations as the majority of the citizens are in the low income category and the general service customers have limited ability to absorb any additional costs.

The proposed rate increases will disproportionately affect MKO in a second fashion in that many of the benefits to be generated by the increases will flow to the provincial government to be used for general purposes and MKO First Nations receive little or no benefit from provincial disbursements.

In reviewing the proposed rate increases MKO would be concerned with the following factors:

1. are Manitoba Hydro forecasts reliable;
2. are the actual and projected costs of Hydro necessary;
3. has Manitoba Hydro demonstrated that its revenue requirements are reasonable.

Specifically MKO would be reviewing are the rate increases sustainable for First Nations and for First Nation citizens. In that regard MKO would be focussing on two specific areas:

1. Bill reduction through demand side management
2. Bill reduction through rate mitigation measures.

MKO would examine the application with respect to the recognition and implementation of specific mitigation measures such as:

1. removal of mitigation costs from rates
2. allocation of greater share of net export revenue to First Nations customers
3. establishment of a "equivalent to gas" rate for heat portion of bills
4. allocation of net export revenue to reduce diesel cost of service
5. removal of water rental fees from rates to First Nations.

With regard to the preliminary issues list, MKO would be a supporting intervener for all issues save and except numbers 6 to 10. MKO would have a significant interest as an intervener on issues 12 to 15 and would share primary intervener status on issues 36 to 38 and 47.