

March 10, 2015

REFERENCE NO:

122956-0007

PLEASE REPLY TO:

D. Tomas Masi

DIRECT LINE:

204-977-0321

EMAIL:

tmasi@darcydeacon.com

Public Utilities Board
400 – 330 Portage Avenue
Winnipeg, MB R3C 0C4

Attention: Darren Christle, Executive Director and Secretary

Dear Mr. Christle:

Re: Manitoba Hydro 2014/15 and 2015/16 GRA

LEGAL ASSISTANT:

Lauren Binne

DIRECT LINE:

204-975-2555

EMAIL:

lbinne@darcydeacon.com

Please find attached the reply of the Manitoba Métis Federation (“MMF”) to the specific objections raised by Manitoba Hydro in connection with some of the Information Requests submitted by MMF. As directed by the Board, MMF’s reply to Manitoba Hydro’s objections has been included in the body of each disputed Information Request. MMF seeks a determination from the Board as to whether Manitoba Hydro ought to provide the information sought.

MMF is of the position that the Information Requests disputed by Manitoba Hydro are relevant, significant and within the scope of the present GRA hearing. In addition, MMF contends that the information requested is vital to the intervention to be conducted by MMF in this proceeding as directed by the Board; namely to review the proposed rate impacts on the following customer groups: rural customers, low-income customers, all-electric customers; and small-to-medium businesses.

In the brief time it has had to date, MMF has made attempts to discuss Manitoba Hydro’s concerns regarding the impugned Information Requests with Manitoba Hydro. MMF provided Manitoba Hydro with a draft comprehensive response yesterday afternoon in order to facilitate a settlement. Unfortunately, Manitoba Hydro advises that it does not have enough time to fully and properly consider MMF’s draft response and answer the non-contentious Information Requests in accordance with the established timelines. As a result, it was agreed that MMF would submit its formal response to the PUB for adjudication.

In order to facilitate the process, MMF has agreed to accept Manitoba Hydro’s “alternative proposed response” with respect to a number of the contested Information Requests as enumerated below (subject of course to reviewing and considering the adequacy of the answer provided by Manitoba Hydro):

BRANCH OFFICE - CALGARY

- MMF/MH-I-45a;
- MMF/MH-I-50a-m;
- MMF/MH-I-51a-b;
- MMF/MH-I-52;
- MMF/MH-I-55; and
- MMF/MH-I-56a-c.

Accordingly, MMF seeks an Order from the Board requiring Manitoba Hydro to respond to the information requested in the attached Information Requests. If you require any further amplification with respect to the above request, please contact the writer at your convenience.

Yours truly,

D'ARCY & DEACON LLP

Per:

A handwritten signature in black ink, appearing to read 'D. Masi', written over a light blue horizontal line.

D. Tomas Masi

TM / lb