

The Public Utilities Board

400 – 330 Portage Avenue
WINNIPEG MB R3C 0C4

“APPENDIX I”

INTERVENOR REQUEST FORM

1. Application Re: Manitoba Hydro 2015/16 & 2016/17 GRA
2. Name of Requesting Party: Manitoba Metis Federation ('MMF')
3. Address of Requesting Party: 300-150 Henry Avenue
WINNIPEG MB R3B 0J7
Attention: Al Benoit & Jasmine Langhan
4. Phone Number: Business: 204-586-8474
Residence: _____
Fax Number: 204-947-1816
5. Contact Person or Persons: Kris Saxberg, D'Arcy & Deacon LLP
6. Address: c /o D'Arcy & Deacon LLP, Barristers & Solicitors
2200 – One Lombard Place, WINNIPEG MB R3B 0X7
7. Phone Number: Business: (204) 925-5353
Email: ksaxberg@darcydeacon.com
Fax Number: (204) 943-4242
8. State reasons for the proposed intervention.

The Manitoba Métis Federation

The Métis Nation is one of the Aboriginal Peoples of Canada referred to in section 35 of the Constitution Act, 1982 and the Manitoba Métis Community, is part of the Métis Nation. The Manitoba Métis Federation (MMF) is the democratic and self-governing political representative of the Manitoba Métis Community. The MMF promotes, protects and advances the collective rights

of approximately 100,000 citizens of the Manitoba Métis Community at the local, regional and provincial levels.

The MMF is organized into 7 province-wide Regions with approximately 134 MMF Locals in communities throughout Manitoba that are located within the 7 MMF Regions. Elected through province-wide ballot-box elections, the MMF Board of Directors is comprised of one President, and one Vice President and two Board of Directors for each of the 7 Regions as well as the Spokesperson of the Infinity Women Secretariat. The history of Manitoba is vitally connected with the history of the Métis as founders of Manitoba.

The MMF's Interest in the General Rate Application

The MMF represents over 100,000 residential and small business customers across the province that will be impacted by Manitoba Hydro's proposed rate increases. While the MMF promotes, protects and advances the diverse interests of its members in urban, rural and northern and southern areas of the province, the MMF is particularly concerned about the interests of its low income members in rural areas who rely primarily on electric space heat and do not have access to gas heating. Many of these customers are elderly, low income, single-parent families, and young families, struggling to make ends meet.

The MMF also supports and advocates on behalf of a number of members of the Manitoba Métis Community that operate businesses throughout the province that will be impacted as small and medium general service customers. Many of these customers are either starting out or are struggling to make a living or are more established but require certainty in costs in order to maintain their businesses.

The MMF will speak to the issues facing customers who are citizens of the Manitoba Métis Community. While the MMF will not speak to the interests of other customers being represented by other interveners, the MMF acknowledges that many of the issues facing customers who are citizens of the Manitoba Métis Community may also be experienced by other customers, who may not be citizens of the Manitoba Métis Community, but could be impacted in similar ways.

9. State nature of proposed intervention.

a) Do you intend

- i) to appear throughout the hearing: X
- ii) to participate in the production of evidence: X
- iii) to participate in the testing of evidence: X
- iv) to present final argument: X

b) Do you intend to call witnesses:

Yes X No

c) If yes to No. 9 b), please list the proposed witnesses:

(1) Name: Greg Matwichuk

(2) Address: #10, 1922 – 9th Avenue SE, CALGARY AB T2G 0V2

(3) Qualifications: Regulatory Accountant

(4) Subject of submission:

Mr. Matwichuk will provide consultation advice on all aspects of the Application and may file evidence to be presented in conjunction with CAC.

- (1) Name: John McCormick
- (2) Address: 1014 Hillcrest Ave. SW, Calgary, Alberta T2T 0Z2
- (3) Qualifications: LLB and MBA – Financial Services Expert
- (4) Subject of submission (please note date for filing submission):

Mr. McCormick will provide consultation services to assist MMF with testing Manitoba Hydro's evidence and in developing closing argument. It is anticipated that MMF will be working with CAC in connection with Mr. McCormick's evidence.

- (1) Name: Jerrold Oppenheim
- (2) Address: 57 Middle Street GLOUCESTER MASS 01930
- (3) Qualifications: DSM and Low Income program expert
- (4) Subject of submission (please note date for filing submission):

Mr. Oppenheim will provide consultation services regarding DSM and Low-Income programs – it is not anticipated that he will file evidence.

MMF plans a full intervention on all issues raised in the Hydro filing. We will forward our comments on the List of Issues circulated by Manitoba Hydro under separate cover prior to the pre-hearing conference.

10. Will you be applying for costs under Board Order No. 163/87:

Yes X No

A detailed budget is provided herewith.

11. Comments and other information

MMF does not have the financial resources to contribute to the cost of the Intervention and is therefore **seeking a predetermination by the PUB that it qualifies for a potential award of costs** (without determining the quantum until the intervention is complete). MMF counsel will prepare monthly accounts to ensure that the Intervention is in line with the budget. Counsel has requested at least one interim payment (with an appropriate holdback) prior to a formal application for costs being submitted immediately after the evidentiary portion of the hearing. Counsel has indicated that a six to eight month delay in receiving payment for services may cause undue hardship for the Firm.