

## MANITOBA PUBLIC UTILITIES BOARD

Re: MANITOBA HYDRO

NEEDS FOR AND ALTERNATIVES TO REVIEW OF MANITOBA HYDRO'S

PREFERRED DEVELOPMENT PLAN

Regis Gosselin - Chairperson

Marilyn Kapitany - Board Member

Larry Soldier - Board Member

Richard Bel - Board Member

Hugh Grant - Board Member

HELD AT:

Public Utilities Board

400, 330 Portage Avenue

Winnipeg, Manitoba

April 9, 2014

Pages 6014 to 6320



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6018 --- Upon commencing at 9:00 a.m. 2 3 THE CHAIRPERSON: Well, I think we'd like to start the proceedings. I believe that everyone's in position. I wonder if there are any documents to acknowledge; apparently not. So with 7 that, I'll turn the microphone over to you, Me. Hacault, s'il vous plait. 9 MR. ANTOINE HACAULT: Bonjour, M. 10 President. We do have one (1) set of documents which were not marked. They are IRs of MIPUG -- or of La 11 Capra by MIPUG. And I believe, in consultation with 13 the Board secretary, that they can be marked as MIPUG 14 Exhibit 22. They have been posted on the website. 15 there were twelve (12) questions. So I think they're going to put them one (1), two (2), three (3), up to twelve (12). So it will be MIPUG Exhibit 12. 17 18 MR. KURT SIMONSEN: Exhibit 22 --19 MR. ANTOINE HACAULT: Oh, twenty-two 20 (22).21 MR. KURT SIMONSEN: 1 to 12. 22 23 --- EXHIBIT NO. MIPUG-22-1: IR of La Capra by MIPUG 24 25 --- EXHIBIT NO. MIPUG-22-2: IR of La Capra by MIPUG

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   IEC LA CAPRA ASSOCIATES PANEL CONTINUED:
21
22
               DANIEL PEACO, Previously Affirmed
23
                JOHN ATHAS, Previously Affirmed
24
                MARY NEAL, Previously Affirmed
25
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PUB re NFAT 04-09-2014 6020 CONTINUED CROSS-EXAMINATION BY MR. ANTOINE HACAULT: 2 MR. ANTOINE HACAULT: Now, if Diane could please put Manitoba Hydro Exhibit 104-8, that was 3 the quilt. And we were talking -- yesterday about how different plans fared. And we had been talking, comparatively, quite a bit about how six (6) plan --Plan 6 fared with others. 7 8 But in the context of integrated 9 planning --10 THE CHAIRPERSON: Me. Hacault, just 11 situate this grid -- this quilt for us, please, in 12 terms of --13 MR. ANTOINE HACAULT: Yes. 14 THE CHAIRPERSON: -- this represents 15 the updated capital costs. 16 CONTINUED BY MR. ANTOINE HACAULT: 17 18 MR. ANTOINE HACAULT: There's two (2)

- 19 things that -- this quilt is part -- is the latest
- update that Manitoba Hydro has provided, March 27. And
- it has information that was a bit more recent than the 21
- 22 update on which La Capra relied. And we spent quite a
- 23 bit of time yesterday with this slide. It has the
- 24 revised capital costs. It has the revised treatment of
- 25 common factors.

- 1 And the last thing that it did, which La
- 2 Capra's analysis did not have, if you look in the upper
- 3 right-hand side, it has, "No WPS investment," whereas
- 4 La Capra's analysis still had the WPS investment.
- 5 The -- with that kind of preface as an
- 6 explanation, the one thing I want to explore a little
- 7 bit and have thoughts on is optionality. We've had
- 8 some discussion with prior panels on what the 750 line
- 9 might give, in addition to the 250 line, even though
- 10 the economics aren't as good on this quilt.
- If, as a hypothetical, we were going to
- 12 choose Development Plan 6, can La Capra comment on any
- 13 optionality that, that gives us? What flexibility does
- 14 it give us if export prices move, capital costs move.
- 15 What advantages and disadvantages do we
- 16 have with choosing that as, kind of, our first step and
- 17 where it might lead us to different paths?
- 18 MR. DANIEL PEACO: You want it in
- 19 comparison to anything else in particular, or...
- 20 MR. ANTOINE HACAULT: Well, let's
- 21 compare six (6) to -- to two (2). If we just said
- 22 we're going to do Keeyask/Gas, but now we're going to
- 23 six (6), what kind of optionality is foreclosed and
- 24 what is open for us, as Manitoba ratepayers?
- MR. DANIEL PEACO: Okay. Well, let's

24

6022 start -- let's start with the transmission component of that, because I think that's probably where the -- I mean, if you build Keeyask, it's -- it's there. So 3 then the question is: What flexibility do you have to operate around that? 6 The -- as we -- as we've spoken about here in the last couple days, some of the analysis that 7 we've -- that we've looked at shows that even if you -you go into something like Plan 14, the existence of --10 of the added import capability provides more access to the market, which effectively serves as a -- as another 11 12 hedging option in drought condition with the system. 13 And so that -- that gives more options 14 to manage dry water conditions in the -- in the hydro 15 system than -- than exist today. I think to the extent 16 that -- obviously, that would provide -- the 750 line, having built only Keeyask, will clearly give some 17 18 export headroom in the system so that -- to the extent 19 that there is any kind of additional facilities that -that were built to try to export into the market, into 21 MISO, obviously, that would already exist, whether it's 22 Conawapa or something else. So that would be some --

But in terms of domestic load, I think

export market opportunities.

some optionality, again, relative to the -- to the

- 1 to the extent that there are attractive sources of
- 2 power available to be imported from the south, that
- 3 clearly would expand the import capability quite a bit.
- 4 So there would be expanded opportunities to take
- 5 advantage of anything that might be more lucrative to
- 6 the south.
- 7 MR. ANTOINE HACAULT: Thank you.
- 8 THE CHAIRPERSON: I noticed that you
- 9 didn't mention any transmission revenues from that line
- 10 that would originate for -- in relation to traffic in
- 11 the US?
- 12 MR. DANIEL PEACO: Yeah, I -- and I
- 13 guess I would think about more how that sort of fits
- 14 into the -- the optionality question that he posed.
- 15 There probably would be some. I'm not sure how much it
- 16 would change, depending upon what kinds of options you
- 17 exercised.
- 18 THE CHAIRPERSON: But I meant operating
- 19 purely as a transmission line in the US as opposed to
- 20 using it as a vehicle for power that would be
- 21 travelling to Manitoba either way, or from Manitoba or
- 22 to Manitoba.
- In other words, there are people that
- 24 invest in transmission lines in the US simply for --
- MR. DANIEL PEACO: Sure.

- 1 THE CHAIRPERSON: -- merchant
- 2 transmission purposes.
- 3 MR. DANIEL PEACO: Sure. But I think
- 4 the -- the investment would be -- it would -- it would
- 5 presumably be part of the network tariff, and you'd get
- 6 a -- you'd get a return. I mean, typical investment in
- 7 the US, if it was built for expanded diversity exchange
- 8 between two (2) areas of a system, I mean, it would --
- 9 it would deemed to be needed and included in the -- in
- 10 the network tariff. And -- and the owner would --
- 11 would get a return on that and -- and be able to charge
- 12 the fees. I'm not sure...
- And I guess I'd have to go back and look
- 14 and see exactly how the US portion of this line would
- 15 be treated, but I would assume it would give some sort
- 16 of similar revenue. It would -- it would receive
- 17 revenues as being part of the network tariff.
- 18 I don't know how that would chan -- I'd
- 19 -- I'd have to look at it to see how that would change,
- 20 depending upon the mode of use of the line, depending
- 21 whether it's for import or export.
- 22
- 23 CONTINUED BY MR. ANTOINE HACAULT:
- 24 MR. ANTOINE HACAULT: Thank you. Now,
- 25 I'd like to keep in mind your comments with respect to

- 1 Development Plan 6 but contrast that with Plan 14,
- 2 which is the Preferred Development Plan now deferred
- 3 for Conawapa to '26. It doesn't show on here, but
- 4 that's my understanding. The earliest possible would
- 5 be at that date.
- If we were in a hypothetical to choose
- 7 Plan 14, and we're talking again long-term risks and
- 8 long-term forecasts, what does choosing Plan 14 do to
- 9 our options?
- 10 MR. DANIEL PEACO: Relative to the
- 11 prior discussion?
- MR. ANTOINE HACAULT: Yes.
- MR. DANIEL PEACO: Well, with Keeyask
- 14 and Conawapa, you're, at least initially, you -- you
- 15 have substantial surplus in Manitoba, and the 750 line
- 16 is basically sized to be able to export the power
- 17 that's going to be produced from those two (2)
- 18 facilities in excess of domestic load.
- 19 It wouldn't, by itself -- my
- 20 understanding is even with a -- with a bit of an
- 21 upgrade that's contemplated with the line, it wouldn't
- 22 provide a lot of additional opportunity for further
- 23 generation to export. So -- because the -- the line is
- 24 basically sized to be big enough to evacuate power --
- 25 surplus power from both of those facilities during

- 1 reasonably high water conditions.
- 2 So -- but I do think that the -- the
- 3 drought -- the drought uses the line as a -- as a
- 4 source of imports during drought conditions, which
- 5 still apply, and we've -- we've talked about that.
- 6 MR. ANTOINE HACAULT: Yes. Now, let me
- 7 just test this a bit, because we've seen versions of
- 8 Plan 14 with deferring Conawapa, because as I
- 9 understand the evidence so far, we don't need to make a
- 10 decision to build Conawapa today. We still have some
- 11 flexibility based on the contracts in postponing that -
- 12 the real decision for another four (4) years.
- If Conawapa is approved now, am I right,
- 14 firstly, that we'll be stuck with the capital costs
- 15 without knowing whether or not Keeyask proves that
- 16 those capital costs as estimated were accurate, too
- 17 low, or too high?
- 18 MR. DANIEL PEACO: Yeah, I -- I quess
- 19 I'm not sure that anybody's proposing that it be
- 20 approved now. If...
- 21 MR. ANTOINE HACAULT: Well, I quess,
- 22 what's your understanding of Hydro's Preferred
- 23 Development Plan? What's their first -- their first
- 24 choice? Is it still what's shown on this slide, which
- 25 is K19 -- it's Keeyask19, Conawapa26, and then -- and

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- 1 the 750 line with the WPS sale, but no WPS investment?
- 2 MR. DANIEL PEACO: Well, I -- it was my
- 3 understanding in reading the -- the oral testimony
- 4 provided and the materials that have come along with
- 5 that, that the Company has -- has basically set aside
- 6 Conawapa for the time being, realizing that that's --
- 7 they said that's an option. We can do it later, but
- 8 we're not -- you know, it's not necessarily something
- 9 that we're asking for approval for now.
- 10 And my understanding of their testimony
- 11 essentially brings them back to something that looks
- 12 like five (5) or six (6) with a -- with the DSM at.
- 13 They're asking for the -- they're asking for the
- 14 Keeyask, the -- the 750 line, the Minnesota Power
- 15 contract, and then we'll, you know, we'll -- we'll
- 16 defer further decisions till later.
- 17 MR. ANTOINE HACAULT: And does that
- 18 make sense for La Capra? Does it make sense to wait on
- 19 the Conawapa decision to see whether we are able to
- 20 negotiate more contracts, what's happening with
- 21 construction costs, and what's happening with export
- 22 prices?
- 23 Does it make sense to defer the decision
- 24 on Conawapa?
- MR. DANIEL PEACO: Well, I think it was

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- 1 always -- I mean, obviously, Conawapa's on a different
- 2 -- has always been on a different timeline than
- 3 Keeyask, and is -- inherently that -- that gives --
- 4 gives anyone different options, because if you're not -
- 5 if you're not in the construction phase, or you
- 6 haven't -- you haven't spent as much money, you have --
- 7 you have more flexibility to change direction.
- 8 My understanding is that based upon what
- 9 was learned about -- about the cost of the project and
- 10 the -- and the economics environment within which to
- 11 look at that project, that it would say, We need to
- 12 make sure we exercise that option, because we could
- 13 learn in a few years that the markets turn in one (1)
- 14 direction, and Conawapa looks more attractive, or -- or
- 15 learn on the converse that it looks, you know, that the
- 16 -- what -- what looks to be fairly unattractive
- 17 economics persist.
- 18 And I think those -- that information
- 19 would be updated and considered at the time it -- it's
- 20 ripe to make a decision on the project. I'm -- I'm not
- 21 hearing Hydro indicate anything different than that.
- MR. ANTOINE HACAULT: And, sir, from a
- 23 resource planning perspective, is it La Capra's view
- 24 that Hydro should continue to expend the minimum it
- 25 needs to expend to continue to protect the Conawapa

- 1 plan, or are the econ -- economics such that we should
- 2 just say, Well, for the next four (4) or five (5)
- 3 years, until something does change, it's not even
- 4 worthwhile spending some minimum protection money?
- 5 MR. DANIEL PEACO: Yeah. We -- we
- 6 haven't -- we haven't sort of dug into sort of the
- 7 tactics of what you do with Conawapa in the -- in the
- 8 next few years. I think what we've gotten to here is
- 9 the -- so the economic piece is there's a -- there's a
- 10 decent likelihood that at least the deferral of that
- 11 project is -- is going to make sense, particularly when
- 12 you combine the economic change, the cost change, the
- 13 DSM program.
- 14 How Hydro decides to manage the Conawapa
- 15 option going forward is -- is not something we really
- 16 looked at, but I'm sure that they'll be developing a
- 17 plan for that.
- 18 MR. ANTOINE HACAULT: And when you talk
- 19 about economics, sir, the next document I'd like to
- 20 draw your attention to is Appendix 9B, which is marked
- 21 as Exhibit 12-1, and in particular the discussion that
- 22 starts at page 89 of -- of that part of your report.
- 23 We've had Potomac testify with respect
- 24 to its views. As Intervenors, we weren't in the
- 25 commercially sensitive information part, but I'd like

6030 to have a bit of discussion with respect to this part of the analysis in your report and how it might impact the updated information. 3 So blacked out, it starts: 4 "In other words, the MH price --5 6 price forecast..." And then it's blanked out for CSI. 7 And it continues: 9 "The high Manitoba Hydro price 10 forecast was not on the Potomac curve 11 and is assumed to be impossible." 12 Does La Capra adopt the view of Potomac? 13 MR. JOHN ATHAS: We have not had to 14 make that decision. 15 MR. ANTOINE HACAULT: Okay. So here, you're just basically relying on the input information that you've received for Potomac, and -- and La Capra 17 18 hasn't come to an independent conclusion that? 19 MR. JOHN ATHAS: That's correct. 20 MR. ANTOINE HACAULT: And you're 21 reporting here that the low and reference points were 22 assigned a 50 percent probability each. 23 Who decided that probability? Was it 24 Potomac or was it La Capra?

That was -- that was

MR. JOHN ATHAS:

- 1 La Capra.
- 2 MR. ANTOINE HACAULT: Okay. So help me
- 3 understand here. If I'm La Capra and I'm assigning 50
- 4 percent probability to low and 50 percent probability
- 5 to reference, is La Capra -- are you making a judgment
- 6 call?
- 7 MR. JOHN ATHAS: Well, in this case,
- 8 it's a -- it's a mathematical exercise. We took the --
- 9 one (1) of the benefits of the uncertainty analysis in
- 10 the way it was performed by -- you know, overall
- 11 performed by Manitoba Hydro and used by La Capra is if
- 12 your viewpoints change on -- on the -- an overall
- 13 distribution essentially of -- of power prices, you
- 14 could -- you could develop an equivalent to a new
- 15 almost S-curve profile based on that new opinion of
- 16 what the -- of -- of what that profile would -- those -
- 17 those three (3) points from Potomac Economics.
- 18 Then the exercise would be to take the -
- 19 to take the prices that you -- that you have full
- 20 analysis for and -- in the Manitoba Hydro work, and
- 21 figure out where those would fall on that cumulative
- 22 distribution. And then you would estimate from that
- 23 cumulative reading and the math of where that cumula --
- 24 those points falls on the cumulative distribution the -
- 25 what probabilities -- what portions of the hundred

- 1 percent probability the three (3) forecasts should
- 2 have.
- 3 So it's a way to -- to derive different
- 4 probabilities and let you look at an expected value and
- 5 a profile with -- that would be based on new points
- 6 with the old analys -- old analysis data, having to
- 7 rerun that. It's one of this -- the -- the -- one (1)
- 8 of the strengths of this type of analysis.
- 9 MR. ANTOINE HACAULT: So can I
- 10 translate that into you're stress testing some of the
- 11 parameters?
- 12 MR. JOHN ATHAS: I -- I wouldn't call
- 13 it stress testing. I'd call it -- I'd call it updating
- 14 the -- using a new perspective for market prices, and
- 15 instead of having the ability to then choose three (3)
- 16 different -- those market price forecasts, running them
- 17 through all the modelling and having three (3) points
- 18 to then be put into the new -- new S-curves, new
- 19 quilts, and all that.
- 20 It would -- the approximation of that
- 21 could be by assigning the probabilities from that --
- 22 from that new cumulative energy price distribution to
- 23 the old modelling runs, the original modelling runs.
- 24 And then -- and then -- so it's just -- so you get the
- 25 same effect of redoing the analysis by just adjusting

- 1 the probabilities from the old modelled points.
- MR. ANTOINE HACAULT: Okay. Now, let
- 3 me back -- get back to a pretty fundamental question.
- 4 The report, as we see later on, did the S-curves using
- 5 the 50/50 probability and using Potomac's information,
- 6 correct?
- 7 MR. JOHN ATHAS: Assigning the -- using
- 8 Potomac's information to derive the 50/50
- 9 probabilities, and then using the original analysis.
- 10 MR. ANTOINE HACAULT: Okay. And does
- 11 La Capra still view that as an appropriate metric today
- 12 in light of, I'm going to say, Manitoba Hydro's view is
- 13 that export prices have been better and they've
- 14 reflected in updates?
- So my question to you is: Given the
- 16 updated information, is this still an appropriate
- 17 metric and are the graphs that we're going to look at
- 18 still an appropriate metric?
- MR. JOHN ATHAS: They are an
- 20 appropriate metric by -- by definition. The degree of
- 21 revel -- relevance of the -- of that metric and how it
- 22 weights in with other metrics is the -- part of the
- 23 decision-making process for the -- for the PUB panel.
- 24 MR. ANTOINE HACAULT: Yes, understood.
- 25 So if we turn to the next page, page 90, as I

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- 1 understand your response, Mr. Athas, these new S-curves
- 2 have been done with Manitoba Hydro 2012 information but
- 3 assigning the new probabilities as described in the
- 4 descriptive part below the graph.
- 5 Is that correct?
- 6 MR. JOHN ATHAS: That's correct.
- 7 MR. ANTOINE HACAULT: And if we go
- 8 further down the page, Diana, please. You've created a
- 9 short explanation of what choosing the different
- 10 probabilities, based on Potomac's view, might give us,
- 11 as far as impacts for different values when we compare
- 12 the Plan 14 to the All Gas case, correct?
- 13 MR. JOHN ATHAS: That's correct.
- 14 MR. ANTOINE HACAULT: And we see in the
- 15 top right-hand corner that the ref/ref/ref is not
- 16 affected. It still is where we had started when this
- 17 filing was made, at one billion six hundred and ninety-
- 18 six million (1,696,000,000), correct?
- 19 MR. JOHN ATHAS: That's correct.
- 20 MR. ANTOINE HACAULT: But where it does
- 21 materially change is in our expected value?
- MR. JOHN ATHAS: That's correct.
- 23 MR. ANTOINE HACAULT: The -- just so we
- 24 can remind ourselves, so let's keep that number in our
- 25 head, a hundred and fifty-four (154) expected value

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6035
   based on the original filing. Diana, could you bring
  up our Volume XX-4 at page 17?
 3
                          (BRIEF PAUSE)
 5
 6
                  MR. ANTOINE HACAULT: Oh, I must have
 7
   the wrong...
 8
 9
                          (BRIEF PAUSE)
10
11
                  MR. ANTOINE HACAULT: I guess my notes
   had the wrong reference. I had the expected value in
13
   the original quilts at one billion eighty-five mill --
   million (1,085,000,000) factor, assuming the Manitoba
14
15
   Hydro distribution probabilities.
16
                  MR. JOHN ATHAS: The equivalent -- the
   equivalent that the number there would be actually
17
18
   eleven fifty -- (1,050) -- one billion one hundred and
   fifty-five million (1,155,000,000) because we take the
   differences versus the -- versus the All Gas case.
21
   All Gas case is minus seventy (70), I believe, if you -
22
   - if you check the expected value of that and the
23
  Manitoba Hydro calculations.
24
                  MR. ANTOINE HACAULT: Okay.
25
                  MR. JOHN ATHAS: We're talking about
```

- 1 our table.
- 2 MR. ANTOINE HACAULT: Okay. So they're
- 3 redistributing the probabilities according to Potomac
- 4 lowers our expected value, even on the original filing
- 5 by about a billion dollars?
- 6 MR. JOHN ATHAS: That -- that's
- 7 correct.
- 8 MR. ANTOINE HACAULT: Do you have any
- 9 sense, sir, with the updated information that we've
- 10 looked at, and that's before all the DSM, that was our
- 11 updated quilt -- oh, sor -- thank you very much. Sc
- 12 it's been brought up on the screen. It was page 11 and
- 13 not page 17. My handwriting wasn't great.
- And we see, as you've explained, sir, on
- 15 the left-hand side, All Gas was at minus seventy (70),
- 16 and the expected value of Plan 14 was one billion
- 17 eighty-five (1,085,000,000).
- So what you've done is you've added the
- 19 seventy (70) to the one billion eighty-five
- 20 (1,085,000,000) to come to one billion one hundred and
- 21 fifty-five (1,155,000,000), and contrasted that with
- 22 the one hundred and fifty-four (154), correct?
- 23 MR. JOHN ATHAS: That's correct.
- MR. ANTOINE HACAULT: Sir, my question
- 25 to you now was have you run what the expected value

6037 would be using the 50:50 probability metric that you've decided to use, based on Potomac's evidence as to what that would do to the expected value, at least up to the 3 Exhibit 104-8 that we were looking at, which includes revision for common costs, capital costs, and no WPS 6 investment? 7 No, we have not. MR. JOHN ATHAS: 8 MR. ANTOINE HACAULT: Okay. Would it be something that would take very much time to run? 9 10 11 (BRIEF PAUSE) 12 13 MR. JOHN ATHAS: Just -- just to kind 14 of clarify, it wouldn't be some -- something that we 15 have to run as in models. 16 MR. ANTOINE HACAULT: Okay. 17 MR. JOHN ATHAS: It's something that we 18 would be estimating from -- from known numbers that are 19 outputs of the modelling that was -- were performed by Manitoba Hydro. I -- I think it could be relatively 21 straightforward. If it's not relatively straightforward, I can't do it. So it's -- it's either 22 23 easy or -- or not available to me at this time. 24 MR. ANTOINE HACAULT: Okay. Can I

suggest, then, that the undertaking be taken under

- 1 advisement as to whether or not Mr. Athas, being a
- 2 representative of La Capra, can reproduce the table
- 3 shown at Appendix 9B, page 90, but with the updated
- 4 information?
- 5 MR. CHRISTIAN MONNIN: We'll take that
- 6 under -- undertaking under advisement. What -- what --
- 7 what's at the forefront of that advisement is assuming
- 8 that La Capra has the information necessary to -- to
- 9 make that analysis.
- 10 MR. ANTOINE HACAULT: Thank you.
- MR. JOHN ATHAS: And -- and just to
- 12 clarify, the -- my qualifier as 'easy' would be if I
- 13 can use the information that I -- that I used to -- to
- 14 make the addendum. There -- there has been additional
- 15 information come in. I have not had much time to look
- 16 at that at all. And so, you'd be starting from, kind
- 17 of, ground zero on that new information, and it
- 18 wouldn't be easy.
- 19 THE CHAIRPERSON: Let's try to attack
- 20 it without looking at data. You know, if you -- if you
- 21 have a base case, ref/ref/ref; you change it to
- 22 ref/ref/high for cap -- higher capital costs. Let's
- 23 start with that assumption: ref/ref/high capital costs.
- 24 And in terms of pricing, you -- you
- 25 remove the probabilities. You go to fifty (50) high,

- 1 fifty (50) reference.
- 2 That likely would -- would increase the
- 3 expected value of the outcome, wouldn't it?
- 4 MR. JOHN ATHAS: That's correct.
- 5 THE CHAIRPERSON: I mean, it's -- it's
- 6 just -- with a -- intuitively, just without doing any
- 7 data, you'd expect that by removing the probability of
- 8 low prices, you would get a higher expected outcome.
- 9 MR. JOHN ATHAS: I -- I suspect that
- 10 the -- the change in -- if remember the numbers, the
- 11 change in val -- the change in net present value for
- 12 going to the new capital cost estimates from the old
- 13 changed the Preferred Development Plan by, I believe,
- 14 \$898 million from the Manitoba Hydro presentation.
- I think that on the seventy-eight (78)
- 16 year NPV, that's how this number would change. It
- 17 would be \$898 million lower than the one fifty-four
- 18 (154). But that's -- so if I get time to think about
- 19 it and see -- think to it -- figure out there's no
- 20 other issues that I haven't -- that I'd have to
- 21 calculate, I'll be able to -- I -- I'll probably get
- 22 comfortable that, that approximation is worth -- is
- 23 correct.
- 24
- 25 CONTINUED BY MR. ANTOINE HACAULT:

6040 MR. ANTOINE HACAULT: 1 Thank you very much. And just to confirm, this 50/50 waiting, which eliminates the -- any waiting on the high prices --3 but, sorry, let's -- let's go back to 9B-90. 5 I think in the description there's a reverse description that's put in Figure 9-178, based 7 on the paragraph that I -- that precedes it. 8 MR. JOHN ATHAS: Oh, I just noticed that too. That's correct. It should be -- should be 10 zero, fifty (50), zero in the third line of the 11 caption. 12 MR. ANTOINE HACAULT: I just realized 13 that based on the -- the Chairperson's comments. 14 The discussion that precedes this graph 15 indicates that the zero probability is assigned to the 16 high prices, and 50 percent probability to references prices, and 50 percent probability to low prices, 17 18 correct, Mr. Athas? 19 MR. JOHN ATHAS: That is correct. 20 THE CHAIRPERSON: Now, could we go back 21 to -- to see what the -- I thought it was the opposite. 22 I thought it was fifty (50) high, fifty (50)... 23 24 (BRIEF PAUSE)

6041 THE CHAIRPERSON: Okay. So it's --1 okay, this is the -- the Potomac situation. Okay, got 3 it. MR. JOHN ATHAS: This is applying the -- the -- essentially developing a -- a price profile on the -- the Potomac estimates. 7 CONTINUED BY MR. ANTOINE HACAULT: 9 MR. ANTOINE HACAULT: And the Potomac 10 estimates that you're referring to are Potomac's best information on what the likely prices are going to be? 11 12 MR. CHRISTIAN MONNIN: I don't think he 13 can answer to what -- what Potomac's best estimation 14 is. It comes from the report, and it says what it says 15 in the report. 16 CONTINUED BY MR. ANTOINE HACAULT: 17 18 MR. ANTOINE HACAULT: Okay. Well, was 19 the est -- did you take the low estimate, the high estimate, or was -- was there a range that Potomac gave 21 you to choose from? 22 MR. DANIEL PEACO: To develop the 23 curve, we had to use the low, reference, and high that 24 they developed, or else we would have -- we just -- if

reference would only give us a point.

- 1 MR. ANTOINE HACAULT: Thank you. So
- 2 I've made that change in my materials to correct page
- 3 9B-90. Thank you, sir.
- Now, I've taken other panels through,
- 5 what I'm going to say, lessons learned in the last six
- 6 (6) or seven (7) months, and whether our stress
- 7 testing, I'll call it, the highs and the lows were high
- 8 enough and low enough.
- 9 And I'd like to have a bit of that
- 10 discussion, because it seems to me nobody --
- 11 everybody's in agreement in this hearing that nobody's
- 12 going to be right on the forecast. To me, in that
- 13 context, I want to have a discussion about are -- are
- 14 we at least in agreement as to whether we're setting
- 15 the low parameters low enough and the high parameters
- 16 high enough so that we won't have some weird,
- 17 unexpected results.
- So let me back up. There was an
- 19 application filed based on information in August of
- 20 last year. And we started with an NPV of close to \$1.7
- 21 billion. When La Capra looked at capital costs, it, in
- 22 its initial report, Exhibit 3-1, commented at page
- 23 2(I).
- 24 And the first -- there's a couple of
- 25 assumptions, and one of the assumptions at the very

6043 bottom of this page, the last bullet: 2 "Manitoba Hydro assumes very little 3 uncertainty in the cost of Conawapa and the associated transmission facilities." 5 6 Were the metrics that were chosen -where would the new estimates on capital costs lie with respect to the stress testing? 9 MR. DANIEL PEACO: Are you asking about 10 the stress testing we did? 11 MR. ANTOINE HACAULT: Yes. We'll -- we 12 started with probabilities and S-curves and --13 MR. DANIEL PEACO: Yeah. 14 MR. ANTOINE HACAULT: -- you know, high 15 16 MR. DANIEL PEACO: Well --17 MR. ANTOINE HACAULT: -- capital costs, 18 low capital costs. And from August to when we did our -- they did the Keeyask pricing and got some information in, in December, there was a change. Some 21 people might argue whether it's significant or not. It's -- it lead to about 8 or \$900 million --22 23 MR. DANIEL PEACO: Right. 24 MR. ANTOINE HACAULT: -- in NPV 25 difference.

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6044 What can we learn from those three (3) 1 or four (4) months as to whether or not we're choosing lows that are low enough and highs that are high 3 enough? 5 MR. DANIEL PEACO: Let me make a comment, but I think probably Mr. Athas probably has an 7 answer to that. We -- the comment here goes to a couple of things. I just want some background. 9 We did confer with Knight Piesold, 10 another independent expert that looks specifically at 11 the costs, and sort of took their mea -- took a measure of their opinion as to what the capital costs estimates 13 look like. And from that, we structured the 14 sensitivity test in our -- in our modelling to sort of 15 postulate some alternative cost structures that were 16 broader than what we found in -- in the application. 17 And -- and I think that was sort of our 18 attempt, using our materials, to offer somewhat of a 19 stress test of that. And we've -- we've kind of prepared that to what we now see as the -- the new cost estimates. 21 22 I don't know, John, if you want to 23 explain that uncertainty and analysis and how it 24 relates to today.

Yeah.

I get -- just -

MR. JOHN ATHAS:

- 1 let me comment on a couple of steps.
- 2 MR. ANTOINE HACAULT: And -- and please
- 3 continue to answer, but the question that I'm asking,
- 4 remember, is: Are we choosing the low low enough and
- 5 the high high enough?
- 6 It's not so much how the calculations
- 7 are made, but based on your observations of what Hydro
- 8 chose, are the -- when they choose high costs in their
- 9 metrics, and we saw the quilts, are we choosing a
- 10 number that's high enough based on what we know
- 11 happened in those three (3) or four (4) months?
- MR. DANIEL PEACO: Yeah. I -- I think,
- 13 to -- to that specific question, we can offer -- we can
- 14 offer our observations. But I -- I think you've really
- 15 got to put the question to Knight Piesold, because
- 16 they're the ones that actually studied the cost
- 17 estimates and the -- the P50, P90 and whether --
- 18 whether the -- the range of cost uncertainty considered
- 19 was appropriate.
- 20 We -- we did not -- that was not in our
- 21 scope of work. We did not do that. So our -- our
- 22 perspective on that would be much less informed than
- 23 theirs.
- 24 MR. ANTOINE HACAULT: Understood. But
- 25 isn't one of your -- of La Capra's roles is to see

- 1 whether or not the analysis is robust, stands up to --
- MR. DANIEL PEACO: That's --
- 3 MR. ANTOINE HACAULT: -- reasonable due
- 4 diligence?
- 5 And in the context of that, are you
- 6 saying that La Capra has no views and no opinions as to
- 7 whether or not we've chosen metrics that are high
- 8 enough and low enough as lows and highs?
- 9 MR. DANIEL PEACO: I quess what I'm --
- 10 let me try it again. We -- we have not specifically
- 11 reviewed the cost estimates for Conawapa. That was not
- 12 our scope of work. It was Knight Piesold's. In
- 13 structuring the analysis that we did to test the
- 14 robustness, we took advantage of their review and our
- 15 discussions with them to say, What kind of a range have
- 16 we looked that sort of covers what you see as the --
- 17 the types of uncertainty in the -- in the cost of the
- 18 facilities that we should be examining?
- 19 We wanted to make sure that we had cast
- 20 a broad enough net in the uncertainty analysis that we
- 21 presented in our report so that it would cover the
- 22 range of cost uncertainty that Knight Piesold would
- 23 come here to talk about. And so what we've -- what we
- 24 have done in our piece is the -- if the uncertainty is
- 25 as Knight Piesold expects it to be, what -- what does

- 1 that look like in terms of the quilts?
- 2 So I guess I'm relying on our discussion
- 3 with Knight Piesold to sort of define that band. We
- 4 can obviously do different set up. We could -- we
- 5 could narrow or -- or differently shifted or however
- 6 you want to do that. But the one we did do was -- is
- 7 the result of a discussion with Knight Piesold about
- 8 their view of the cost estimates and the uncertainty in
- 9 the cost estimates.
- 10 We wanted to make sure that when we came
- 11 to this day, that we would have an analysis that had
- 12 bracketed the kind of uncertainty in the cost that --
- 13 that they were -- they were prepared to testify to.
- 14 MR. JOHN ATHAS: And I -- I agree every
- 15 -- with everything Mr. Peaco said. I just want to make
- 16 sure that we understand. You asked a question. And I
- 17 don't want to try to answer it too narrowly, but you
- 18 answered based on what we know today, what -- you know,
- 19 versus what different opinions have come out today, in
- 20 -- in the six (6) months.
- 21 What we -- I just want to make sure we
- 22 understand the -- the use of the -- of the uncertainty
- 23 analysis and the like to see if it's -- you know, how
- 24 it applies. We know that, from Manitoba Hydro's
- 25 perspective, they've increased their high capital cost

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- 1 estimates. That, on the surface, could make one assume
- 2 that they have changed their perspective as to what's -
- 3 what might be a wide enough band to analyze.
- 4 They also have put -- correspondingly,
- 5 they've changed the -- they've reduced the probability
- 6 that they assign to the -- to the high capital cost
- 7 estimate. So it's hard to -- we haven't done any
- 8 analysis to assume whether that's a curve shift or
- 9 whether they're reading a different point off of the
- 10 same curve. If they're reading at a different point
- 11 off of the same curve, then we haven't had any updated
- 12 information as to the perspective on -- on overall
- 13 uncertainty on the -- on capital costs. We may have
- 14 just had their -- their one opin -- their known
- 15 opinion, choosing to look at different points.
- So -- so the amount of specific
- 17 knowledge that I would say is known that has come out
- 18 in -- in -- for the ranges of information, because
- 19 there hasn't been any updated full, you know, thorough
- 20 uncertainty analysis around things since 2012 and the
- 21 small -- and the small 2014 updates, that some -- I --
- 22 I think that the -- still -- still potentially some
- 23 learning to do as to whether the ranges were adequate.
- 24 MR. ANTOINE HACAULT: Thank you for
- 25 that. So does it leave us in this hearing with what's

- 1 been happening with a lot of other -- my other
- 2 questioning? La Capra had looked at the original
- 3 filing. And if we go -- can you scroll so we can see
- 4 the introductory paragraph of this conclusion, Diana,
- 5 just a bit up.
- 6 Here La Capra, in its initial comments,
- 7 says: "Some concerns we discuss in our
- 8 report."
- 9 So one of the concerns of La Capra was
- 10 that it assumed very little uncertainty in the cost of
- 11 Conawapa and, we've been talking about Conawapa, but
- 12 associated transmission facilities.
- Does that continue to be a concern, sir,
- 14 or are we in the same situation as a lot of other
- 15 subjects: we had -- La Capra's offered an opinion based
- 16 on the official -- initial filing, but can't offer an
- 17 opinion to this Board based on the new information and
- 18 the new probabilities and costs?
- 19 MR. DANIEL PEACO: I think it's
- 20 probably closer to the latter than the former. We --
- 21 we have the new cost -- capital cost updates that the
- 22 Company has provided. We have not had an opportunity -
- 23 I know that Knight Piesold has had some opportunity
- 24 to look at those, but we have had -- not had an
- 25 opportunity to confer with them or do any analysis

6050 associated with that. We've -- the only thing we've been able 2 to do at -- at this point is to take Hydro's numbers 3 and do the update that we provided in the addendum. 5 MR. JOHN ATHAS: Could we have a 6 second? 7 (BRIEF PAUSE) 9 10 MR. JOHN ATHAS: All set. No problem. 11 MR. ANTOINE HACAULT: So does this fall into the same category as the previous subjects that 13 I've covered: unless the PUB requests that information be updated, at this point La Capra can't comment on 14 15 whether it still continues to have concerns with the 16 updated approach or not? 17 18 (BRIEF PAUSE) 19 20 MR. DANIEL PEACO: Well, the -- hang on 21 a second. 22 23 (BRIEF PAUSE) 24 25 MR. JOHN ATHAS: We -- we've updated

6051 the 2012 -- our review of the 2012 analysis in the addendum for the new capital cost estimates. You know, that's -- that's what -- pardon me. That's what the -the addendum is. And that inc -- I'm not -- I'm not sure what information you are suggesting that we could update for -- update for, if -- if requested by the --7 by the panel. 8 MR. ANTOINE HACAULT: Sorry. Well, let me just bring you back to Exhibit 104-8. At -- it's page 3 in the PDF, but page 2 of 7 in the document. 10 Ιf 11 -- you see in the middle of the paragraph, it talks about updated probabilities. And in the middle it 12 13 says: 14 "The reference capital cost scenario 15 probability weighting has been 16 updated to 60 percent from 50 percent 17 used in the NFAT submissions." 18 So you would have looked at the 50 19 percent: 20 "And the high capital cost scenario 21 probability weighting has been 22 updated to 20 percent from the 30 23 percent used in the NFAT submission." 24 So I can understand for Keeyask why we might want to do that, because we have a signed

- 1 contract. And the reason I was asking whether La Capra
- 2 considered this issue and whether it still had concerns
- 3 is we've got Conawapa coming out in, at the earliest,
- 4 in about eight (8) to ten (10) years, and maybe later,
- 5 out in the -- in the future. But the weighting for the
- 6 high capital cost of Conawapa and related transmission
- 7 has been brought down from 30 percent to 20 percent.
- And are we sure that this is an
- 9 appropriate stress testing and an appropriate
- 10 probability weighting and an appropriate change in
- 11 probability weighting?
- 12 MR. JOHN ATHAS: We did not incorporate
- 13 the -- as it says in Addendum 9A in the introduction --
- 14 9U in the introduction, that it -- we did not
- 15 incorporate new pro -- probabilities that were assigned
- 16 to the high and low, the high and reference. We used
- 17 the original ones with the -- because of the aspect
- 18 that they're being -- that those probabilities were
- 19 assigned to scenarios that had changes in capital costs
- 20 to all generation. And there has been some
- 21 information, as you point out, regarding specifically
- 22 Keeyask.
- So we chose to do the analysis, the
- 24 update to our analysis, using the original 50 percent
- 25 for reference and 30 percent for high. So we have not

- 1 felt that the -- that there is enough information to --
- 2 that we would have -- we would have made the change.
- 3 THE CHAIRPERSON: Now, let me just ask
- 4 a question here, because I -- I did earlier ask the
- 5 question of Manitoba Hydro in relation to the capital
- 6 costs and in relation to the probabilities are that
- 7 showing up here.
- 8 So -- and my question was related to,
- 9 now knowing that your capital costs have increased, I
- 10 understand why the reference has changed. What I don't
- 11 understand is, because the trend is been toward higher
- 12 capital costs, why would you maintain the low at 20
- 13 percent? Why wouldn't you be increasing the high to 30
- 14 percent, lowering the low to 10 percent?
- Namely -- and this is my thinking, and
- 16 let -- and tell me if I'm wrong. My thinking is the
- 17 trend has been toward higher capital costs than has
- 18 otherwise been the case. And this has been continuous
- 19 throughout the history of this proposal.
- 20 Wouldn't you assign a higher probability
- 21 to increased capital costs relative to what they're
- 22 showing there now?
- 23 MR. DANIEL PEACO: There's two (2)
- 24 issues, I think, and John alluded to that. This
- 25 probability distribution, as was used in Manitoba

- 1 Hydro's quilt analysis and in our own, is applied not
- 2 just to Keeyask and not just to Keeyask and Conawapa,
- 3 but all -- all the capital investment in -- in those
- 4 plans.
- 5 And so in doing our analysis, we had to
- 6 say, there's one (1) discussion to be had about how
- 7 does the probability distribution around the ultimate
- 8 cost of Keeyask look now that we know something about
- 9 their contract.
- 10 Hydro has -- has inferred some things
- 11 about that contract to re-estimate Conawapa. But
- 12 that's obviously a somewhat more uncertain proposition
- 13 because you don't have a physical con -- you don't have
- 14 a contract in place for that facility at this point,
- 15 and things can happen between now and that point in
- 16 time. And then there's all the other ones.
- 17 So we were: A) with short time, and B)
- 18 with -- with not -- not being clear that applying this
- 19 new distribution to everything that's treated as
- 20 uncertain in the capital costs domain in the
- 21 uncertainty analysis made sense to do that. So that's
- 22 -- that's a pro -- that's -- that's an issue.
- 23 I think it's a -- it's a fair discussion
- 24 to have to say: What do we know about Keeyask and how
- 25 it changes its distribution? And while there's --

- 1 there's still obviously -- I mean, my understanding is
- 2 the contract is by no means a fixed -- fixed-price
- 3 contract, so there's still opportunity for the cost to
- 4 move on Keeyask, it does -- it does resolve some
- 5 uncertainties for that facility. But it doesn't change
- 6 some of the others. And it -- and it does give you
- 7 some reason to think that the prior estimates were --
- 8 were -- the range was low, because what we're now
- 9 looking at as a reference case was -- was pretty close
- 10 to their high end before.
- 11 So -- so I think -- I understand your --
- 12 your question and concern, and I think we have the same
- 13 concern. But we don't really have the information I
- 14 would -- I know that Knight Piesold was -- was
- 15 beginning to look at this, but I don't know where they
- 16 are in the process of looking at that.
- 17 MR. JOHN ATHAS: I would point out that
- 18 -- that there -- there are a couple of things. There -
- 19 there's this -- there's this certain -- this -- I --
- 20 I agree with the logic that you -- that you're putting
- 21 forward. One of the -- but we -- and we tried to
- 22 bracket that, as Mr. Peaco mentioned earlier, because -
- 23 in trying to anticipate what people may think is
- 24 relevant ranges and -- and the like as to -- as
- 25 information evolves.

6056 1 So in -- in technical Appendix 9B on page 60, we -- we showed -- we did a capital cost sensitivity analysis. And the capital costs that we 3 included in there, without -- with -- with the basis of some discussion with Knight Piesold -- they were not finished their work. With the basis for -- without a -- any scientific derivation of looking at all the 7 different parts of the construction process and the 9 like. 10 We -- we cho -- chose to change the 11 capital cost estimates for Keeyask and Conawapa to 12 where we made low the reference, the prior reference, 13 and we made the reference 20 percent higher than the 14 prior reference, and we made high 20 percent prior --15 higher than the prior high. That's certainly the --16 there hasn't been a lot of information that's get --17 that says that that was -- that is now the prevailing 18 opinion, but it -- it does provide information as to 19 how much, if you move the whole set of all three (3) case, either by changing the low probability, or chan -21 - changing the probability of low, or changing the -the course of low. 22 23 We have a second sensitivity -- capital cost sensitivity, where we -- we just increased the 24 probability of the -- of the high capital cost, and --

- 1 and not change the -- the reference. So there's --
- 2 there's different sensitivities that -- that could be
- 3 done. There's -- that we tried to bra -- bracket the
- 4 one (1) with the changing of the probabilities. Those
- 5 are very easy to do, but to simulate a change in a view
- 6 point.
- 7 But the one that sounds closer to what
- 8 you're -- which is it -- which you're posing as -- as a
- 9 -- a potential outcome is the sensitivity that starts
- 10 on page 60 on the section Roman numeral IV, and that
- 11 would -- that -- that incorporates the -- moving the
- 12 trend of all three (3) estimates.
- 13 MR. ANTOINE HACAULT: I'll -- before I
- 14 move on, I'll -- I'll try that again. So you've put
- 15 all these sensitivities. Are we to take it that this
- 16 is the best opinion of La Capra as to what appropriate
- 17 stress testing is to look at these projects and inform
- 18 our decision as opposed to the quilt, because the quilt
- 19 is not as, I'm going to say, as extreme as what you're
- 20 proposing as stress testing?
- 21 And I'm still trying to get an answer on
- 22 what's the highs and what's the lows? What's the
- 23 appropriate stress testing? We have one (1) in the
- 24 quilt, and we have a whole bunch of scenarios in your
- 25 material. Do we just put the sensitivities and the

- 1 material aside as not being something that's relevant
- 2 as far as highs and lows, or should those be the new
- 3 highs and lows?
- 4 MR. DANIEL PEACO: Well, we don't -- I
- 5 guess, the analysis that we did brackets the
- 6 information that Hydro has put on the table. It
- 7 bracketed the opinion that Knight Piesold had back at
- 8 the end of last year when we conferred with them in
- 9 preparing our initial report. Whether it's fair --
- 10 whether -- whether there's a -- a value -- a reasonable
- 11 value that falls outside of this boundary now is -- we
- 12 -- that's a piece of information we haven't pursued.
- 13 We haven't talked with either Hydro or Knight Piesold
- 14 about the updated capital cost and how that might
- 15 actually play out in the uncertainty for those projects
- 16 or for the other facilities.
- 17 The -- you know, to the extent that
- 18 there is an opinion that there is a larger bracket, you
- 19 know, clearly as John described, that analysis is easy
- 20 to set up and do in our -- in our modelling, subject to
- 21 the updating on other information.
- Or I would note that higher highs,
- 23 particularly in the -- in the context of Conawapa,
- 24 we're already at the point where the project, at the
- 25 cost we have, is -- is not showing good economics. So

- 1 a higher number is -- is maybe interesting, but it's
- 2 just going to show, you know, a larger negative
- 3 economics.
- 4 So at some point, it becomes an economic
- 5 exercise, how -- how high that cost could go. Now,
- 6 once -- once you've committed to it, you worry about --
- 7 if you -- if you commit to a certain out -- investment,
- 8 and then after you've committed, at the end of the
- 9 project it's a lot higher than you estimated, that's --
- 10 that's a different problem. But at this point, you're
- 11 talking about Conawapa as a -- as an option you have
- 12 yet to commit to.
- MR. ANTOINE HACAULT: So, understood.
- 14 So am I to take from your answer that it probably isn't
- 15 useful for the PUB to ask for that information, because
- 16 Conawapa's not -- the econo -- economics aren't there
- 17 with the current forecasts, and if we choose a
- 18 different ref being the high capital costs, which is
- 19 what happened in Keeyask, it would only make the
- 20 situation look worse, so we really don't need to go
- 21 down that road?
- 22 MR. DANIEL PEACO: Well, I -- I guess
- 23 we can -- I think we've done -- we've given a full
- 24 explanation of the analysis that we can do, but I would
- 25 -- I guess it would be my recommendation that before we

6060 -- we take on an additional analysis of that, we're not to -- I mean, the -- the specific questions of the capital cost uncertainty will be -- will -- I'm sure 3 will be subject of the -- the Knight Piesold presentation when they -- when they come in. 6 And at that time, if there's new 7 information that the panel would like to see in an updated analysis from us, we're happy to do that. just -- I just don't have the -- the underlying base of 10 information to offer up something other than it, What if it's higher? What if it's lower? I don't -- I 11 12 don't have the underlying knowledge and the updated cost estimates and the uncertainties to offer a 13 reasonable alternative to that. 14 15 And, I mean, we're -- we're happy to --16 to provide pertubations to the uncertainty analysis 17 we've done with 30 percent adders, if you -- if you 18 choose, but it was simply as a, What if it is, what's 19 it look like kind of analysis. 20 MR. JOHN ATHAS: Okay. Thank you. 21 I could just correct something, I was actually looking 22 at some analysis that was done on high capital costs, 23 but not -- not the original thorough analysis. 24 The Technical Appendix 9A on -- on page 25 108 star -- and -- and page 114, start two (2)

- 1 different analyses that we did for the testing around
- 2 sensitivities around capital costs. So the one I was
- 3 speaking about on the -- starts on page 116 of -- of
- 4 Technical Appendix 9A.
- 5 MR. ANTOINE HACAULT: Thank you very
- 6 much, gentlemen, for your -- your assistance. Now, I
- 7 don't need to get into a -- a very detailed and
- 8 technical discussion on the next two (2) parameters.
- 9 We've discussed construction costs, which is one (1) of
- 10 the main factors, and whether or not we've got a band
- 11 that's wide enough.
- 12 Are you able to provide any comments
- 13 from a due diligence perspective with respect to the
- 14 two (2) other factors, being the -- the prices we went
- 15 through, Potomac, and -- and that 50/50 analysis? I
- 16 think we've dealt with that.
- 17 Is that fair enough? That would be an
- 18 appropriate stress test?
- MR. DANIEL PEACO: Yes.
- 20 MR. ANTOINE HACAULT: Now, what about
- 21 the other metric that we've got left on our quilts,
- 22 which is the discount rates?
- Do you have any recommendations or
- 24 comments on the appropriateness of the parameters that
- 25 Hydro's chosen as low, refs, and highs?

- 1 MR. JOHN ATHAS: Just -- just for a
- 2 couple -- backing up a step for clarity. We did a few
- 3 energy price or energy export revenue sensitivities,
- 4 and they're in -- laid out in Technical Appendix 9A,
- 5 some of which was updated in -- in the addendum.
- 6 One of the reasons why we particularly
- 7 tried to do the Potomac Economics test is that, as a --
- 8 as a charge to the -- going forward to the -- how to
- 9 work together, and -- and, like, for the independent
- 10 energy consultants team, we were asked to try to
- 11 incorporate as much information from the other experts
- 12 as possible into our -- into our analysis.
- So that was one of the reasons why we
- 14 felt it was important to try to take the latest
- 15 information from Potomac economics and include that in
- 16 the price sensitivity. There are other kinds of export
- 17 price sensitivities in our -- in our reports, like plus
- 18 and minus 10 percent revenues, export revenues and the
- 19 like, so.
- 20 Now, similar -- as you asked about
- 21 discount rates, similarly, we had discussions with --
- 22 with representatives from MPA on the -- on the
- 23 appropriateness of the estimates for the discount
- 24 rates, which are really saying the appropriates -- or
- 25 the appropriateness for the estimation of the interest

- 1 rates assumptions that feed into that discount rate.
- 2 With the -- with -- based on those
- 3 discussions, we had two (2) avenues to pursue
- 4 developing different kinds of sensitivities. One (1)
- 5 is -- one (1) is very quick, because it was saying that
- 6 it -- it's the -- there's a de minimis probability on -
- 7 on -- that came out of that discussion for the low
- 8 discount rate sensitivity -- outcome that was modelled
- 9 by Manitoba Hydro, and we have a -- an analysis in --
- 10 in our technical Appendix 9A that removes that branch
- 11 and assigns -- assigns just a 50/50 probability to the
- 12 other two (2) branches, the high discount rate as
- 13 modelled by Manitoba Hydro and the reference.
- 14 The other part of the discussion we had
- 15 with MPA was that the -- that the -- that probably --
- 16 that -- that the -- another way to look at it, they
- 17 were saying that they -- you should proba -- you might
- 18 want to have -- and they were not finished their
- 19 analysis at this time, so that -- but we had to get
- 20 some kind of opinion before going in, so that we said
- 21 that the -- they said that the low, reference, and high
- 22 might all be a little bit lower than they would have
- 23 estimated them to be.
- So that we ran a sensitivity
- 25 incorporating their information in a -- in a -- a more

6064 round way, to not imply over -- over-precision, we ran a sensitivity to discount rates where the low is 4 1/2 percent, the reference was 5 1/2 percent, and the high was 7 1/2 percent, and that ref -- represents roughly about a, you know, a little more than a 1 percent increase in low, about a 1/2 percent increase in -- in 7 the reference, and about a 1 percent increase in high. 8 THE CHAIRPERSON: Just for the 9 transcript, MPA is Morrison Park Advisors? 10 MR. JOHN ATHAS: Morrison Park 11 Advisors, yes. 12 13 CONTINUED BY MR. ANTOINE HACAULT: 14 MR. ANTOINE HACAULT: Can I attempt to 15 put this statement to you, and if you think it's fair, 16 you can respond? Can I take it that if you're running 17 scenarios in your analysis with respect to capital 18 cost, discount rates, and energy prices, that La Capra believed it was a credible sensitivity which needed to be run, and should be considered in arriving at a decision? 21 22 23 (BRIEF PAUSE) 24 25 MR. JOHN ATHAS: The -- there was some

- 1 discussion yesterday about integrated resource planning
- 2 versus a -- this kind of analysis that's here. This is
- 3 a -- a little unique in a process for -- for doing some
- 4 analysis, from our perspective of the -- in support of
- 5 the -- the panel and the question here.
- 6 Normally, the choice of sensitivities
- 7 and even of what -- even metrics and other analysis --
- 8 to -- to guide the analysis comes from a discu -- from
- 9 our discussion with the client. You know, what --
- 10 what's important to them. What are they worried about
- 11 and the like, and the -- and the unique nature here,
- 12 where we are left to be independent and also to have a
- 13 scope of work that's in charge -- that's charged with
- 14 putting together lots of sensitivities and prescribed
- 15 to us in the scope of work, the -- that
- 16 discussion did not take place other than through the
- 17 scope of work.
- 18 So we -- we ran -- a lot of the
- 19 information that we ran here was -- was, you know,
- 20 directed by needing to fulfill the scope of work, and -
- 21 and so they -- and they -- and we tried to do that
- 22 within a, what we considered a relevant range of things
- 23 based on discussions with the other -- other experts.
- 24 They, you know, it take -- we, in some ways did not
- 25 have the luxury, and then need to take the -- develop

- 1 the opinion as to whether those were -- were the most
- 2 important sensitivities to make.
- 3 So since you're speaking about it in a
- 4 generalized way, looking at all of our sensitivities.
- 5 MR. ANTOINE HACAULT: And so if I
- 6 reformulate my suggestion to you, you've used relevant
- 7 range.
- 8 Can we take it that if there is an
- 9 analysis in your reports with respect to energy
- 10 construction costs or discount rates, that is an
- 11 illustration of a relevant range, which needed to be
- 12 run and should be considered in arriving at a decision?
- MR. JOHN ATHAS: Again --
- 14 MR. DANIEL PEACO: Let me try. I think
- 15 I'm with you up until the -- until the end. I think,
- 16 as John said, our -- our charge was to develop the
- 17 sensitivities and do our best to put a -- put a
- 18 relevant range in, relevant being what we understood
- 19 the other experts were going to be testifying to, and
- 20 making sure that when -- when the -- when the panel had
- 21 our evidence and their evidence, they could look at our
- 22 analysis and say, This is what I think about Knight
- 23 Piesold's judgment about capital costs uncertainty, and
- 24 I can look up in La Capra's numbers and find how mu --
- 25 how sensitive the result is to that number. I can look

- 1 up to see how sensitive it is to Morrison Park
- 2 Associates's recommendations on discount rate.
- 3 So we endeavoured to test the parameters
- 4 that were identified as being -- I think -- I think, by
- 5 and large the parameters we tested for sensitivities
- 6 are -- are relevant and important to look at. And I --
- 7 we did our best to make to sure that the ranges that we
- 8 tested were relevant to the -- to our best
- 9 understanding of the opinions that -- that the panel
- 10 will hear from the other experts that are -- that will
- 11 be testifying to those. And -- and the panel will
- 12 ultimately put whatever weight they want to our
- 13 sensitivity analysis in those opinions --in -- in
- 14 picking numbers off the table.
- Now, if -- if the -- if the universe has
- 16 moved so far that, that we're off the chart -- we're
- 17 outside the bounds of those sensitivity analysis, then
- 18 -- then the panel would need to decide whether we need
- 19 to redo some things. But that was the -- the spirit in
- 20 which these things were done. But I -- I think I fall
- 21 short of the last part of your statement.
- 22 MR. JOHN ATHAS: Yeah, I -- I agree
- 23 with that. I just wanted to also mention that if there
- 24 was a element of the scope of work that we thought was
- $^{25}$  asking us to prov -- put together numbers that we

- 1 considered impossible, or at least such -- so
- 2 improbable, we would've felt compelled to note that on
- 3 our -- on our slides, our tables.
- 4 MR. ANTOINE HACAULT: Thank you very
- 5 much for that discussion. That ends this part of the
- 6 discussion on have we chosen the appropriate stress
- 7 tests up and down and -- and what should we look at or
- 8 what -- what La Capra's views were.
- 9 I'll do a couple little different or
- 10 separate subjects and then get back into other areas.
- 11 In particular, Diana, could you bring the La Capra
- 12 presentation -- I think it's been marked as Exhibit 45
- 13 -- slide 59.
- 14 There's been some discussion between Mr.
- 15 Peaco and Mr. Athas and members of the panel with
- 16 respect to this, and especially with respect to the red
- 17 line, the No New Generation, as compared to some of the
- 18 other projects.
- 19 And the one thing I wanted to clarify in
- 20 that discussion, is it -- is my understanding correct
- 21 that all the, I'm going to say, other plans, if we
- 22 exclude the No New Generation, are based on the NFAT
- 23 filing?
- 24 MR. DANIEL PEACO: You have -- if you
- 25 look at the legend --

- 1 MR. ANTOINE HACAULT: Except for three
- 2 (3), I guess -- the Wind/Gas.
- 3 MR. DANIEL PEACO: These cases are not
- 4 all in this original submission; Plan 14, obviously,
- 5 is. If you look at the legend at the bottom, Plan 14
- 6 is the first one listed on the top left.
- 7 The next one down is called -- is
- 8 labelled, "Plan 16, All CCGT." That is a new case that
- 9 Manitoba Hydro ran through its SPLASH model, its
- 10 economic model, and provided to us, like, December,
- 11 early January.
- MR. ANTOINE HACAULT: Can I stop you
- 13 just there, and then you can continue your answer?
- 14 With respect to Plans 14 and 16, do they
- 15 assume DSM? And what -- if they do, is it just a base
- 16 level DSM or -- or they assuming the DSM Level 2?
- MR. DANIEL PEACO: The -- I'll -- I'll
- 18 answer that question for each plan. Plan 14, clearly,
- 19 assume -- assumes the reference level DSM from the
- 20 original submission; likewise, Plan 16 does.
- The only difference between Plan 16 and
- 22 Plan 1, which is the All Gas, is that the generation
- 23 additions were all comb -- combined cycle units. And
- 24 there wasn't a mix of -- of combustion turbines and
- 25 combined cycles. Nothing else, other than that change

- 1 in mix of combined cycle combustion turbine, that's the
- 2 only change relative to Plan 1. Plan 1, clearly, had
- 3 reference level DSM.
- 4 The -- going down that -- that side of
- 5 the legend, Plan 3, Wind/Gas, is the Wind/Gas Plan
- 6 included in the submission. And again, that includes
- 7 the reference level DSM.
- 8 Moving to the right-hand side of the
- 9 legend, the All Gas base case is -- is Plan 1 as filed
- 10 in the submission, and includes reference level DSM
- 11 from the submission.
- 12 The next one down is -- we've labelled
- 13 as seventeen (17), No New Generation. That is the
- 14 second new case that Manitoba Hydro ran through its
- 15 SPLASH and economic models and provided the results to
- 16 us in -- around the end of last year. And that is
- 17 constructed to include a -- a mixture of increased DSM,
- 18 one (1) -- I -- I believe it's one (1) -- one (1) --
- 19 one and a half  $(1 \ 1/2)$  times the reference level, so 50
- 20 percent more DSM than assumed in the -- all the other
- 21 cases we've talked about.
- 22 And it also includes a program for fuel
- 23 switching from electric space heat to natural gas. And
- 24 so there's a -- there's a combination of load
- 25 reductions from those two (2) sets of assumptions in

- 1 that plan.
- 2 And then the -- the last one, labelled
- 3 'LCA Wind/Gas', that is our variant of Plan 3, the only
- 4 changes being changes to the cost of the wind resource.
- 5 So it would -- other -- other than the change in the
- 6 cost of the wind resource, it has all the other
- 7 characteristics of Plan 3, including the original
- 8 reference level DSM.
- 9 MR. ANTOINE HACAULT: Thank you. And
- 10 that's what I wanted to clarify. My understanding was,
- 11 for doing one and a half  $(1 \ 1/2)$  times DSM in the No
- 12 New Generation plus the fuel switching, that starts to
- 13 bring us pretty close to the definition that Manitoba
- 14 Hydro's given us for the Level 2 DSM.
- And so we're not comparing plans with an
- 16 equal amount of DSM here; the red line is the one that
- 17 benefits from all the DSM, correct?
- 18 MR. DANIEL PEACO: That's correct.
- 19
- 20 (BRIEF PAUSE)
- 21
- MR. ANTOINE HACAULT: And it also
- 23 benefits from the enhanced import criteria. So we
- 24 don't know where the other plans would be if we
- 25 increased the import criteria.

- 1 MR. DANIEL PEACO: That's right. And -
- 2 and to the -- to the point -- I mean, to your point,
- 3 that's exactly why we asked for the plan. But for --
- 4 we -- we -- today we have other plans that include
- 5 those in other positions. But when we asked for this,
- 6 there was no other plan that tested any of those
- 7 parameters.
- 8 I -- I would -- I guess I -- I would
- 9 agree with where I think your question is going, is now
- 10 that we've learned that that's beneficial, to go back
- 11 and look and see how it -- how those elements might mix
- 12 in with other combinations to come up with a -- a
- 13 better plan.
- 14 MR. ANTOINE HACAULT: So thank you.
- 15 That's -- because I was thinking to myself, Well, can
- 16 we look at this graph and do a meaningful comparison?
- 17 And that's why I wanted to get a little bit of
- 18 clarification from you.
- 19 There's two (2) critical points that we
- 20 -- we -- at least two (2) anyways, that we would need
- 21 to address to make this comparison meaningful, is,
- 22 firstly, relaxing the import on all these plans, and
- 23 secondly, seeing what DSM would do to all these plans.
- Would you agree with that?
- MR. DANIEL PEACO: Yeah. I think you

- 1 can learn from the Plan 17 that if -- if those things
- 2 can be done physically and if they can be done cost
- 3 effectively, they clearly have a material impact on --
- 4 on the -- on the results of the economics.
- 5 MR. JOHN ATHAS: The other thing, just
- 6 for clarity, because you're talking about putting the
- 7 relaxed import into the other -- other plans, the --
- 8 when we had the discussion about that -- that
- 9 characteristic of a no generation plan with -- with the
- 10 members from Manitoba Hydro, that change in criteria
- 11 was relevant in the cases where we had 750 -- or added
- 12 750 megawatts of transmission.
- 13 So if the -- so a criteria change alone
- 14 may not be a good thing to look at if the -- and say
- 15 Plan -- Plan 2 that has no transmission additions.
- 16 MR. RICHARD BEL: So my understanding,
- 17 that -- that Plan 17 is put forward not as a real
- 18 alternative plan, does it stand alone? Because it
- 19 looks very -- on expected value it looks like it
- 20 dominates.
- 21 MR. DANIEL PEACO: Well, it does. But
- 22 I -- I mean, I take Mr. Hacault's point. And I've --
- 23 and I've seen this in other studies. If -- if it turns
- 24 out that DSM is -- is such a wonderful resource that it
- 25 improves the economics of every plan, then you should,

- 1 you know, include that in every plan. And I think that
- 2 Hydro has -- has sort of come to that realization. At
- 3 the time we asked for this, they hadn't gotten there
- 4 yet.
- 5 But -- so I think some of the economics
- 6 that are driving the value of that plan will also show
- 7 up and is showing up, I guess, in the -- in the new
- 8 information on -- on the other plans with DSM included
- 9 in them.
- 10 So I guess I would say we intended this
- 11 mostly as we need to see an economic test of the
- 12 concept to see whether it's worth exploring. And I
- 13 think we're now at the point where you say: Boy, that
- 14 did -- did a nice job on the economics. Let's follow
- 15 up and see how that actually best works into the -- the
- 16 planning overall.
- 17 So it -- you know, there's questions of
- 18 -- it sort of now begins a discussion about what's an
- 19 appropriate import limitation policy? Should we be
- 20 thinking about -- or can we be thinking about
- 21 transmission as -- and its import value to us? And,
- 22 you know, what is the proper role of DSM in any of the
- 23 plans that you're configure -- you're planning to
- 24 configure going forward?
- 25 So, I mean, I -- I would say those are

- 1 three (3) features of that analysis that might apply to
- 2 how you look at each of the alternatives that you're
- 3 considering.
- 4 MR. RICHARD BEL: Okay. Thank you.
- 5 Thank you.
- 6 MR. JOHN ATHAS: The one thing -- the
- 7 one thing I would add to that just is that the -- that
- 8 in -- just to -- sometimes you -- you -- plans are
- 9 named or given themes based on you -- you decided that
- 10 you wanted to test a certain amount of -- a certain
- 11 combination of elements that you already have and you
- 12 try to figure out a way to name them and to keep track
- 13 of them.
- 14 In this case, this -- the -- there is,
- 15 as -- as Mr. Peaco mentioned, some very important
- 16 learnings to take out of there relative to the -- the
- 17 import policy and DSM. Those were viewed as
- 18 instruments by us to -- to develop a case that deferred
- 19 generation enough to call it New Gen -- No New
- 20 Generation, along with fuel switching, to -- you know,
- 21 to meet a question that was posed to us in the scope of
- 22 work.
- But -- so it's -- it's just a good
- 24 example that -- that plan-to-plan conclusions are one
- 25 thing that can be made, but there's a lot of

- 1 information and learning to be done from -- from
- 2 examining the components of the plans, as -- as we just
- 3 had the discussion.
- 4 THE CHAIRPERSON: Yeah. You might not
- 5 be able to -- for example, you might not be able to
- 6 lock in firm capacity from the US at the time you need
- 7 it if you go with this particular -- I mean, you could
- 8 -- you know, I think the danger of this is that -- I
- 9 understand the value of this.
- 10 But the danger to this is that if you
- 11 overweight this outcome relative to other possibility
- 12 or other options that have been examined.
- 13 MR. DANIEL PEACO: Yeah. And I -- I
- 14 would say to that point, to the extent that you and the
- 15 person that were saying, We're done, go do this plan; I
- 16 mean, it's -- it's not that. This was a -- this was,
- 17 you know, in part, directed in the scope of work:
- 18 What's -- consider what it looks like if we don't do
- 19 generation in Manitoba. And so we -- we said, Well,
- 20 first we've got to get a sense of what's the economics
- 21 look like.
- 22 And we -- John and I sat in a room and
- 23 we said, Well, how could we do that? Well, let's -- we
- 24 got to think about DSM. We got to think about imports.
- 25 We got to think about fuel switching. And so we just

- 1 kind of came up with -- with something to test. And
- 2 there was always a possibility the test would -- would
- 3 be far to the left here. And we'd say: Well, none of
- 4 that works. I guess we got to do generation.
- 5 But it went the other way. So now --
- 6 but -- so now I -- I would recommend it only to the
- 7 extent that it raises issues that -- that seem to have
- 8 promised improved economics.
- 9 What we've learned from this case and
- 10 from some of the other cases we've looked at, the
- 11 import dynamic, even when you're building for more
- 12 export, is important in the -- in the dry years. And
- 13 so that's -- and -- and the import limitation there is
- 14 -- is a consideration in the economics of -- of every
- 15 plan, those kind of things.
- 16 So I would say take the -- take the
- 17 lessons from that, from the DSM cases that have been
- 18 run, and then sort of figure out what mixture of these
- 19 things makes sense. And -- and in many cases, the
- 20 things that were featured in that hypothetical No Gen
- 21 Plan would need to be vetted to see how would we
- 22 actually do that. If we were going to build the
- 23 transmission solely for export, as this literally would
- 24 contemplate, what would be the best transmission line
- 25 to do that? It wouldn't necessarily be this -- the

- 1 same 750 line that we're -- that -- that you're
- 2 building for export.
- 3 But -- but what we -- what we did see is
- 4 if you do build it -- and it goes back to the
- 5 discussion we were having earlier -- if you do build
- 6 the 750 line with Keeyask and the -- and the Plan 6
- 7 discussion we were having earlier, it would also bring
- 8 with it some of that import flexibility as well, which
- 9 we talked about before.
- 10 So that part we've -- we've learned from
- 11 the -- from the analysis that we've done, if that -- if
- 12 that helps.
- 13 THE CHAIRPERSON: Okay.

- 15 CONTINUED BY MR. ANTOINE HACAULT:
- 16 MR. ANTOINE HACAULT: Just before we
- 17 break, just on this particular slide, 59 of Exhibit 45,
- 18 can we find somewhere what Hydro was asked to assume or
- 19 what it did assume as the cost of the DSM measures that
- 20 you've talked about, the one and a half (1 1/2) and the
- 21 fuel switching?
- 22 MR. JOHN ATHAS: The -- the detailed
- 23 information that was sent to us, along with the -- with
- 24 -- and transferring the information on these cases has
- 25 those -- has those cost assumptions in them. It's --

- 1 the -- you -- you can't see the cost of any one item in
- 2 -- in any of these lines in -- on -- on the chart.
- 3 Because I -- I took your question as: Can you see on
- 4 this chart the cost of --
- 5 MR. ANTOINE HACAULT: Oh, no. No, no.
- 6 I -- I just -- do we have in our materials -- because I
- 7 confess, although I've read most of them, I don't
- 8 necessarily retain everything of the I don't know how
- 9 many thousand pages.
- 10 Is there somewhere in the materials that
- 11 I can find where the DSM cost assumptions are -- just
- 12 like what -- when this was run, what did it cost for
- 13 one and a half (1 1/2) DSM and the fuel switching?
- 14 MR. DANIEL PEACO: We received -- we
- 15 received the -- the economic model output from Manitoba
- 16 Hydro, but we're still -- we still have not received
- 17 sort of the -- the backup in the assumptions.
- 18 MR. ANTOINE HACAULT: Are you able to
- 19 advise whether there was any cost assigned to DSM?
- 20 MR. JOHN ATHAS: Definitely there was
- 21 costs assigned to DSM in the -- in their analysis.
- MR. ANTOINE HACAULT: You just don't
- 23 know how much. Is that it?
- 24 MR. JOHN ATHAS: Offhand, I -- there's
- 25 a column of numbers that are for -- for seventy-eight

6080 (78) years for many different plans that I haven't committed to memory. 3 MR. ANTOINE HACAULT: Is that something that's filed in the materials, part of the record of this hearing? MR. JOHN ATHAS: I actually don't know 6 if it -- if it has been filed. 7 8 MR. ANTOINE HACAULT: With respect to this particular plan, No New Generation, 17, to the extent it's not CSI, because I wouldn't want that 10 disclosed, would it be possible to put that background 11 information on the record? 12 MR. JOHN ATHAS: Yes. We could extract 13 the -- the cost information from the tables that was 14 15 given to us by Manitoba Hydro for the twenty-seven (27) 16 scenarios -- twenty-seven (27) scenarios that was -that was modelled to get the red line. 17 18 19 (BRIEF PAUSE) 20 MR. ANTOINE HACAULT: I don't know if I 21 22 can narrow that undertaking, but what I'm looking for 23 is -- and I think it would just be one (1) cost. I 24 mean, it shouldn't vary if it was an assumption for 25 DSM.

- 1 What I'd like to have, to the extent
- 2 it's possible to focus on -- on that particular item,
- 3 is with respect to the slide at page 59 of Exhibit 45,
- 4 I'd ask that we be provided with the DSM expenses and
- 5 fuel-switching costs that were assumed in running the
- 6 model leading to the No New Generation example on that
- 7 slide.
- 8 MR. JOHN ATHAS: Okay. There are
- 9 twenty-seven (27) cases that go into running -- to
- 10 developing that red line. There -- and I'm not -- I'm
- 11 not positive now that I -- that they are all the same
- 12 cost assumption for DSM under all those cases.
- So, certainly, if they are the same,
- 14 then I only have to give you one (1) common number.
- 15 But if they're -- if they're different or -- or
- 16 partially different between cases, maybe there's -- I
- 17 forget whether there was a low and a high DSM cost or
- 18 things like that. Then I'd have more columns than one
- 19 (1).
- 20 MR. ANTOINE HACAULT: Okay. Well,
- 21 provide me the narrow one if you can, and if it needs
- 22 to be wider, you'll provide me with the wider one?
- 23 MR. JOHN ATHAS: Are you suggesting
- 24 that you'd like just reference/reference/reference?
- 25 MR. ANTOINE HACAULT: Whatever's

- 1 easier. I'm not looking to create a whole bunch of
- 2 work here, but I'd like to know what the DSM and fuel-
- 3 switching costs were. And --
- 4 MR. JOHN ATHAS:
- 5 Reference/reference/reference would certainly be
- 6 representative of the costs that they -- that they've--
- 7 MR. ANTOINE HACAULT: Well, let's --
- 8 let's start with that. So the undertaking would be to
- 9 provide the assumed DSM and fuel-switching costs at
- 10 reference/reference/reference. And if we believe that
- 11 that information isn't complete or needs to be
- 12 supplemented, we'll communicate further with counsel
- 13 for independent expert counsel -- consultants.
- 14 MR. CHRISTIAN MONNIN: We'll accept an
- 15 undertaking with two (2) -- two (2) issues. I'll couch
- 16 it under taking under advisement. We're not sure if we
- 17 can actually isolate that information and pull it out.
- 18 And then there's also the CSI stipulation which will
- 19 have conduct of that undertaking.

20

21 (BRIEF PAUSE)

- MR. CHRISTIAN MONNIN: Sure.
- 24 MR. ANTOINE HACAULT: It might be an
- 25 appropriate time for a break. I'd just like to make

- 1 sure I reorganize my notes and -- and see what priority
- 2 items I should deal with because, quite frankly, the
- 3 discussion I had this morning on is the high high
- 4 enough and the low low enough and the parameters lasted
- 5 a lot longer than I thought it would. I thought we
- 6 would have some pretty short answers on that. But
- 7 there was a useful discussion which lasted a bit
- 8 longer.
- 9 THE CHAIRPERSON: Okay. Let's take ten
- 10 (10) minutes. Thank you.

11

- 12 --- Upon recessing at 10:30 a.m.
- 13 --- Upon resuming at 10:46 a.m.

14

- THE CHAIRPERSON: I think that we're
- 16 ready to resume the proceedings. So if everybody is in
- 17 position, we will -- we will commence the hearing
- 18 process.

- 20 CONTINUED BY MR. ANTOINE HACAULT:
- 21 MR. ANTOINE HACAULT: The next subject
- 22 I just -- that's just going to be very short, we've had
- 23 the gas -- and this discussion has occurred between the
- 24 panel and, I believe, Mr. Peaco and perhaps Mr. Athas -
- 25 has that straight line and no curve. And Dr. Grant

- 1 referenced that.
- Now, I just want to clarify actually in
- 3 Exhibit 13, which is Appendix 10A at page 61, La Capra,
- 4 as I understand it, is acknowledging that, with respect
- 5 to the Gas Plan, there's a fair amount of uncertainty
- 6 because of the back-end long-term gas price risk.
- 7 Is that correct?
- 8 MR. JOHN ATHAS: Yes. We've recognized
- 9 that at a couple of places in this report.
- 10 MR. ANTOINE HACAULT: So although your
- 11 comparisons always start with that straight line, if we
- 12 drew the probabilities and risk with respect to the
- 13 gas, as we see that in the quilt, it shows us some
- 14 negative and positive aspects to that plan; but we're
- 15 not saying that it's not a risky plan.
- 16 MR. JOHN ATHAS: Yeah. I mean -- I
- 17 mean, risk -- risk has -- has a -- needs more
- 18 definition when you discuss what's risky and what --
- 19 what's -- whether something has risk. In the -- in the
- 20 cost variability after the -- after a plan is chosen,
- 21 there isn't a plan here that doesn't have variability
- 22 risk.
- 23 We tried to show that in -- and I think
- 24 we -- we answered an IR about that as well. But if --
- 25 if you look at 10A, page -- page 46 in 10A, you'd see

- 1 that we showed the variability of -- of price of
- 2 electricity in the year 2032 for the All Gas case
- 3 versus the Preferred Development Plan in that point in
- 4 time, in -- in that one (1) year. And that shows that
- 5 the -- that shows that the -- I believe it's the prior
- 6 page. Oh, actually, I have different page numbers, so
- 7 it's -- yeah, prior page, please, page 45.
- 8 So this is a -- this is a representation
- 9 using the same -- the financial model output of the
- 10 twenty-seven (27) branches for the All Gas Plan vers --
- 11 and the Plan 14, which is the one labelled 'K19 sales
- 12 with C25/750'. That -- that is Plan 14, and it should
- 13 have been labelled Plan 14.
- 14 But the -- so this graph shows what the
- 15 -- how variable the two (2) plans are across the
- 16 twenty-seven (27) branches, in terms of what the cost
- 17 to consumers would be as modelled by Manitoba Hydro in
- 18 2032. And it shows that the -- there is variability
- 19 around the All Gas price -- the price of electricity
- 20 for an All Gas plan was pursued, and there is more
- 21 variability around the price of the -- of electricity
- 22 to consumers under the Preferred Development Plan. And
- 23 in this -- and at that point in time, the Preferred
- 24 Development Plan is higher by the differences that you
- 25 see on the chart.

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- 1 MR. ANTOINE HACAULT: Thank you. And I
- 2 think the las -- the other page which we started at is
- 3 also instructive.
- 4 It's -- can you explain that -- that
- 5 graph and what it tells us about the risk related to
- 6 the All Gas Plan over a fifty (50) year time period?
- 7 MR. JOHN ATHAS: Yes, it's -- this is
- 3 at the end of fifty (50) years, the same mechanics were
- 9 putting it together. Year 2062, and it shows that the
- 10 -- at that point in time the All Gas Plan is a higher-
- 11 priced electricity and has more variability across the
- 12 seven (7) -- twenty-seven (27) branches that were
- 13 analyzed by Manitoba Hydro.
- 14 MR. ANTOINE HACAULT: Thank you. And
- 15 the next short subject that I want to deal with is what
- 16 we've referred to as Plan 4, the one with the 250 line.
- 17 As I understand -- let me start with a little bit of
- 18 background. La Capra wanted -- wanted to decide
- 19 whether a DSM should be looked at. It took some
- 20 measures to ensure that the DSM that was being proposed
- 21 by Manitoba Hydro was a plausible DSM scenario.
- Is that correct?
- 23 MR. JOHN ATHAS: The -- the amount of -
- 24 the only scenario of DSM that we postulated was in
- 25 the Plan 17, and that was utilizing what was already

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- 1 established by them as the one point five (1.5) times
- 2 the base. We had asked them also to do fuel switching,
- 3 which obviously manages demand, but it might not be
- 4 included in some people's definition of DSM, but -- so
- 5 -- and that was discussed and prescribed primarily by
- 6 us.
- 7 Outside of that, we have not had, within
- 8 our scope of work, to determine if any of the other
- 9 information put forth in the -- in the proceeding --
- 10 Level 1, 2, 3 -- have, you know, any degree of concern
- 11 on our part.
- 12 MR. ANTOINE HACAULT: Yes. So did La
- 13 Capra have any knowledge of the Great Northern
- 14 Transmission Line Project prior to undertaking its work
- 15 and what was being suggested for that project?
- MR. DANIEL PEACO: Yes, it was
- 17 obviously featured in the -- in the submission.
- 18 MR. ANTOINE HACAULT: And what was La
- 19 Capra's understanding of the -- what was being proposed
- 20 for the Great Northern Transmission Line, and when did
- 21 it first become aware that what was being proposed was
- 22 a 750 megawatt, or 500 kV, line?
- 23 MR. DANIEL PEACO: Well, when we read
- 24 the -- read the submission, we understood their primary
- 25 proposal and the alternative -- the alternatives

- 1 offered to that.
- 2 MR. ANTOINE HACAULT: So was that the
- 3 submission by Minnesota Power, when you're talking you
- 4 -- you read the submission? Let me try and rephrase
- 5 that. I'm trying to determine when La Capra knew -- go
- 6 ahead if you need to discuss.

7

8 (BRIEF PAUSE)

- 10 MR. DANIEL PEACO: Go ahead with your
- 11 question.
- MR. ANTOINE HACAULT: I'm trying to
- 13 determine when La Capra knew that the Great Northern
- 14 Transmission Line being proposed in the -- was a 750
- 15 megawatt line, or a 500 kV.
- 16 Did it learn it before the Manitoba
- 17 Hydro submission or after?
- MR. DANIEL PEACO: Well, I mean, we --
- 19 we came into this project at the time that they filed
- 20 the submission, so we really weren't...
- MR. ANTOINE HACAULT: When you say,
- 22 "submission," you're talking about Manitoba Hydro's
- 23 submission? Because there's various filings in the
- 24 States with respect to the --
- MR. DANIEL PEACO: Yeah.

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- 1 MR. ANTOINE HACAULT: -- Great Northern
- 2 Transmission Line in various publications that came
- 3 out, and I'm just wondering if you have any sense of
- 4 when either yourself, Mr. Peaco, or Mr. Athas, or -- we
- haven't had a discussion to the extreme right, but knew
- 6 that Great Northern Transmission was a 500 kV line.
- 7 MR. DANIEL PEACO: We -- we really
- 8 hadn't -- we may have somebody that was aware of it
- 9 before we were engaged to -- to work on this project,
- 10 but fundamentally, we -- we became familiar with it as
- 11 we emerged into this project, reading the NFAT
- 12 submission and the materials in this case.
- MR. ANTOINE HACAULT: And so you
- 14 believe that La Capra only became aware that the Great
- 15 Northern Transmission Line that was being proposed and
- 16 all the filings about a year ago, or perhaps a bit more
- 17 than that? You only became aware as a result of the
- 18 Manitoba Hydro submission that, in fact, it was not the
- 19 smaller line, the 250 megawatt line, but the larger
- 20 line, the 750 megawatt line?
- 21 MR. DANIEL PEACO: Yeah. We -- we
- 22 really had no -- no reason to -- to be, other than if -
- 23 if we had been curious about looking at transmission
- 24 proposals around the country, we had no reason to be
- 25 involved in -- in the travel of that project prior to

- 1 being hired for this -- this assignment.
- 2 MR. ANTOINE HACAULT: So you spent some
- 3 time analyzing that option.
- Now, from the economics directionally,
- 5 the analysis so far indicates that Plan 4 would be a
- 6 better plan for Manitoba ratepayers if it was still on
- 7 the -- still on a possibility where you could reapply
- 8 and get that line?
- 9 MR. DANIEL PEACO: You're referring to
- 10 the discussion we had yesterday?
- MR. ANTOINE HACAULT: Yeah.
- MR. DANIEL PEACO: Yes.
- MR. ANTOINE HACAULT: Now, given that
- 14 it appears that Manitoba ratepayers are asked to bite
- 15 the bullet, so to speak, do you have any
- 16 recommendations on -- on what could occur as far as
- 17 sharing of the economic benefits and apportioning
- 18 benefits? We've looked at provincial benefits and
- 19 benefits to Manitoba Hydro.
- 20 Do you have any thoughts on how those
- 21 might be allocated, as I -- you've identified the
- 22 benefits, correct?
- 23 MR. DANIEL PEACO: I -- I quess I'm --
- 24 I'm not sure if I understand the context of your
- 25 question.

- 1 MR. ANTOINE HACAULT: Well -- well,
- 2 let's take it in little bites. The -- what we've
- 3 referred to, for example, as the interest guarantee
- 4 fee, you may have read in the transcripts, we've
- 5 established at one point in time, it was just .5 of a
- 6 percent, and it's been increased to 1 percent.
- 7 Has La Capra given any thought as to if
- 8 there's -- the Manitoba ratepayers are forced to bite
- 9 the bullet, whether one (1) way to alleviate the rate
- 10 pressure on Manitoba ratepayers would be to change the
- 11 amounts being charged for interest guaranteed fees.
- 12 MR. DANIEL PEACO: On the transmission
- 13 line?
- 14 THE CHAIRPERSON: That -- that strikes
- 15 me that that is beyond the scope of work that was
- 16 assigned to -- to these experts, so I -- I think
- 17 Morrison Park would be the more appropriate consultant
- 18 to -- to ask that question to.
- MR. ANTOINE HACAULT: Thank you.
- 20
- 21 CONTINUED BY MR. ANTOINE HACAULT:
- MR. ANTOINE HACAULT: I gave that as
- 23 just an example to -- to generate the discussion,
- 24 because the -- the witnesses didn't seem to kind of
- 25 appreciate or understand my -- my question.

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- 1 Has La Capra, given that as an example
- 2 and keeping in mind the Chairperson's comments, given
- 3 any thought as to how Manitoba ratepayers could be
- 4 dealt with, given -- if it is -- if it does turn out
- 5 that the 250 option is no longer something that can be
- 6 pursued?
- 7 MR. DANIEL PEACO: I -- I quess I'm
- 8 going to have to ask a question. We're -- we're back
- 9 on transmission now instead of the -- the debt
- 10 guarantee fee, correct?
- MR. ANTOINE HACAULT: Well, just --
- 12 there's one (1) plan, the Plan 4, which showed better
- 13 economics, correct?
- MR. DANIEL PEACO: Yes.
- MR. ANTOINE HACAULT: And if -- we're
- 16 being told that it would be pretty hard to redo the
- 17 application in the States and go back to a two (2) -- a
- 18 250 megawatt line, and that has a negative impact on
- 19 Manitoba ratepayers.
- 20 Has La Capra given any thought on -- on
- 21 how we might alleviate that negative impact on
- 22 ratepayers by taking that option off the table?
- 23 MR. DANIEL PEACO: Okay. I think I
- 24 understand now. So your hypothetical is saying that,
- 25 But for removing Plan 4 off the table, that would have

- 1 been a better -- better plan as an impact on
- 2 ratepayers, and we're going to something that's less
- 3 beneficial, and how -- you know, we -- that's not -- we
- 4 have -- our scope of work didn't go to -- to those
- 5 kinds of issues.
- 6 THE CHAIRPERSON: The new -- the No New
- 7 Gen case, notional case that you -- do you -- that
- 8 we've been looking at, the kind of trans -- the kind of
- 9 import amounts that we're talking about, rela --
- 10 relative to that plan could not be encompassed within a
- 11 250 megawatt line? Or am I wrong?
- 12 You probably haven't looked at that, but
- 13 -- or -- or did you?
- MR. DANIEL PEACO: Well -- well, we
- 15 didn't look at that, and -- and again, this goes back
- 16 to our earlier discussion. This was a -- I mean, the
- 17 discussion we had with Hydro in putting this case
- 18 together was like, Okay, so how do we want to postulate
- 19 this? And I think the answer was -- well, the easiest
- 20 thing for us to do to model is to -- is to model the
- 21 transmission line we already have in the model.
- 22 So we said, All right. Run -- run this
- 23 case with the 750 line, and we didn't do multiple
- 24 cases, so we -- we -- for example, the question
- 25 yesterday is, Well, how much of the benefit is from DSM

PUB re NFAT 04-09-2014 6094 and fuel switching, or, you know, what if we built -so those pertubations of this case have not been run. And -- and it was simply a -- a negotiation of 3 expediency with Hydro as to -- as to how to sort of do a case that combines some of the elements that we're interested in testing. 7 (BRIEF PAUSE) 9 CONTINUED BY MR. ANTOINE HACAULT: 10 11 MR. ANTOINE HACAULT: I'm going to 12 switch to another kind of discrete area, and it's 13 touching upon some of La Capra's comments on the 14 seventy-eight (78) year metric in the economic 15 analysis. 16 Diana, if you can bring up Exhibit 3-1 17 at page 9, please? 18 And some of the key issues that were 19 identified in this report, being the main report, at number 2 was that the seventy-eight (78) year planning 21 horizon analysis is particularly susceptible to 22 forecast uncertainty.

that the -- hopefully I'm summarizing this correctly,

the weighted dis -- depreciation for a generating

We've had some evidence in this hearing

23

24

6095 station, as far as a time frame, would be more around sixty-seven (67) years. 3 Has La Capra looked at and made any kind of conclusion apart from showing us different metrics, as to white -- what might have been an appropriate metric for an economic analysis? 7 (BRIEF PAUSE) 9 10 MR. JOHN ATHAS: Well, we thought that the -- that appropriate metrics to look at -- that 11 12 someone might want to consider -- that's with some 13 degree of weight or not -- in their -- in their 14 decision were the metrics we put forward. That's --15 that's how -- that's why we -- we chose them. I'm not 16 -- so, yes, we thought of what would be appropriate 17 metrics. 18 MR. ANTOINE HACAULT: Do I take -- take 19 it that given your choices only went to fifty (50) years, is that La Capra's view is that the appot -- the 21 appropriate metrics would range from the twenty (20) 22 years to thirty (30) -- or to fifty (50) year range 23 that you've suggested, but not the seventy-eight (78) 24 year range? 25 MR. JOHN ATHAS: Well, no, we didn't

- 1 say that. We've actually said many times that they
- 2 complement the information of the seventy-eight (78)
- 3 year NPV.
- We also -- and I wouldn't even -- I -- I
- would be remiss if I didn't clarify that you -- that we
- 6 don't even believe that twenty (20) is the lowest
- 7 metric that you could use. We think an appropriate
- 8 metric of some weight is the -- as I had some
- 9 discussion -- and -- yesterday, I believe, or maybe --
- 10 maybe it was -- of the -- what's the -- what's the
- 11 capital cost.
- 12 I mean, there's some decisions in
- 13 drivers, whether it be utilities or -- or investments
- 14 that, you know, they take a posture of -- of, you know,
- 15 abs -- and -- absolutely, minimali -- minimizing
- 16 investment, or once an investment becomes this certain
- 17 size relative to their firm, or other things, they will
- 18 -- they will stop right there.
- 19 So I'm -- there's -- I wouldn't want
- 20 anybody read in the fact that the only new metrics that
- 21 we put out were between twenty (20) and fifty (50) for
- 22 the CPVs says that that's -- that's what we think shou
- 23 -- people should look at, because we also did put
- 24 together the IRRs for seventy-eight (78) years.
- 25 MR. ANTOINE HACAULT: Understood that

- 1 there's different metrics. And thank you for that
- 2 answer. I was trying to focus on the time frame. And
- 3 in particular, I had prefaced my question with respect
- 4 to the average service life that's used for
- 5 depreciation purposes of all the different components
- 6 of about sixty-seven (67) years.
- 7 And did La Capra give any thought as to
- 8 why it might be appropriate to go seventy-eight (78)
- 9 years, instead of the metric that we use for
- 10 depreciation on an average basis?
- MR. JOHN ATHAS: To the extent that --
- 12 that we did not hear anything from other IECs that the
- 13 -- that it was, you know, ver -- unlikely that the
- 14 plant could be continuing to operate or that the --
- 15 that the investments that -- there would be investments
- 16 at some point that would have to be so substantial that
- 17 they would be relevant to the -- to the economic
- 18 analysis.
- 19 We hadn't heard that information, so we
- 20 went along with presumption that the -- that seventy-
- 21 eight (78) years had -- as modelled, had some validity.
- MR. ANTOINE HACAULT: Thank you. Mr.
- 23 Williams dealt with this to some extent, and I don't
- 24 want to canvass what he already canvassed. But in one
- 25 (1) of the IRs that have been marked as an exhibit in

6098 this proceeding -- it was a MIPUG IR of La Capra. 2 It noted that La Capra's view was that planning analysis should be updated to current information at the time an investment is made. 5 MR. JOHN ATHAS: So it was 6A? 6 7 (BRIEF PAUSE) 9 MR. ANTOINE HACAULT: Now, does that continue to be the view of La Capra with respect to --10 11 MR. CHRISTIAN MONNIN: I'm sorry, Mr. Hacault, the IR that you're referring to, could you --12 13 MR. ANTOINE HACAULT: Maybe further 14 down. 15 MR. CHRISTIAN MONNIN: -- point the 16 witnesses to the specific language, please? 17 18 (BRIEF PAUSE) 19 CONTINUED BY MR. ANTOINE HACAULT: 20 21 MR. ANTOINE HACAULT: Could you go to 22 the next page? We've just seen page 1 of 2. 23 24 (BRIEF PAUSE) 25

6099 MR. ANTOINE HACAULT: It's at the very 1 Sorry, I hadn't made a note of the line and the page number in my text. 3 So I'll give the witnesses an 4 opportunity to review their response starting at line 16, going to -- or 13 going to line 16. 7 (BRIEF PAUSE) 9 10 MR. DANIEL PEACO: So you were in -- in particular, your question was pertaining to the very 11 12 last sentence? 13 MR. ANTOINE HACAULT: Yes, and as it 14 relates to Conawapa and related transmission. 15 Does it remain La Capra's view? 16 MR. DANIEL PEACO: 17 MR. ANTOINE HACAULT: And if that 18 investment commitment only needs to be made in 2019, 19 does it continue to be La Capra's view? 20 MR. DANIEL PEACO: This is stating -- I 21 -- what I think is a fairly fundamental principle in --22 in this thing as you -- you would make any decision with the best then-current information that you can 24 when making a decision. And it, you know, it's a 25 lesson that's long been learn -- learned many times

- 1 over and over, is that things change in this industry,
- 2 and, you know, sticking with decisions once -- once you
- 3 know that things have changed is -- is always a -- you
- 4 know, is -- is a -- can lead to some -- some bad
- 5 outcomes.
- 6 MR. ANTOINE HACAULT: Thank you. Next,
- 7 just a very short subject. It's with respect to the 1
- 8 percent guarantee fee. There's been various references
- 9 in there with respect to whether it's included as a,
- 10 you know, provincial benefit or not.
- Is my understanding correct that La
- 12 Capra has made the decision it has based on the advice
- 13 of Morrison Park?
- 14 MR. JOHN ATHAS: That's correct.
- MR. ANTOINE HACAULT: It -- it's not an
- 16 appendant opinion that La Capra has reached itself?
- 17 THE CHAIRPERSON: Could you repeat the
- 18 question?
- 19 MR. JOHN ATHAS: Could you clarify the
- 20 -- the adjective?
- 21
- 22 CONTINUED BY MR. ANTOINE HACAULT:
- 23 MR. ANTOINE HACAULT: Yes. Okay, the -
- 24 okay. Sorry it has to be -- I -- I didn't repeat my
- 25 question again, and I apologize for poorly phrasing the

- 1 question. It assumed that the previous question was
- 2 repeated again.
- In La Capra's -- even the updated
- 4 report, it confirms that the treatment of the 1 percent
- 5 quarantee fee is not -- is seen as a straight transfer
- 6 and a cost to the province, but it refers to Morrison
- 7 Park.
- 8 So the first question was asked, Did you
- 9 get that from Morrison Park? The answer was, Yes. The
- 10 second part, because I've had different answers on
- 11 whether or not Morrison Park analyzed that issue and
- 12 came to its own independent conclusion on that issue.
- 13 MR. JOHN ATHAS: I believe that the
- 14 initial -- in our discussions, the initial question of
- 15 whether that was a compensatory or a transfer payment
- 16 might have come up from -- likely came up from Morrison
- 17 Park Associates and the advisors.
- 18 The -- when -- as the discussion went on
- 19 and it -- and it seemed like a -- an area where they
- 20 were -- where they were likely to come out in their --
- 21 their review, it -- it was -- and it seemed logical to
- 22 -- to us, we decided to put our provincial analysis
- 23 together, assuming that that was compensatory and thus
- 24 not a transfer payment.
- 25 MR. ANTOINE HACAULT: I don't think I

- 1 have an answer to my question yet. My question -- the
- 2 first question, you said, Well, Morrison Park's view
- 3 was that it was compensatory.
- 4 My question is: Did La Capra come -- do
- 5 its own analysis and come to an independent conclusion
- 6 on that issue?
- 7 MR. JOHN ATHAS: No, we did not.
- 8 THE CHAIRPERSON: And -- and besides,
- 9 it was beyond the scope of your work, wasn't it?
- 10 MR. JOHN ATHAS: And expertise.

- 12 CONTINUED BY MR. ANTOINE HACAULT:
- MR. ANTOINE HACAULT: I -- I just
- 14 wanted to confirm that, because some of the materials
- 15 suggested, the way I was reading it, that you may have
- 16 come -- done an analysis and come to your own
- 17 independent conclusion. I just want to thank you for
- 18 that confirmation, sir.
- 19 MR. JOHN ATHAS: I apologize for the
- 20 ambi -- ambiguity.
- 21 MR. DANIEL PEACO: And it's -- falls in
- 22 a -- in a -- a category of a number of things we've
- 23 talked about today where we reached out to other
- 24 experts that were working on those areas to -- to be
- 25 informed about where their testimony is likely to go,

6103 and how we should position the -- the work that we're doing in conjunction with that. 3 (BRIEF PAUSE) 5 6 MR. ANTOINE HACAULT: I have another discreet subject area, and I'm -- Mr. Chairman, members of the panel, I'm -- I'm shooting to be completed before or at 11:30, just to give you some idea of where 10 I'm at. 11 It relates to the financial analysis and 12 the discount rates, and in particular, Exhibit 13. 13 That's your Appendix 10A at page 20, that last line. 14 I'll give the witnesses a chance to read the last 15 paragraph. 16 17 (BRIEF PAUSE) 18 19 MR. ANTOINE HACAULT: Now, the calculations used for the financial analysis assume a 21 seven point zero-five (7.05) nominal discount rate, 22 correct? 23 MR. JOHN ATHAS: That's correct. 24 MR. ANTOINE HACAULT: And does La Capra agree that the net present value of what customers pay

- 1 should somehow reflect the time value of money to
- 2 customers?
- 3 MR. JOHN ATHAS: Yes.
- 4 MR. ANTOINE HACAULT: And to show the
- 5 difference that some customers might have in their
- 6 views as to the value of money, is it fair to suggest -
- 7 and if we can go to page 22, that -- as you can see
- 8 below the chart, that La Capra chose a range of rates
- 9 going down from 4.4 percent to 9.7 percent nominal
- 10 discount rates?
- MR. JOHN ATHAS: Yeah. As it says, we
- 12 used the low and high discount rates that were in the
- 13 Manitoba Hydro analysis.
- MR. ANTOINE HACAULT: Okay. So that
- 15 wasn't something that was La Capra's idea in choosing
- 16 those particular rates. It was sourced from Manitoba
- 17 Hydro?
- 18 MR. JOHN ATHAS: That's correct.
- MR. ANTOINE HACAULT: And your view and
- 20 opinion is that the seven point zero-five (7.05)
- 21 nominal rate is the appropriate one?
- 22 MR. JOHN ATHAS: It -- it certainly
- 23 fits with a lot of convention in -- in utility analysis
- 24 that the -- that the cost of money of -- of the utility
- 25 for doing revenue requirements analysis or analysis,

6105 from the customer perspective, is -- is in the middle of the debate in terms of the ranges that are debated, of whether they should be extremely low or extremely 3 high from a customer's perspective. 5 6 (BRIEF PAUSE) MR. ANTOINE HACAULT: This last area is just to try and see if I can summarize some of the conclusions or opinions -- I don't know how you want to 10 call them -- that La Capra put forth in some of its 11 12 reports, and if we could turn to Exhibit 3-2, which is 13 the February report, at page 7 -- I -- I hope my colleague, Mr. Williams, is feeling better, because I 14 15 think I'm getting into chicken soup. 16 So the third bullet down: 17 "Supplemental analysis confirms our 18 initial assessment that Manitoba 19 Hydro evaluated a narrow selection of 20 development plans, and in most cases, 21 did not perform sufficient analysis 22 to show that the plans were developed 23 to be optimal or near optimal 24 configurations of the development scenarios evaluated." 25

6106 1 Does that continue to be La Capra's opinion today? 3 MR. DANIEL PEACO: Yes. And it's -you know, the examples or the discussions we've had about the wind case, the -- the natural gas case, the absence of DSM, the number of things that we've talked about that are sort of missing from some of the scenarios that were -- alterative scenarios that -that are considered. 10 MR. ANTOINE HACAULT: So would you 11 agree with me that this puts a lot of pressure on decision makers? 12 13 MR. CHRISTIAN MONNIN: I -- I think 14 that's ultimately the decision of the decision makers 15 to the ultimate issue, and that's the panel's 16 determination to make. 17 18 CONTINUED BY MR. ANTOINE HACAULT: 19 MR. ANTOINE HACAULT: The next bullet: 20 "The selection of alternative 21 development plans limits the ability 22 to test important alternative 23 configurations, including a five (5) 24 to ten (10) year delay of Keeyask, 25 the sequencing of transmission

	6107
1	additions, and the value of
2	transmission in non-hydro plans and
3	alternative combinations of decide
4	demand-side management and natural
5	gas-fired generation."
6	Does that conclusion still stand today,
7	sir?
8	MR. DANIEL PEACO: Yes.
9	MR. ANTOINE HACAULT: And with respect
10	to these two (2) points, are these chicken soup issues,
11	or are they fundamental issues?
12	MR. CHRISTIAN MONNIN: I I believe
13	the vernacular yesterday was material or or
14	immaterial. I don't think chicken soup is really in
15	play here.
16	MR. ANTOINE HACAULT: Shot taken.
17	
18	CONTINUED BY MR. ANTOINE HACAULT:
19	MR. ANTOINE HACAULT: Is the answer
20	material or immaterial?
21	MR. DANIEL PEACO: Pop quiz pop
22	quiz, if he he remembers other terminology. The
23	I I think the discussion we've had here in the last
24	two (2) days shows where we think there are significant
25	changes in the analysis that result from the issues

- 1 that we're raising in these two (2) bullets.
- 2 MR. ANTOINE HACAULT: And can you go as
- 3 far as saying whether you view that these are material
- 4 or non-material?
- 5 MR. DANIEL PEACO: I think you -- the
- 6 panel has our analysis, and ultimately, it's their
- 7 judgment as to decide what's -- what's material to
- 8 their decision.
- 9 MR. ANTOINE HACAULT: Okay.
- 10 MR. DANIEL PEACO: They obviously --
- 11 they're -- they're more than rounding error in the
- 12 numbers, for sure.
- MR. ANTOINE HACAULT: But, like me,
- 14 you're pay -- you're being paid some dollars to
- 15 exercise your professional judgment.
- 16 MR. DANIEL PEACO: We wouldn't -- we
- 17 wouldn't have flagged them in the summary if we didn't
- 18 think that they were significant issues that the panel
- 19 would want to consider.
- 20 MR. ANTOINE HACAULT: Thank you. Can
- 21 we go to Exhibit 3-1? And I'll be flipping, but page
- 22 7. The -- there's comments with respect to the SPLASH
- 23 economic modelling and uncertainty analysis, and --
- 24 MR. DANIEL PEACO: Excuse me. Just a -
- 25 what document are we in?

6109 MR. ANTOINE HACAULT: We're -- this is 1 the -- the January report, January 24 report. 3 MR. DANIEL PEACO: Oh. This is the main report. Okay. 5 MR. ANTOINE HACAULT: The main report, 6 but -- so --7 THE CHAIRPERSON: Just wondering. That -- that isn't -- because it's showing no -- no redactions, it's not CSI. 10 MR. ANTOINE HACAULT: Yeah. I just saw 11 that. 12 THE CHAIRPERSON: It's not CSI? 13 MR. ANTOINE HACAULT: It -- it -- this 14 is from the -- the public site, so we should --15 THE CHAIRPERSON: Yeah. MR. ANTOINE HACAULT: -- get one. 16 I 17 don't think this paragraph has CSI, but we should just 18 check before we -- we proceed further. 19 MS. ODETTE FERNANDES: There were no 20 redactions made to this report. MR. ANTOINE HACAULT: Okay. 21 22 23 CONTINUED BY MR. ANTOINE HACAULT: 24 MR. ANTOINE HACAULT: Now, the second paragraph, second line, it's in -- noted:

	6110
1	"While this
2	SPLASH model], being able to simulate
3	unique characteristics of Manitoba
4	Hydro's power system has the
5	advantage of being tailored to that
6	system, it has the disadvantage of
7	limited transparency to the outside
8	reviewer."
9	Were you and when I say, "you," La
10	Capra able to conduct any kind of analysis to test
11	the soundness of that system compared to other systems
12	that you've seen?
13	MR. DANIEL PEACO: It would the
14	you know, there's there's other other types of
15	assignments that we've done that would be similar to
16	this. If the utility is using a, I would say a
17	commercially standard planning model, it's easy enough
18	to licence the software and test the data and do
19	things. That's you know, that's not really feasible
20	in this context.
21	The and so we in in not being
22	able to sort of make a version of the model and do our
23	own analysis and tests, or and replicate their
24	analysis and test alternatives, we did have Hydro run a
25	couple of alternative cases, which we've talked about,

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- 1 and we -- they did agree to prepare a special detailed
- 2 output report for us, some of which is shown in some of
- 3 the exhibits here, so that we could look at -- in -- in
- 4 some more granularity than the average results that --
- 5 that typically report up in the model.
- 6 So we could look at how the -- how the -
- 7 some of the output in detail, for, say, a particular
- 8 water con -- configuration, and -- and tested those.
- 9 So we -- we did a lot with their output results, both
- 10 as it shows up in the economic model, and -- and the
- 11 production results that -- that show up in, for
- 12 example, the -- the analysis that we've shown on
- 13 results across different water year assumptions.
- 14 So I would say that we -- with that more
- 15 detailed data, we were able to do a fair amount of
- 16 inspection of the output, and -- and in some detail,
- 17 and in doing that, we -- we didn't come across anything
- 18 that, to us, looked like it was not performing as it
- 19 was antici -- it was set out to do.
- 20 I think the -- the work that we had to -
- 21 that we did with that data overcame some of the --
- 22 the -- sort of the more straightforward transparency
- 23 methods that I talked about.
- 24 So we did have a fair amount of look at
- 25 -- at the details of their output, and spent some time

- 1 talking with the folks there. So I feel like we -- we
- 2 accomplished a lot in -- in that respect, but it --
- 3 obviously, it's -- it's a lot less efficient than
- 4 having a -- taking their data, putting it in the model
- 5 we have, and -- and running it and testing it
- 6 ourselves.
- 7 MR. ANTOINE HACAULT: So is it fair to
- 8 say that La Capra did not identify any specific
- 9 concerns? At least I didn't see any in the reports
- 10 with respect to the SPLASH model, that might show that
- 11 it's not reliable?
- MR. DANIEL PEACO: We -- actually, we -
- 13 we discussed this in some detail in, I think it's 6,
- 14 is it? Technical Appendix 6. The -- like any model,
- 15 there are approximations to the real world, and we talk
- 16 about some of those in -- in Technical Appendix 6. We
- 17 didn't find any that -- for the purposes of a long-term
- 18 planning study, we didn't find any issues that we felt
- 19 made it unreasonable to use for the -- for the purposes
- 20 of this analysis.
- 21 MR. ANTOINE HACAULT: Thank you.
- 22 That's what I was looking to -- to find out. It's
- 23 11:30. I -- there's some other questions I might have
- 24 asked, but I think I've covered most of the essential
- 25 stuff, and I thank both the members of the Board and

- 1 members of the La Capra panel for doing their best to
- 2 answer my questions, which weren't always clear. Thank
- 3 you very much.
- 4 THE CHAIRPERSON: Thank you, Me.
- 5 Hacault. I believe that we're ready to turn over the
- 6 microphone to Manitoba Hydro. I'm sorry? I'll canvass
- 7 the Intervenors to make sure there's no questions.
- Mr. Orle, please.
- 9 MR. GEORGE ORLE: Thank you, Mr. Chair.
- 10 I do have a few short questions I'd like to ask.

- 12 CROSS-EXAMINATION BY MR. GEORGE ORLE:
- MR. GEORGE ORLE: So, good morning, Mr.
- 14 Peaco, Mr. Athas, Ms. Neal. My name is George Orle. I
- 15 represent an organization of Northern Aboriginal
- 16 members, and my questions relate primarily to the area
- 17 of rates. And I note from the supplemental report that
- 18 was filed in February that you referred back to
- 19 Appendices 9A and 10A, and that they were still
- 20 appropriate at that time.
- 21 Given that we've had some substantial
- 22 changes made to the supplemental 9A that came before
- 23 this -- this hearing, my question is, to what extent
- 24 can we still rely upon 10A as being accurate or -- or
- 25 being appropriate forecasts for rates?

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6114 MR. JOHN ATHAS: Our -- my -- our 1 understanding is that ten (10) -- that all the financial analysis produced by Manitoba Hydro, which we 3 used as a basis for 10A, I -- I don't think I would actually -- I don't think people are constituting that as a forecast of rates, because I've heard often that it's -- that it's illus -- illustrations of rate paths for metrics -- for comparative metrics, and not necessarily a rate plan. 10 So it's -- it's not a -- so that -- I 11 just -- I'm not trying to be picky on the choice of 12 words, but I just want to make sure that I don't answer 13 something that has an implication to other people. 14 So from the standpoint of the metrics 15 and other kinds of analysis, including average price 16 for -- of electricity in -- analyzed in 10A, naturally, 17 for some plans, the -- the numbers have changed with 18 the updated capital cost information. 19 Depending on the observations and conclusions that would be -- that one was making on 21 10A, I would -- I think they could -- they have -still have a lot of relevance. 22 23 MR. GEORGE ORLE: I'm -- I'm sorry? 24 MR. JOHN ATHAS: They still have a lot 25 of relevance.

6115 MR. GEORGE ORLE: And then if -- if we 1 can go to Appendix 10A, which is Exhibit La Capra 13, and to page 24 in the report? And the last sentence in 3 the summary, I just wanted to get some clarification on that. It reads: "Moreover -- moreover, the actual 6 7 rates paid by domestic customers vary over time, with significant increases 9 forecasted toward the end of the 10 study period." 11 I -- I just wanted to reconcile that 12 with the fact that the -- the way the rates are being 13 proposed is a annual increase that's given over a period of time, and I'm just trying to reconcile that 14 15 with -- with your forecast, that the -- the rates will 16 vary, and that there'll be significant increases towards the end of the study period. 17 18 MR. JOHN ATHAS: They will vary amongst 19 plans, but all plans would probably -- could be categorized as significant -- having significant 20 21 increases over the study period. 22 MR. GEORGE ORLE: Okay. And when you 23 say, "Particularly towards the end of the study 24 period," what -- what period of time are you referring 25 to?

6116 MR. JOHN ATHAS: The financial 1 analysis, and -- which include the rate analysis, went out for fifty (50) years, and that's -- they would be 3 in the forty (40) to fifty (50) year range that we're talking about, the end of the study period. 6 MR. GEORGE ORLE: Okay. That summary 7 was carried over into the -- the initial report, and that's the reference to Exhibit 3 -- 3-1, and if we could go to page 32 of that report, and the last bullet 10 on that page? 11 That bullet reads: 12 "The -- the results from LCA's 13 economic analysis indicate that the 14 PDP does not have the cost advantage 15 over some other plans that Manitoba 16 Hydro asserts, meaning the rate 17 impact issues will be more difficult 18 than Manitoba Hydro has described." 19 First of all, what -- what do you mean by, "the rate impact will be more difficult"? 21 MR. JOHN ATHAS: It would be higher. 22 MR. GEORGE ORLE: Thank you, Mr. 23 Chairman. Thank you, members of the panel. 24 THE CHAIRPERSON: I'm not sure I understood the -- your answer to the first question

6117 that Mr. Orle posed, namely that the rates would be higher at the end of the study period relative to -you didn't say, "relative." But my understanding was 3 the same as Mr. Orle's, that the -- the plans call for a significant increase over twenty (20) years, and then we would see a dip in -- in rates beyond the twenty 7 (20) year study period. 8 So I'm trying to reconcile those two 9 (2), your statement in the report and what I just said. 10 MR. JOHN ATHAS: I think that they --11 they go down, but they still are substantial. They 12 still are higher. They're -- they're not -- they're 13 substantially higher in the future than they are today. 14 THE CHAIRPERSON: Yeah. Thank you. 15 16 (BRIEF PAUSE) 17 18 THE CHAIRPERSON: Ms. Saunders, have 19 you got ques -- questions for these witnesses? 20 MS. JESSICA SAUNDERS: I do have a -- a 21 few short questions. Jessica Saunders. I represent 22 the Manitoba Metis Federation. 23 24 CROSS-EXAMINATION BY MS. JESSICA SAUNDERS:

MS. JESSICA SAUNDERS: I would like to 25

- 1 start by asking a few questions on Plan 17,
- 2 particularly the import capability aspect of this plan.
- 3 So Plan 17 includes a new 750 megawatt transmission
- 4 line.
- 5 And that's for importing firm power, but
- 6 no new generation in Manitoba until at least 2029,
- 7 correct?
- 8 MR. DANIEL PEACO: The -- the last part
- 9 of that?
- 10 MS. JESSICA SAUNDERS: That the -- the
- 11 line is for importing firm power, but no new generation
- 12 in Manitoba until at least 2029.
- Is that correct?
- 14 MR. DANIEL PEACO: Well, actually, it's
- 15 later than that. The 2029 is when the transmission
- 16 line is -- is first introduced in that plan. I think
- 17 the first generation is -- is several -- several years
- 18 after that.
- 19 MS. JESSICA SAUNDERS: Okay. Thank
- 20 you. Would you agree that Manitoba Hydro has
- 21 expressed concern that there would not be enough
- 22 installed capacity in the US to provide a source of
- 23 sufficient capacity or cost-effective generation for
- 24 the needed level of imports?
- MR. DANIEL PEACO: Yes, I understand

- 1 that.
- MS. JESSICA SAUNDERS: And Manitoba
- 3 Hydro is a winter-peaking system, correct?
- 4 MR. DANIEL PEACO: Yes.
- 5 MS. JESSICA SAUNDERS: MISO, as well as
- 6 other relevant regional transmission organizations, PJM
- 7 and SPP -- that's Southwest Power Pool -- those are
- 8 summer-peaking systems, correct?
- 9 MR. DANIEL PEACO: Yes.
- 10 MS. JESSICA SAUNDERS: So in the winter
- 11 season, when Manitoba Hydro most needs firm power,
- 12 isn't there likely to be excess firm generating
- 13 capacity in MISO, PJM, and SPP?
- 14 MR. DANIEL PEACO: There's considerable
- 15 seasonal diversity, what I call seasonal diversity,
- 16 between Manitoba Hydro and the -- and the systems to
- 17 the south, yes.
- 18 MS. JESSICA SAUNDERS: And wouldn't
- 19 owners of generation in MISO, PJM, and SPP be able to
- 20 sell firm system capacity during the Manitoba Hydro
- 21 winter-peak system?
- 22 MR. DANIEL PEACO: The -- given that
- 23 they will necessarily be planning their systems to
- 24 cover their summer peak, it would -- they presumably
- 25 always have some surplus in other times of the year.

- 1 And so that would be an opportunity -- you know, that
- 2 would create the opportunity for such transactions,
- 3 yes.
- 4 MS. JESSICA SAUNDERS: And during
- 5 winter periods, isn't the cost of energy available for
- 6 export from MISO, PJM, and SPP lower in most hours than
- 7 it is in comparable hours of summer periods?
- 8 MR. DANIEL PEACO: That's the case
- 9 today, yes.
- 10 MS. JESSICA SAUNDERS: Yes. Isn't it
- 11 probable then that Manitoba Hydro can obtain firm
- 12 capacity and reasonably priced energy from existing
- 13 generating sources in MISO, PJM, and SPP to meet its
- 14 loads during Manitoba Hydro's winter peak season,
- 15 assuming that there is transmission capa -- capaci --
- 16 capability linking Manitoba Hydro with those RTOs?
- 17 MR. DANIEL PEACO: I'm -- I'm sorry to
- 18 do this, but I -- could you repeat -- I know you're
- 19 reading it, so could you read that again?
- 20 MS. JESSICA SAUNDERS: I apologize.
- 21 I'll engage here.
- MR. DANIEL PEACO: Sorry. I'm a fast
- 23 talker, too. I've been chastised many times this week
- 24 already, so --
- MS. JESSICA SAUNDERS: And isn't it

- 1 probable that Manitoba Hydro could obtain that firm
- 2 capacity and reasonably priced energy from existing
- 3 generating resources in those RTOs and meet its loads
- 4 during Manitoba Hydro's winter peak season, assuming
- 5 that there's transmission capacity that would link
- 6 Manitoba Hydro to those RTOs?
- 7 MR. DANIEL PEACO: Well, I think that
- 8 that would be something that clearly would need to be -
- 9 that would be the opportunity that you would explore
- 10 if you were going to pursue a strategy of -- of the --
- 11 of the type that's embedded in that -- in that
- 12 scenario, yes.
- MS. JESSICA SAUNDERS: I'll move on.
- 14 I'll refer you to Figure 326 at page 25 of Appendix 3B.
- 15 And that's at La Capra's Exhibit 6-1. Sorry, page --
- 16 page 25, Appendix 3B of Exhibit 6-1, La Capra exhibit,
- 17 if that's okay, Diana? Yes.
- 18 So do I understand this figure correctly
- 19 that the associated -- sorry, let me rephrase this.
- 20 Do I understand this correctly in that
- 21 adding a 750 megawatt line between Manitoba Hydro and
- 22 MISO, along with Manitoba Hydro's purchasing firm power
- 23 from generators in MISO, SPP, and/or PJM, would enable
- 24 Manitoba Hydro to export power in the annual amounts
- 25 shown above the dotted line?

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6122
 1
                  MR. DANIEL PEACO: Excuse me just a
   second.
 3
                          (BRIEF PAUSE)
 5
                  MR. DANIEL PEACO: Excuse me a second.
 6
   This -- we have a version of this that was redacted. I
   just want to make sure that we don't get into CSI. I
   just... Okay.
10
11
                          (BRIEF PAUSE)
12
13
                  MS. JESSICA SAUNDERS:
                                           Okay.
14
                  MR. DANIEL PEACO: Okay. I'm -- I'm
15
   set now. I'm -- and I'm sorry, can you ask the
16 question again?
17
                  MS. JESSICA SAUNDERS: So I'm -- I'm
18
   just trying to understand this line, and it -- it
19
   somewhat relates to the questions I -- I just asked
20
   you.
21
                   But -- so this figure, above that line,
22
   adding a 750 megawatt line between, say, Manitoba Hydro
23
   and MISO, along with Manitoba Hydro's purchasing firm
24
   power from generators, and MISO, SPP, and PJM, would
   that enable Manitoba Hydro to export power in the
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6123 annual amounts shown above the dotted line here in Figure 3-26? 3 (BRIEF PAUSE) 5 6 MR. DANIEL PEACO: I -- I quess I can't -- I can't glean directly from the table. 7 understanding, it would be the case. The 750 line would come in, in 2029, in this example. All right. So it would -- it would not enable exports prior to 10 11 that date. There's -- there's existing export transfer 12 capability, and that's -- those are basically resources 13 that exist in Hydro today, prior to 2029, in this 14 configuration. 15 MS. JESSICA SAUNDERS: Okay. 16 17 (BRIEF PAUSE) 18 19 MS. JESSICA SAUNDERS: And so if I can just refer you to the final paragraph on this page. 21 Starting at -- in the middle there: 22 "More important capacity could allow 23 higher imports in off-peak periods, 24 allowing exports of hydro during peak 25 price periods. The value of these

	6124
1	exports and of the additional
2	capacity in this scenario is likely
3	to be significant but at this point
4	is unknown, as that analysis has not
5	been conducted by Manitoba Hydro."
6	So am I correct in understanding that
7	this indicates that much of the exportable energy is
8	the result of energy imported in off-peak hours and
9	stored as elevated water in Manitoba reservoirs until
10	needed as a source of firm capacity and energy for
11	exports?
12	MR. DANIEL PEACO: Yeah, the I mean,
13	Hydro's system, it allows it to take advantage of off-
14	peak low off-peak prices and and store and
15	reshape that and and provide exports during time of
16	of peaks in the in the neighbouring systems. And
17	so that's what it's referring to.
18	MS. JESSICA SAUNDERS: Thank you. And
19	so moving on to a different area. Yesterday, Mr. Gange
20	asked you some questions regarding wind, and Mr.
21	Williams asked you some questions on solar. I'm going
22	to ask you some questions regarding these resources.
23	And I'll first go through a few sections of your report
24	to begin. And then I'll ask you some questions on the
25	potential role of those resources.

6125 And as I believe they -- they somewhat 1 speak to a theme that I want to get at with you, I'll -- I'll take you through the exercise of referring you 3 to a number of -- of parts of your report first, if that's okay. And then I'll commence with my 6 questioning. 7 MR. DANIEL PEACO: Okay. MS. JESSICA SAUNDERS: Thanks. So -and this relates to Plan 17. And often in the last few days we've -- we've discussed it. And this plan, of 10 course, includes DSM, fuel switching, and imports. 11 12 And you note that DSM and fuel switching 13 could lessen the need for new generation for longer than -- than a decade, as we just discussed, correct? 14 15 MR. DANIEL PEACO: Yes. 16 MS. JESSICA SAUNDERS: And at page 26 of Appendix 3B of La Capra 6-1, in the second paragraph 17 18 you find that: 19 "The results of this alternative plan 20 demonstrate that even with only moderate adjustments to assumptions 21 22 on load, the need for new resources 23 can be delayed until at least 2029." 24 And that's pretty much what we just 25 summed up in -- in my last question. And then on page

6126 21 of Appendix 3A, which is La Capra Exhibit 6 -- 21 -in the middle of the third paragraph, you discuss the two (2) development plans that contain wind and note 3 that: 5 "Manitoba Hydro is not planning to 6 develop any wind resources. strong domestic resource, modular development options, and declining 9 resource costs, it is very likely 10 that at least some wind development 11 should be included in an optimized 12 development strategy." Correct? 13 14 MR. DANIEL PEACO: Yes. 15 MS. JESSICA SAUNDERS: And if I could 16 ask Diana to go to Manitoba Hydro's IR of La Capra 17 number 20. When asked about which technologies La 18 Capra would have screened in that Manitoba Hydro did 19 not, La Capra indicated that they would have screened in solar and biomass, correct? 21 MR. DANIEL PEACO: Yes. MS. JESSICA SAUNDERS: We're nearing 22 23 the end. Finally, at page 31 of Appendix 3B, that's La 24 Capra Exhibit 6-1, in the last paragraph, you discuss 25 that your initial evaluation of the Wind/Gas Plan

- 1 identified several potential changes that could have
- 2 developed more optimal configuration than the one
- 3 presented by Manitoba Hydro.
- 4 La Capra noted that:
- 5 "Potential revisions included choice
- of gas technology for capacity,
- 7 timing, and sequence of the wind and
- 8 gas development in consideration of
- 9 annual -- [sorry] additional import
- 10 capacity. These changes could easily
- 11 produce results closer to an optimal
- 12 solution involving wind development."
- 13 And that's correct?
- MR. DANIEL PEACO: Yes.
- MS. JESSICA SAUNDERS: And so moving on
- 16 to my questions. Thank you for -- for engaging in that
- 17 with me.
- 18 Recognizing that Plan 17 includes no new
- 19 generation, in your view, how could wind, solar, and
- 20 biomass play a role in further extending the date
- 21 before which large-scale gas or hydro generation is
- 22 required?
- MR. DANIEL PEACO: Well, I think that
- 24 if you -- if you take the -- the Plan 17 analysis that
- 25 we've talked about as an illustration of an alternative

6128 configuration, I think that, you know, some of the lessons you could learn from that could apply to other combinations of small or module resources. 3 For example, the energy savings -- or 4 some of the energy production from -- from renewables might contribute in -- in a way that is manageable within the hydro system as -- as part of a scenario 7 that would be an alternative configuration to what was postulated in that case. 10 11 (BRIEF PAUSE) 12 13 MS. JESSICA SAUNDERS: Okay. 14 15 (BRIEF PAUSE) 16 17 MS. JESSICA SAUNDERS: And is it fair 18 to say that the imported electricity that composes Part 19 17 -- or, sorry, part of Plan 17, that could consist of a combination of wind and gas from MISO? 21 MR. DANIEL PEACO: I'm sorry, try that 22 again? 23 MS. JESSICA SAUNDERS: So the imported 24 electricity that composes part of Plan 17, that could 25 consist of a combination of wind and gas from MISO,

- 1 correct?
- MR. DANIEL PEACO: It could, yeah.
- 3 MS. JESSICA SAUNDERS: In your view,
- 4 what circumstances would need to be in place in which
- 5 the wind portion of those imports would be better
- 6 sourced from facilities located in Manitoba?
- 7 MR. DANIEL PEACO: Well, I mean,
- 8 there's a number -- number of combinations of things
- 9 that you could do. A -- the question is, the -- the
- 10 import line could be used for a number of purposes. It
- 11 could be used specifically, for example, if -- if the
- 12 decision -- if you have the transmission import
- 13 capability decision -- would be -- could be to contract
- 14 with a US wind resource directly, if that's -- if
- 15 that's where you're going, as opposed to a Manitoba
- 16 resource, but either of those could -- could occur.
- But without import, transmission
- 18 capability to support that, then, obviously, you know,
- 19 any wind resource development would be -- would be
- 20 local, but I -- I don't know that they're necessarily
- 21 one or the other, and any -- on the import line may be
- 22 -- could be -- simply be used as -- as supplemental
- 23 energy or support between the two (2) systems. I -- I
- 24 don't know if that helps answer your question.
- MS. JESSICA SAUNDERS: M-hm. Thank

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   you.
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2
3
                          (BRIEF PAUSE)
 5
                   MS. JESSICA SAUNDERS:
                                           In these
   proceedings, we've heard that Manitoba Hydro is going
   to continue to consider it's options in moving forward.
7
8
                   In your review -- sorry, in your view,
9
   what economic benefits could there be to a process that
   proceeds initially with Plan 17, and then
10
11
   reinvestigates the potential for large Hydro
12
   development, say, every five (5) years or so?
13
                   MR. DANIEL PEACO: Well, I -- I think
14
   the -- I think it's -- essentially, what Hydro has --
15
   has proposed with their proposal to sort of begin with
    the Level 2 DSM, and to my understanding, it's -- it's
16
17
    somewhat of a different a program than -- than we
18
   assumed in Plan 17, but it has about the same effect of
19
   -- if I'm adding a -- a fair amount of load management
    into the system on a front end, and how that effects
21
   subsequent decisions on timing of other resources will
   be -- is to determined, but I -- I think, it's
22
23
   essentially the -- the approach that they've now
24
   recently proposed.
25
                   MS. JESSICA SAUNDERS:
                                           Okay.
                                                   And of
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- 1 course, that's an approach -- this -- this concept of
- 2 reevaluating every, say, five (5) years or so is -- is
- 3 consistent with other jurisdictions you're aware of
- 4 that would engage in a certain planning process
- 5 regarding large hydro?
- 6 MR. DANIEL PEACO: Well, I think that -
- 7 I think Hydro is like any other utility. They've
- 8 continually sort of reviewing and updating their plans,
- 9 and looking -- looking ahead.
- I think, when you're -- when you're
- 11 dealing particularly with a potentially really large
- 12 addition to your system, like Keeyask or Conawapa would
- 13 be, then, you know, the lead times in the -- in the
- 14 planning process is a -- is a bit more unique than it
- 15 would be if you're not looking at something at that
- 16 magnitude.
- But I think that's -- you know, my -- my
- 18 sense is that's -- that's the planning -- is a planning
- 19 cycle that -- that Manitoba Hydro goes through, and --
- 20 and all utilities do that on a periodic basis.
- 21 MS. JESSICA SAUNDERS: Okay. Thank
- 22 you. Those are all my questions.
- 23 THE CHAIRPERSON: Thank you. It's
- 24 probably an appropriate time to -- to break for lunch.
- 25 Me. Monnin...?

6132 MR. CHRISTIAN MONNIN: Yes, M. -- M. 1 President. I do have some further documents to -- to file with -- with the Board. I've just received confirmation as we have an errata sheet which covers some of the -- the reports filed by LCA. It's just been sanctioned for CSI, so we can file it. 7 I only have two (2) copies which I can give to the Board at this point in time, and we'll get hard copies to the balance of the parties as soon as we 10 can. 11 Mr. Secretary, that would LCA-48, if I 12 recall correctly. 13 MR. KURT SIMONSEN: That's correct. 14 MR. CHRISTIAN MONNIN: Thank you. 15 --- EXHIBIT NO. LCA-48: Errata sheet 16 17 18 THE CHAIRPERSON: Thank you, Me. 19 Monnin. So we'll pro -- we should break for -- for lunch. Let's take forty-five (45) minutes, which would 21 take us to twenty (20) to 1:00. It's our intention to 22 adjourn for the day no later than five o'clock today, 23 so I'll put everybody on notice that there's a time 24 constraint. Thank you.

6133 1 (PANEL RETIRES) 2 --- Upon recessing at 11:55 a.m. 3 --- Upon resuming at 12:45 p.m. 5 6 THE CHAIRPERSON: Good afternoon. Ι 7 believe that everybody's in position to commence the proceeding this afternoon. So I'd like to welcome Mr. Peter Kulchyski, who is going to be making a 10 presentation to the panel. So without further ado, Mr. 11 Kulchyski, if you don't mind telling us if you're 12 acting on your own behalf or on behalf of another 13 party, I would appreciate it. 14 So welcome to the proceedings of today. 15 PRESENTATION BY DR. PETER KULCHYSKI: 16 17 DR. PETER KULCHYSKI: So thanks very 18 much for having me here. And I should I am acting on 19 my own behalf, just as a member of the public. I haven't had time to sort of clear this presentation or 21 vet it with my colleagues in the Quewetin Public Interest Research Group (phonetic). They are very 22 23 interested in this whole process, but as things 24 transpired, I've been fairly busy and -- and wrote my 25 report. And I appreciate you're receiving it so late.

- 1 And I appreciate you're giving me a little bit of time
- 2 to speak before you.
- 3 So to cut to the meat of the matter,
- 4 since I have only fifteen (15) minutes, I want to say
- 5 I'm -- I'm concerned to bring really two (2) broad
- 6 issues to your attention. One has to do with what we
- 7 could call contingent liabilities, significant
- 8 financial costs that could arise from unfilled
- 9 Aboriginal and treaty rights claims. And I have three
- 10 (3) specific types of claims that I'm going to talk to
- 11 you about.
- 12 And then, secondly, I want to talk at a
- 13 macro level about the costs of social impacts and the
- 14 kind of social impacts that we're addressing. And then
- 15 hopefully I'll have time for a few remarks in
- 16 conclusion.
- 17 I -- I spelled out in -- still in the
- 18 fairly broad level of abstraction.

19

20 (BRIEF PAUSE)

- 22 DR. PETER KULCHYSKI: So in terms of
- 23 Aboriginal rights and titles as contingent liabilities,
- 24 this is an approach that was taken by Arthur Manuel,
- 25 who's now -- you know, who's been a co-chair of the

- 1 World Council of Indigenous Peoples, the former of the
- 2 -- one of the Shuswap Nations, and who I have the
- 3 pleasure to work with in an organization called
- 4 Defenders of the Land.
- 5 He developed the strategy in
- 6 coordination with Joseph Stiglitz, who's no mean name
- 7 in the world of economics. So, you know, there are
- 8 some very serious people who've signed off on the
- 9 notion that unfilled Aboriginal title and rights
- 10 responsibilities could be seen as contingent
- 11 liabilities that needs to be addressed in the financial
- 12 books of governments and organizations that have or are
- 13 using Aboriginal lands for some interest, such as
- 14 building a hydro dam.
- I -- I -- there -- there may be others,
- 16 but I believe there are three (3) major potential legal
- 17 cases arising out of unfilled Aboriginal rights and
- 18 titles or treaty rights and titles claims in Northern
- 19 Manitoba. And I say a few words about each of those in
- 20 my report, but I'll say a few words here.
- 21 The first is the fact that it's not
- 22 widely known in Manitoba, but Tataskweyak, then called
- 23 Split Lake, the chief never signs the group adhesion to
- 24 the treaty. We don't have the chief's 1908 signature
- 25 on the treaty adhesion. Instead, what the chief signed

- 1 was an individual adhesion through what the -- the
- 2 treaty commissioner says was an error, although we
- 3 don't know that for sure. But he came back without the
- 4 chief's signature on the adhesion.
- 5 Everyone behaved as if the treaty had
- 6 been signed, but it's well documented. It's published
- 7 in a book called 'As Their Natural Resources Fail',
- 8 based on archival records, that they do not have -- and
- 9 they never corrected the error. They -- they do not
- 10 have the -- the chief's signature on an adhesion to
- 11 Treaty 5.
- 12 That means, potentially, Tataskweyak has
- 13 unsurrendored Aboriginal title to its whole traditional
- 14 territory, the value of which -- and I happen to have
- 15 worked many years in the Northwest Territories, in
- 16 Nunavut, on modern treaties comprehensive land claims.
- 17 So in the Sahtu region, which includes
- 18 about, I don't know, four thousand (4,000) people,
- 19 their modern treaty was worth about \$80 million. If,
- 20 as well as the treaty, damages were assessed, you know,
- 21 you could go from the tens of millions to the hundreds
- 22 of millions of dollars in value for that simple fact.
- 23 The -- the signature on the treaty is a
- 24 very, very important thing. The government spent huge
- 25 efforts doing it. And wherever there's a problem with

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- 1 these sorts of things -- and, in fact, in the Northwest
- 2 Territories, they had a treaty. Treaty 11 had been
- 3 signed in 1921.
- In spite of the presence of the treaty,
- 5 because of so many irregularities, they went ahead and
- 6 signed modern land claims worth in total hundreds and
- 7 millions of dollars if we look at each of the different
- 8 areas. So that's the first that I think is potentially
- 9 serious.
- 10 Second is the fact that Treaty 5, like
- 11 the other numbered treaties, in its what's called the
- 12 extinguishment clause or the surrender clause,
- 13 surrenders rights, titles, and interests to land within
- 14 a specified territory, lands only. And that was the
- 15 case of all of the numbered treaties.
- 16 In all of the modern treaties, from the
- 17 James Bay and Northern Quebec Agreement to the Western
- 18 Arctic Agreement, the Gwich'in Agreement, the Sahtu
- 19 Agreement, the Nunavut Agreement, in all of those, the
- 20 surrender clause has changed somewhat. And I quoted
- 21 the one from the Sahtu Agreement which says it
- 22 surrenders rights, titles, and interest to lands and
- 23 waters.
- 24 Potentially, if -- if the courts were to
- 25 acknowledge that in Treaty 5 there was no surrender of

- 1 waters -- and if the government thought water didn't
- 2 need to be surrendered, one would wonder why, over the
- 3 last thirty (30) years, it's been going through a lot
- 4 of efforts to include water on the surrender documents.
- 5 That would mean that the -- all of the
- 6 Cree communities affected by hydro development still
- 7 have rights to the rivers. We know historically that
- 8 they actually charged passage. And we also know from
- 9 the Supreme Court that any custom, practice, or
- 10 tradition that's integral to the distinctive culture of
- 11 the First Nation -- and I'm quote the -- the Supreme
- 12 Court -- that's considered an Aboriginal right.
- 13 So if we pair the -- the Aboriginal
- 14 right fact with the fact that water rights have not
- 15 been surrendered, if we also look at culturally the
- 16 fact that women among Cree and Anishnaabe cultures have
- 17 a historical responsibility for water, and women
- 18 weren't engaged in the treaty process in any way, I
- 19 think you have a very significant liability there.
- 20 You would have a -- a title case over
- 21 rivers, and there you would have a serious issue of
- 22 damages because of the -- the dams that have already
- 23 been built. So you would be talking about hundreds of
- 24 millions of dollars in liabilities, in contingent
- 25 liabilities, which could become actual liabilities.

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- 1 And the third Aboriginal rights issue
- 2 that I think is of some significance has to do with the
- 3 Northern Flood Agreement. It's important to note that
- 4 the Northern Flood Agreement was negotiated before the
- 5 Constitution in 1982. The Constitution then recognized
- 6 Aboriginal and treaty -- existing Aboriginal and treaty
- 7 rights.
- 8 If we were to apply the now-standard
- 9 case, the Seewee (phonetic) case, on what is a treaty,
- 10 they said -- the courts say you have to take a liberal
- 11 and generous perspective, you have to look at the
- 12 capacity of the parties involved, you have to look at
- 13 the nature of the documents. Under any of those
- 14 criteria, certainly any reading of the Seewee case, we
- 15 would say the Northern Flood Agreement is a treaty.
- This becomes -- actually, it's not an
- 17 innocuous statement. It becomes a very significant
- 18 financial statement. The reason why is because to
- 19 change a treaty, you need a constitutional amendment.
- 20 There have been several so-called implementation
- 21 agreements signed subsequent to the 1990s that purport
- 22 basically to erase the liabilities that were engaged in
- 23 through the Northern Flood Agreement.
- I contend that those implementation
- 25 agreements, unless they're accompanied by a

- 1 constitutional amendment, are not worth the paper
- 2 they're written on; that all the liabilities under the
- 3 Northern Flood Agreement still exist for all of the
- 4 Northern Aboriginal communities.
- 5 And again, we're talking about very
- 6 significant liabilities that could run into the
- 7 hundreds of millions of dollars.
- 8 So those are three (3) off the top of my
- 9 head. There are other Aboriginal and treaty rights
- 10 issues in these communities, but those are the three
- 11 (3) that seemed to me to be, in terms of economic
- 12 value, which I know is your concern, the -- the ones
- 13 that are most significant.
- 14 And, you know, you can say this is
- 15 irrelevant; this won't make much difference. You know,
- 16 the relocation of the St. Peter's Reserve to Pequis
- 17 some might say would never have reached the courts.
- 18 You know, it's led to a significant cash payment to the
- 19 Pequis Reserve.
- The Metis land claim, again, you know,
- 21 in the -- when scrip was being negotiated and was being
- 22 settled, you know, people thought it might not be worth
- 23 a lot. It's come to be, you know, valued significantly
- 24 high.
- 25 These are cases that will reach -- that

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- 1 will be adjudicated through the courts if they're not
- 2 dealt with in a proper fashion. And part of the reason
- 3 for that is because the conditions in these -- in the
- 4 communities, particularly now if we're talking about
- 5 the communities affected by the proposed dams, but in
- 6 fact all of the hydro-affected communities, are very
- 7 bad.
- 8 And I want to turn -- that's the second
- 9 part of my presentation, looking at the social costs.
- 10 In fact, I believe, you know, for forty (40) years,
- 11 every time it builds a dam, Hydro promises prosperity
- 12 to the local peoples. That prosperity has not arrived.
- I went -- part of the reason I'm here
- 14 today is I went to an uprising in Tataskweyak two (2)
- 15 years ago, in the spring of 2012, over the appalling --
- 16 and I underscore the word -- the appalling housing
- 17 conditions that continue to prevail there. In a
- 18 certain sense, it's even worse than Gillam, where Hydro
- 19 builds beautiful houses for its employees and allows --
- 20 you know, and admits in the Clean Environment
- 21 Commission Hearings that what it wants to see for First
- 22 Nations, the most cost-effective housing, are mobile
- 23 modular units, which translates into trailers. So
- 24 trailers are good enough for First Nations people, and
- 25 houses are good enough for Hydro employees.

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- 1 We are creating, and we are continuing
- 2 to create, a province of haves and have-nots. And that
- 3 creates an economic cost both in terms of the social
- 4 payments that we have to make to support the have-nots
- 5 and, you know, in terms of, I don't know, the cost in
- 6 human misery. I know ethics is like a ghost in this --
- 7 these proceedings, but I think, as Manitobans, we have
- 8 to -- if we're concerned about the future, we have to
- 9 be concerned about the immiseration of Northern Hydro-
- 10 affected communities.
- 11 All Hydro is offering them through this
- 12 process, as far as I can see, is more promises. It's
- 13 my absolutely considered belief -- I have to keep an
- 14 eye on the time here -- that more dams should not be
- 15 built until some of those promises are fulfilled, until
- 16 we actually see some prosperity in the Hydro-affected
- 17 communities.
- 18 Right now, Hydro can take leaders from
- 19 the communities and travel around and -- and tout the
- 20 deals that it's signing. It will never take anyone
- 21 into the communities to show them to prosperity the
- 22 deals have created. It won't go there itself to talk
- 23 about the prosperity the deals have created, because it
- 24 has not created prosperity. It's created misery, and
- 25 misery far worse than we see in the non-Hydro-affected

- 1 communities. And this has to stop.
- 2 And I believe the only way it will stop
- 3 is if we tell them, You don't get your new dams, you
- 4 don't get your new toys until you actually address the
- 5 situation that exists in the present. And I -- I
- 6 believe that will make an effort on the part of all
- 7 Manitobans. I believe we should come to you for a
- 8 small rate increase to improve the material and social
- 9 infrastructures of Hydro-affected Aboriginal
- 10 communities, if that's what it takes.
- 11 But somehow that business has to be
- 12 accomplished first before more dams are built. I'm
- 13 absolutely convinced of that. We cannot be creating a
- 14 -- a province where, you know, the haves benefit more
- 15 and the have-nots are worse off and just let this
- 16 continue.
- 17 Now, one specific element about the
- 18 social impact that I want to draw your attention to,
- 19 that's actually incalculable, is what these dams will
- 20 actually do is affect among the last trap lines that
- 21 are in the near -- contiguous with the affected
- 22 communities. The Tchiakeesiks (phonetic) trap line,
- 23 the Mason (phonetic) trap line, the Jack Mason
- 24 (phonetic) trap line, the late Frank Beardy's trap line
- 25 are among the last trap lines that immediately

- 1 accessible from Tataskweyak and from Gillam.
- 2 And so what we're doing -- and, you
- 3 know, in my experience, and I've travelled to a lot of
- 4 Northern indigenous communities, it's the hunting
- 5 families, the families that are still living a land-
- 6 based way of life, who are in many cases the last
- 7 social support, the last strong, intact families in
- 8 those communities. Those are the families we're now
- 9 proposing, cut their last link to the land.
- 10 We might think, Oh, there's just a few
- 11 trap lines, it's just a few people. But those are the
- 12 people who are the -- the last social bedrock of their
- 13 community. Without them, the community experiences
- 14 total anomie, total disarray, a complete social
- 15 dysfunction that a few million dollars sometime down
- 16 the road, that will be managed by a small local elite,
- 17 is not going to come close to repairing.
- We are creating, I think, an
- 19 extraordinary social disaster. And, you know, we're
- 20 sleepwalking through it. So I urge you as a panel to
- 21 reject both of these projects and send Hydro back to
- 22 the table and say: Your first project should be to
- 23 live up to the promises you made forty (40) years ago.
- 24 Deal with that. If you can build beautiful houses for
- 25 your employees, what will it take to build those kind

- 1 of houses for the First Nations communities?
- 2 Let's make communities where we can
- 3 actually go into the community with pride and say, This
- 4 is what we've built, as well as this huge -- these huge
- 5 resource projects. Then I think we could start talking
- 6 about new mega projects. Until then, I think we're
- 7 whistling on the road to disaster. Thank you very
- 8 much.
- 9 THE CHAIRPERSON: Just a question for
- 10 you, Mr. Kulchyski. I just want to make sure that --
- 11 have you had an opportunity to read the -- the
- 12 information that Manitoba Hydro provided to us in
- 13 respect of the initiatives that they've undertaken to
- 14 address the mitigation of effects flowing from these --
- 15 from the dams?
- 16 Have you -- have you had an opportunity
- 17 to consider that?
- 18 DR. PETER KULCHYSKI: Because I wasn't
- 19 an Intervenor, I didn't look at anything for this
- 20 process, but I did read extensively the reports they
- 21 prepared for the Clean Environment Commission, where I
- 22 did play a role. And I'll have to say I'm not
- 23 impressed. And mostly it deals with what may happen in
- 24 the future.
- We know that there's a small bump of

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- 1 employment that goes with each of these projects. If
- 2 the experience of the Wuskwatim dam is anything of
- 3 value -- you know, I -- I wish someone had -- had done
- 4 -- I wish I myself had sponsored a very good study of
- 5 the -- the training that happened in Wuskwatim. I know
- 6 that the local band, there was a blockade for a while
- 7 on the road because people were very unhappy.
- 8 That what we tend to have is a racially
- 9 stratified workforce, where Aboriginal people are at
- 10 the very bottom of the employment pattern and they go
- 11 and stay in the jobs for a brief period of time,
- 12 generally is the pattern, and leave. And the reason
- 13 why is because they're at the bottom and they're being
- 14 treated like they're at the bottom, and they don't like
- 15 to stay in that environment.
- 16 So you've got a few temporary jobs that
- 17 don't last, that tend to be demeaning for the people
- 18 who take them, and you have a huge camp nearby that has
- 19 a -- a number of very negative social consequences for
- 20 the community. I'm particularly very concerned about
- 21 what -- what -- well, you know, we interviewed a woman
- 22 from Gillam who's -- was happy to have her name on the
- 23 public record and tell her story, Nancy Beardy, who had
- 24 been sexually assaulted during one of the previous
- 25 Hydro ventures.

6147 So I've sort of made it a concern to 1 talk everywhere I can about we need to be doing more around, you know, support for women and preventing 3 sexual assaults, and Hydro just tells us they're going to do the same old thing, and that that's enough. And to me, it's not enough. 7 THE CHAIRPERSON: Okay. There are no other further questions, so I appreciate your taking the time and trouble to come in and speak to us. And your comments have been noted, and they will appear on 10 11 the -- on the -- the record of these proceedings and 12 will be part of the consideration of the panel. Thanks 13 very much for that. 14 DR. PETER KULCHYSKI: Thank you very 15 much. Cheers. THE CHAIRPERSON: I believe that we're 16 ready to -- we'll need a bit of time, so we'll stand 17

18 down for a -- a minute or two (2).

19

20 --- Upon recessing at 1:01 p.m.

21 --- Upon resuming at 1:07 p.m.

22

23 THE CHAIRPERSON: Good afternoon.

24 believe that we're ready to resume today's -- this --

25 today's proceedings. So with that, I'll turn it over

- 1 to Ms. Ramage, please.
- MS. PATTI RAMAGE: Thank you, and good
- 3 afternoon, Mr. Chair. We have circulated a fair bit of
- 4 paper in the last few minutes, and I thought I'd run
- 5 through what that is that we've handed out, and the
- 6 plan for the afternoon.
- 7 The first things to deal with are
- 8 Manitoba Hydro has provided some further responses to
- 9 undertakings. The first one (1) in the -- in my pile
- 10 is Manitoba Hydro Exhibit 166, and this is a response
- 11 to Manitoba Hydro Undertaking Number 79, and this was
- 12 where Manitoba Hydro was to produce the capital cost
- 13 sensitivity found at Slide 11 and essentially add Plan
- 14 5 to the multiple accounts analysis. So that will be
- 15 entered as Manitoba Hydro Exhibit 166.

16

17 --- EXHIBIT NO. MH-166: Response to Undertaking 79

- 19 MS. MARILYN KAPITANY: Ms. Ramage, just
- 20 before you go on, I apologize, but could you remind me
- 21 what Mr. Wojczynski's qualification was on that one?
- MR. ED WOJCZYNSKI: Mr. Wojczynski does
- 23 not recollect the qualifications, and will have to go
- 24 dig them out, which I --
- MS. MARILYN KAPITANY: Would that be an

- 1 undertaking?
- 2 MR. ED WOJCZYNSKI: I will undertake to
- 3 find out my qualifications on the undertaking were.
- 4 MR. BYRON WILLIAMS: Mr. Williams might
- 5 be able to refresh Mr. Wojc -- Wojczynski's memory. I
- $6\,$  -- I think this was a -- a question I had posed to Dr.
- 7 Shaffer, and I had asked if he would insert Plan 5 into
- 8 the analysis, and he said yes, and then there was some
- 9 discussion, because Mr. Wojczynski wanted to double-
- 10 check that the base information was available. Does --
- 11 does that refresh your memory at all, Mr. Wojczynski?
- MR. ED WOJCZYNSKI: It's useful to have
- 13 people younger than me around, and that sounds right,
- 14 yes. Well, I don't believe we have a need for the
- 15 undertaking anymore.
- 16 MS. MARILYN KAPITANY: I agree. Thank
- 17 you.
- MS. PATTI RAMAGE: Okay. And the
- 19 second document is -- is identified as Manitoba Hydro
- 20 Exhibit 104-10, and this is further information in
- 21 terms of the economic evaluation update. So that --
- 22 that'll be filed in the group with Exhibit 104.

- 24 --- EXHIBIT NO. MH-104-10: Further information on the
- 25 economic evaluation update

6150 MS. PATTI RAMAGE: And next, Manitoba 1 Hydro has produced its book of documents in three (3) parts. The first part is identified as LCA Volume I. 3 I would suggest that be made Manitoba Hydro Exhibit 5 167. 6 --- EXHIBIT NO. MH-167-1: First volume of Manitoba 7 8 Hydro's book of documents 9 identified as LCA Volume I 10 11 MS. PATTI RAMAGE: Then Volume II would be one (1) -- and I guess I should say 167-1, and Volume II would be 167-2. 13 14 15 --- EXHIBIT NO. MH-167-2: Volume II 16 17 MS. PATTI RAMAGE: Ms. Boyd wanted me 18 to point out that's the much thinner volume, and Volume 19 III, also Ms. Boyd's though, is -- is 167-3, and that would be the financials. And the reason it's in a 21 separate volume is it has these fancy accordion tables in here, so they've been reproduced in a large enough 22 23 form that they can actually be viewed with the naked 24 eye. 25

6151 --- EXHIBIT NO. MH-167-3: Volume III 2 3 MS. PATTI RAMAGE: So the -- the plan for this afternoon is that I will begin the cross and work through Volume I. We will -- when I am complete, Ms. Moroz, who you met earlier back when we were on direct, she is our counsel who deals with all matters 7 transmission, and she has a few questions on her area of practice, and then we'll be turning the mic over to Ms. Boyd to -- to bring it home. 10 11 So you won't get -- well, I -- I am satisfied you will get tired of me, but there is an end 13 in sight. 14 15 IEC LA CAPRA ASSOCIATES PANEL CONTINUED: 16 DANIEL PEACO, Previously Affirmed 17 JOHN ATHAS, Previously Affirmed 18 MARY NEAL, Previously Affirmed 19 20 CROSS-EXAMINATION BY MS. PATTI RAMAGE: 21 MS. PATTI RAMAGE: Good afternoon, Mr. 22 Peaco, Mr. Athas, and Ms. Neal. I don't think we've 23 actually formally been introduced, perhaps back in the 24 -- when we did the workshops, but I'm Patti Ramage, 25 counsel for Manitoba Hydro, and as you heard, Ms. Boyd

- 1 and Ms. Moroz will be also participating in the cross-
- 2 examination this afternoon.
- If I could have you turn to the book of
- 4 documents, Volume I, and that's the document I'll be
- 5 dealing with, so the other two (2) can be set aside for
- 6 now. If we could turn to Tab 1 of that document? And
- 7 this would be Appendix 1, page 3 of your report, and
- 8 here we're dealing with Manitoba Hydro's planning
- 9 criteria.
- 10 And would you agree that the purpose of
- 11 the generation planning criteria is to ensure that
- 12 there are sufficient resources to meet Manitoba load
- 13 reliably, and it's used to determine when new resources
- 14 are required?
- MR. DANIEL PEACO: Yes.
- 16 MS. PATTI RAMAGE: And you had an
- 17 exchange yesterday with Dr. Bel, and I just wanted to
- 18 clarify for the record. I think you and I are going to
- 19 be on the same page. I want to make sure that the
- 20 panel is on the same page with us. And at transcript
- 21 page 5,731, for the record -- it's not necessary to
- 22 turn there. Actually, it started with a question from
- 23 Dr. Bel, and he asked:
- "I'm wondering if by changing that
- constraint, it allows us to utilize

	6153
1	the existing hydro system more
2	efficiently."
3	And in your reply, you said the
4	following.
5	"In drought conditions, the import
6	capacity today limits the amount of
7	energy you can import in those
8	circumstances, so this gives you more
9	more division freedom"
10	I think the word 'division' shouldn't
11	have been there. I'm going to read it without that
12	word.
13	"So this givens you more freedom in
14	order to take advantage of off-peak
15	prices to import and and manage
16	the reservoir differently than you
17	can with the limitations on the
18	import as it as it sits today."
19	Do you recall that exchange?
20	MR. DANIEL PEACO: Yes, and I think
21	it's probably the degrees of freedom.
22	MS. PATTI RAMAGE: Good. I was trying
23	to figure out what that word would have been. And I
24	just wanted to confirm that the comments you made
25	pertain only to the long-term planning of of
1	

- 1 Manitoba Hydro, and that in the operational time
- 2 horizon, there are no restrictions on imports.
- 3 Would you agree with that? Restriction
- 4 on imports imposed by the planning criteria.
- 5 MR. DANIEL PEACO: Well, there -- there
- 6 are firm import limits on the system that would limit
- 7 the planning criteria. To the -- to the extent that
- 8 you wanted to rely on firm imports in excess of the
- 9 firm transfer limits, you'd be precluded from that.
- 10 MS. PATTI RAMAGE: Okay, we're in
- 11 agreement so far. So when we are in a drought -- just
- 12 to make it clear for the panel, when we're in a
- 13 drought, Manitoba Hydro can import as much as we can,
- 14 up to 100 percent of the capability of the line, and
- 15 the planning criteria would have no bearing on what we
- 16 do in that operational time frame?
- 17 MR. DANIEL PEACO: Right. The planning
- 18 criteria governs your planning choices.
- 19 MS. PATTI RAMAGE: Perfect. And
- 20 there's two (2) parts to the planning criteria,
- 21 correct, the capacity criterion and the energy
- 22 criterion?
- MR. DANIEL PEACO: Yes.
- 24 MS. MARILYN KAPITANY: Could I just
- 25 ask, how does the 10 percent restriction that we talked

25

PUB re NFAT 04-09-2014 6155 quite a bit, how does that relate to what we're talking about here? The -- the import restriction is what I'm referring to. 3 MR. DANIEL PEACO: That's -- that's part of the -- the planning criteria, the energy planning criteria, that Ms. Ramage is referring to. 7 CONTINUED BY MS. PATTI RAMAGE: 9 MS. PATTI RAMAGE: So, Mr. Peaco, when 10 our planners are making long-term plans, they use the planning criteria to -- it places limitations around 11 12 their plans. 13 So one would be the 10 percent 14 limitation in the planning criteria, correct? 15 MR. DANIEL PEACO: Correct. 16 MS. PATTI RAMAGE: But when we're in the real-time time frame and whether it's a drought or 17 18 high water conditions -- well, it would be a -- we're 19 going to talk about a drought if we're talking about 20 imports. 21 If Manitoba Hydro is looking to import, 22 in the real time frame, they can do whatever they like 23

MR. DANIEL PEACO:

Sure.

MS. PATTI RAMAGE: -- in terms of

6156 importing, subject only to the size of the line? 2 MR. DANIEL PEACO: Yeah, I was going to say subject to the physical limits of the -- of the 3 transmission, yes. 5 THE CHAIRPERSON: Just drought or is any of the other -- any time? 7 CONTINUED BY MS. PATTI RAMAGE: 9 MS. PATTI RAMAGE: To confirm any time in the -- in -- in the -- in real time. 10 MR. DANIEL PEACO: Yeah. In -- in real 11 time the -- the ratings of the lines won't necessarily 13 -- just back up. Just -- maybe as -- as we may get -get there. So let me just -- for purposes of 14 15 reliability planning, there'll be studies done to determine a -- a firm transfer limit across an 16 17 interface, say between Manitoba, and so that -- that --18 that's basic -- in shorthand is a -- is a rating where 19 you expect you can always count on having abil -- at least that much transfer capability between systems. But on certain weather conditions and 21 22 certain loading conditions, the -- the physical thermal 23 limits of the lines may -- may be much larger than that 24 number. And so there may be times where the lines can actually move more power for a period of time, maybe on

- 1 an interruptible basis, but -- but larger than that
- 2 number. So if you're planning on capacity the, firm
- 3 transfer limits really are what you're -- what you're
- 4 looking at for reliability. But there may be times
- 5 where this -- the lines are actually -- can, at least
- 6 for a period of time, move more power than that.
- 7 Does that -- does that help?
- 8 MS. PATTI RAMAGE: I'm going to just
- 9 follow up a little more to make sure we're all on the
- 10 same page. The -- the planning criteria is used by Ms.
- 11 Flynn's group to establish the date of need for
- 12 generation, but it's -- and if you understand our
- 13 people it's not used by Mr. Cormie's group to establish
- 14 what we're going to do in the operational time frame.
- MR. DANIEL PEACO: Yes, we're on the
- 16 same page.
- MS. MARILYN KAPITANY: Yes, but then
- 18 when you described Plan 17 and one of the things you
- 19 said in there was to relax the 10 percent restriction,
- 20 in real life there is no 10 percent restriction then.
- Is that what you're saying?
- MR. DANIEL PEACO: No. In -- in the
- 23 planning criteria there's a restriction. So the amou -
- 24 the amount to which the planning criteria will --
- 25 would allow Hydro to entertain a plan that relied firm

- 1 imports above that level would be precluded. So they -
- 2 they'll only consider allowing that -- that much of
- 3 the portion of their firm system to be tied to -- to
- 4 imports, and the rest would need to be internal to the
- 5 system as -- as a planning choice.
- 6 And so in the -- in the case that we
- 7 looked at, we said relax that. So in terms of
- 8 determining when more capacity was needed, we --
- 9 they'll -- we basically allowed the system to contract
- 10 for import to a higher level as a planning decision as
- 11 part of setting up that case. Does that -- if that
- 12 makes -- if that helps.
- MS. MARILYN KAPITANY: Yeah.
- MR. DANIEL PEACO: So, yeah.

- 16 CONTINUED BY MS. PATTI RAMAGE:
- 17 MS. PATTI RAMAGE: I'm going to try to
- 18 break it up one -- a little bit closer. Manitoba Hydro
- 19 has a responsibility to ensure that its -- has -- has -
- 20 to ensure for the safe and reliable provision of
- 21 power to Manitobans.
- Is that your understanding of the
- 23 Corporation's mandate?
- 24 MR. DANIEL PEACO: Yes, you and every
- 25 other utility.

- 1 MS. PATTI RAMAGE: Yes. And when we
- 2 are planning, we plan -- for planning purposes we have
- 3 a long-term planning out -- outlook.
- 4 MR. DANIEL PEACO: Yes.
- 5 MS. PATTI RAMAGE: We can't plan for
- 6 tomorrow today or we will not have power likely, if all
- 7 of our plans were made in a twenty-four (24) hour
- 8 period. We need years ahead to make planning
- 9 decisions.
- MR. DANIEL PEACO: Yes.
- MS. PATTI RAMAGE: And so for planning
- 12 decisions, essentially the planning criteria -- and I'm
- 13 going to go out on a limb and these guys will probably
- 14 be shaking their heads.
- MR. DANIEL PEACO: I see you're on a
- 16 short leash there.
- 17 MS. PATTI RAMAGE: Yeah. Hope is not a
- 18 plan for our planners, and therefore they need some
- 19 sort of limitations around what -- what they can plan
- 20 to. And so when Ms. Kapitany refers to the 10 percent,
- 21 a limitation that Manitoba Hydro has put on is that you
- 22 cannot -- you -- you cannot assume more than 10 percent
- 23 when you're planning and that that plan -- so that
- 24 you're planning -- you're going to assume 10 percent
- 25 and you have to design the system so that you only

6160 assume 10 percent imports, because we need to know that there is going to be energy available in this province. 3 That is very long. I'm just trying to -- to make it clear. 5 THE CHAIRPERSON: So 10 percent of your eggs in one (1) basket? 7 CONTINUED BY MS. PATTI RAMAGE: 9 MS. PATTI RAMAGE: I think you may have 10 it, for planning purposes. But when it comes to the actual operational, if there's 50 percent of the eggs 11 12 in the basket and there's a drought, we can pull all 13 the eggs out. 14 Would that be a fair analogy following--15 MR. DANIEL PEACO: Yeah, and again, 16 subject to the -- the -- to the limits of the 17 transmission system. 18 MS. PATTI RAMAGE: Okay. Now, we were 19 talking about the two (2) parts to the planning criteria. And the first is the capacity criteria. And 21 it is reproduced on -- on page 1 of the book of documents. And I will read it into the record. It's: 22 23 "Manitoba Hydro will plan to carry a 24 minimum reserve against breakdown of

plant, an increase in demand above

	6161
1	forecast of 12 percent of the
2	Manitoba forecast peak demand each
3	year plus reserve required by any
4	export contract in effect at the
5	time."
6	Now, did I read that correctly?
7	MR. DANIEL PEACO: Yes.
8	MS. PATTI RAMAGE: So the purpose of
9	the 12 percent reserve is to act as a safeguard so that
10	the lights stay on even if Manitoba Hydro experiences
11	plant breakdown or if demand exceeds forecast because
12	of extreme weather.
13	Would that be correct?
14	MR. DANIEL PEACO: That's correct.
15	MS. PATTI RAMAGE: And to do this, the
16	the capacity criteria requires Manitoba Hydro carry
17	a minimum reserve equal to 12 percent of the forecasted
18	Manitoba peak demand each year, together with a reserve
19	equal to the terms of any export contracts in effect at
20	that time.
21	Is that correct?
22	MR. DANIEL PEACO: That's what it says,
23	yes.
24	MS. PATTI RAMAGE: And La Capra
25	concluded that the capacity criterion is reasonable and
1	

6162 consistent with industry standards. Is that fair? 2 3 MR. DANIEL PEACO: Yes, it's very similar to what MISO uses, for example. 5 6 (BRIEF PAUSE) MS. PATTI RAMAGE: Now, if we turn to 9 the energy criterion, it's also set out at Tab 1, and 10 I'm going to read it into the record: 11 "The Corporation will plan to have 12 adequate energy resources to supply 13 the firm energy demand in the event 14 that the lowest recorded coincident 15 water supply conditions are repeated. 16 Imports may be considered as 17 dependable energy resources, provided 18 they utilize firm transmission service and are sourced from either 19 20 an organized power market or a 21 bilateral contract. The total 22 quantity of energy considered as 23 dependable energy from import shall 24 be limited to that which can be imported during the off-peak period 25

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6163
1
                      and shall not exceed the quantity of
2
                      export contracts in effect at the
3
                      time, plus 10 percent of Manitoba
                      load."
5
                   So first off, can you confirm I read
   that in correctly?
7
                  MR. DANIEL PEACO: You're doing well.
                  MS. PATTI RAMAGE: I've said it before,
   I'm an excellent reader. Now, Appendix 1, page 17 of
10
   your report, and it's not necessary to go there, you
   indicate that requiring dependable resources to be
11
   available in the event of a repeat of the driest flow
13
   conditions is generally consistent with other hydro-
14
   dependent systems.
15
                   Have I got that right?
16
                  MR. DANIEL PEACO: I don't have it in
   front of me, but I'll -- I'll accept your
17
18
   representation.
19
                  MS. PATTI RAMAGE: It's -- for the
   record, if you wanted to check it's Appendix 1, page
21
   17. But I -- if you accept that subject to check,
22
   I'11...
23
                  MR. DANIEL PEACO:
                                       Split the screen and
24 put it up?
25
                  MS. PATTI RAMAGE: It's -- it's Tab 5
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6164 in the book of documents if you wanted to check. 2 3 (BRIEF PAUSE) 5 MR. DANIEL PEACO: Okay. So we're -what was the passage you were referring to? 7 MS. PATTI RAMAGE: I'm essentially narrowing down what we agree on and what we don't agree 9 on. 10 MR. DANIEL PEACO: Okay. 11 MS. PATTI RAMAGE: So what we agree on 12 is that requiring dependable resources to be available 13 in the event of a repeat of the driest flow conditions 14 is generally consistent with other hydro-dependent 15 systems? 16 MR. DANIEL PEACO: Yes. 17 MS. PATTI RAMAGE: But what you've 18 taken issue with is that Manitoba -- what -- is what 19 Manitoba Hydro's prepared to count on as dependable energy. And as I understand it, you believe the 21 limitation to 10 percent of Manitoba load plus export 22 obligations is not supported by analysis. And you're also of the view that limiting the amount of dependable 24 energy to that which can be imported during the offpeak isn't supported. And those are the two (2)

6165 concerns I -- I'd like to explore. 2 And if I could have you turn to Tab 3 of the book of documents. Now, at Appendix 1, page 8 of 3 your report, you compare Manitoba Hydro's dependable energy requirements to that of BC Hydro and Bonneville Power Administration and state that, quote: 7 "Manitoba Hydro's approach to determining dependable energy 9 requirements is largely similar to 10 other dependent -- hydro-dependent 11 systems." 12 Do you see where I've read that, the 13 first paragraph under the map, the top of it? 14 MR. DANIEL PEACO: Yes. 15 MS. PATTI RAMAGE: So would I be 16 correct that the three (3) utilities we're speaking of -- BC Hydro, Bonneville Power, and Manitoba Hydro --17 18 their dependable energy requirements are similar in 19 that all three (3) are large hydro, heavily dependent on hydro resources, and they use the driest historical 21 flow year to determine the minimum dependable energy available for its hydro generating units? 22 23 Is that correct? 24 MR. DANIEL PEACO: Yes. 25 MS. PATTI RAMAGE: Now, you go on to

- 1 assert that where these utilities differ is in their
- 2 treatment of out-of-system resources. For example, you
- 3 point to the fact that commencing in 2016, BC's
- 4 standard will require it to have domestic resources to
- 5 fill -- fulfill load during the average water
- 6 conditions.
- Now, I'd like you to turn to Tab 7 of
- 8 the book of documents so we can compare the BC and
- 9 Manitoba Hydro systems. And here I'm looking for page
- 10 14 in that tab.

11

12 (BRIEF PAUSE)

- 14 MS. PATTI RAMAGE: Just to clarify, for
- 15 the record, it appears to me that somehow the numbering
- 16 system went wrong. It gos 14 -- page 14, 16. There is
- 17 no page missing.
- Now, in this page we've included
- 19 Manitoba Hydro's rebuttal evidence. And I'm looking in
- 20 particular at page 53, Table 1 on that page.
- In this table, the permitted energy
- 22 imports of BC Hydro are compared to Manitoba Hydro.
- 23 Are you familiar with the table?
- 24 MR. DANIEL PEACO: I think I've seen it
- 25 before, but I...

6167 MS. PATTI RAMAGE: 1 Okay. Well, let's -- we'll walk through it. So if we start by looking at the difference in domestic energy demand of Manitoba versus BC, you'd agree that, according to the figures on the table, the BC domestic energy demand net of DSM in 2016/'17 is projected to be 58,874 gigawatt hours. 7 Do you see that? In the column under BC Hydro, it's the fourth row down. And that 58,000 --9 MR. DANIEL PEACO: Fifth row? 10 MS. PATTI RAMAGE: You are correct, 11 fifth row. I'm a better reader than a counter. it's the fifth row down. And that compares to Manitoba 12 13 Hydro load of 25,960 gigawatt hours? 14 MR. DANIEL PEACO: I see that. 15 MS. PATTI RAMAGE: And do you accept 16 those figures, subject to check? 17 MR. DANIEL PEACO: I'll accept your 18 figures.

- 19 MS. PATTI RAMAGE: Now, the table also
- contains the permitted imports of the two (2)
- 21 utilities. And to make sure we're working from the
- 22 same page, by permitted imports, we are meeting imports
- that the utilities are authorized to include in their 23
- 24 dependable energy calculation.
- 25 Can we agree on that?

- 1 MR. DANIEL PEACO: Say that again.
- 2 MS. PATTI RAMAGE: 'Permitted imports'
- 3 means the imports that the utilities are authorized to
- 4 include in their dependable energy calculation?
- 5 MR. DANIEL PEACO: Where do you see
- 6 that?
- 7 MS. PATTI RAMAGE: Well, I'll tell you
- 8 what. We'll -- I'll carry on. And that's my
- 9 understanding of it. That's how I'm using the term.
- 10 MR. DANIEL PEACO: I don't get it from
- 11 the -- from the document here, that's all.
- 12 MS. PATTI RAMAGE: We'll -- we'll walk
- 13 through and we'll -- we'll get there then. Now,
- 14 Manitoba Hydro indicates that -- that BC Hydro's
- 15 permitted imports are projected to be 4,100 gigawatt
- 16 hours, and you'll see that in the -- I'm going to call
- 17 it the third row down, and compared to Manitoba Hydro's
- 18 permitted imports of 3,068 gigawatt hours.
- Do you see -- do you see that?
- 20 MR. DANIEL PEACO: I see those numbers,
- 21 yeah.
- 22 MS. PATTI RAMAGE: All right. And La
- 23 Capra itself calculated what I call the permitted
- 24 imports themselves at page 1-11 of your evidence.
- 25 That's at Tab 4, if you'd like to double check that

- 1 number.
- MR. DANIEL PEACO: Yes. I see that.
- 3 MS. PATTI RAMAGE: Okay. And if we
- 4 could turn to Tab 8, we can -- we'll walk through how
- 5 BC Hydro's permitted imports are calculated. And this
- 6 is an excerpt from BC Hydro's Integrated Resource Plan.
- 7 It's Appendix 3C at page 1.
- 8 And here, BC Hydro defines the term
- 9 FELCC, and that's capital 'F', capital 'E', capital
- 10 'L', capital 'C', capital 'C', for the court reporter,
- 11 FELCC. It's an acronym for 'firm energy load carrying
- 12 capability'.
- And you'll see on the page, it defines
- 14 FELCC as the maximum amount of annual energy that a
- 15 hydroelectricity system can produce under critical
- 16 water conditions.
- 17 Would you agree that the BC Hydro term
- 18 'FELCC' is what Manitoba Hydro refers to as dependable
- 19 energy?
- 20 MR. DANIEL PEACO: Yes. It looks -- it
- 21 looks to be the same definition.
- 22 MS. PATTI RAMAGE: And if I could have
- 23 you then turn the page to Tab 9 of the book of
- 24 documents, and here we're at page 21 of the same
- 25 report. And if you could look at the statement

6170 beginning at line 6, and as you're reading it, I will read it into the record: 3 "The FELCC of BC Hydro's heritage hydro resources, including resource-5 smart upgrades and the Waneta 6 transaction, is approximately 44,100 gigawatt hours per year in fiscal 2017. The difference between the 9 heritage hydro average energy 10 capability and FELCC is 4,100 11 gigawatt hours per year, which is the 12 average non-firm energy capability of 13 the hydro -- of the heritage hydro resources. Reliant on this 4,100 14 15 gigawatt hours per year means that, 16 on an operational basis, if heritage 17 hydro water conditions are lower than 18 average, IPP non-firm energy/market 19 purchases may be required to replace 20 non-firm hydro." 21 Did you see that? And did I read it 22 correctly? 23 MR. DANIEL PEACO: You're on a roll. 24 MS. PATTI RAMAGE: And if I can try to 25 translate that now into English and see if you agree

6171 with my non-engineering version of what that said, it's -- a few moments ago we agreed that the BC energy criterion is different from Manitoba Hydro's, because BC requires its utility to have domestic resources to fill -- fill load on an average flow year as opposed to the dependable year. 7 MR. DANIEL PEACO: Sorry, where -where are you? 9 MS. PATTI RAMAGE: I'm just -- I'm --10 this is my interpretation of what that paragraph means. I just want you to confirm that that's --11 12 MR. DANIEL PEACO: I was trying to find 13 where you were reading, and I -- I missed the thread. 14 MS. PATTI RAMAGE: Well, what I'm 15 saying is, what this paragraph means is that the -- the 16 BC energy criteria requires it to have domestic resources to fulfil load during an average flow year, 17 18 and that paragraph establishes that the difference 19 between the average energy and dependable energy is 4,100 gigawatt hours. 21 22 (BRIEF PAUSE) 23 24 MR. DANIEL PEACO: All right. Can you try that one (1) more time?

- 1 MS. PATTI RAMAGE: So what that
- 2 paragraph establishes is that the difference between
- 3 average energy and dependable energy is 4,100 gigawatt
- 4 hours. It's the non-firm portion of average energy,
- 5 and it's the -- it would therefore be the maximum --
- 6 projected maximum amount of energy BC can look to to
- 7 obtain from the market to meet its energy criterion.
- MR. DANIEL PEACO: I guess I don't see
- 9 that last phrase in this paragraph.
- 10 MS. PATTI RAMAGE: No, that's me. I'm
- 11 -- is that what you read from this paragraph?
- MR. DANIEL PEACO: Well, everything up
- 13 to --
- MS. PATTI RAMAGE: Oh --
- MR. DANIEL PEACO: -- the last
- 16 paragraph.
- MS. PATTI RAMAGE: -- I'm sorry. Okay.
- 18 I am paraphrasing now. I'm sorry. I wasn't trying to
- 19 quote from the paragraph at that point. I was just
- 20 trying to put it into English for the Board.
- 21 MR. DANIEL PEACO: All I'm saying is
- 22 that -- that the first two-thirds (2/3) of your
- 23 paraphrase, I was with you, but the last part of it, I
- 24 don't see where you get that.
- MS. PATTI RAMAGE: You agree on the

6173 forty-one hundred (4,100). And that's the difference between dependable and average energy? 3 MR. DANIEL PEACO: Well, I don't know because you interpreted the forty-one hundred (4,100) in the last part of your statement. The forty-one hundred (4,100) is the difference between the 7 dependable and their average. I agree with that. 8 MS. PATTI RAMAGE: Okay, good. That's 9 10 MR. DANIEL PEACO: I'm with you that 11 far. 12 MS. PATTI RAMAGE: Okay. Well, we'll 13 stop there then. 14 MR. DANIEL PEACO: Okay. So if we go 15 back to Tab 7, to page 14. 16 17 (BRIEF PAUSE) 18 19 MS. PATTI RAMAGE: You're -- so we've now established Manitoba Hydro has permitted imports of 21 3,068 gigawatt hours. 22 MR. DANIEL PEACO: I'm -- I'm sorry, 23 what tab are you...? 24 MS. PATTI RAMAGE: Tab 7, page 14. 25

6174 (BRIEF PAUSE) 1 2 3 MR. DANIEL PEACO: I'm there. MS. PATTI RAMAGE: Right. So Manitoba Hydro's permitted imports are 3,068 gigawatt hours on projected demand of 25,960 gigawatt hours. And would you represent that that 7 represents -- the 3,068 permitted imports represents 12 percent of -- of domestic demand? 10 MR. DANIEL PEACO: Twelve percent? MS. PATTI RAMAGE: 3,069 gigawatt hours 11 divided by 25,960 gigawatt hours of -- of domestic 13 energy demand. 14 15 (BRIEF PAUSE) 16 17 MR. DANIEL PEACO: So it's 12 percent 18 of the forecasted demand. Are you saying that the 19 numbers were derived as a 12 percent criteria? 20 MS. PATTI RAMAGE: No, no. It's that 21 the permitted imports, that's the -- the amount 22 Manitoba Hydro, under its energy criteria, is permitted 23 to import, we've agreed is 3,068 gigawatt hours. 24 MR. DANIEL PEACO: Based upon the 10 25 percent criteria.

6175 MS. PATTI RAMAGE: That's correct. 1 2 MR. DANIEL PEACO: Okay. 3 MS. PATTI RAMAGE: And that that 3,068, based on the 10 percent criteria -- oh. I've been corrected. It's based on the overall energy criteria, which would include the 10 percent criteria, but it's the overall energy criteria. 7 8 MR. DANIEL PEACO: Okay. 9 MS. PATTI RAMAGE: But that would be 10 3,068 gigawatt hours. And that would represent, for 11 planning purposes, 12 percent of the projected load? 12 MR. DANIEL PEACO: Okay. 13 MS. PATTI RAMAGE: And if we perform that same calculation for British Columbia with 14 15 permitted imports of 4,100 gigawatt hours and projected 16 energy demand of 58,874 gigawatt hours, would you agree that the 4,100 gigawatt hours represents 7 percent of 17 18 BC's energy demand? 19 MR. DANIEL PEACO: What tab was the BC reference where the forty-one (41) came from? 21 MS. PATTI RAMAGE: That was Tab 9. 22 23 (BRIEF PAUSE) 24 25 MS. PATTI RAMAGE: It may help you, Mr.

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6176 Peaco, to look at lines 10 through 12 on that page. Relying on this 4,100 gigawatt hours a year means that, on an operational basis, if heritage hydro water 3 conditions are lower than average, IPP non-firm energy market purchases may be required to replace --6 MR. DANIEL PEACO: Yeah, I'm just not reading in that paragraph anywhere that -- where that -- that's more than a -- nothing more than a statement of the -- the condition of their system at the time. It doesn't articulate the criteria. 10 11 MS. PATTI RAMAGE: If you could go back to Tab 8, you will see their FELCC criteria. 13 14 (BRIEF PAUSE) 15 16 MR. DANIEL PEACO: Well, FELCC is a criteria that defines dependable energy. It doesn't 17 18 define the extent to which their system can rely on 19 energy other than that. 20 21 (BRIEF PAUSE) 22 MS. PATTI RAMAGE: Okay. We'll back 23 up. BC Hydro uses not -- includes average -- average 24 energy amounts in its energy criteria, correct? That's

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6177
                  MR. DANIEL PEACO: I don't -- I haven't
 1
 2
 3
                  MS. PATTI RAMAGE: -- what -- I think--
                  MR. DANIEL PEACO: -- I haven't --
 5
                  MS. PATTI RAMAGE: -- we've established
 6
   that.
 7
                  MR. DANIEL PEACO: -- I haven't -- no.
 9
                          (BRIEF PAUSE)
10
11
                  MR. DANIEL PEACO: I guess my point is
   I haven't seen in the document you've shown me an
13
   articulation of their planning criteria.
14
15
                          (BRIEF PAUSE)
16
17
                  MS. PATTI RAMAGE: Mr. Peaco, if I
18
   could re -- refer you to the La Capra report, and
   that's at Tab 5, page 6 of the book of documents. And
   it was in this -- in this excerpt from the report, I
21
   believe La Capra acknowledged and -- and, in fact, it
22
   was La Capra who raised this issue, that BC Hydro self-
23
   sufficiency standards requires it to have domestic
24
   resources to fulfill load during an aver -- average
25 flow year.
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6178 MR. DANIEL PEACO: Yeah, that's referring to a self-sufficiency standard, not a reliability standard. 3 4 MS. PATTI RAMAGE: For energy, is that not the same thing? MR. DANIEL PEACO: Give me a second. 6 7 (BRIEF PAUSE) 9 10 MS. PATTI RAMAGE: Mr. Peaco, it may 11 also help if you turn to page 22 of the book of 12 documents. 13 MR. DANIEL PEACO: Page 22? MS. PATTI RAMAGE: And that's --14 15 MR. DANIEL PEACO: Tab? 16 MS. PATTI RAMAGE: -- in Tab 9. And at 17 page -- at line 23, it indicates in BC: 18 "By planning to rely upon some volume 19 of non-firm heritage hydro energy 20 supported by the market, BC Hydro 21 will need to continue to assess the 22 markets to ensure that this reliance 23 will result in adequate cost-24 effective supply for customers. The 25 degree of reliance upon non-firm

	6179
1	heritage hydro energy backed by the
2	market is termed 'BC Hydro's non-firm
3	market allowance', about 4,100
4	gigawatt hours per year in fiscal
5	2017."
6	And does that assist you?
7	MR. DANIEL PEACO: Yes, that's helpful.
8	Thank you.
9	
10	(BRIEF PAUSE)
11	
12	MS. PATTI RAMAGE: And a fair bit of
13	flipping around, but if we could go back to page 14 of
14	Tab
15	MR. DANIEL PEACO: Sorry, what tab?
16	MS. PATTI RAMAGE: That's Tab 7. And I
17	just want to confirm that BC Hydro then has permitted
18	imports of 4,100 gigawatt hours, which represents 7
19	percent of their of their domestic energy demand?
20	MR. DANIEL PEACO: I see that.
21	MS. PATTI RAMAGE: So relative to the
22	size of domestic load, Manitoba Hydro allows more
23	imports than BC Hydro.
24	Is that correct? It's
25	MR. DANIEL PEACO: I I see that.

- 1 MS. PATTI RAMAGE: Now, if we pay --
- 2 stay on Tab 7, and we turn to the second page, it's --
- 3 it's page 16 in the book of documents, Table 2, and
- 4 we'll walk through this one too. We see here -- we've
- 5 established that BC Hydro's domestic energy demand, net
- 6 of DSM, in 2016/'17 is 58,874 gigawatt hours.
- 7 It's roughly two (2) times larger than
- 8 Manitoba Hydro's, at twenty-five thousand nine sixty
- 9 (25,960). And then looking down that table, are you
- 10 prepared to accept that Manitoba Hydro's average hydro
- 11 energy in 2016/'17 is projected to be 30,808 gigawatt
- 12 hours?
- MR. DANIEL PEACO: I'll take your
- 14 representation.
- MS. PATTI RAMAGE: And that dependable
- 16 -- Manitoba Hydro's dependable hydro energy is 22,754
- 17 gigawatt hours.
- 18 Can you accept that, subject to check?
- MR. DANIEL PEACO: Yes.
- 20 MS. PATTI RAMAGE: And in this table,
- 21 Manitoba Hydro refers to the difference between average
- 22 hydro energy and dependable hydro energy as the
- 23 critical drought energy deficit, and given that
- 24 definition, would you agree that the critical drought
- 25 energy deficit in Manitoba is 8,054 gigawatt hours?

6181 That's 30,808 gigawatt hours of average energy less 22,754 gigawatt hours of dependable energy, the difference between average and dependable. Yes. 3 MR. DANIEL PEACO: Well, I quess, it's the difference between average and dependable, yes. 6 MS. PATTI RAMAGE: And in practical terms, the critical drought energy deficit of 8,054 7 gigawatt hours represents the amount of water that dries off in -- dries up in Manitoba in a critical 10 drought year as compared to an average year? 11 Is that a fair characterization? 12 MR. DANIEL PEACO: It's the diff --13 it's the difference between average and dry, yes. 14 MS. PATTI RAMAGE: And then looking 15 back at the chart, at Table 2, you would accept -- are 16 you prepared to accept that BC Hydro's resource plan indicates that average hydro energy in BC is 48,200 17 18 gigawatt hours? 19 MR. DANIEL PEACO: I'll take your 20 representation. 21 22 (BRIEF PAUSE) 23 24 MS. PATTI RAMAGE: And I think we've already covered this in some of the quotes, but

- 1 dependable energy in BC is 44,100 gigawatt hours.
- 2 Do you accept that?
- 3 MR. DANIEL PEACO: Okay.
- 4 MS. PATTI RAMAGE: So the critical
- 5 drought energy deficit in British Columbia is 4,100
- 6 gigawatt hours. That's the same number we've been
- 7 speaking of. It's the average hydro energy less
- 8 dependable energy.
- 9 And do you agree with that calculation?
- 10 MR. DANIEL PEACO: I see that.
- 11 MS. PATTI RAMAGE: And I read a quote
- 12 in -- from Tab 8, page 20 a moment ago, and I'm not
- 13 going to read it again, but based on what you've heard,
- 14 would you agree that Manitoba Hydro's critical drought
- 15 energy deficit is equivalent to what BC had referred to
- 16 in their report as BC Hydro's non-firm/market
- 17 allowance?
- 18 MR. DANIEL PEACO: Yeah. I guess the
- 19 thing that's troubling me is in Manitoba Hydro's
- 20 system, labelling a critical drought energy, your
- 21 planning basically has you assuring you can cover
- 22 domestic load and firm commitments with your -- with
- 23 your dependable energy. It looks to me like Hydro --
- 24 BC Hydro is -- is allowing its -- it's relying on the
- 25 forty-eight (48) to do the same thing.

6183 (BRIEF PAUSE) 1 2 3 MS. PATTI RAMAGE: I think -- I think we're saying the same thing. BC is backstopping its --5 its --6 MR. DANIEL PEACO: Right. 7 MS. PATTI RAMAGE: -- energy deficit with market purchases. 9 MR. DANIEL PEACO: Right, but I -- if 10 I'm understanding their criteria right, they're --11 they're saying -- they're basically -- where -- whereas 12 Manitoba Hydro's criteria would say, Dependable energy covers the -- the fact that you've got 31 percent 13 energy above dependable energy does not correlate to 14 15 the fact that you're relying on 30 -- that 31 percent 16 energy from the market to cover your firm obligations, 17 which is what you're implying by comparing to BC Hydro 18 in this way. 19 MS. PATTI RAMAGE: The -- what we're looking for is the relative size of the drought compare -- and -- and how the two (2) utilities react to that. 21 22 MR. DANIEL PEACO: All right. I can 23 stipulate to that, but -- but that wasn't what you 24 represented. 25

6184 1 (BRIEF PAUSE) 2 3 MS. PATTI RAMAGE: Okay. Let's see if we can do it this way. If we look at the column for BC Hydro and each of the numbers we've just gone through, and we look at the critical drought energy deficit as a percentage of domestic energy demand, and it's as a 7 percentage of domestic energy demand, that represents 7 percent of BC load. 10 Is that correct? 11 MR. DANIEL PEACO: The seven (7) -- the 12 difference between their dependable energy and their 13 average energy is 7 percent, correct. 14 MS. PATTI RAMAGE: Right. And in 15 Manitoba, the difference between --16 MR. DANIEL PEACO: Dependable energy 17 and average energy is 31 percent. 18 MS. PATTI RAMAGE: That's right. So on 19 a relative basis, and we'll make sure the panel has this, in a critical drought, the worst drought in 21 historic record, it -- it's a much more severe event in 22 Manitoba than for BC Hydro, when comparing 31 percent 23 to 7 percent. 24 MR. DANIEL PEACO: Okay. So what --25 what this tells --

6185 MS. PATTI RAMAGE: Is that correct? 1 2 MR. DANIEL PEACO: -- what this tells me is you have much more variability in -- in stream 3 flow than BC Hydro does, but your planning criteria ignores everything above dependable for purposes of 6 supply. MS. PATTI RAMAGE: That's correct. And 7 can you advise the panel what storage BC Hydro has as compared to Manitoba Hydro? 10 MR. DANIEL PEACO: I don't have the 11 numbers. 12 MS. PATTI RAMAGE: Would you accept, relative to check, that BC Hydro's storage capability 13 is roughly double Manitoba Hydro's? 14 15 MR. DANIEL PEACO: I -- that -- I would 16 accept your representation on that. 17 MS. PATTI RAMAGE: And as we walked 18 through earlier, when expressed as a portion of 19 domestic load, Manitoba Hydro already allows a greater degree of BC -- of imports than BC Hydro. 21 Is that correct? 22 23 (BRIEF PAUSE) 24 25 MR. DANIEL PEACO: From -- from Table

PUB re NFAT 04-09-2014 6186 1? 2 MS. PATTI RAMAGE: That's right. The 3 MR. DANIEL PEACO: Yeah. discussion we had before on Table 1. 5 MS. PATTI RAMAGE: Okay. Yes. Moving to Tab 6 of the book of the documents, in the La Capra report -- and here I'm referencing -- it's page 8 in 7 the book of documents, Tab 6 -- La Capra --9 MR. DANIEL PEACO: I'm sorry, page --10 MS. PATTI RAMAGE: Page 8 in Tab 6. 11 MR. DANIEL PEACO: I don't have a page 12 8. 13 MS. PATTI RAMAGE: Page number's on the 14 bottom right-hand corner. It's La Capra's page --15 MR. DANIEL PEACO: Okay. 16 MS. PATTI RAMAGE: -- 1-57. 17 MR. DANIEL PEACO: Okay. 18 MS. PATTI RAMAGE: La Capra states here 19 that -- and I'm not going to quote directly, but,

- 20 Manitoba Hydro's energy criterion has some unique and
- 21 limiting features which restrict resource planning
- 22 options.
- 23 And I want to explore that comment,
- 24 because we've already established BC Hydro projects to
- 25 limit its reliance on non-firm energy -- non-firm

- 1 market energy to 4,100 gigawatt hours per year.
- 2 And I am assuming you're familiar with
- 3 hydro resources in the pacific northwest that you
- 4 referenced in your report earlier, and would you agree
- 5 that that region supplies 56 percent of its electricity
- 6 -- or I'm going to start over.
- 7 Would you agree that in the Pacific
- 8 Northwest, 56 percent of the region's electricity
- 9 generating capacity is supplied by hydro?
- 10 MR. DANIEL PEACO: I'll accept your
- 11 representation.
- 12 MS. PATTI RAMAGE: And according to the
- 13 2012 Columbia River Basin Annual Report, which is
- 14 referenced in Manitoba Hydro's rebuttal evidence, the
- 15 Pacific Northwest region has a winter peak load of
- 16 approximately 32,000 megawatts.
- Would you accept that, subject to check?
- 18 MR. DANIEL PEACO: I take your
- 19 representation.
- 20 MS. PATTI RAMAGE: And the Pacific
- 21 Northwest region is connected to California, which is a
- 22 summer peaking region.
- Is that correct?
- MR. DANIEL PEACO: Yes, it is.
- 25 MS. PATTI RAMAGE: And if I could have

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6188
   you turn to Tab 11 of the book of documents.
   page 28.
 3
                          (BRIEF PAUSE)
 5
 6
                   MS. PATTI RAMAGE: This is a
   presentation from the Resource Adequacy Advisory
 7
   Committee of the Pacific Power and Conservation Council
   Steering Committee, dated December 6, 2013. And I'm
    looking at the top slide on the page. It's headed,
10
11
    "Modified RA assessment."
12
                   Are you there?
13
                   MR. DANIEL PEACO: I am.
14
                   MS. PATTI RAMAGE: And if I could look
15
   -- have you look at the bottom of the slide underneath
16
    the graphical depiction, it says -- do you see where it
    says, "Summer on-peak zero megawatts; off-peak 3,000
17
18
   megawatts"?
19
                   MR. DANIEL PEACO: I see that.
20
                   MS. PATTI RAMAGE: And do you see in
21
    the column circled in red that transfer capability is
22
   up to 5,000 megawatts in some months?
23
24
                          (BRIEF PAUSE)
25
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6189 MS. PATTI RAMAGE: It's the column to 1 the right of the one circled in red. I'm sorry. 3 (BRIEF PAUSE) 5 6 MR. DANIEL PEACO: I'm sorry. I -- I 7 was looking at the wrong place. Your question again? Was -- in the 8 MS. PATTI RAMAGE: 9 column to the right of the column circled in red under 10 'average', do you see that transfer capability is up to 11 5,000 megawatts in some months? MR. DANIEL PEACO: I see the number, 12 13 yeah. 14 MS. PATTI RAMAGE: And you would agree 15 that that means that in a manner similar to what 16 Manitoba Hydro's assumed, the Pacific Northwest region considers no on-peak summer imports and up to 3,000 17 18 megawatts in the off-peak period, which is not 100 19 percent of their transfer capability? 20 21 (BRIEF PAUSE) 22 23 MR. CHRISTIAN MONNIN: Sorry, Ms. 24 Ramage, the Steering Committee meeting dated December 25 6th, 2013, you know, this -- this is -- this is my

- 1 first rodeo, as they say.
- Who are these people and where -- what -
- 3 where was this presentation?
- 4 MS. PATTI RAMAGE: These are the people
- 5 who your client referenced in their report on page 1-8
- 6 as being comparable to Manitoba Hydro. And this is --
- 7 when Manitoba Hydro followed up on that to see how the
- 8 comparison worked, this is the information that was in
- 9 our rebuttal evidence, and I'm just walking through it.
- 10 MR. CHRISTIAN MONNIN: Okay. And the
- 11 slide that you're referring to, this one here on the
- 12 screen, which is on page 28, seems to be analyses, but
- 13 do you have any backup data for this, or just the
- 14 slides? This is all you have?
- MS. PATTI RAMAGE: I -- I'm not sure
- 16 this is the time for us to be responding to Information
- 17 Requests. This information was filed in our rebuttal
- 18 evidence as -- to deal with the evidence of La Capra.
- 19 So I'll -- I'll --
- 20 MR. CHRISTIAN MONNIN: And I don't
- 21 think I'm treading over there. I'm just -- this is the
- 22 first time that we've seen this particular document.
- 23 And I'm just inquiring of the nature of it.
- 24 MS. PATTI RAMAGE: Yeah, I -- I don't
- 25 have anything with me. It shouldn't be the -- it -- it

6191 was referenced in the rebuttal evidence. MR. CHRISTIAN MONNIN: Okay. Could --2 maybe we can do that offline, but perhaps you can show 3 me where it's referenced in your rebuttal evidence, because this is the first time this document has been 6 seen. 7 (BRIEF PAUSE) 9 10 MS. PATTI RAMAGE: It is referenced in 11 Manitoba Hydro's rebuttal evidence on page 51. And the 12 reference to the Pacific Northwest region is referenced 13 in the La Capra report on page 1-8. 14 15 (BRIEF PAUSE) 16 17 MR. CHRISTIAN MONNIN: So are you 18 referring to -- would that be Footnote 23? 19 20 (BRIEF PAUSE) 21 22 MS. PATTI RAMAGE: Yes. 23 MR. CHRISTIAN MONNIN: And so there's a 24 typo. It -- it's -- that's referring to November 20th 25 and this is December 6th, 2013. The -- the slide deck

6192 that you have is December 6th, 2013, and the footnote refers to November 20th, 2013. 3 MS. PATTI RAMAGE: I'm advised by Mr. Hunter that it is the same document. It's a -- if -if there's a difference, it's a typo. 6 MR. CHRISTIAN MONNIN: Thank you. (BRIEF PAUSE) 9 10 MS. PATTI RAMAGE: And hopefully maybe 11 to move things along --12 MR. CHRISTIAN MONNIN: Mr. Peaco has 13 one (1) further point on that. And I believe it's page 14 1-8 of their report. Mr. Peaco, if you want, you --15 MR. DANIEL PEACO: No, that's fine. I -- I was just -- you called my attention to 1 -- 1-8. 17 And I see that we -- we indicate that BC Hydro was in 18 the Pacific Northwest. Is that the reference you were 19 talking about? 20 CONTINUED BY MS. PATTI RAMAGE: 21 22 MS. PATTI RAMAGE: Yes. 23 MR. DANIEL PEACO: All right. So you 24 weren't pointing to a specific document that we 25 referred to?

6193 1 MS. PATTI RAMAGE: No, I'm not. It was just the -- the general comparison between the regions 3 MR. DANIEL PEACO: All right. I wasn't 4 understanding the --6 MS. PATTI RAMAGE: -- we were following 7 up on. 8 MR. DANIEL PEACO: -- the connection to what you were referring to. I don't have enough on this -- I haven't seen this document and I don't have 10 enough on this page to know what it's doing. 11 12 MS. PATTI RAMAGE: You can confirm you 13 were provided with a copy of Manitoba Hydro's rebuttal evidence, correct? 14 15 MR. DANIEL PEACO: Yes. 16 MS. PATTI RAMAGE: And that rebuttal evidence also provided examples of some sort of 17 18 limitation on the consideration of external supply as a 19 resource in the cases of Ontario Hydro, Hydro-Quebec, and the Maritimes region. And in the interest of time 21 I'm hoping not to have to walk through each one. 22 But would you agree that these examples 23 are not fundamentally different than the BC Hydro or 24 pacific northwest examples we've walked through and that limitations of this type are not unique?

6194 MR. DANIEL PEACO: Yeah, and I think 1 we've established -- we stated that in our report. 3 (BRIEF PAUSE) 5 MS. PATTI RAMAGE: If you could go to 6 7 Tab 6 of the report. And that is page 8. The tab --I'm sorry, Tab 6 of the book of documents, which reproduces page 1-57 of your report. And I'm reading from the -- the third paragraph under the letter 'A': 10 11 "Manitoba Hydro's energy criteria 12 conversely has some unique and 13 limiting features which restrict the 14 resource planning options." 15 And so I am suggesting to you, sir, that 16 Manitoba Hydro's energy criterion, based on the review of the utilities we have just done, of hydro utilities, 17 18 is not unique? 19 I will agree it is limiting, because that's the intent of a criterion, but it is not unique? 21 MR. DANIEL PEACO: Right, but we -- you 22 also read eloquently from one (1) of my other -- other 23 reports that we stated that your criteria was similar to these other systems that you just talked about. So 24 25 the -- the statement here is not a statement specific

6195 It's unique relative to the broader to those. industry. 3 (BRIEF PAUSE) 5 6 MS. PATTI RAMAGE: Okay. And I think where our disagreement then comes -- because if I 7 continue reading in that paragraph, what La Capra has 9 indicated: 10 "There is a lack of analytical 11 support for limitations of the criter 12 -- limitations the criterion places 13 on dependable energy from imports, 14 and overall the criterion does not 15 fully consider the modern system with high transfer capability with -- with 16 17 Manitoba Hydro's neighbours." 18 And I took from that that the -- the 19 unique feature was the -- the limitations that are placed with the energy criterion. 21 Was I mistaken? 22 MR. DANIEL PEACO: You're not mistaken, 23 but I guess the question is you made the assumption 24 that that was -- that was referring simply to the 25 universe of other hydro systems.

- 1 MS. PATTI RAMAGE: Help me by
- 2 explaining what is unique about Manitoba Hydro's energy
- 3 criterion.
- 4 MR. DANIEL PEACO: What's unique about
- 5 it? It's -- a hydro system has -- has different
- 6 criterion than other systems would.
- 7 MS. PATTI RAMAGE: So it's not unique
- 8 among hydro systems; it is unique as compared to a --
- 9 MR. DANIEL PEACO: Yeah, as I said
- 10 before --
- MS. PATTI RAMAGE: -- a thermal system,
- 12 is that what you mean?
- MR. DANIEL PEACO: -- that statement is
- 14 in our report, and you read it.
- 15 MS. PATTI RAMAGE: If you could clarify
- 16 for me. Is it -- you're saying it's not unique amongst
- 17 hydro systems but hydro systems are unique as compared
- 18 to, for example, a thermal system.
- MR. DANIEL PEACO: Right.
- 20 MS. PATTI RAMAGE: Is that what you
- 21 mean?
- MR. DANIEL PEACO: Exactly.
- 23 MS. PATTI RAMAGE: Now, if I could have
- 24 you turn back to Tab 1, and that's page 1. And I want
- 25 to move to the capacity criterion for a moment.

6197 And can you confirm that Manitoba 1 Hydro's capacity criterion includes a minimum reserve against breakdown of plant and increases in demand 3 above forecast? 5 MR. DANIEL PEACO: Yes. 6 MS. PATTI RAMAGE: And you'd also agree that the energy criterion -- that's the energy criterion does not include any reference to a minimum reserve against breakdown of plant or increase in demand above forecast. 10 11 Is that correct? 12 13 (BRIEF PAUSE) 14 15 MR. DANIEL PEACO: Could you state the 16 question again? 17 MS. PATTI RAMAGE: You'd acknowledge 18 that Manitoba Hydro's energy criterion does not include 19 any reference to a minimum reserve against breakdown of plant or increase in energy demand above forecast? 21 Well, it builds in MR. DANIEL PEACO: 22 reserves by -- by tying to dependable energy. It isn't 23 initially tied to breakdowns, but the unavailability 24 due to water supply. And it does not say anything about load forecast, it just says it shall -- shall

- 1 supply firm energy demand.
- MS. PATTI RAMAGE: So, no, it does not
- 3 con -- does not include any reference to minimum
- 4 reserves against breakdown or -- of plant or increase
- 5 in energy demand above forecast, correct?
- 6 MR. DANIEL PEACO: Apart from water
- 7 shortage.
- 8 MS. PATTI RAMAGE: If I could have you
- 9 go to Tab 10 then, that's page 26 in the book of
- 10 documents. And this is an excerpt from Manitoba
- 11 Hydro's 2012 electric load forecast. It's page 57 from
- 12 that forecast.
- Do you see where it is stated -- and I'm
- 14 talking, it's the fifth paragraph down, middle of the
- 15 page.
- 16 MR. DANIEL PEACO: I'm sorry, what
- 17 page?
- MS. PATTI RAMAGE: We're on page 57 in
- 19 Tab 10.
- MR. DANIEL PEACO: Okay.
- 21 MS. PATTI RAMAGE: It's -- it's page 57
- 22 of the forecast, 26 of the book of documents. And I'm
- 23 looking -- it's the fifth paragraph down, middle of the
- 24 page.
- Do you see where it's stated that

- 1 Manitoba -- that the Manitoba Hydro load forecast is
- 2 prepared assuming normal weather?
- MR. DANIEL PEACO: I see that.
- 4 MS. PATTI RAMAGE: And if you turn the
- 5 page back to page 44 of the -- from the load forecast,
- 6 which is page 25 in the book of documents, do you see
- 7 the statement at the top of the page that says:
- 8 "A record cold winter will increase
- 9 load 4 percent, and a record warm
- 10 winter will decrease it 3 percent.
- 11 An additional 2 percent load increase
- is possible due to a record hot
- summer, and a 1 percent decrease is
- 14 due to a record cool summer."
- Do you see that on the page?
- 16 MR. DANIEL PEACO: I see that
- 17 statement, yes.
- 18 MS. PATTI RAMAGE: Yes. And would you
- 19 agree that extremely long and cold winters are possible
- 20 in Manitoba?
- 21 MR. DANIEL PEACO: I've never heard of
- 22 that.
- 23 MS. PATTI RAMAGE: I was trying to see
- 24 if I could say it with a straight face. And still on
- 25 page 44 of the load forecast, if we look at the table

- 1 on the page, we see the effect of weather due to winter
- 2 extremes on gross firm energy.
- 3 And it's the -- and here we're looking
- 4 at the -- the difference between the twenty-five
- 5 thousand eight hundred eighty-two (25,882) of record
- 6 cold.
- 7 Do you see that on the right-hand side?
- MR. DANIEL PEACO: I'm sorry, where --
- 9 what --
- 10 MS. PATTI RAMAGE: I -- I'm in the box
- 11 on the right-hand side, top box --
- MR. DANIEL PEACO: Okay.
- MS. PATTI RAMAGE: -- under "Effective
- 14 weather due to winter extremes." And it says, "Record
- 15 cold," and then in gigawatt hours, it indicates 25,882
- 16 gigawatt hours for a record cold.
- MR. DANIEL PEACO: I see that.
- 18 MS. PATTI RAMAGE: Yeah. And do you
- 19 see under, "Record warm," it indicates 24,120 gigawatt
- 20 hours? And would you agree that's a difference
- 21 of 921 gigawatt hours?
- MR. DANIEL PEACO: Is that -- are we
- 23 doing the math, or is that on the table here somewhere?
- 24 MS. PATTI RAMAGE: It's not on the
- 25 table. We're doing the math. The difference between

- 1 our record cold and our record warm is nine hundred and
- 2 twenty (920) --
- 3 MR. DANIEL PEACO: Am I -- are we
- 4 looking at the twenty-five eight eight two (25,882) and
- 5 the twenty-five four eight nine (25,489)?
- 6 MS. PATTI RAMAGE: You know what, I've
- 7 just been corrected. I am working from normal, not
- 8 record warm. So the difference between a normal winter
- 9 and a record cold winter is -- that is the 921 gigawatt
- 10 hours. That would be why you can't work my math.
- MR. DANIEL PEACO: Okay. So -- so the
- 12 two (2) numbers we're comparing are -- the -- the
- 13 record cold I have at twenty-five (25) --
- 14 MS. PATTI RAMAGE: -- thousand eight
- 15 hundred and eighty two (882) and the normal on the
- 16 left-hand side of the box.
- 17 MR. DANIEL PEACO: Twenty-four nine
- 18 sixty-one (24,961)?
- 19 MS. PATTI RAMAGE: And that difference,
- 20 which represents the difference between normal and
- 21 extreme cold, is 921 gigawatt hours.
- 22 And do you agree with that?
- 23 MR. DANIEL PEACO: Yeah, that looks --
- 24 yeah. I can -- I can imagine that that's close to the
- 25 answer in that -- on that one.

6202 1 MS. PATTI RAMAGE: You can only imagine, right? 3 MR. DANIEL PEACO: I've learned never to do math on the stand. 5 MS. PATTI RAMAGE: You're familiar with the fact that Manitoba Hydro maintains two (2) CTs in Brandon, and they provide 2,354 gigawatt hours of 7 dependable energy, or 1,177 gigawatt hours per unit? 9 Does that sound right, the --10 MR. DANIEL PEACO: But is that on the 11 page here or something? 12 MS. PATTI RAMAGE: No, it's not on the 13 page. I'm -- I'm jumping to just a comparison of what that means. So I can take you there if you'd like to --14 15 MR. DANIEL PEACO: No. 16 MS. PATTI RAMAGE: -- see that for 17 confirmation. 18 MR. DANIEL PEACO: I --19 MS. PATTI RAMAGE: Will you accept, subject to tec -- check -- that the Brandon turbines each are 1,177 gigawatt hours per unit? 21 22 MR. DANIEL PEACO: As long as I don't 23 have to do a math operation on the number over here. 24 MS. PATTI RAMAGE: Oh, okay. And we all know that generating units fail from time to time,

- 1 and that the failure rate is -- it's known as a forced
- 2 outage rate, and for thermal units, that rate can be in
- 3 the range of 5 to 10 percent, or even higher,
- 4 potentially.
- 5 Would you agree with that?
- 6 MR. DANIEL PEACO: I accept that.
- 7 MS. PATTI RAMAGE: And so, on a normal
- 8 basis, one might expect outages in the 5 to 10 percent
- 9 range, but it's also possible that we could have
- 10 catastrophic outages, the outages like the one at
- 11 Sherco in Minnesota, which put their CT out for -- I
- 12 think it was twenty-two (22) months.
- Those sort of things do happen, correct?
- MR. DANIEL PEACO: Correct.
- MS. PATTI RAMAGE: Yeah, the -- their
- 16 coal plant. Sorry, I -- and should such a catastrophic
- 17 outage occur in Brandon, it would result in the loss of
- 18 1,177 gigawatt hours per year of dependable energy to
- 19 Manitoba Hydro.
- Is that correct?
- 21 MR. DANIEL PEACO: I'll take your
- 22 representation.
- 23 MS. PATTI RAMAGE: Yeah. So would you
- 24 agree, then, that energy contingency events such as
- 25 extreme winter or an extended outage of a thermal unit

- 1 or, you know, a drought worse than the drought of
- 2 record can occur, and none of those events are
- 3 explicitly considered in Manitoba Hydro's energy
- 4 criterion?
- 5 MR. DANIEL PEACO: I didn't -- it
- 6 doesn't -- the criterion doesn't articulate that, no.
- 7 MS. PATTI RAMAGE: And next I want to
- 8 move on to talking about the No New Generation Plan.
- 9 And if I understood your exchange with Dr. Bel
- 10 yesterday, I concluded that the No New Generation
- 11 concept was effectively an opportunity to test Manitoba
- 12 Hydro's planning criteria, as well as the value of
- 13 imports.
- 14 Is that fair?
- MR. DANIEL PEACO: Yes.
- MS. PATTI RAMAGE: And it's not a plan,
- 17 per se, that you would suggest has been developed to,
- 18 for example, compete with the Preferred Development
- 19 Plan at this time?
- 20 MR. DANIEL PEACO: It was a scenario we
- 21 analyzed to test the economics of certain combinations
- 22 of options that were in our -- in our scope of work.
- 23 MS. PATTI RAMAGE: But it's not -- it's
- 24 -- you're not putting up -- it up as a -- as a
- 25 competitor to the Preferred Development Plan, are you?

6205 MR. DANIEL PEACO: As a plan, per se? 1 No. I mean, it's -- it's an economic study at this point, but it points to some things that may -- may 3 well ultimately warrant being considered in a plan. 5 MS. PATTI RAMAGE: And -- and that concept is then -- as I understand it, it's premised on 7 three (3) things: it's lower net load achieved through DSM and fuel switching savings, the construction of a 750 megawatt import line in service in 2029, and it's relaxing Manitoba Hydro's planning criteria to allow 10 11 for imports up to 20 percent. 12 Is that correct? 13 MR. DANIEL PEACO: Yes. Oh, I'm sorry. 14 MS. PATTI RAMAGE: It's -- it's 15 premised on lower net load achieved through DSM and 16 fuel switching savings first. Second, the construction of a 750 megawatt import line in service in 2029. And 17 18 third, relaxing Manitoba Hydro's planning criteria to 19 allow for imports up to 20 percent of Manitoba Load. 20 Is --21 MR. DANIEL PEACO: That's correct. 22 MS. PATTI RAMAGE: Do I have the three 23 (3) key components? 24 MR. DANIEL PEACO: That's correct.

MS. PATTI RAMAGE: Now, you indicated

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- 1 during Monday's presentation that your analysis assumes
- 2 DSM at a 150 percent of reference case assumptions,
- 3 which you indicated is far less than Manitoba Hydro's
- 4 Level 2 DSM, which is four (4) times the reference case
- 5 assumption.
- Is -- do I recall that correctly?
- 7 MR. DANIEL PEACO: Yes.
- 8 MS. PATTI RAMAGE: And you treat fuel
- 9 switching as separately from DSM. Is that correct?
- 10 MR. DANIEL PEACO: Well, not -- I mean,
- 11 the discussion we had to put that case together, we --
- 12 we specifically wanted to look at -- at a fuel
- 13 switching component to the -- to the plan. And so that
- 14 was the discussion. And -- and it is a form of DSM,
- 15 but specifically one that -- one that we wanted to
- 16 understand be -- the impacts of.
- MS. PATTI RAMAGE: But when you
- 18 referred to the 150 percent, did that include fuel
- 19 switching?
- 20 MR. DANIEL PEACO: My understanding,
- 21 the way it was represented to us, is that the
- 22 assumptions would be put together using 150 percent of
- 23 DSM plus a fuel switching program.
- 24 MR. JOHN ATHAS: Just to make some --
- 25 just to make sure, the -- the label of 150 percent is

- 1 something that we are using for Manitoba Hydro. I
- 2 mean, La Capra Associates didn't do any analysis to say
- 3 whether that -- whether that's an approximate, whether
- 4 that's -- whatever that is.
- 5 The scenario that you -- that was
- 6 postulated and tested within the NFAT is a hundred --
- 7 is called the one point five (1.5) times base level
- 8 DSM, which is embedded in the load forecast. So some
- 9 of the questions sounded like we derived the label.
- 10 MS. PATTI RAMAGE: The purpose of my
- 11 question was just to make sure the Board understands
- 12 that when we're talking about 150 percent we're talking
- 13 about DSM fuel switching is -- would be in addition to
- 14 that.
- And that's correct, correct?
- 16 MR. DANIEL PEACO: That's correct.
- 17 MS. PATTI RAMAGE: Now, with respect to
- 18 the 750 megawatt import line, would I be correct in
- 19 saying that the primary driver for the need for this
- 20 line would be additional firm energy supply from
- 21 external regions into Manitoba?
- MR. DANIEL PEACO: Yes.
- 23 MS. PATTI RAMAGE: And in response to
- 24 the Information Request Manitoba Hydro/LCA 7a2, it's at
- 25 Tab 15, if the parties wish to turn there. I don't

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6208 think it's necessary, but it looks like everyone will. 2 In that response, La Capra indicated that it expected that new transmission built to the US 3 to accommodate imports to Manitoba would require permitting approval, but LCA has no basis to conclude that this is a major impediment to pursuing such transmission. 7 Do you recall that response? 9 MR. DANIEL PEACO: Yes. 10 MS. PATTI RAMAGE: And based on Monday's evidence, I take it that you're prepared to 11 12 accept that an import line from Minnesota is not feasible. 13 Would -- would that be correct? 14 15 MR. DANIEL PEACO: Could you refresh me 16 what specifically you're referring to? 17 MS. PATTI RAMAGE: You know what? I 18 don't have the reference right now, so I'll ask the 19 question. Are you prepared to accept that -- that a line from Minnesota -- based on the evidence you've 21 heard in the hearing thus far, in particular the report 22 and testimony of Eric Swanson, are you prepared to 23 accept that an import line from Minnesota is not 24 feasible?

MR. DANIEL PEACO: I didn't -- I don't

- 1 think I testified to the feasibility or the
- 2 infeasibility of a line from Minnesota. I said that it
- 3 wasn't necess -- necessarily a condition of the case
- 4 that we were testing.
- 5 MS. PATTI RAMAGE: Okay. If we assume
- 6 -- we accept that you haven't testified to it, having
- 7 heard the evidence you've heard thus far, would you be
- 8 prepared to say that a line from Minnesota is feasible?
- 9 MR. DANIEL PEACO: I don't have any
- 10 basis to know whether it is or isn't feasible.
- 11 MS. PATTI RAMAGE: And what I recall
- 12 you -- again from your evidence, and I don't think I
- 13 have the transcript rever -- reference here, which I
- 14 should.
- 15 But I understood that you said that if
- 16 you're really of -- of the mind-set to build an import
- 17 line, you would look for a different point than you
- 18 would if you were building a transmission line for
- 19 export.
- 20 Does -- does that sound like I'm
- 21 correctly restating the evidence?
- MR. DANIEL PEACO: Yes, I recall that.
- 23 MS. PATTI RAMAGE: Yeah. And that
- 24 would be because you're looking for a region that has
- 25 surplus when you're importing, correct?

- 1 MR. DANIEL PEACO: You would -- you
- 2 would consider the market that you -- that you're --
- 3 you're tapping into. If you're -- if you were
- 4 intending to rely on that for imports, then you would
- 5 want to go to places where that would be the most
- 6 lucrative opportunity.
- 7 MS. PATTI RAMAGE: You suggested, I
- 8 thought -- I thought I heard you suggested that North
- 9 Dakota might be an option.
- 10 Is that correct?
- MR. DANIEL PEACO: Yeah.
- MS. PATTI RAMAGE: Okay. And are you
- 13 aware that load in North Dakota is growing due to oil
- 14 development --
- MR. DANIEL PEACO: I am.
- 16 MS. PATTI RAMAGE: -- and the state --
- 17 yeah. And the state is looking for new resources in --
- 18 in the order of a thousand (1,000) megawatts of base
- 19 load?
- 20 MR. DANIEL PEACO: I'm not familiar
- 21 with the numbers, but...
- MS. PATTI RAMAGE: And you haven't
- 23 retained counsel or otherwise investigated the
- 24 requirements of a Certificate of Public Convenience
- 25 from the State of North Dakota.

6211 Would that be correct? 1 2 MR. DANIEL PEACO: That's correct. MS. PATTI RAMAGE: And are you aware of 3 Mr. Swanson's evidence that while the North Dakota statutory and regulatory scheme is somewhat different from Minnesota's, there's -- there would still be an issue of needing to get regulatory approvals for a line 7 that would not be providing native load benefits? Do you recall that -- have you seen that 9 evidence or read it? 10 11 MR. DANIEL PEACO: It was my 12 understanding Mr. Swanson wasn't in a position to 13 testify about North Dakota. 14 MS. PATTI RAMAGE: Mr. Swanson did, in 15 fact, testify about North Dakota and that was a quote from his evidence 16 17 So were you aware of it? 18 MR. DANIEL PEACO: The quote again? 19 MS. PATTI RAMAGE: He indicated that North Dakota statutory regulatory scheme is somewhat different from Minnesota. There would still be an 21 22 issue of needing to get those regulatory approvals for 23 a line that would not be providing native load benefit. 24 And I have to say -- I can pull out the 25 transcript -- that maybe my --

1 MR. DANIEL PEACO: Well --

- 2 MS. PATTI RAMAGE: -- paraphrase. I
- 3 haven't put quotes around it in my notes, so.
- 4 MR. DANIEL PEACO: I -- I recall a
- statement to that effect, and I don't disagree with
- 6 that statement.
- 7 MS. PATTI RAMAGE: And if we look to
- 8 our neighbours to the west, you're aware that
- 9 Saskatchewan has signed an MOU with Manitoba Hydro to
- 10 discuss up to 500 megawatts of new supply?
- MR. DANIEL PEACO: I'm aware of that.
- MS. PATTI RAMAGE: So it would appear
- 13 Saskatchewan is not in a surplus situation?
- 14 MR. DANIEL PEACO: Is it -- that MOU is
- 15 -- is the evidence for that?
- 16 MS. PATTI RAMAGE: I'm suggesting that
- 17 a -- a province that is -- is looking for 500 megawatts
- 18 from Manitoba is not likely to be in a surplus
- 19 situation.
- 20 MR. DANIEL PEACO: Okay. I'll take
- 21 your representation on that.
- MS. PATTI RAMAGE: And our neighbours
- 23 to the east, Ontario, is a large, sparsely populated
- 24 area with a proportionally small peak load of 750
- 25 megawatts, with hydro resources that depend upon the

- 1 same rivers as Manitoba Hydro, or many of them.
- 2 And would that likely to be a source of
- 3 major new supply in the long term for Manitoba Hydro?
- 4 MR. DANIEL PEACO: I'm not aware that
- 5 it would be.
- 6 MS. PATTI RAMAGE: And Ms. Saunders
- 7 this morning, she's -- was counsel for MMF, she raised
- 8 the possibility of importing capacity from a number of
- 9 American markets. One was PJM, and for the record, you
- 10 can confirm that PJM -- the region is Pennsylvania, New
- 11 Jersey, and Maryland.
- 12 Is that correct?
- 13 MR. DANIEL PEACO: That's what PJM
- 14 stands for, but their market footprint is bigger than
- 15 that.
- 16 MS. PATTI RAMAGE: Okay. Could you
- 17 confirm there's no firm transmission pathway between
- 18 Manitoba Hydro and PJM?
- 19 MR. DANIEL PEACO: That's -- would be
- 20 my understanding, yes.
- MS. PATTI RAMAGE: Yeah. The other
- 22 region that was put to you by Ms. Saunders was SPP, the
- 23 Southwest Power Pool, and I understand that includes
- 24 Arkansas, Louisiana, Mississippi, New Mexico, and
- 25 Oklahoma.

6214 Is that correct? 1 2 MR. DANIEL PEACO: Amongst some other 3 places, yes. MS. PATTI RAMAGE: And can you confirm that there's no firm transmission pathway between Manitoba Hydro and SPP? MR. DANIEL PEACO: Other than as a --7 as a -- in agreement with MISO. So they're -- it'll be accessed through MISO. 10 MS. PATTI RAMAGE: Thank you. 11 THE CHAIRPERSON: I think it's probably 12 an appropriate time for us to take a break. We've been at it for over an hour and a half. So let's take ten 13 (10) minutes, and resume after that. 14 15 16 --- Upon recessing at 2:27 p.m. --- Upon resuming at 2:21 p.m. 17 18 19 THE CHAIRPERSON: I believe everyone's in position. We can resume the proceedings. 21 22 (BRIEF PAUSE) 23 24 MS. PATTI RAMAGE: Mr. Chair, just --Mr. Simonsen spoke to me on the break. In terms of

- 1 timeframe, I am moving as quickly as I can. I am -- I
- 2 understand we're ending at 5:00. The suggestion was we
- 3 wouldn't be back on tomorrow. I am concerned about
- 4 that, because Ms. Boyd has some important topics to
- 5 address as well.
- 6 I can advise the panel that Manitoba
- 7 Hydro has very little in terms of CSI, so that that
- 8 time can hopefully be carried over. We do note,
- 9 however, that Intervenors were provided extended times,
- 10 and that's created more cross, but we will try to make
- 11 it up by keeping CSI to a -- an absolute bare minimum,
- 12 and -- and our view is almost nothing on CSI. I won't
- 13 say nothing, but very, very little.
- 14 THE CHAIRPERSON: If it helps, the
- 15 panel is prepared to sit later than 4:30 tomorrow, but,
- 16 you know, keep in mind that the paperwork tends to
- 17 expand to fill the briefcase. So although we're
- 18 offering more time, I would like to make sure that we
- 19 don't use it frivolously, so.
- 20 MS. PATTI RAMAGE: I like to think we
- 21 never use it frivolously.
- 22
- 23 CONTINUED BY MS. PATTI RAMAGE:
- 24 MS. PATTI RAMAGE: If I could now take
- 25 you to Tab 18 of the book of documents, and I'm looking

6216 at page 47. This is a response to an Information Request. It's Information Request PUB/LCA-20. 3 And in this request, the PUB had noted that La Capra had identified various scenarios where changed assumptions could result in the deferral of Keeyask and Conawapa, and the PUB asked La Capra to 7 prepare a matrix. 8 And this is the matrix you've prepared, 9 correct? It's on the top half of page 47? 10 MR. DANIEL PEACO: I see that. 11 MS. PATTI RAMAGE: The first column 12 identifies the assumption that is being made or changed 13 from Manitoba Hydro's Preferred Development Plan. 14 Is that correct? 15 16 (BRIEF PAUSE) 17 18 MS. PATTI RAMAGE: I'm sorry, it's from no new resources. I was corrected. 19 20 MR. DANIEL PEACO: I'm sorry, I just wanted to make sure I was familiar with what the 21 22 response was. So your question again? 23 MS. PATTI RAMAGE: I just wanted to 24 confirm that the first column deals with the -- the

changes being made from the Manitoba Hydro baseline.

6217 MR. DANIEL PEACO: Yes. 1 2 MS. PATTI RAMAGE: The second column is the year new capacity will be required in the event of 3 that particular -- or with that particular assumption, and the third column is new dependable energy, the year it will be required under the particular assumption. Is that correct? 7 MR. DANIEL PEACO: 9 MS. PATTI RAMAGE: And the first row 10 indicates the year of need established by Manitoba Hydro, based on its generation planning criteria and 11 12 the 2013 reference case assumptions. 13 Is that correct? 14 MR. DANIEL PEACO: That's correct. 15 MS. PATTI RAMAGE: And if we skip a few 16 lines and look down to the diversity contract 17 extension, can you confirm that under the assumptions

- 18 La Capra made regarding diversity contract extensions,
- 19 the year of need for winter peak capacity is deferred
- 20 to 2031/'32?
- MR. DANIEL PEACO: Yes.
- MS. PATTI RAMAGE: And under the same
- 23 line, the year of need for dependable energy is marked
- 24 as N/A, which I interpret as not applicable.
- To confirm, does this mean that La Capra

- 1 believes there is no need for dependable energy under
- 2 this assumption?
- 3 Or maybe easier, would I be correct that
- 4 extending the diversity contract would have no impact
- 5 on the year that dependable energy is required, such
- 6 that the year should remain at 2023/'24?
- 7 MR. DANIEL PEACO: Yeah, I -- I quess
- 8 my understanding is it -- it had no impact on the -- on
- 9 the energy year of need.
- 10 MS. PATTI RAMAGE: So it's 2023/'24,
- 11 and if I go through each one separately under the
- 12 capacity side, I'm trying to move along, where we see
- 13 the notation, "N/A", that means the year of capacity
- 14 need has not changed, and would remain at 2026/'27.
- 15 Is that correct?
- 16 MR. DANIEL PEACO: Yes. Yes, correct.
- 17 MS. PATTI RAMAGE: And still looking at
- 18 that table, I'd like to quickly just review with you
- 19 the assumptions made under, "Relax import limitations."
- 20 And there, what you're referring to is relaxing the
- 21 generation planning criteria.
- Is that correct?
- MR. DANIEL PEACO: Yes.
- 24 MS. PATTI RAMAGE: And based on the
- 25 double asterisked footnote, it's my understanding that

6219 -- would it be correct that La Capra has included imports on the existing 700 megawatts of firm transmission service twenty-four (24) hours of every 3 day of each year as dependable energy? 5 MR. DANIEL PEACO: I think it's only 6 the off-peak hours. 7 MS. PATTI RAMAGE: Okay. MR. DANIEL PEACO: All -- all hours, I'm sorry. You're correct. 10 MS. PATTI RAMAGE: And that -- the 11 import limit referred -- or the 10 percent import limit 12 has also been ignored. Is that correct? 13 14 (BRIEF PAUSE) 15 16 MR. DANIEL PEACO: This has no consideration to the limit of -- of 10 percent. 17 18 MS. PATTI RAMAGE: And on the last line 19 of that chart, it indicates, "Use of average hydro supply." If that was used, the year of energy need would be moved to 2046/'47, and the graph below on the 21 page is intended to illustrate that conclusion. 22 23 Is that correct? 24 MR. DANIEL PEACO: That's correct. 25 MS. PATTI RAMAGE: Now, on that graph,

- 1 the grey upward sloping line on the graph, that
- 2 represents Manitoba Hydro's 2013 net load together with
- 3 exports.
- 4 Is that correct?
- 5 MR. DANIEL PEACO: I'm sorry?
- 6 MS. PATTI RAMAGE: The grey up -- the
- 7 grey upward sloping line, it's a solid line, that's the
- 8 2013 net load together with exports?
- 9 MR. DANIEL PEACO: Yes.
- 10 MS. PATTI RAMAGE: And the blue line is
- 11 the same thing, only it's 2012 load, correct?
- MR. DANIEL PEACO: Yes.
- MS. PATTI RAMAGE: The solid maroon
- 14 line represents available dependable energy, assuming
- 15 no new generation, correct?
- MR. DANIEL PEACO: Yes.
- MS. PATTI RAMAGE: And then the dashed
- 18 maroon line represents the available supply assuming
- 19 the average of all flow conditions for hydro resources
- 20 rather than dependable hydro supply.
- Is that correct?
- MR. DANIEL PEACO: Correct.
- 23 MS. PATTI RAMAGE: And where those
- 24 supply lines intersect with the load lines, that
- 25 indicates the year that new supply is required,

6221 correct? 2 MR. DANIEL PEACO: Yes. 3 MS. PATTI RAMAGE: So if we assume the 2013 load, the grey line, and apply Manitoba Hydro's current generation planning criteria which is based on dependable energy resources to determine the need date, 7 you'd agree that the year of energy need is 2023/'24. 8 Do you see where the lines intersect 9 there? 10 MR. DANIEL PEACO: Yes. 11 MS. PATTI RAMAGE: Okay. And again, assuming the 2013 load but applying average flow 13 conditions for hydro resources, the date of need is the 2046/'47 that was identified by La Capra, correct? 14 15 MR. DANIEL PEACO: Yes. 16 MS. PATTI RAMAGE: Now, if I look at 17 that line, that's the supply with average hydro 18 generation. That would include 3,068 gigawatt hours of 19 imports. 20 Is that correct? 21 MR. DANIEL PEACO: I'm sorry, which 22 line? 23 MS. PATTI RAMAGE: The -- the average -24 - the supply with average hydro generation? 25

6222 1 (BRIEF PAUSE) 2 3 MR. DANIEL PEACO: We'll have to check that. 5 MS. PATTI RAMAGE: Well, let's -- let me walk through it. So this table is intended to 7 detail Manitoba Hydro's total dependable power resources and total energy demand from 2013/'14 to 2030/'31, correct? 9 10 Oh, I'm sorry. I've jumped ahead. I'm 11 talking about one table and I've -- I've missed taking you there. I'd like you to get to the -- if we could 13 turn back a page to page 44. And this is the --14 MR. DANIEL PEACO: Just to be -- to be clear --15 16 MS. PATTI RAMAGE: Yeah. 17 MR. DANIEL PEACO: -- was that -- was -18 - the question you were asking me, was it -- was it related to this table or no? 19 20 MS. PATTI RAMAGE: Yes, it was. 21 going to walk through. I asked you whether the --22 whether 3,068 gigawatt hours were included in the --23 the average hydro generation amount in -- in addition 24 to the difference between dependable and average. I --I'm adding that to the question to clarify.

6223 1 2 (BRIEF PAUSE) 3 MR. DANIEL PEACO: Why don't you ask your question and we'll find it. MS. PATTI RAMAGE: Yeah, I'm going to 6 7 try to shortcut it then. Do you recognize that included in the -- now I'm going to change my question to try to shortcut this -- that included in the dependable supply shown of -- of 30,000 gigawatt hours, 10 11 that's the red line at the bottom, that would include 12 roughly 3,000 gigawatt hours of imports? 13 MR. DANIEL PEACO: That would be a 14 derivation of the dependable energy supply. 15 MS. PATTI RAMAGE: That's correct. 16 MR. DANIEL PEACO: Yes. Okay. 17 MS. PATTI RAMAGE: Okay. And the 18 difference between the dependable line and the average line in a -- in a drought year would also be -- be covered through imports, correct? And that would 21 represent 8,000 gigawatt hours roughly? 22 MR. DANIEL PEACO: The difference 23 between --24 MS. PATTI RAMAGE: Dependable and 25 average. Your --

6224 1 MR. DANIEL PEACO: Would be covered by 2 imports? 3 MS. PATTI RAMAGE: In a drought year, the -- the red solid line is the -- is -- is drought 5 energy. 6 MR. DANIEL PEACO: Well, that would be a reduction of exports, but it wouldn't be imports 7 because you -- your firm load is served by dependable 9 energy. 10 MS. MARY NEAL: If I may say something 11 about this chart. So the -- the figure up on the screen, I mean, it's simply moving the solid red line 13 to the dashed red line. That's simply adding to the average hydro supply in the dependable energy table. 14 15 So you have -- instead of using 16 dependable energy, you're just using the average energy. So that moves it up about eight thousand 17 18 (8,000) and that's all that it is. 19 MS. PATTI RAMAGE: And in a drought year that eight thousand (8,000) would have to be covered by -- through imports, correct? 21 22 MR. DANIEL PEACO: No. 23 MS. MARY NEAL: That's not what it's 24 saying. 25

6225 1 (BRIEF PAUSE) 2 3 MS. PATTI RAMAGE: Okay. My understanding of this is where you're asking -- or you're -- this is indicating that we're going to use average hydro supply. That's what we are going to plan to, correct? Average hydro supply. And that would be 7 the -- somewhere, I'm going to say, 30 -- 38,500 gigawatt hours in 2013/'14. 10 MR. DANIEL PEACO: I -- I see what your 11 question is. So you're saying the dash line were the -12 - were the criterion then you'd be relying on those 13 imports. 14 MS. PATTI RAMAGE: That's right. And 15 Ms. Flynn points out it's probably easiest if you looked at the dash line at 2046/'47, you're relying on 16 17 37,500 gigawatt hours to meet average --18 MR. DANIEL PEACO: That's correct. 19 MS. PATTI RAMAGE: And at the same time the dependable energy flow, which is the amount you 21 will actually receive in a drought is something less than thirty thousand (30,000). That's the red line 22 23 below that. 24 That's correct? 25 MR. DANIEL PEACO: Yes.

- 1 MS. PATTI RAMAGE: And so as per our
- 2 earlier discussion, if we are in a drought and we are
- 3 actually -- we have changed our planning criteria to
- 4 use average, we will have to recover the difference
- 5 between the solid red line and the dotted red line and
- 6 where we will go for that is in imports. Because we
- 7 have changed the criteria as it relates to imports,
- 8 correct?
- 9 MR. DANIEL PEACO: Definitely, yeah.
- 10 MS. PATTI RAMAGE: So we would recover
- 11 8,000 gigawatt hours roughly from imports in this case?
- 12 MR. DANIEL PEACO: If that were -- if
- 13 that were the criteria, that's right.
- 14 MS. PATTI RAMAGE: And what I'm asking
- 15 you is that then you recognize that in addition to that
- 16 there are three thousand (3,000) roughly, gigawatt
- 17 hours included in dependable energy such that we would
- 18 be recovering a total of 11,000 gigawatt hours in
- 19 imports.

- MR. DANIEL PEACO: Okay.
- 21 THE CHAIRPERSON: So where's the three
- 22 thousand (3,000) coming from?
- 24 CONTINUED BY MS. PATTI RAMAGE:
- 25 MS. PATTI RAMAGE: The -- the thousand

- 1 (3,000) we had established earlier this afternoon that
- 2 as part of dependable energy and using the curr -- the
- 3 criteria of Manitoba Hydro presently, Manitoba Hydro
- 4 can import, under the current limits, 3,000 gigawatt
- 5 hours within its dependable energy criteria.
- 6 So with this suggestion of use of
- 7 average flow, we're now up to 11,000 gigawatt hours of
- 8 dependable energy in 2046/'47, correct? Shortfall.
- 9 That will be recovered in imports. Just to make sure
- 10 the panel's --
- MR. DANIEL PEACO: Yeah.
- 12 MS. PATTI RAMAGE: -- with us.
- MR. DANIEL PEACO: Yeah.
- MS. PATTI RAMAGE: Okay.
- MR. DANIEL PEACO: Yeah, we're on the
- 16 same page.
- 17 MS. PATTI RAMAGE: Now, if I could get
- 18 you to go to page 49 in this document, we're still in
- 19 Tab 18. This is a response La Capra provided to a PUB
- 20 IR, and it's PUB/LCA-22B. And if we look to the
- 21 response, my understanding of La Capra's calculation is
- 22 that here La Capra is confirming that Manitoba Hydro's
- 23 physical import capability on its existing firm
- 24 interconnection is 6,443 gigawatt hours.
- 25 Is that correct?

6228 MR. DANIEL PEACO: Yes. 1 2 MS. PATTI RAMAGE: And if we turn back to page 2047, I should say, we'd establish that the 3 supply with average hydro generation line is based on the assumption that during the critical drought period Hydro needs a total of 11,000 gigawatt hours in order 7 to achieve average energy production. 8 MR. DANIEL PEACO: 9 MS. PATTI RAMAGE: So if Hydro's 10 physical import capability on its existing firm 11 interconnection is only 6,443 gigawatt hours per year 12 but it needs to rely on 11,000 gigawatt hours of firm 13 imports during a critical drought, would you agree it's simply not feasible in these circumstances? And in 14 15 fact it would be reckless for a resource planner to 16 plan to a 2046/'47 energy need date? 17 MR. DANIEL PEACO: Yes. 18 19 (BRIEF PAUSE) 20 21 MS. PATTI RAMAGE: And would you agree 22 then that the year of energy need date would be much earlier than 2046/'47 in -- in this circumstance? 23 24 It be would whenever it hit the 6,000 25 gigawatt hours?

- 1 MR. DANIEL PEACO: Yeah, you would have
- 2 to have expanded import capability in order to even
- 3 contemplate something of that nature.
- 4 MS. PATTI RAMAGE: So that -- that
- 5 number at the bottom of that chart is incorrect?
- 6 MR. DANIEL PEACO: Which number are you
- 7 referring?
- MS. PATTI RAMAGE: Twenty-four -- the
- 9 year of 2046/'47 is incorrect. The year of energy need
- 10 would be much earlier than that?
- 11 MR. DANIEL PEACO: With -- with the
- 12 existing transmission system, yes.
- 13 MS. PATTI RAMAGE: And to confirm, all
- 14 of the numbers on this table are based on the existing
- 15 transmission system, correct?
- 16 MR. DANIEL PEACO: Yes, I believe
- 17 that's correct.
- 18 MS. PATTI RAMAGE: If we can now turn
- 19 to Tab 19 of the book of documents. Here we have slide
- 20 35 from your presentation yesterday on the next page.
- 21 There's also a page contained in -- it's page 26
- 22 through 28 of your report.
- 23 And it describes La Cap -- La Capra
- 24 describes Manitoba Hydro's assumptions on wind
- 25 projects?

6230 1 MR. DANIEL PEACO: Yes.

- MS. PATTI RAMAGE: And on each of these
- 3 pages -- I think it's a bit of overkill maybe on our
- 4 part to have included them all -- La Capra has
- 5 identified Manitoba Hydro's wind capital cost as being
- 6 twenty-four hundred dollars (\$2,400) per kilowatt.
- 7 Is that correct?
- 8 MR. DANIEL PEACO: Which pages are you
- 9 referring to?
- MS. PATTI RAMAGE: Well, page 50, which
- 11 is page -- slide 35 of yours. You'll see that --
- 12 MR. DANIEL PEACO: You said each of
- 13 these pages. And I was just --
- 14 MS. PATTI RAMAGE: Oh, I'm sorry. I'm
- 15 saying your capital costs on page 50 are -- Manitoba
- 16 Hydro's capital costs are referred to as twenty-four
- 17 hundred dollars (\$2,400) on page 50 of the book of
- 18 documents, and again on page 51 of the book of
- 19 documents, which is Appendix 3, page 26, of the La
- 20 Capra report.
- MR. DANIEL PEACO: Yes.
- MS. PATTI RAMAGE: It's, again, twenty-
- 23 four hundred dollars (\$2,400) on that page?
- MR. DANIEL PEACO: I see that.
- MS. PATTI RAMAGE: You see that?

6231 MR. DANIEL PEACO: Yes. 1 2 MS. PATTI RAMAGE: Now, if we -- while you're there -- or if you turn to page 52, which is 3 Manitoba Hydro's response to GAC/Manitoba Hydro First Round 1c, Manitoba Hydro confirms that the twenty-four hundred dollars (\$2,400) per kilowatt is not correct and the updated number is twenty-one hundred dollars 7 (\$2,100) per kilowatt. 9 Do you see that? 10 11 (BRIEF PAUSE) 12 MR. DANIEL PEACO: I don't. 13 14 MS. PATTI RAMAGE: If you see on page 15 52, at the bottom there's three (3) bullets with three (3) -- at each one there's a reference case of twenty-16 one hundred dollars (\$2,100) indicated. 17 18 Do you see that? 19 MR. DANIEL PEACO: I guess I don't see the language about the correction. 21 22 (BRIEF PAUSE) 23 24 MS. PATTI RAMAGE: If you read actually 25 in the response as identified in Manitoba Hydro's

6232 letter to the Public Utilities Board on September 13th, 2013, and posted on Manitoba Hydro's external website, and then it goes on, and that correction was made in --3 in that correspondence and confirms that that is the correct, do you see, and that the reference case is in fact twenty-one hundred dollars (\$2,100) per kilowatt? 7 MR. DANIEL PEACO: Okay. And this is referring to the levelized cost analysis? 9 10 (BRIEF PAUSE) 11 12 MS. PATTI RAMAGE: Mr. Miles updated --13 advises me that this what gave the updated economics 14 and that this is what the capital cost was of wind. 15 MR. DANIEL PEACO: Well, my question 16 was, if -- if you're talking about the -- the response seems to be referring to the levelized cost analysis 17 18 from the screening as opposed to the economic analysis 19 of the case. 20 21 (BRIEF PAUSE) 22 23 MS. PATTI RAMAGE: I'm going to try to 24 move things along faster. Is it your understanding 25 that the economic analysis is based on the figure

- 1 twenty-two hundred dollars (\$2,200) per kilowatt for
- 2 the capital cost of wind?
- 3 MR. DANIEL PEACO: I would have to
- 4 check, but my recollection is that the numbers were
- 5 different in the two (2) analysis and I'd -- I would
- 6 have to check those.
- 7 MS. PATTI RAMAGE: Would you accept the
- 8 twenty-two hundred dollars (\$2,200) subject to -- per
- 9 kilowatt an hour, or an hour, per kilowatt for the
- 10 capital cost of wind --
- MR. DANIEL PEACO: I guess I --
- 12 MS. PATTI RAMAGE: -- subject to check?
- 13 MR. DANIEL PEACO: -- I wouldn't,
- 14 because I -- my recollection is the person in our shop
- 15 that worked on this found mismatches in the analysis,
- 16 and so we ended up using twenty-four (24). And my --
- 17 and my belief, but I don't have the verification was
- 18 that was what was in the economic analysis that we were
- 19 comparing to. I'd have to check that.
- 20 So I quess I'm not willing to stipulate
- 21 to your representation just yet.
- MS. PATTI RAMAGE: And the difference
- 23 between the twenty-four hundred dollars (\$2,400) you're
- 24 speaking of and the twenty-two hundred dollars (\$2,200)
- 25 I'm speaking of is major transmission.

6234 Is that correct? 1 2 MR. DANIEL PEACO: That may be. Because the number we have is -- includes transmission, so we -- my understanding is in -- the number we have here is what we understand that the costs were with transmission in the analy -- economic analysis. 7 (BRIEF PAUSE) 9 10 THE CHAIRPERSON: Mr. Peaco, even with a relatively optimistic scenario that you have 11 described here of lower cost, higher life -- lifetime, 13 and so on, you're still showing that a -- a preferred 14 case is better than the Wind/Gas scenario. 15 Is that -- that's the inference I can draw from that -- from the graph there? 17 MR. DANIEL PEACO: Yeah, that -- yes, 18 and that's based upon --19 THE CHAIRPERSON: It's -- I mean, after all these adjustments it's still -- the Wind/Gas scenario is still less economic than the Preferred 21 22 Plan? 23 MR. DANIEL PEACO: Yeah, on -- on 2012 24 assumptions. That's correct. 25

6235 1 (BRIEF PAUSE) 2 CONTINUED BY MS. PATTI RAMAGE: 3 4 MS. PATTI RAMAGE: Mr. Peaco, La Capra has used the figure of seventeen hundred and fifty dollars (\$1,750) per kilowatt for its capital cost of wind. 7 Is that correct? 9 MR. DANIEL PEACO: Yes. 10 MS. PATTI RAMAGE: And that includes 11 interconnection costs, correct? 12 MR. DANIEL PEACO: Yes. 13 MS. PATTI RAMAGE: It does not include 14 transmission costs, correct? 15 MR. DANIEL PEACO: You mean --16 MS. PATTI RAMAGE: Of major 17 transmissions? 18 MR. DANIEL PEACO: Just some 19 reenforcements? 20 MS. PATTI RAMAGE: Yes. 21 MR. DANIEL PEACO: No. 22 MS. PATTI RAMAGE: And Manitoba Hydro's 23 figure of twenty-four hundred dollars (\$2,400) that 24 you're referring to in -- included that major 25 transmission, correct?

6236 MR. DANIEL PEACO: It wasn't clear 1 exactly what that did include. 3 MS. PATTI RAMAGE: Okay. If I could have you to move to what I think is -- well, to page And in this IR response, which is Manitoba Hydro/La Capra 14a, La Capra was asked for the source of the seventeen fifty (1,750) per kilowatt. And La 7 Capra answered that the source is the 2012 Wind Technologies Market Report by the US Department of Energy. La Capra attached the ninety-two (92) page 10 11 report and referred the reader to page 37 of Figure 23. 12 Do you see that response? 13 MR. DANIEL PEACO: Yes. 14 MS. PATTI RAMAGE: Now, portions of 15 that report is -- are included in this tab. And if I could get you to turn to page 56 of the book of 16 17 documents. And I'm looking in the middle of the 18 paragraph that is in the middle of the page, and it 19 says: 20 "The interior region with both the 21 largest sample and the fewest 22 outliers was the lowest cost region 23 on average, with average costs of 24 \$1,760 per kilowatt." 25 Do you see where I'm reading that --

6237 MR. DANIEL PEACO: I do. 1 2 MS. PATTI RAMAGE: -- on the page? 3 And on the next page, if we turn that page to page 57, I think it's page 57 of our book of documents, page 37 of that report, you will see a figure, it's Figure 24, and it's labelled: 7 "Regional Boundaries Overlayed on a Map of Average Annual Wind Speeds at 80 Metres." 9 10 Can you confirm that this chart, though, 11 identifies boundaries of the regions used in the 12 report? 13 MR. DANIEL PEACO: Yes. 14 MS. PATTI RAMAGE: And do you see the 15 interior region in the centre of Figure 24, and can you 16 confirm that that interior region includes the following 13 States: North Dakota, Minnesota, South 17 18 Dakota, Iowa, Montana, Wyoming, Colorado, Nebraska, 19 Kansas, Oklahoma, New Mexico, Missouri, and Texas? 20 MR. DANIEL PEACO: Yes. 21 MS. PATTI RAMAGE: And Figure 23 on the 22 top of this page, and that's on the left-hand side, 23 you'll see the interior region is demonstr -- what --24 what is going on in the interior region is graphically 25 depicted, and it indicates that forty-two (42) projects

- 1 installed in 2012 are included in the capital cost
- 2 review for the interior region.
- 3 MR. DANIEL PEACO: Yes.
- 4 MS. PATTI RAMAGE: Each one of those
- 5 little disks represents a -- a cost of those -- the
- 6 capital costs of those projects. And would you agree
- 7 the capital costs roughly fall between -- in the range
- 8 of fifteen hundred dollars (\$1,500) per kilowatt and
- 9 twenty-four hundred dollars (\$2,400) per kilowatt?
- 10 MR. DANIEL PEACO: It's below fifteen
- 11 hundred (1,500), but -- probably more like thirteen
- 12 (13) to -- to twenty-three (23).
- MS. PATTI RAMAGE: If I was bargaining
- 14 with you, I'd say fourteen (14), but we'll move on.
- MR. DANIEL PEACO: Okay.
- 16 MS. PATTI RAMAGE: Are you able to
- 17 identify which specific states in the interior region
- 18 each of these projects is located in?
- 19 MR. DANIEL PEACO: From this data, no.
- 20 MS. PATTI RAMAGE: Do you have the
- 21 data?
- MR. DANIEL PEACO: We -- we are
- 23 familiar with some individual projects.
- 24 MS. PATTI RAMAGE: But you can't -- you
- 25 couldn't tie each for -- one (1) of the forty-two (42)?

6239 1 MR. DANIEL PEACO: No. 2 3 (BRIEF PAUSE) 5 MS. PATTI RAMAGE: Are you suggesting that the 1,750 kilowatts -- seventeen hundred dollars 7 (\$1,700) -- seventeen hundred dollars (\$1,700) -- seven (7). I'm going to have trouble. Start over. There's too many numbers here. 10 The one thousand seven hundred and fifty 11 dollars (\$1,750) per kilowatt is representative of the 12 current cost of building wind in Manitoba? MR. DANIEL PEACO: It's -- it's the 13 14 number from this database that's most representative, 15 because there are a number of projects that are in 16 states neighbouring Manitoba, but it's not the Manitoba 17 data. 18 MS. PATTI RAMAGE: It -- for example, 19 it doesn't take into account costs like transportation 20 and duty? 21 MR. DANIEL PEACO: Correct. 22 MS. PATTI RAMAGE: Wouldn't have cold 23 weather packages, likely. 24 MR. DANIEL PEACO: I would imagine projects in North Dakota would be similar to what you

- 1 would need in Manitoba.
- MS. PATTI RAMAGE: Now, if I could take
- 3 you to page 60 of the book of documents? Here we have
- 4 a map of the United States, and it's described as:
- 5 "Figure 4: Location of wind power
- development in the United States."
- 7 MR. DANIEL PEACO: Yes.
- MS. PATTI RAMAGE: And for each state,
- 9 do you see there's two (2) numbers provided? The top
- 10 number is the cumulative installed wind capacity in the
- 11 state, and the bottom number is the annual addition in
- 12 2012.
- 13 Are you with me?
- MR. DANIEL PEACO: Yes.
- 15 MS. PATTI RAMAGE: And would it be fair
- 16 to recognize that Texas dominated wind additions to the
- 17 region in 2012 with 1,826 megawatts, and that would be
- 18 more than seven (7) times the wind additions in North
- 19 Dakota of 235 megawatts?
- MR. DANIEL PEACO: Okay.
- 21 MS. PATTI RAMAGE: Yeah. And if you
- 22 look back to the -- there's a page on your left-hand
- 23 side, and you see Figure 31, which compares capacity
- 24 factors by region.
- Do you see that?

6241 1 Do you see that? 2 MR. DANIEL PEACO: Yes. 3 MS. PATTI RAMAGE: And here, the interior region is on the right-hand side of the graph, and this compares forty-eight (48) projects. 6 Is that right? MR. DANIEL PEACO: 7 Yes. MS. PATTI RAMAGE: And you'd agree that the majority of wind projects in the interior region had capacity factors that fall somewhere between 10 11 roughly 30 percent and 50 percent? 12 MR. DANIEL PEACO: Yes. 13 MS. PATTI RAMAGE: And at the bottom of page 58, top of page 59, if I can read -- and you're 14 going back a page -- it indicates that: 15 16 "Generation-weighted average capacity 17 factors are the highest in the 18 interior region, 37 percent." 19 Do you see that? MR. DANIEL PEACO: I see that. 20 21 MS. PATTI RAMAGE: And if we're guided 22 by the 2012 report, then 37 percent is a reasonable 23 capacity factor for the interior region, and both 24 Manitoba Hydro and La Capra have used more optimistic 25 outlooks.

6242 Is that not correct? 1 2 MR. DANIEL PEACO: Correct. 3 MS. PATTI RAMAGE: La Capra is suggesting 43 percent? 5 MR. DANIEL PEACO: Yes. MS. PATTI RAMAGE: And Manitoba Hydro 6 7 is suggesting 40 percent? 8 MR. DANIEL PEACO: Right. 9 MS. PATTI RAMAGE: Versus an average of 10 37 percent. And you haven't done any analysis on the 11 site-specific characteristics in Manitoba, have you? 12 MR. DANIEL PEACO: No, we have not. 13 14 (BRIEF PAUSE) 15 16 MS. PATTI RAMAGE: My last topic, I think -- and I apologize. It's not in the book of 17 18 documents. We've stuck some pages in -- in the back of 19 the book of documents, and I forgot to identify them 20 specifically. It is La Capra's -- an -- an excerpt 21 from La Capra Appendix 5. 22 23 (BRIEF PAUSE) 24 25 MS. PATTI RAMAGE: Does everybody have

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- 1 this? It's page -- it begins at page 5-14. I don't
- 2 believe it needs to be marked, because it's already
- 3 part of the record. I -- we just gave it for -- yeah,
- 4 it's not part of the bound part, and it's part of the
- 5 record, so I think we'll just refer to it as if we were
- 6 pulling up the actual report.
- 7 And if I could have you turn to page --
- 8 what's marked as 19 in this -- this section of the La
- 9 Capra report? I'm -- I'm looking at figure 5-7, and if
- 10 I understand correctly, this figure is looking to test
- 11 how the Preferred Development Plan performs relative to
- 12 the All Gas Plan under a sequen -- sequence of below-
- 13 average flow years.
- 14 Is that correct?
- MR. DANIEL PEACO: Yes.
- 16 MS. PATTI RAMAGE: And for the purpose
- 17 of Figure 5-7, you selected a consecutive sequence of
- 18 flow years beginning in 2007, and then going back to
- 19 the beginning of the flow record in 2012, so as to
- 20 create a thirty-four (34) year sequence.
- 21 Is that correct?
- MR. DANIEL PEACO: That's correct.
- 23 MS. PATTI RAMAGE: So the flow record,
- 24 then, includes all of the very low-flow years through
- 25 the 1930s and 1940s, correct?

- 1 MR. DANIEL PEACO: Yes.
- 2 MS. PATTI RAMAGE: And the blue shading
- 3 on the graph represents the percent of average water
- 4 year, and am I correct that the average water year is
- 5 the average of all flow years in Manitoba Hydro's
- 6 ninety-nine (99) year flow record?
- 7 MR. DANIEL PEACO: Yes.
- 8 MS. PATTI RAMAGE: Yeah. As opposed to
- 9 -- it's not suggesting it's the average of the thirty-
- 10 four (34) years. It's the ninety-nine (99) year flow
- 11 record.
- MR. DANIEL PEACO: Exactly.
- MS. PATTI RAMAGE: All right. And the
- 14 black line lab -- labelled average water year is tied
- 15 to the axis on the right, and it's flat at 100 percent,
- 16 so that the blue shading, when it's above that line, it
- 17 represents above-average water year, and when the blue
- 18 shading is below, it means it's a below-average water
- 19 year, correct?
- 20 MR. DANIEL PEACO: Correct.
- 21 MS. PATTI RAMAGE: And the red line
- 22 that's labelled, "Preferred Plan Minus All Gas," refers
- 23 to the annual net revenue, and it shouldn't be mistaken
- 24 for a percentage of average water flow year, correct?
- MR. DANIEL PEACO: Yes. That -- that

6245 data goes to the -- the dollar axis on the left. 2 MS. PATTI RAMAGE: And can you confirm, then, that this is the case, what I've just described, for all of the simil -- similar figures in this section? And here I'm referring to Appendix 5-8, 5-10, 5-11, 5-13, and 5-14? 7 MR. DANIEL PEACO: Yeah. MS. PATTI RAMAGE: Now, would I be -the -- correct in suggesting that the analysis in this section from pages 5-14 through 5-29 accounts for 10 revenue from opportunity sales only, and does not 11 include the fixed revenues from the sale of dependable 12 13 energy for each of these plans? 14 15 (BRIEF PAUSE) 16 17 MR. DANIEL PEACO: Yeah, I believe it's 18 -- it's plotting the data that's the output from 19 SPLASH, so it's -- it's tracking the data that's changing from case to case -- or -- or flow year -flow condition to flow condition. 21 MS. PATTI RAMAGE: But that -- but that 22 23 data would not include the dependable energy, correct -24 - or, I'm -- I'm sorry, the fixed-end revenue? Ignore 25 what I just said. And that data, therefore, it doesn't

- 1 -- does not include the revenue from dependable sales?
- MR. DANIEL PEACO: Yes, because that's
- 3 outside of the SPLASH. These are just SPLASH results,
- 4 so it's -- it would be outside of that.
- 5 MS. PATTI RAMAGE: You would agree that
- 6 to the extent that the Preferred Plan has incremental
- 7 revenue from dependable sales, that line would shift
- 8 upwards if the revenues from dependable sales were
- 9 included?
- 10 MR. DANIEL PEACO: That would shift,
- 11 but -- yes.
- MS. PATTI RAMAGE: And it would shift
- 13 upward quite significantly, correct?
- 14 MR. DANIEL PEACO: Yes, but we we're --
- 15 yeah. Yeah, if you were to do that calculation, that's
- 16 what it would show.
- 17 MS. PATTI RAMAGE: And if we were to
- 18 look at, for example, Figure 5-8, the same thing would
- 19 happen. If dependable revenues were also included,
- 20 that would be a more -- it -- it's a more optimistic
- 21 flow record, but at the same time, if dependable
- 22 revenues were included, the line would shift up --
- MR. DANIEL PEACO: Yes.
- MS. PATTI RAMAGE: -- right? And
- 25 similarly, the same for all of the figures in this

- 1 section, correct?
- MR. DANIEL PEACO: That's correct.
- MS. PATTI RAMAGE: And I'm going to
- 4 quickly do one (1) more quick area, because that went
- 5 faster than I thought. And just because our friends
- 6 from climate change came upstair -- came to watch to
- 7 hear their topic, I hate to make them miss it, and I
- 8 just want to quickly ask you.
- 9 I -- I wanted to confirm, with your
- 10 conversation with Ms. Van Iderstine the other day, that
- 11 -- that La Capra is not claiming expertise in the area
- 12 of modelling quantitavit -- quantitative climate
- 13 change, or climate change impacts, or hydro climol --
- 14 climatology or hydrology, correct?
- MR. DANIEL PEACO: Correct.
- MS. PATTI RAMAGE: But in your scope of
- 17 work, you were asked to comment on climate change
- 18 sensitivity analysis, correct?
- MR. DANIEL PEACO: Correct.
- 20 MS. PATTI RAMAGE: And your review of
- 21 Manitoba Hydro's work on climate change was based on
- 22 the materials contained in the NFAT filing, the
- 23 responses that Hydro provided to your IR request, as
- 24 well as multiple technical presentations and meetings
- 25 and teleconferences with staff from Manitoba Hydro,

- 1 correct?
- MR. DANIEL PEACO: Yes.
- 3 MS. PATTI RAMAGE: And in your review
- 4 of the climate change sensitivity analysis, you
- 5 identified two (2) key limitations, and -- but would
- 6 you agree that Manitoba Hydro had identified and
- 7 recognized those limitations during the various
- 8 discussions and exchanges you had with them?
- 9 MR. DANIEL PEACO: Yes. Our report is
- 10 -- is simply identifying those -- those things that
- 11 Hydro had already identified.
- 12 MS. PATTI RAMAGE: And just to confirm,
- 13 you're not aware of any other generation developers
- 14 similar to Manitoba Hydro who've undertaken more
- 15 extensive analysis or advanced modelling of climate
- 16 change impacts in a resource planning application.
- 17 Is that correct?
- MR. DANIEL PEACO: Right.
- 19 MS. PATTI RAMAGE: Mr. Peaco, I
- 20 appreciate your answers. I'm now off the mic. You get
- 21 a fresh face.
- MR. DANIEL PEACO: Unfortunately, your
- 23 side does not. Maybe you do. Maybe you get John next
- 24 time.
- MS. PATTI RAMAGE: I think Ms. Moroz is

- 1 going to take over for a moment, and then followed by
- 2 Ms. Boyd. So I'm going to clear out of here very
- 3 quickly. We'll -- perhaps if we could just have a --
- 4 literally, a one (1) minute break, I think.

5

6 (BRIEF PAUSE)

- 8 THE CHAIRPERSON: Before you start, I
- 9 should welcome you to the proceedings. I don't think
- 10 I've ever seen you before at one (1) of these
- 11 proceedings, so.
- 12 MS. JENNIFER MOROZ: Thank you, Mr.
- 13 Chairman.
- 14 THE CHAIRPERSON: I just want to make
- 15 sure I pronounce your name properly.
- 16 MS. JENNIFER MOROZ: Moroz, M-O-R-O-Z.
- 17 It means 'frost' in Ukrainian.
- MS. PATTI RAMAGE: Mr. Moroz -- or, Mr.
- 19 Moroz, Mr. Chair, if I could just tell the Board, it's
- 20 Patti Ramage back here, a quick story, Ms. Moroz was
- 21 supposed to be the regulatory lawyer for Manitoba Hydro
- 22 twenty (20) years ago, and she was going on mat leave,
- 23 and there was two (2) files, a PUB file, or this little
- 24 thing called MISO Map, and we decided MISO Map would be
- 25 a quick one (1) she could finish off, and I would do

- 1 regulatory and she would do transmission, and so she
- 2 hasn't been back for twenty (20) years.
- 3 MS. JENNIFER MOROZ: So I ask your
- 4 indulgence given that fact.

- 6 CROSS-EXAMINATION BY MS. JENNIFER MOROZ:
- 7 MS. JENNIFER MOROZ: We're ready to
- 8 proceed? Thank you. Well, good afternoon, Mr. Peaco
- 9 and other members of La Capra.
- MR. DANIEL PEACO: Good afternoon.
- 11 MS. JENNIFER MOROZ: I'm hoping to
- 12 provide some more questions in the nature of short
- 13 snappers for you, as opposed to Ms. Ramage's questions,
- 14 hopefully, and I will be -- sorry?
- MR. DANIEL PEACO: Your predecessors
- 16 have -- have used that.
- 17 MS. JENNIFER MOROZ: I am going to be
- 18 concentrating on just three (3) issues, and they are
- 19 all based on La Capra's Technical Appendix 8 on
- 20 transmission, which is Exhibit number 11, which I
- 21 believe will be coming up on the screen at some point.
- 22 And the first issue that I wanted to
- 23 canvass with you was some comments that you had made
- 24 about the MISO Wind Synergy study, and you deal with
- 25 that issue starting on page 25 of Appendix 8.

- 1 Now, the MISO Wind Synergy study, just
- 2 to do a -- a brief overview, that was a study conducted
- 3 by MISO and various stakeholders over the course of
- 4 three (3) years, from 2011 to 2013.
- 5 Is that correct?
- 6 MR. DANIEL PEACO: That's my
- 7 understanding, yes.
- 8 MS. JENNIFER MOROZ: And one (1) of the
- 9 purposes of that study, I understand from your report,
- 10 was to look at the potential advantages or benefits of
- 11 a new transmission interconnection between an area that
- 12 operates hydro generation in conjunction with large
- 13 concentrations of wind.
- 14 Is that accurate?
- MR. DANIEL PEACO: That's my
- 16 understanding, yes.
- MS. JENNIFER MOROZ: And based on my
- 18 understanding of that Wind Synergy study, there were
- 19 three (3) different possible transmission
- 20 interconnections that were analyzed.
- Is that correct?
- MR. DANIEL PEACO: Yes, I believe
- 23 that's right.
- 24 MS. JENNIFER MOROZ: And they were all
- 25 for a 500 kV line?

6252 1 MR. DANIEL PEACO: Yeah. 2 MS. JENNIFER MOROZ: Okay. 3 MR. DANIEL PEACO: I -- I believe so, but I -- I don't have the study memorized for details, but if you want to point me to something I can verify, or I -- I'll accept your representation. 7 MS. JENNIFER MOROZ: Thank you. The options that were studied, then, as I understand it, were an eastern option, and that was essentially running from Manitoba Hydro's Dorsey substation to 10 11 Minnesota, terminating at the Blackberry station. 12 Is that correct? That was the east 13 option. Perhaps I can point you to, I think it's page 29 or 30 of your report, where you start referring to 15 the various options. 16 MR. DANIEL PEACO: Maybe it's twenty-17 six (26)? 18 MS. JENNIFER MOROZ: Yes, that's 19 probably it. 20 21 (BRIEF PAUSE) 22 23 MR. DANIEL PEACO: Talk about two (2) 24 of them -- two (2) options studied there. 25 MS. JENNIFER MOROZ: Correct. And the

- 1 east option is the one that I was referring to that
- 2 runs essentially from Manitoba Hydro's Dorsey
- 3 substation to Minnesota, terminating at Blackberry.
- 4 Is that correct?
- 5 MR. DANIEL PEACO: Yes.
- 6 MS. JENNIFER MOROZ: And then you have
- 7 the western option as well. That was, again,
- 8 originating from Dorsey and terminating in North Dakota
- 9 at Barnesville Station near Fargo.
- 10 Is that correct?
- MR. DANIEL PEACO: Right.
- 12 MS. JENNIFER MOROZ: And I mention
- 13 these different nomenclature, because MISO apparently
- 14 changed how they referenced these studies over the
- 15 course of three (3) years.
- 16 And then finally, I don't know if you're
- 17 familiar that they canvassed a third option, which they
- 18 referred to as a central option?
- 19 MR. DANIEL PEACO: I recall that. One
- 20 (1) -- I think they eventually had three (3), and then
- 21 they focussed on these two (2) in the study, or
- 22 something to that effect.
- 23 MS. JENNIFER MOROZ: Thank you. And
- 24 would you agree that the east option is essentially the
- 25 international power line that Manitoba Hydro has

6254 proposed in its preferred Development Plan --2 MR. DANIEL PEACO: Essentially, yes. 3 MS. JENNIFER MOROZ: Thanks. I'd like to refer you, then, to page 8-30 of your report, and at the top of the page, you've drawn an observation or conclusion from the MISO Wind 7 Synergy study. And to quote, it states that: 8 "In addition, the study found that 9 after the new hydro Conowapa and 10 Keeyask is operational, and the new 11 transmission interconnection is 12 completed, the interface flow from 13 Manitoba Hydro to MISO is only 14 increased on average by 358 15 megawatts. This indicates a less 16 than optimal transfer on the Manitoba 17 Hydro to US intertie." 18 And Mr. Peaco, when LCA was asked for 19 the basis for that figure of 358 megawatts, LCA had referenced a MISO presentation that's available on its 21 website with respect to that study. 22 Is that correct? 23 MR. DANIEL PEACO: Is that an IR 24 response? 25 MS. JENNIFER MOROZ: Yes.

6255 1 MR. DANIEL PEACO: Okay. 2 MS. JENNIFER MOROZ: In IR Manitoba Hydro/LCA 043a, which referenced PUB/LCA 073c, you 3 referenced MISO's November 5th, 2012 presentation. 5 MR. DANIEL PEACO: Wha -- what was the number of the 'I' -- the IR? MS. JENNIFER MOROZ: The initial IR was 7 Manitoba Hydro/LCA 043, where you asked Manitoba Hydro to please see the response to PUB/LCA 073c, and that, in turn, referenced the November 5th, 2012, MISO 10 11 presentation. 12 MR. DANIEL PEACO: Okay. But which 13 response has the -- actually has the --14 MS. JENNIFER MOROZ: The latter. The 15 PUB/LCA 073c. 16 MR. DANIEL PEACO: Thank you. 17 MS. JENNIFER MOROZ: Mr. Peaco, are you 18 aware that that average 358 megawatt increase in 19 interface flow was averaged over a time period of a full year, as opposed to, say, a day or a week? 21 MR. DANIEL PEACO: Can I take a minute 22 to refresh? 23 MS. JENNIFER MOROZ: Yes. 24 25 (BRIEF PAUSE)

25

6256 1 MR. DANIEL PEACO: Okav. 2 MS. JENNIFER MOROZ: Would you agree that a new interconnection such as the ones that were -3 - were being studied in the Wind Synergy Study would connect to power systems that had different generation mixes, and as well, different seasonal loads? 7 MR. DANIEL PEACO: You're talking about the difference in the connection points between the two (2) terminals of the two (2) lines? 10 MS. JENNIFER MOROZ: No, I was talking about the fact that a proposed new interconnection of 11 the kind that was being studied by nice -- by MISO 13 would be in essence connecting one (1) power region or 14 one (1) system that had a different generation mix and 15 different seasonal loads than the one in the adjacent 16 MISO region to which it would be connecting? 17 MR. DANIEL PEACO: Referring to 18 Manitoba and MISO? 19 MS. JENNIFER MOROZ: Correct. 20 MR. DANIEL PEACO: Yes. 21 MS. JENNIFER MOROZ: Thank you. And 22 would you also agree that such a proposed 23 interconnection would have bi-directional flows that

would vary both on a daily basis and a seasonal basis?

Yes.

MR. DANIEL PEACO:

6257 MS. JENNIFER MOROZ: Now, in view of 1 those facts, would you agree that using the average interface flow, meaning averaged over a full year, 3 would not be the best method in order to determine the increased capacity that would be gained from a new 6 interconnection? MR. DANIEL PEACO: 7 Yes. MS. JENNIFER MOROZ: And if I could have you look at Tab 22 of Volume I of Manitoba Hydro's book of documents. 10 11 12 (BRIEF PAUSE) 13 14 MR. CHRISTIAN MONNIN: Page -- page 87? 15 MS. JENNIFER MOROZ: Yes. 16 CONTINUED BY MS. JENNIFER MOROZ: 17 18 MS. JENNIFER MOROZ: So this chart 19 entitled, 'Manitoba Hydro MISO Interface Flow', is taken from that same November 5th, 2012, presentation 21 that you had referenced in your responses to IRs. And 22 I would like to just go through this chart with you, 23 just in terms of orienting the panel to this chart. 24 If you look at the legend at the bottom, the sort of dark aqua colour, that shaded colour on the

- 1 graph represents the baseline transmission capacity of
- 2 the existing Manitoba-to-US interconnection.
- 3 Is that right?
- 4 MR. DANIEL PEACO: I'm sorry?
- 5 MS. JENNIFER MOROZ: Is it correct that
- 6 the aqua shaded portions of the chart, as indicated on
- 7 the legend below, where it says, "base case," that
- 8 those aqua portions indicate the baseline transmission
- 9 capacity of the existing Manitoba-to-US interconnection
- 10 -- or interface?
- 11 MR. DANIEL PEACO: I would have to look
- 12 back at the study. I'm not sure what -- what was in
- 13 the base case.
- 14 MS. JENNIFER MOROZ: Is it clear to you
- 15 that the lime green shaded area above that aqua colour
- 16 represents the additional transmission capacity from
- 17 the east option?
- MR. DANIEL PEACO: Yes.
- 19 MS. JENNIFER MOROZ: And if we assume
- 20 that the agua shaded portion is actually the baseline
- 21 capacity of the existing Manitoba-to-US interface,
- 22 would you agree that the increase in capacity
- 23 represented by this chart is more in the nature of 750
- 24 megawatts for the east option?
- MR. DANIEL PEACO: I guess -- from the

6259 -- the size of the --2 MS. JENNIFER MOROZ: Correct. 3 MR. DANIEL PEACO: -- shading, yes. MS. JENNIFER MOROZ: The next issue I'd like to canvass with you is MISO's multi-value projects, which you have referred to in again the Technical Appendix 8, starting at about page 8-23. 7 So based on your report, I understand that you're familiar with the concept of a MISO multi-value project. 10 Is that correct? 11 MR. DANIEL PEACO: That's correct. 12 MS. JENNIFER MOROZ: And in a nutshell, 13 a MISO multi-value project allows those facilities that 14 are being -- sorry, being constructed to be cost-shared 15 among multiple users of that transmission facility, and 16 as well possibly among various regions within MISO. 17 Is that accurate to say? 18 MR. DANIEL PEACO: Yes. 19 MS. JENNIFER MOROZ: And that would be in contrast to, say, a transmission project that was 21 built under Module B of MISO's tariff, which is the 22 transmission service module, whereby the transmission 23 service customer who initiates a request normally is 24 the one who would pay for any additional facilities

that would be required to meet the service request.

6260 MR. DANIEL PEACO: That's correct. 1 2 MS. JENNIFER MOROZ: I would now like to refer you to the direct evidence of Dr. David 3 Jacobson. And that is found in Exhibit 95, page 82 of that exhibit. 6 (BRIEF PAUSE) 9 In that direct evidence, Dr. David -sorry, Dr. Jacobson testified that MISO had approved 10 11 roughly \$2 billion worth of upgrades that were 12 categorized as multi-value projects in order to 13 facilitate renewable integration and that these facilities would increase the Minnesota to Wisconsin 14 15 transfer capability before 2020. 16 Were you familiar with that evidence? 17 MR. DANIEL PEACO: Yes. 18 MS. JENNIFER MOROZ: And Dr. Jacobson's 19 view is that that represents a window of opportunity and that the transmission service request that Manitoba 21 Hydro has submitted for exports to Wisconsin will be able to capitalize on that additional capacity and yet 22 23 have the costs of those facilities shared regionally. 24 Would you agree that that is a window of 25 opportunity for Manitoba Hydro?

6261 MR. DANIEL PEACO: Yes. And I 1 understand the -- the testimony on the position and the -- and the request for transmission for transmission 3 service gives that opportunity. 5 MS. JENNIFER MOROZ: Thank you. the final issue that I wanted to canvass with you was 7 contingency reserves. And there's some commentary about Manitoba Hydro's use of contingency reserves on page 8-57 of Appendix 8. 10 11 (BRIEF PAUSE) 12 13 MS. JENNIFER MOROZ: I'm sorry. Appendix 8 is Exhibit 11, I believe. And if we scroll 14 15 down just a little bit, I would like to quote from page 16 857, in which you stated that, sorry: 17 "The MISO system in the South might 18 be able to provide coverage for such 19 an event by the adequate reserves and 20 available capacity over the 21 interconnection. Manitoba Hydro did 22 not provide any documentation or 23 information that exhibited this 24 ability." 25 And when you were referring to such an

- 1 event, my understanding is that you were referring to
- 2 the loss of a Bipole.
- 3 Is that correct?
- 4 MR. DANIEL PEACO: Correct.
- 5 MS. JENNIFER MOROZ: Are you aware that
- 6 Manitoba Hydro provided rebuttal evidence on this issue
- 7 of contingency reserve arrangements with MISO?
- 8 MR. DANIEL PEACO: Yes.
- 9 MS. JENNIFER MOROZ: So referring to
- 10 Exhibit 85 at page 81, lines 12 to thre -- 12 through
- 11 17, Manitoba Hydro referenced that it does have a
- 12 coordination agreement with Mani -- sorry, with MISO
- 13 and that pursuant to the obligations in that agreement,
- 14 MISO is obligated to provide Manitoba Hydro, on
- 15 request, with up to 1,850 megawatts of contingency
- 16 reserves in the event of a contingency. And that's on
- 17 a firm basis.
- Now, in view of that rebuttal evile --
- 19 evidence, do you still have any concerns about the
- 20 availability of MISO's contingency reserves?
- 21 MR. DANIEL PEACO: We have this
- 22 testimony and the cross-examination that Mr. Monnin did
- 23 in -- in -- of your witnesses in -- in the hearings.
- 24 And I've subsequently provided a response to IR,
- 25 indicating we now have the explanation as to how that

6263 scheme works and -- and we're -- and we now understand. 2 MS. JENNIFER MOROZ: And you no longer 3 have any concerns about it? MR. DANIEL PEACO: We now understand 4 how -- how it's configured, yes. Unfortunately, we would -- we would hope to get the information on that 7 some time ago. MS. JENNIFER MOROZ: Understandable. 8 Thank you. I have no further questions. 9 10 THE CHAIRPERSON: Thank you, Ms. Moroz. 11 That didn't appear so bad, was it? MS. JENNIFER MOROZ: I don't know. Let 12 13 me think about it. 14 15 (BRIEF PAUSE) 16 17 THE CHAIRPERSON: We probably should 18 take a five (5) minute break for the benefit of the 19 participants. 20 21 --- Upon recessing at 3:44 p.m. --- Upon resuming at 3:52 p.m. 22 23 24 THE CHAIRPERSON: I believe that everybody is in position to resume to proceedings, so

- 1 I'll turn the microphone over to you, Ms. Boyd.
- 2 Welcome back, by the way.
- MS. MARLA BOYD: Thank you, Mr. Chair.
- 4 Good afternoon. Good afternoon, panel.
- 5 MR. DANIEL PEACO: Good afternoon.

- 7 CROSS-EXAMINATION BY MS. MARLA BOYD:
- 8 MS. MARLA BOYD: You may already know
- 9 I'm Marla Boyd. And I'm going to start this afternoon
- 10 with LA Volume II, which is Manitoba Hydro Exhibit 167-
- 11 2.
- 12 And looking at Tab 1, are you familiar
- 13 with the finance textbook that's included in Manitoba
- 14 Hydro's book of documents? It's by Stephen Ross,
- 15 Randolph Westerfield, and Jeffery Jaffrey, called
- 16 'Corporate Finance'?
- 17 MR. JOHN ATHAS: I -- I believe that I
- 18 noticed that it was in -- that the title once or twice,
- 19 but I'm not sure that I am very familiar with it at
- 20 all.
- 21 MS. MARLA BOYD: And do you recall that
- 22 Manitoba Hydro's expert witness, Dr. Borison, reviewed
- 23 this text in his evidence?
- MR. JOHN ATHAS: Yes.
- MS. MARLA BOYD: And on page 11 of

- 1 Schedule 3 of Manitoba Hydro's rebuttal evidence, which
- 2 is Manitoba Hydro Exhibit number 85. Navigant refers
- 3 to page 186 of that textbook as support for the use of
- 4 the net present value as a primary metric for the
- 5 economic evaluation of alternative development plans.
- 6 Do you aca -- recall reviewing that?
- 7 MR. JOHN ATHAS: Yes, I recall
- 8 discussion about the net present value.
- 9 MS. MARLA BOYD: And would you agree
- 10 that net pres -- present value is the primary measure
- 11 of the economics of resource plans?
- 12 MR. JOHN ATHAS: I would agree that
- 13 it's a -- it's a metric that's produced in almost all
- 14 resource planning. The primary metric is a question on
- 15 how the decision is made.
- 16 MS. MARLA BOYD: I'm sorry, it's the
- 17 primary metric, or...?
- 18 MR. JOHN ATHAS: It -- prime -- whether
- 19 it's primary or not is depending upon the decision
- 20 criteria that's being applied to all the metrics.
- MS. MARLA BOYD: And you'd accept that
- 22 it's used predominantly in evaluating resource plans?
- 23 MR. JOHN ATHAS: It is used in some
- 24 manner, yes.
- MS. MARLA BOYD: Thank you. At Tab 3

6266 of our book of documents, LA provided valuation advice to the New Hampshire Public Utilities Commission on the valuations of the Public Service Company of New Hampshire. That's a report that's dated March 31st of 5 2014. 6 Is that correct? MR. JOHN ATHAS: Yeah, that's correct. MS. MARLA BOYD: And did any of you participate in the preparation of that report? 10 MR. DANIEL PEACO: No. 11 MS. MARLA BOYD: Are you familiar with 12 the contents of the report? MR. DANIEL PEACO: I'm familiar the 13 14 report was done, but it was done by another project 15 team. 16 MS. MARLA BOYD: And I've included some 17 excerpts of the report in our book of documents. I'd 18 just ask you to turn to them. To quote from page 19 of 19 this report, "La Capra Associates" -- it's at the top: 20 "La Capra Associates's determination 21 of the value of the generation assets 22 is based primarily on a discounted 23 cash flow, or DCF, analysis of the 24 anticipated future costs and 25 revenues."

6267 1 Do you see that? 2 MR. DANIEL PEACO: Yes, we do. 3 MS. MARLA BOYD: Does that mean that La Capra used net present value as your primary method? 5 MR. JOHN ATHAS: For the valuation of 6 existing assets, yes. 7 (BRIEF PAUSE) 9 10 MS. MARLA BOYD: In your direct 11 evidence this week, you also addressed the use of 12 internal rate of return, or IRR, and cumulative present 13 value, CPV, as additional helpful tools to supplement decision making. 14 15 Is that correct? 16 MR. JOHN ATHAS: Yes. 17 MS. MARLA BOYD: And I correct in 18 understanding that CPV considers the present value of 19 costs and revenues up to a particular point in time? 20 MR. JOHN ATHAS: That's correct. 21 MS. MARLA BOYD: And CPV ignores all 22 cash flows, either positive or negative, that occur 23 beyond that point in time? 24 MR. JOHN ATHAS: By definition. 25 MS. MARLA BOYD: And if I were to take

- 1 a CPV at, say, thirty-five (35) or fifty (50) years and
- 2 add back in the residual value at that point, that
- 3 would essentially get me back to the seventy-eight (78)
- 4 year NPV analysis, would it not?
- 5 MR. JOHN ATHAS: Yes, it would mean I
- 6 wasted my time in calculating the thirty-five (35) year
- 7 in the present CPV.
- 8 MS. MARLA BOYD: Thank you. The New
- 9 Hampshire work did use either IRR or CPV, did it?
- MR. CHRISTIAN MONNIN: Ms. Boyd,
- 11 they've been quite clear that their team was not
- 12 involved in preparing the New Hampshire report. So
- 13 you're asking them to speak to a report that they had
- 14 no involvement with.
- MS. MARLA BOYD: Are you aware of the
- 16 contents of the report?
- 17 MR. DANIEL PEACO: I'm -- I'm generally
- 18 aware of the contents of the report, but I have been
- 19 quite engaged in preparing for another case.
- 20 MS. MARLA BOYD: Understandably. You
- 21 did indicate to Ms. Van Iderstine on Monday that when
- 22 representatives of your firm were giving evidence, that
- 23 you knew what they were working on and what the
- 24 evidence was about.
- 25 Is that correct?

- 1 MR. DANIEL PEACO: Yes, and I knew that
- 2 the team was working on this and I know what the
- 3 evidence is about.
- 4 MS. MARLA BOYD: And are -- are you
- 5 able to comment on whether or not the IRR or CPV
- 6 metrics were used in that work?
- 7 MR. DANIEL PEACO: Our discounted cash
- 8 flow analysis does a -- an internal rate of return
- 9 merchant calculation, so to that extent it does.
- 10 MS. MARLA BOYD: And that would be
- 11 where you used the interest rate and then solve for the
- 12 purchase price.
- Is that correct?
- 14 MR. DANIEL PEACO: That's correct.
- 15 MS. MARLA BOYD: And in essence is that
- 16 not also considered NPV in most circles?
- 17 MR. DANIEL PEACO: Yeah, you -- you
- 18 result in a present value.
- MS. MARLA BOYD: Thank you.
- In your Appendix 9A on page 24, you
- 21 state that it's common practice in evaluating utility
- 22 investments to look at year-by-year effects. Do you
- 23 recall that?
- MR. JOHN ATHAS: Yes.
- MS. MARLA BOYD: You then indicated

- 1 that LCA undertook this analysis using cumulative
- 2 present values truncated at different points in time,
- 3 correct?
- 4 MR. JOHN ATHAS: That's correct.
- 5 MS. MARLA BOYD: And you go on to state
- 6 in the report at page 25 that LCA believes it's more
- 7 appropriate to look at how each plan's incremental
- 8 costs translate into ratepayer impacts in a revenue
- 9 requirement analysis.
- 10 Is that correct?
- 11 MR. JOHN ATHAS: That's correct.
- MS. MARLA BOYD: Turning to the use of
- 13 a seventy-eight (78) year time frame, would you agree
- 14 that it's important to try and capture the full
- 15 economic value of the assets when comparing options?
- 16 MR. JOHN ATHAS: To calculate the NPV
- 17 metric, I think that's correct.
- MS. MARLA BOYD: So by way of a simple
- 19 example, if I or my boss were looking at buying a
- 20 future retirement property down south and comparing
- 21 buying a house to buying a trailer, I'd certainly want
- 22 to recognize the shorter life of the trailer, wouldn't
- 23 I?
- 24 MR. JOHN ATHAS: Not if you were
- 25 worried about how much money was in the bank and you

- 1 hadn't the sold the house yet. The residual value is
- 2 like -- it's not cash, it's resi -- it's value that if
- 3 you dispose of the asset or you do something, you can
- 4 realize it. In a cash flow analysis it's not cash,
- 5 it's --
- 6 MS. MARLA BOYD: And at the end --
- 7 sorry. Were you finished?
- MR. JOHN ATHAS: It's a value.
- 9 MS. MARLA BOYD: It's a value. At the
- 10 end of the day, don't I have to consider the residual
- 11 value?
- 12 MR. JOHN ATHAS: It should be
- 13 considered; that's one (1) reason why we -- NPV is in
- 14 our analysis. I -- I just point out that it's not a --
- 15 as with the CPVs that are there, it is -- it is not a
- 16 cash flow at that -- at the year 78. So if you're
- 17 worried about what the situa -- how the cash flow is by
- 18 a certain period of time, it is irrelevant.
- 19 MS. MARLA BOYD: And the house that
- 20 your referred to me selling, I could sell for cash,
- 21 could I not?
- MR. JOHN ATHAS: Yes, you could.
- 23 MS. MARLA BOYD: What would be the
- 24 interest in focussing on cash flow in an economic
- 25 analysis?

6272 MR. JOHN ATHAS: If -- if the -- at the 1 point -- at the end of -- of some -- of a -- asset's useful life that's a good point to stop. There are 3 many resources in the -- in a resource plan, not all have the exact end-of-life. Hopefully, they don't have -- all have the same end of life as one (1) particular year so that the -- so that calculating the -- the --7 looking at the cash flow, to me, is very relevant, especially in the shorter periods of time because there are different parties that have con -- liabilities 10 11 involved with the support of an asset or a plan. 12 There are different people that have 13 paid electric bills only up to that point in time. since they're not going to get a cheque in the mail if 14 15 they -- if they -- for the business at the end of --16 year 35, it's, I think -- for instance, it's a pretty relevant parameter for them. 17 18 MS. MARLA BOYD: The goal of the 19 economic analysis is deter -- to determine which option makes the most sense, correct? 21 MR. JOHN ATHAS: Exactly. 22 MS. MARLA BOYD: And the cash flow

- 23 analysis determines whether or not you can afford that
- 24 option?
- 25 MR. JOHN ATHAS: A financial analysis

6273 would determine whether you could afford that option for the -- on -- on the company's books. 3 MS. MARLA BOYD: So the first step in your process is to determine whether or not you're making the best economic choice, correct? MR. JOHN ATHAS: It would be to 6 determine if there is a -- an economic value at the end of seventy-eight (78) years that you think might be worth going after. 10 MS. MARLA BOYD: Thank you. 11 12 (BRIEF PAUSE) 13 14 MS. MARLA BOYD: Turning to page 24 of 15 Appendix 9A, you stated in your report: "It is common for decision makers to 16 17 place much less weight on long-term 18 forecasts of long-term benefits." 19 Do you recall that? 20 MR. JOHN ATHAS: That's correct. 21 MS. MARLA BOYD: And discounting an NPV 22 analysis gives less weight to future events than those 23 that are closer in time, correct? 24 MR. JOHN ATHAS: Yes. 25 MS. MARLA BOYD: And if I could turn

- 1 you to page 16 of your Appendix 9A, about halfway down
- 2 the page? Thank you. You have analyzed -- or,
- 3 outlined the characteristics of an unleveraged cashflow
- 4 analysis, and we just reviewed those, that there's no
- 5 finance-related costs?
- 6 MR. JOHN ATHAS: Correct.
- 7 MS. MARLA BOYD: And all annual costs
- 8 during the development construction of any capital
- 9 project are treated the same as if they were expense
- 10 cash requirements?
- MR. JOHN ATHAS: Yes.
- 12 MS. MARLA BOYD: And there is no
- 13 corresponding capitalization to include elements such
- 14 as interest during construction?
- MR. JOHN ATHAS: Yes.
- 16 MS. MARLA BOYD: And this approach does
- 17 not translate capital expenditures into the series of
- 18 annual revenue requirement dollars that would be
- 19 included in annual cost of service totals for rate-
- 20 making purposes?
- MR. JOHN ATHAS: That's correct.
- MS. MARLA BOYD: And just to clarify,
- 23 these are standard characteristics for this type of
- 24 analysis, correct?
- 25 MR. JOHN ATHAS: In resource planning,

6275 most -- I would -- more often than not, I would actually see some sort of revenue requirement translation. 3 MS. MARLA BOYD: The unleveraged cashflow methodology or analysis includes all of these characteristics typically, correct? 7 MR. JOHN ATHAS: I believe these are characteristics that it doesn't include. 9 MS. MARLA BOYD: Okay. You flipped my 10 question around, but yes, these are things that are typical of that type of analysis, or -- or typically 11 12 not included in that analysis? 13 MR. JOHN ATHAS: That's correct. 14 15 (BRIEF PAUSE) 16 17 MS. MARLA BOYD: You indicated in your 18 second last response to me that you'd expect some type 19 of revenue requirement analysis. Did I -- did I get 20 you correctly? MR. JOHN ATHAS: That's correct. 21 22 MS. MARLA BOYD: And you're aware that 23 Manitoba Hydro completed that in Chapter 11 of its --24 its appendix -- it -- its filing? 25 MR. JOHN ATHAS: Yes, financial

- 1 analysis.
- MS. MARLA BOYD: Thank you. If I can
- 3 turn to page 92 of 9A? Looking at the first paragraph
- 4 under the discount rate sensitivity, you've indicated
- 5 that LCA assigned a zero probability to the Manitoba
- 6 Hydro low discount rate case of 3.35 percent in real
- 7 terms?
- 8 MR. JOHN ATHAS: Yes.
- 9 MS. MARLA BOYD: And are you aware that
- 10 the 3.35 real discount rate has an embedded long Canada
- 11 bond rate of 2.3 percent?
- 12 MR. JOHN ATHAS: That sounds correct.
- MS. MARLA BOYD: And if you need a
- 14 reference, it's in CAC/Manitoba Hydro 1-127. If I
- 15 could refer you to Manitoba Hydro's rebuttal evidence,
- 16 that's Exhibit 85, page 126, lines 27 to 30? Manitoba
- 17 Hydro indicated in this response that:
- 18 "Real interest rates have been at or
- 19 below the rates that underlie our
- 20 load case for 17 percent of the time
- 21 since April of 2008."
- Do you recall reviewing that?
- MR. JOHN ATHAS: Yes.
- 24 MS. MARLA BOYD: And given that, how
- 25 can you conclude that there is zero possibility that

- 1 such rates would occur?
- 2 MR. JOHN ATHAS: For seventy-eight (78)
- 3 years, I don't necessarily get convinced from that --
- 4 from that twelve (12) of the last sixty-nine (69)
- 5 months.
- 6 MS. MARLA BOYD: But it's not zero
- 7 possibility, is it? There's a demonstration in front
- 8 of you that it's occurred.
- 9 MR. JOHN ATHAS: You -- you -- there's
- 10 -- well, there's definitely not zero probability of the
- 11 -- the absolute extremes of any distribution, but when
- 12 you're doing the -- when you're doing a -- a decision
- 13 analysis and certainty analysis, you don't nece --
- 14 necessarily run with the -- with the last -- with the -
- 15 with the most extreme value of the -- of the curves,
- 16 but you would have -- so my -- my question -- my -- my
- 17 response is that it wasn't necessary to assign any
- 18 probability to that in order to represent what we
- 19 believe is a -- a more appropriate distribution.
- 20 MS. MARLA BOYD: So Manitoba Hydro had
- 21 assigned probabilities of 15 percent low, 50 percent
- 22 reference, and 35 percent high.
- Is that correct?
- 24 MR. JOHN ATHAS: Excuse me, if you
- 25 could repeat the question? I'm sorry.

6278 MS. MARLA BOYD: Sure. Manitoba Hydro 1 had assigned probabilities of 15 percent to the low dis -- discount rate, 50 percent to the reference discount 3 rate, and twenty 20 -- 35 percent to the high discount rate. Do you recall that? 6 7 MR. JOHN ATHAS: That's correct. MS. MARLA BOYD: And LCA has changed those probabilities to zero percent for low, 50 percent for reference, and 50 percent for high? 10 11 MR. JOHN ATHAS: That's correct. 12 MS. MARLA BOYD: And so could you 13 explain why you would choose to shift the probabilities to the 50:50 ref and high? 14 15 16 (BRIEF PAUSE) 17 18 MR. JOHN ATHAS: We hadn't had a very 19 detailed discussion on probability of the -- of those two (2) remaining scenarios by themselves with -- with 21 MPA at the time, and I used 50:50 as just a -- as a --22 as the point that you would use when you don't have any better information. 23 24 MS. MARLA BOYD: Why wouldn't you use thirty-three (33), thirty-three (33), thirty-three

PUB re NFAT 04-09-2014 6279 (33)? 2 MR. JOHN ATHAS: Because I already eliminated the -- the probability of -- of being too 3 extreme of the -- the low interest rate scenario. With some testing, the ability to -- testing, what happens if you had a perspective that you're eliminating the low interest rate scenario. I used it -- used the -- a 7 lot of analysis here with the Manitoba Hydro probabilities. 10 MS. MARLA BOYD: But you didn't 11 eliminate the 50 percent high. If you were eliminating 12 extremes, you only eliminated the low extreme. 13 Is that fair? 14 MR. JOHN ATHAS: That's correct. 15 16 (BRIEF PAUSE) 17 18 MS. MARLA BOYD: Have you undertaken 19 any analysis of the assignment of probabilities? 20 MR. JOHN ATHAS: No. MS. MARLA BOYD: And are you aware that 21 22 Manitoba Hydro undertook an analysis of that to -- to 23 derive its probabilities? That's Appendix 9.3. 24 MR. JOHN ATHAS: Yes, I'm aware that

there was an -- that there was an analy -- analytical

- 1 exercise starting with opinions about probabilities at
- 2 one (1) point to -- to arrive at the final
- 3 probabilities.
- 4 MS. MARLA BOYD: And you didn't do any
- 5 similar analysis?
- 6 MR. JOHN ATHAS: For sensitivities,
- 7 it's not always -- it's not -- it wasn't necessarily
- 8 trying to prove the other one wrong. It's providing a
- 9 sensitivity of -- of metric with information as to what
- 10 -- as to how it might be if it was -- if people
- 11 considered that appropriate.
- 12 MS. MARLA BOYD: So the zero, 50:50 is
- 13 not LCA's assessment of what's appropriate? It's a
- 14 sensitivity?
- MR. JOHN ATHAS: Sensitivity.
- 16 MS. MARLA BOYD: And did you look at
- 17 what the interest rates had been over the last sixty-
- 18 nine (69) months?
- MR. JOHN ATHAS: No.
- 20 MS. MARLA BOYD: You knew that it
- 21 hadn't occurred that -- that two point three (2.3) had
- 22 occurred in the last sixty-nine (69) months twelve (12)
- 23 times?
- MR. JOHN ATHAS: I believe my
- 25 conversation with MPA representatives was that this is

6281 the lowest that it's -- it's been -- the lowest it's ever been at that level that that was assumed for a few -- for several months recently, but that it would be 3 extremely improbable that it could be a -- an interest rate that would prevail the seventy-eight (78) years. 6 MS. MARLA BOYD: Had you looked at how many, if any, months there had been a high interest rate in the last sixty-nine (69) months? 9 MR. JOHN ATHAS: Nope. 10 MS. MARLA BOYD: You didn't look at it? 11 MR. JOHN ATHAS: No. 12 MS. MARLA BOYD: Would it surprise you 13 to know that there were zero? 14 MR. JOHN ATHAS: It wouldn't surprise 15 me that they could be zero. 16 17 (BRIEF PAUSE) 18 19 MS. MARLA BOYD: LCA also did some work for the Massachusetts Department of Energy Resources, 21 September 30th of 2013. I have that at Tab 2 of the 22 book of documents. 23 MR. JOHN ATHAS: Yes. 24 MS. MARLA BOYD: Are you familiar with 25 that work?

- 1 MR. JOHN ATHAS: Somewhat, yes.
- MS. MARLA BOYD: I just want to bring
- 3 your attention to the key assumptions that are on page
- 4 5 of that report. That's page 4 of the book of
- 5 documents. LCA's assessment at that point was use of a
- 6 5 percent nominal rate and assumption and a real
- 7 discount rate of approximately 2.4 percent.
- 8 Is that correct?
- 9 MR. CHRISTIAN MONNIN: Again, Ms. Boyd,
- 10 I just want to bring attention to the panel that none
- 11 of the representatives of La Capra were involved with
- 12 writing this report.
- 13 MS. MARLA BOYD: I'm sorry, I believe
- 14 Mr. Athas just told me he was somewhat familiar with
- 15 it.
- 16 MR. CHRISTIAN MONNIN: He might be
- 17 familiar, but he did not write the report is what I
- 18 said.
- 19
- 20 CONTINUED BY MS. MARLA BOYD:
- 21 MS. MARLA BOYD: Fair enough. If he
- 22 can't answer the question, that's fine.
- MR. JOHN ATHAS: Many of the
- 24 assumptions in this report reflect the -- the
- 25 perspective of the Department of Energy in

- 1 Massachusetts and not necessarily the perspective of La
- 2 Capra Associates.
- MS. MARLA BOYD: Perhaps I read the
- 4 footnote wrong, but it seemed to me that it was
- 5 explaining that LCA used 2.4 percent, and in fact that
- 6 was higher than what the AESC study used at 1.36
- 7 percent. I thought the message was that LCA was being
- 8 conservative in using 2.4 percent.
- 9 Is that not right?
- 10 MR. JOHN ATHAS: That's absolutely
- 11 correct that we used that. It doesn't say anything
- 12 about whether that was our endorsement or the -- or the
- 13 Department of Energy's consideration.
- 14 THE CHAIRPERSON: Ms. Boyd, could you
- 15 repeat the reference to the document that you're
- 16 discussing?
- MS. MARLA BOYD: Yes, it's in our
- 18 Volume II book of documents at Tab 2.
- THE CHAIRPERSON: Thank you.
- 20 MS. MARLA BOYD: It's a Massachusetts
- 21 Department of Energy Resources, and on page 4 of the
- 22 book of documents there's a list of key assumptions.
- 23 Footnote 7 at the bottom includes the 5
- 24 percent nominal rate, two point five (2.5) inflation,
- 25 and the discount rate of 2.4 percent.

6284 1 (BRIEF PAUSE) 2 3 MS. MARLA BOYD: Mr. Chair, your mic. THE CHAIRPERSON: Sorry. 5 CONTINUED BY MS. MARLA BOYD: 7 MS. MARLA BOYD: Thanks. I'm going to move on to Tab 4. Yesterday La Capra presented figures such as the one that's shown at Tab 4 in your direct evidence, showing uncertainty analysis of alternatives 10 11 using an All Gas as a baseline. 12 And in page 67 of your report, which is 13 at page 10 of our book of documents, the dotted red 14 line represents the All Gas scenario, the vertical 15 line, correct? 16 MR. JOHN ATHAS: That's correct. 17 MS. MARLA BOYD: And Dr. Grant asked 18 you about the effects of these figures or on these 19 figures of changing the baseline from All Gas to the Preferred Development Plan. 21 Do you recall that? 22 MR. JOHN ATHAS: That's correct. 23 MS. MARLA BOYD: And when you answered 24 that question, Mr. Athas, you referred to that figure, 25 contrasting the LCA uncertainty analysis approach with

- 1 the Manitoba Hydro uncertainty analysis approach.
- 2 And in that case, the blue dotted line
- 3 is showing the LCA approach to the Preferred
- 4 Development Plan, correct?
- 5 MR. JOHN ATHAS: That's correct.
- 6 MS. MARLA BOYD: And on that table, the
- 7 -- the top figure -- or the top table in the figure
- 8 provides statistics for the two (2) alternatives using
- 9 what's described as the LCA approach?
- 10 MR. JOHN ATHAS: That's correct.
- MS. MARLA BOYD: And, for example, in
- 12 that case the -- the All Gas Plan has no variation,
- 13 it's all zeros?
- MR. JOHN ATHAS: It was --
- MS. MARLA BOYD: Do you see that?
- MR. JOHN ATHAS: -- zeroes in the base
- 17 case, that's correct.
- 18 MS. MARLA BOYD: And the Preferred
- 19 Development Plan varies from the 10th percentile of
- 20 negative 1.9 billion, or one nine one three (1.913), to
- 21 what's described as a 90th percentile reward of fifty-
- 22 eight sixty-two (5862).
- Do you see that?
- MR. JOHN ATHAS: That's correct.
- MS. MARLA BOYD: And as I understand

- 1 it, the fifty-eight sixty-two (5862) is actually the
- 2 95th percentile and that number should have been
- 3 corrected to fifty-five sixty-seven (5567).
- Do you recall that? I believe you've
- 5 corrected it elsewhere.
- MR. JOHN ATHAS: Yes, there's a few
- 7 times we haven't caught the fact that when we picked up
- 8 the software it had 95 percent --
- 9 MS. MARLA BOYD: Okay. So --
- 10 MR. JOHN ATHAS: -- for Manitoba Hydro.
- MS. MARLA BOYD: -- fifty-five sixty-
- 12 seven (5567) is the correct number?
- MR. JOHN ATHAS: Yeah.
- 14 MS. MARLA BOYD: And you indicated in
- 15 your -- in your response to Dr. Grant that changing the
- 16 baseline with the LCA approach would effectively be to
- 17 flip the graphic, as you described it, whereby the
- 18 position of the two (2) alternatives would be switched.
- 19 The Preferred Development Plan would become the
- 20 vertical line and the All Gas would be the S-curve
- 21 showing the variation.
- Is that correct?
- 23 MR. JOHN ATHAS: I -- I think we had a
- 24 kind of corner-to-corner flip, yeah, something to that
- 25 effect.

- 1 MS. MARLA BOYD: Well, actually
- 2 Manitoba Hydro has taken the liberty at Tab 5 of
- 3 providing a flipped figure.
- 4 MR. JOHN ATHAS: Thank you.
- 5 MS. MARLA BOYD: Through the magic of
- 6 technology. So do you -- just to walk through that.
- 7 This provides the same statistics with the changed
- 8 baseline. So in this case the Preferred Development
- 9 Plan has no variation. It's all zeroes.
- 10 Do you see that?
- MR. JOHN ATHAS: That's correct.
- MS. MARLA BOYD: And the All Gas varies
- 13 from the 10th percentile of negative fifty-five sixty-
- 14 seven (5567) to the 90th percentile of nineteen
- 15 thirteen (1913).
- 16 Do you agree?
- 17 MR. JOHN ATHAS: Looks right.
- MS. MARLA BOYD: It appears that with
- 19 the All Gas baseline, the All Gas alternative has no
- 20 risk and the Preferred Development Plan has
- 21 considerable risk. However, when you flip the graph
- 22 and the Preferred Development Plan becomes the
- 23 baseline, it appears to have no risk while the All Gas
- 24 Plan has considerable risk.
- Do you agree?

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6288 MR. JOHN ATHAS: I -- I believe you 1 could make the same inferences from the prior chart as well, because we -- our chart shows whether the --3 whether the -- when the All Gas Pla -- how many -- what percentiles or what -- on percentage points the All Gas Plan would be higher cost than the -- than the 7 Preferred Plan. And I can read those numbers right off that -- right off of this curve. So I don't believe it changes perspective. It just -- it just changes lens. 10 MS. MARLA BOYD: For the purposes of the uncertainty on that analysis, is there any 11 particular reason that you have to choose, or should 13 choose, All Gas as the baseline? 14 MR. JOHN ATHAS: No, we have several 15 charts in our -- in our figures that we actually choose 16 other ones as baselines. We were following the 17 convention set forth by the -- Manitoba Hydro in the 18 NFAT. 19 MS. MARLA BOYD: Well, to be fair, Manitoba Hydro used All Gas ref/ref/ref rather than the 21 twenty-seven (27) different scenarios as its baseline, 22 correct? 23 MR. JOHN ATHAS: Yes, but they -- they

-- that's because Manitoba Hydro -- well, at expected

value they also -- you also subtract the -- the Gas

6289 case. And so it's -- so when the -- you didn't calculate the information that we calculated, which is one of the economics at the different points of one (1) 3 -- of one (1) plan versus the All Gas. 5 MS. MARLA BOYD: On Monday, at transcript page 5,669, LCA indicated that the primary 7 value of these figures... 8 9 (BRIEF PAUSE) 10 11 MR. JOHN ATHAS: One (1) -- one (1) 12 correction then -- then I'm going to have to ask you to 13 repeat your question, because I was --14 MS. MARLA BOYD: Sure. 15 MR. JOHN ATHAS: There are some tables 16 in the -- in the NFAT filing where the -- where the --17 each of the plans were subtracted from the -- their 18 corresponding branch of the -- of -- of the All Gas 19 Plan. So there -- there's a quilt with all zeroes in there for All Gas, much like we did. The difference is there hasn't -- there's hasn't -- it -- it's never been 21 22 plotted in a risk profile. 23 MS. MARLA BOYD: Thank you. So I was 24 turning you to transcript page 5,669. And you 25 indicated on Monday that the primary value of these

- 1 figures -- and I'm referring to the two (2) that are in
- 2 the book of documents -- or the one (1) that's in the
- 3 book of documents, the type of figure that you had done
- 4 at Tab 4, that the values of those figures is to
- 5 demonstrate that the plans perform differently under
- 6 different conditions.
- 7 Is that right?
- 8 MR. JOHN ATHAS: That's correct.
- 9 MS. MARLA BOYD: So what would you
- 10 advise the Board to be taking from this regarding the
- 11 risk of various alternatives?
- MR. JOHN ATHAS: I believe they could
- 13 look at the -- the potential benefits and the potential
- 14 penalties of choosing one (1) plan over the All Gas
- 15 Plan on a probabilistic distribution basis.
- 16 And -- and since this -- as we had a
- 17 discussion with -- many times about the issue of
- 18 liability and merchant versus utility and -- and other
- 19 things, this is the -- since there is no -- a do
- 20 nothing base case that's around as a -- as a real
- 21 option that you have to plan the system, as was
- 22 mentioned earlier today, to a liability criteria. To
- 23 me that is a very good expression of value.
- 24 MS. MARLA BOYD: Would you agree that
- 25 when Manitoba Hydro compares to the All Gas ref/ref/ref

6291 that display of risk is not sensitive to the baseline, there's only one (1) view, the ref/ref/ref view? 3 MR. JOHN ATHAS: Well, I might as well make it clear, I believe that when you show your risk profile all compared to ref/ref/ref, you're essentially showing the variation in your cost, not the variation 7 in your benefits. It's -- because it -- it has the variation of the cost of that plan if it was enacted. And it doesn't necessarily show anything about whether I would have -- whether I would have -- if I -- if I 10 11 wanted to favour that, but a particular branch, whether I would have made a decision in a different manner. 12 MS. MARLA BOYD: You understand 13 14 Manitoba Hydro's analysis to be an NPV, correct? It 15 includes both costs and benefits? 16 MR. JOHN ATHAS: Yes, but the only 17 thing that varies when you go across the profile is 18 cost. 19 (BRIEF PAUSE) 20 21 22 MR. JOHN ATHAS: Maybe I could be 23 helpful to explain what I might have lip synced to be 24 some doubt. That the -- I believe it was testified by 25 the Manitoba Hydro panel that -- that you could have

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- 1 taken a difference of any value to produce the -- the
- 2 risk profiles that were -- that Manitoba Hydro elected
- 3 to put into the NFAT, and make some observations and
- 4 conclusions of that.
- 5 What -- what the -- what we are -- what
- 6 -- what I believe we have done is completely consistent
- 7 with the information that's the primary information
- 8 that was discussed within the -- within the NFAT, which
- 9 is to say, What is the economic comparison between
- 10 plans.
- 11 And in that NFAT analysis, all of
- 12 Chapter 9 go -- goes through and says, Let me -- let me
- 13 talk about the value of a -- of a plan under these
- 14 reference conditions by comparing it to my lowest cost
- 15 investment plan, All Gas.
- 16 That tells me -- that calculates a value
- 17 number. As a matter of fact, it's talked about a lot,
- 18 1.696 million is probably etched in everybody's brain,
- 19 and it's the last thing they think about before they go
- 20 to sleep at night.
- 21 That number is the same number that I
- 22 calculate for each of the branches on -- on a -- on a
- 23 conceptual basis. Therefore, I believe it's
- 24 determining -- just it -- it is -- I'm estimating the
- 25 value of a plan versus the base case chosen under the -

- 1 under the different conditions of the plan.
- 2 The only thing that varies when you
- 3 calculate your other points of the quilt is the cost of
- 4 the particular plan, and it doesn't give me any
- 5 indication of whether the cost of the base case plan
- 6 changed more or less. That's why I kind of tried to
- 7 conceptualize what didn't make any sense to me as a
- 8 cost profile.
- 9 MS. MARLA BOYD: The NPV includes
- 10 benefits and costs, correct?
- 11 MR. JOHN ATHAS: The NPV that is in the
- 12 other -- it's not a -- okay, let -- let's -- let me --
- 13 let's back up. The steps, I understand, from the
- 14 process, is you've calculated an NPV of a plan when you
- 15 include revenue for export sales. That, I believe, is
- 16 an interim calculation before you start talking about
- 17 whether a plan's good or not. It's all related to net
- 18 costs of a plan. I don't believe it's a net benefit of
- 19 a plan, I believe it's a net cost to choosing that
- 20 plan.
- 21 You -- you -- in Chapter 9, all the
- 22 discussions of net benefit are derived by subtracting
- 23 the costs of that particular plan under reference
- 24 conditions from the cost of the all gas parameter of
- 25 the reference conditions and thus, the one point six-

- 1 nine-six (1.196) and all the other numbers that you
- 2 compare to.
- 3 MS. MARLA BOYD: Thank you. I'm going
- 4 to move on to Tab 6 of Manitoba Hydro's book of
- 5 documents. Page 12 of the book of documents shows
- 6 slide 29 from your direct evidence on Monday.
- 7 MR. JOHN ATHAS: Yes.
- 8 MS. MARLA BOYD: This is the case that
- 9 you reviewed a little bit earlier that -- it includes
- 10 DSM, which was increased to be 150 percent of the base
- 11 DSM, correct?
- MR. JOHN ATHAS: Correct.
- MS. MARLA BOYD: And it also
- 14 incorporates a reduction to the load forecast due to
- 15 fuel switching.
- MR. JOHN ATHAS: Correct.
- MS. MARLA BOYD: And you, in your
- 18 request to Manitoba Hydro to make adjustments for the
- 19 LCA no generation load line, made two (2) adjustments
- 20 to the 2012 net load forecast, correct?
- 21 MR. JOHN ATHAS: Those were the two (2)
- 22 requested changes to the load forecast.
- 23 MS. MARLA BOYD: That is the reduction
- 24 of the load forecast to be equivalent to the 2013 load
- 25 forecast and incorporating Level 1 DSM?

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- 1 MR. JOHN ATHAS: No. The -- the -- I
- 2 didn't think we were going to revisit this again. We
- 3 wanted to see what exactly it says here. Some DSM
- 4 that's more than in the base case, some fuel switching
- 5 that also helps mitigate the capacity need in the
- 6 winter to go along with the -- the -- something that
- 7 just perhaps -- like the transmission that reduces the
- 8 dependable energy requirements.
- 9 In the course of that discussion, we
- 10 were -- there was a lot of discussion that -- that
- 11 said, Perhaps you should use the 2013 numbers. And --
- 12 and -- but -- and if the -- and there was a time when
- 13 it was thought that we would be comfortable with using
- 14 the 2013 numbers in the 2012 analysis if it was a good
- 15 proxy and was going to save effort for the Manitoba
- 16 Hydro staff.
- MS. MARLA BOYD: You had a discussion
- 18 this morning with Mr. Hacault where you discussed the
- 19 Level 2 DSM, which includes fuel switching, being
- 20 similar in nature to the -- the No Generation LCA
- 21 option, correct?
- MR. JOHN ATHAS: The understanding is
- 23 that the -- the load level represented by the 2013 load
- 24 forecast with the Level 2 DSM is fairly close to the
- 25 loads that were used by the -- by the -- in the -- by

- 1 Manitoba Hydro when they ran this No -- No New
- 2 Generation case for us.
- 3 Naturally, it's fairly close to the
- 4 subjective and fairly -- and it's averaged over a
- 5 longer curve. It is not as close in the early years as
- 6 it is in the later years.
- 7 MS. MARLA BOYD: And Mr. Wojczynski
- 8 provided you or your counsel yesterday with the
- 9 document that's at page 18 of our book of documents.
- 10 Do you have that? That's the one. Thank you.
- I think this visually demonstrates what
- 12 you were just talking about, that if you look at the
- 13 black line, that's the LCA adjusted load.
- 14 MR. JOHN ATHAS: It's exactly what I
- 15 was picturing in my mind when I was describing it.
- 16 MS. MARLA BOYD: Great. And the orange
- 17 line then is the level 2 DSM that we've been
- 18 discussing. You can see that it runs under and then
- 19 crosses over.
- Is that right?
- MR. JOHN ATHAS: Yes, assuming that --
- 22 assuming it says that the -- that's all to the 2013
- 23 load forecast.
- 24 MS. MARLA BOYD: Turning over the page
- 25 to page 19 of our book of documents, this is slide

- 1 number 32 from your direct evidence. I just wanted to
- 2 spend a minute reviewing the discussion you had with
- 3 Dr. Bel yesterday regarding the economics of that No
- 4 Generation case.
- In fairness, I think, just to be clear,
- 6 your position is not that you're advancing this as a
- 7 viable plan, but that it's a hypothetical plan that
- 8 demonstrates the potential benefits from increasing
- 9 DSM, a larger interconnection, and relaxed import
- 10 limits.
- 11 Is that fair?
- 12 MR. JOHN ATHAS: That's fair, and the
- 13 converse is also true: that it -- that it demonstrates
- 14 that there's no penalty by trying to pursue a plan that
- 15 delays the -- the introduction of generation into the
- 16 Manitoba Hydro system.
- MS. MARLA BOYD: Okay. Well, we'll
- 18 talk about that one, but -- this graph shows at the
- 19 right-hand side that the -- the No Generation case is
- 20 the black line along the top, correct?
- 21 MR. JOHN ATHAS: That's correct.
- MS. MARLA BOYD: And at the -- at the
- 23 far right side of the graph, the -- that case seventy-
- 24 eight (78) -- the No Generation case seventy-eight (78)
- 25 year NPV is almost as good as the Preferred Plan.

- 1 Is that right?
- MR. JOHN ATHAS: That's correct.
- 3 MS. MARLA BOYD: The Preferred -- the
- 4 Preferred Plan is the blue line?
- 5 MR. JOHN ATHAS: Yeah, but the number
- 6 is -- I prefer to make an observation that the number
- 7 is lower than the blue line and not necessarily say
- 8 good.
- 9 MS. MARLA BOYD: Okay. Now, that No
- 10 Generation case included the benefits of expanding DSM,
- 11 including fuel-switching, correct?
- 12 MR. JOHN ATHAS: That's correct.
- MS. MARLA BOYD: And the Preferred Plan
- 14 economics that are shown on this graph do not include
- 15 expanded DSM.
- 16 Is that correct?
- 17 MR. JOHN ATHAS: That's correct.
- MS. MARLA BOYD: So would you agree
- 19 that the Preferred Plan economics would improve
- 20 relative to the No Generation case if it also included
- 21 the benefits of expanding DSM?
- MR. JOHN ATHAS: Not if you put the --
- 23 the DSM in the All Gas case as well.
- 24 MS. MARLA BOYD: Well, if you compare
- 25 it to the No Generation case, the Preferred Plan would

- 1 be higher, correct? The line would be higher.
- 2 MR. JOHN ATHAS: I -- I don't know
- 3 that. I mean, you -- you're talking about, Maybe we
- 4 should have done a -- maybe we should have done an
- 5 analysis that we had have discussed with the -- with
- 6 Manitoba Hydro people at the time is -- why don't we
- 7 put DSM in all the cases? And we said, Go ahead, run
- 8 them, if you -- but please, run our case first, because
- 9 you don't seem to have a lot of time to run them.

10

11 (BRIEF PAUSE)

- MS. MARLA BOYD: Are you able to
- 14 comment if we were to put the DSM in all of the -- the
- 15 plans, the -- the No Gen and -- sorry, in the Preferred
- 16 Plan and the All Gas, that they would -- they would
- 17 both improve?
- 18 MR. JOHN ATHAS: In -- on a cost side,
- 19 yes.
- MS. MARLA BOYD: I'm sorry?
- 21 MR. JOHN ATHAS: From -- they would
- 22 both have lower costs.
- MS. MARLA BOYD: Lower costs.
- 24 MR. RICHARD BEL: Can I ask what did
- 25 you mean by, It shows no penalty from delaying?

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6300 MR. JOHN ATHAS: Well, I -- I guess we 1 took from the scope of work, and I've seen this is in other -- other jurisdictions as well -- where -- where 3 the -- as a matter of fact, it's corresponding to legislation in -- in Connecticut for IRP, but it -- I -- we took it as the -- that the -- because the -- the scope of work item was to examine a case with gener --7 with no new generation or generation significantly 9 delayed. I forget the actual choice of words. 10 So with that, it sounded to me like --11 like -- because everyone is talking about putting in 12 generation, that maybe we -- that someone has the 13 perspective of -- that said, How bad would it be if we 14 didn't put in generation if we did everything else? 15 And that's kind of akin to the Connecticut legislation, 16 which says that IRP, which they had to do at the time, 17 had to consider a case where they put in as much DSM as 18 it took to -- to defer the need for generation past ten 19 (10) years. 20 They did not categorize it as being 21 limited by all economic on some screening testing or 22 anything, they just said, Tell us what this case looks 23 like. And -- and so -- and -- and there I get the --24 you know, by definition, if you believe that the --

everything is nice and coordinated, and it -- and

- 1 you're -- that's asking for more DSM that might be
- 2 technically deemed economic, there -- in that case,
- 3 they kind of wondered about, How bad does it get if I
- 4 do that?
- 5 And so -- so that's why I said that the
- 6 -- there's a lot to be learned from our -- from a No
- 7 New Gen case. As Mr. Peaco explained, there's -- you
- 8 know, you can look at the value of the components, you
- 9 can look at the value of the components and then decide
- 10 that -- that maybe they should be in other plans, like
- 11 we're discussing here.
- But they -- one (1) of the things it
- 13 says is that you -- that you -- even if you ended up on
- 14 a No Gen case and never pursued the hydros, you're
- 15 probably not exactly going down a bad path.

- 17 CONTINUED BY MS. MARLA BOYD:
- MS. MARLA BOYD: If I could ask you to
- 19 turn to page 20 of our book of documents? This is
- 20 Slide 129 from Manitoba Hydro Exhibit 95, our direct
- 21 evidence, and it shows the benefits of DSM in various
- 22 plans.
- MR. JOHN ATHAS: Yes.
- MS. MARLA BOYD: Do you see that under
- 25 the Preferred Development Plan, there's a \$285 million

- 1 benefit going from base DSM to Level 1 DSM?
- MR. JOHN ATHAS: That's correct.
- MS. MARLA BOYD: And do you see that
- 4 there's a further \$737 million going from Level 1 DSM
- 5 to Level 2 DSM?
- 6 MR. JOHN ATHAS: That's correct.
- 7 MS. MARLA BOYD: So therefore, the
- 8 benefit of going from the base DSM to Level 2 DSM is
- 9 just over a billion dollars. Do you agree?
- 10 MR. JOHN ATHAS: The cost reduction is
- 11 that much. If you start to try to compare apples to
- 12 apples, and you want to put the -- put the -- the DSM
- 13 Level 2 into the -- into the All Gas case, I think the
- 14 numbers on this page say that the economics get worse.
- MS. MARLA BOYD: Yes, the -- the All
- 16 Gas Plan, you could do the same thing, right, it's
- 17 there base to Level 1, five thirty-five (535), Level 1
- 18 to Level 2, eight sixteen (816)?
- MR. JOHN ATHAS: That's right. That's
- 20 why I kind of -- in my frame of mind I like to think of
- 21 it as an isolation at lowered cost. If you put it in
- 22 the other case it reduced the -- it made it actually
- 23 less beneficial, or -- or potentially worse than the --
- 24 than the All Gas case. And that was -- that was one
- 25 (1) of the boxes that was used on the slide in our

- 1 presentation by -- by Mr. Peaco.
- MS. MARLA BOYD: So if I look back to
- 3 page 19, your slide number 32, if the Preferred Plan
- 4 line were re -- redrawn to include the DSM benefits
- 5 that are in the No Gen case, that line would move up by
- 6 approximately a billion dollars, correct?
- 7 MR. JOHN ATHAS: No. It -- it goes --
- 8 the blue line goes down by \$329 million at the end
- 9 based on your own numbers, the one (1) on the page we
- 10 were just looking at. I can't tell you how the black
- 11 line moves because you didn't run that case. I can
- 12 tell you that the blue line versus All Gas moves down
- 13 by \$329 million.
- 14 MS. MARLA BOYD: And both of them would
- 15 be above the No Gen case?
- 16 MR. JOHN ATHAS: I don't know that.
- 17 Let's -- let me -- me be clear. You -- we talked about
- 18 how there -- the loads might be similar. Well, in the
- 19 2000 -- in the 2013 start analysis and other things,
- 20 some of that load -- well, in -- in our analysis we
- 21 kind of had to pay for all the load reduction. Some of
- 22 that -- some of the load reduction that's in the -- in
- 23 these analysis that you're referring to comes from
- 24 reduction in the load forecast for 213 -- 2013, so it's
- 25 free.

6304 1 I don't -- that's why I don't think it's apples to apples. 3 (BRIEF PAUSE) 5 MS. MARLA BOYD: The No Gen case on 6 slide 32 has the benefit of load reduction. We've already reviewed that, correct? 9 MR. JOHN ATHAS: Has the benefit of load reduction at a cost. 10 11 MS. MARLA BOYD: And if you were to take the same load reduction into the Preferred 13 Development Plan at the costs that are shown on slide 14 129, it would move that line up \$1 billion relative to 15 the No Gen case, correct? MR. JOHN ATHAS: I don't know that. 16 17 You -- you're asking me the same question about four 18 (4) different ways. The analy -- DSM by the -- if you turn to your own page, right here, on page 20 of the -of the document, you are demonstrating that DSM has different effects on the cost reduction to different 21 22 plans. 23 And you're asking me to speculate on it 24 -- on how if you actually made a No New Gen case, a 25 2013 case, with Level 2 DSM and -- and so I didn't have

6305 to pay for some of the load reduction because it -because it came, I -- if the black line would be identically to black line, I doubt it. 3 4 5 (BRIEF PAUSE) 6 7 MS. MARLA BOYD: If we were to work with the All Gas Plan and to put the \$1.3 billion that's shown in the move from the base to the Level 2 DSM on your graph, that would move the No Gen line and 10 11 the All Gas line closer together, correct? 12 MR. JOHN ATHAS: If the -- if I was 13 compar -- if the -- if you made the assumption that the black line would be the No Gen case that would come out 14 15 of a 2013 analysis, even if I don't put the DSM in, 16 that's what -- that's what would happen. 17 But I don't -- but if I put the 2013 18 loads in, the first thing I'd have to do is take away 19 some of the DSM costs that were put in to get me the load -- the cost reduc -- the load reduction. 21 MS. MARLA BOYD: You understand all 22 those costs are included in all of the figures that are 23 on page 20? 24 MR. JOHN ATHAS: Yeah. But I don't see

the All -- the No Gen case.

6306 MS. MARLA BOYD: Okay. 1 The No Gen case is in the email that's on page 14 of our book of documents. And it confirms that the No Gen case 3 includes the -- at line 13 of page 2 of 3 of the response, includes the 2013 NFAT planning assumptions? 6 MR. JOHN ATHAS: Let me make sure I'm 7 looking at the right spot. 8 MS. MARLA BOYD: Sure. It's your 9 response to Manitoba Hydro LCA-16A. And you included in that response the text of an email, which was the 10 confirmation of the planning assumptions included in 11 the No Gen case. And on line 13, page 2 of 3, the 12 13 assumption is the 2013 NFAT planning assumptions. 14 15 (BRIEF PAUSE) 16 17 MR. JOHN ATHAS: We went through -- we 18 went through a rather lengthy discussion in the first 19 week of December at the offices of Manitoba Hydro. We wanted to see the -- the No New Generation case under 21 conditions of uncertainty that didn't exist in the 2013 22 assumptions. 23 So subsequent to this memo dated in 24 November we asked for the 2012-based analysis for No 25 New Generation under the twenty-seven (27) branches of

- 1 the uncertainty analysis that was done.
- I know at that -- one point in that
- 3 discussion I said, I don't really care how you estimate
- 4 the loads, if you start from a 2013 number or other
- 5 stuff, but I want -- we want the 2012 uncertainty
- 6 analysis. And we -- we were under the assumption that
- 7 that's what we got because we didn't see -- we've never
- 8 seen a 2013 vintage uncertainty analysis.
- 9 So we didn't think that you -- that it
- 10 was created specifically for the -- for the purposes of
- 11 this. If it's -- if it's still -- if we were still
- 12 delivered an analysis under 2013 assumptions, then
- 13 we've been mislead.
- 14 MR. CHRISTIAN MONNIN: Ms. Boyd, I just
- 15 -- I'm sorry for introduce -- sorry, interrupt your --
- 16 at quarter to 5:00, but your document, slide 129, page
- 17 20, which you're putting to -- to the witness, I'm just
- 18 curious if that include -- that's right, yes.
- 19 And I apologize if this has been out
- 20 there already, but does this include the updated
- 21 capital costs?
- MS. MARLA BOYD: Yes, I'm advised it
- 23 does.
- 24
- 25 (BRIEF PAUSE)

- 1 CONTINUED BY MS. MARLA BOYD:
- 2 MS. MARLA BOYD: So before I leave
- 3 slide 32 of your presentation I want to talk about the
- 4 third adjustment that was made. That No Generation
- 5 case includes the relaxation of the dependable energy
- 6 import planning criteria by increasing the reliance on
- 7 imports to 20 percent of Manitoba load rather than 10,
- 8 correct?
- 9 MR. JOHN ATHAS: Yes. Yes.
- 10 MS. MARLA BOYD: And you're aware of
- 11 Manitoba Hydro's view on that. But would you agree
- 12 that, if that were done, hypothetically, that the
- 13 Preferred Plan economics would improve relative to the
- 14 No Gen case if it also included a relaxation of the
- 15 import criteria?
- 16 MR. DANIEL PEACO: I don't think we
- 17 know that. The planning is just designed primarily for
- 18 export. It's not clear how much impact that would have
- 19 on the case.
- 20 MR. JOHN ATHAS: One (1) of the
- 21 questions that we'd need to know, are you going to move
- 22 -- are you -- change the timing of any of the -- of the
- 23 other generation additions in the Preferred Plan or
- 24 roll with them as they were. If it's roll with them as
- 25 they were, I don't think it changes anything.

- 1 MS. MARLA BOYD: Well, it's a
- 2 hypothetical because Manitoba Hydro, of course, does
- 3 not view relaxing the imports to 20 percent as an
- 4 appropriate thing.
- 5 But regardless of that, the plan as it's
- 6 laid out here would have all of the benefits that you
- 7 talked about in your evidence, right? We'd be able to
- 8 sell more energy at long-term firm price?
- 9 Do you agree?
- 10 MR. JOHN ATHAS: Yes. You'd -- you'd
- 11 be able to sell -- you'd have additional -- after the
- 12 trans -- after the constraint was changed, the criteria
- 13 was changed, you'd have additional dependable energy so
- 14 you'd sell more energy under firm contracts or short-
- 15 term firm contracts.
- 16 MS. MARLA BOYD: And we'd be able to
- 17 import instead of running Brandon or Selkirk under low-
- 18 flow conditions?
- 19 MR. JOHN ATHAS: I think we testified -
- 20 we had a lot of discussion about how in prior -- in
- 21 prior cross-examination by your -- by your earlier
- 22 colleague that said changing the criteria does not do
- 23 anything to change the operation, so that I don't think
- 24 it would have any change at all to whether you wanted
- 25 to import at low -- low-flow conditions.

6310 We're talking about having the same 1 hardware in fact and changing the planning criteria. So I think the change is zero. 3 MS. MARLA BOYD: And the planners would 4 assume that they could run Brandon and Selkirk under low flows instead of -- I'm sorry, that they could 7 import instead of running Brandon and Selkirk under low flows. 9 MR. JOHN ATHAS: I believe that -- that 10 SPLASH would do a pretty good job of determining 11 whether it should import or -- or run Brandon. And I 12 believe that in -- that in the short term, the 13 operating people probably do the same kind of -- just -14 - questions. 15 16 (BRIEF PAUSE) 17 18 MS. MARLA BOYD: Are we clear that in 19 relaxing these criteria in this hypothetical, that the SPLASH model would be modified to relax the criteria to 21 20 percent? I just want to make sure we're on the same 22 page. 23 MR. JOHN ATHAS: And -- well, let me 24 just explain how I think it probably works. The 25 criteria would change in the SPLASH model. I believe

- 1 that in an instance of a low flow -- of a drought
- 2 calculation, that the -- well, you posed the example:
- 3 Would that -- would that allow -- would the change in
- 4 criteria allow more imports instead of running Brandon
- 5 at low -- at low flow?
- 6 My understanding from the points being
- 7 made by -- by your attorney earlier today was to make
- 8 sure that it was clear to everybody in the room that
- 9 that's only a planning decision criteria to see what
- 10 hardware gets bou -- or what gets put in place, and
- 11 that the actual operation would not be affected by the
- 12 20 percent criteria.
- 13 So for that element of the question that
- 14 you asked, I think SPLASH would come up with the same
- 15 answer.
- 16 MS. MARLA BOYD: So what we're looking
- 17 at is what happens in the evaluation. And the question
- 18 -- my question to you was not, What would they do
- 19 operationally but would -- if you relaxed that
- 20 assumption, would the Preferred Development Plan also
- 21 benefit from that relaxation in the same way that the
- 22 No Generation case benefited in the evaluations?
- 23 MR. JOHN ATHAS: It -- it depends on --
- 24 depends on what capital changes you make for this
- 25 assumption, and it -- and to say benefits are the same,

- 1 it -- when there's a different set of resources, just
- 2 like we see in DSM, the next resource that you add has
- 3 -- has different effects from -- depending on the
- 4 starting point.
- 5 So I -- it won't be the same. I have --
- 6 I don't know whether it will be close, but it won't --
- 7 by definition, it will not be the same.
- 8 MS. MARLA BOYD: Would you accept that
- 9 the Preferred Development Plan would also benefit from
- 10 the other benefits that you looked at with the No Gen
- 11 case, that the imports could be used instead of running
- 12 gas turbines, that you'd defer the in-service date of
- 13 Conawapa, and that you'd import more for export and
- 14 take advantage of the arbitrage potential?
- MR. JOHN ATHAS: Sounds like a really
- 16 good idea. Glad you thought of it.
- 17 MS. MARLA BOYD: The question, though
- 18 is: Would the Preferred Development Plan benefit in
- 19 the same way as the No Gen case?
- 20 MR. JOHN ATHAS: I don't know. I
- 21 haven't moved -- I didn't move a hydro plant around in
- 22 the No Gen case.
- 23 MS. MARLA BOYD: Could I have slide 37
- 24 of LCA Exhibit 45, please. Slide 37.
- I understand that your evidence was that

6313 you created an approximation of a scenario in which the in-service date for Keeyask is delayed five (5) years. 3 Is that right? MR. DANIEL PEACO: That's correct. 5 MS. MARLA BOYD: And you called this plan '2A' in your description? 7 MR. DANIEL PEACO: Yes. MS. MARLA BOYD: And according to your evidence at transcript page 5640, you concluded that on 10 the 2012 reference case basis the net present value of Plan 2 and 2A were exactly the same, so it really had 11 12 no cost effect overall on the plan if you did that. 13 Do you recall that? 14 MR. DANIEL PEACO: I do. 15 MS. MARLA BOYD: Have you reviewed Manitoba Hydro's response to LCA Manitoba Hydro 1-336? 16 17 Could I ask that we have that brought, please? LCA 18 Manitoba Hydro 336. First round. 19 (BRIEF PAUSE) 20 21 22 MS. MARLA BOYD: It's 336, sorry. 23 This is an Information Request that you 24 posed to Manitoba Hydro asking for documentation and 25 analysis related to our evaluation of a gas Keeyask

- 1 Development Plan.
- 2 Do you recall that?
- MR. DANIEL PEACO: Not in particular,
- 4 but...
- 5 MS. MARLA BOYD: I take it that means
- 6 you didn't review our response?
- 7 MR. DANIEL PEACO: No, it's been --
- 8 I've reviewed a lot of responses, so.
- 9 MS. MARLA BOYD: It just didn't stick
- 10 in your mind.
- MR. DANIEL PEACO: I don't have the
- 12 entire case committed --
- MS. MARLA BOYD: Fair enough.
- 14 MR. DANIEL PEACO: -- to memory.
- MS. MARLA BOYD: Neither do I.
- MR. DANIEL PEACO: And I don't have it
- 17 -- don't have the memory of the -- the numbers
- 18 correlating with the information either, so.
- 19 MS. MARLA BOYD: Could we go to page 2
- 20 of this response, please? That's good.
- 21 Manitoba Hydro's evidence in that
- 22 response is that advancing Keeyask ahead of gas -- so
- 23 Keeyask 22 gas, is favourable to the gas first plan
- 24 which puts gas in 22 and Keeyask in 28, with an
- 25 incremental MPV that's \$178 million higher.

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6315
 1
                  Do you see that?
 2
 3
                      (BRIEF PAUSE)
 5
 6
                  MR. DANIEL PEACO: I see that.
 7
                  MS. MARLA BOYD: And do you accept
   Manitoba Hydro's conclusion that the difference between
   those plans is 178 million?
10
                  MR. DANIEL PEACO: Well, we never
11
   received the case behind that, so far as I know.
12
                  MS. MARLA BOYD: Do you have any reason
13
   to dispute it?
14
                  MR. DANIEL PEACO: I don't, but I just
15
   -- we haven't see -- we have -- we weren't provided
16
   with the backup for that case.
17
                  MS. MARLA BOYD: And this would suggest
18 that there is an economic penalty for delaying Keeyask,
19
   correct?
20
                  MR. DANIEL PEACO: $178 million is --
   that would be more or less consistent with our result;
21
22
   that's a fairly small change.
23
                  MS. MARLA BOYD: But it is a change;
24 it's not exactly the same?
25
                  MR. DANIEL PEACO: Right.
```

- 1 MS. MARLA BOYD: Mr. Chair, I have
- 2 another area to go through that I fear is going to be a
- 3 little bit of a tough sled, to be perfectly candid. It
- 4 is five to 5:00. I'm wondering if you'd prefer that we
- 5 adjourn now and do that in the morning or if you'd like
- 6 to carry on?
- 7 THE CHAIRPERSON: Can you give us an
- 8 estimate of how long you would take?
- 9 MS. MARLA BOYD: I'm going to guess
- 10 about thirty (30) minutes.
- 11 THE CHAIRPERSON: I think we'll do it
- 12 tomorrow morning. We had committed to leaving -- to
- 13 finishing today at five o'clock. So yeah, it would be,
- 14 I think, more appropriate to start tomorrow morning.
- 15 I'm starting to wonder -- I'm starting
- 16 to wonder whether we have enough hours in the day
- 17 tomorrow to do all that needs to get done. And I
- 18 wonder if it would be appropriate to consider an early
- 19 start tomorrow morning given -- given the time
- 20 constraints that we're facing and the amount of
- 21 information we're trying to get into that time
- 22 constraint.
- 23 MR. CHRISTIAN MONNIN: I can advise
- 24 that Mr. Peaco believes he'll need about thirty (30)
- 25 minutes for his direct presentation on CSI, and then I

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- 1 believe Mr. Peters has an idea of what he'll be doing -
- 2 the time he'll require for the public cross. And Ms.
- 3 Boyd has said about thirty (30) minutes for cross and
- 4 I'm not sure about the CSI cross, however.
- 5 THE CHAIRPERSON: Mr. Peters, can you
- 6 give us the benefit of your wise counsel?
- 7 MR. BOB PETERS: Someone earlier today
- 8 said don't do math on the public transcript and
- 9 probably sage advice. But if I'm hearing Ms. Boyd is
- 10 taking thirty (30) minutes today, I'm going to want
- 11 between one (1) and one and a half (1 1/2) hours
- 12 tomorrow. So if we say that'll take us to 11:00, and
- 13 then the direct evidence would be done before noon by
- 14 Mr. Peaco on the CSI. I have yet to hear from Ms. Boyd
- 15 or Ms. Murphy for sure how long they would want in the
- 16 afternoon on their cross-examination in the CSI room.
- 17 MS. MARLA BOYD: I can't resist telling
- 18 you that Ms. Murphy has left the building, but Ms. Boyd
- 19 can tell you that we expect that our CSI will be short.
- 20 It should be about thirty (30) minutes.
- 21 MR. BOB PETERS: Having heard that, we
- 22 should be able to complete by 4:30 tomorrow.
- 23 THE CHAIRPERSON: So there's no need
- 24 for an early start tomorrow morning?
- MR. BOB PETERS: I'm not against it,

- 1 but it's up to the parties here as to whether we want
- 2 to -- we may as well if -- if the parties are
- 3 agreeable, let's start early. Well, hang on, Mr.
- 4 Williams...
- 5 MR. BYRON WILLIAMS: No, I have
- 6 something on a different issue, so I'll wait until this
- 7 discussion's ended.
- 8 THE CHAIRPERSON: But my impression is
- 9 that we could start at 9:00 and still finish within the
- 10 time frame of 4:30?
- MR. BOB PETERS: Yes, sir.
- 12 THE CHAIRPERSON: Okay. So that --
- 13 let's -- let's work with that plan. And, Mr.
- 14 Williams...?
- MR. BYRON WILLIAMS: Yes, and I just --
- 16 we're -- we're looking at CAC(Manitoba) towards next
- 17 week. And I think it's our understanding that the IEC
- 18 Knight Piesold has provided some additional evidence
- 19 this morning to Hydro. And we were just hoping we
- 20 could get an update on the scheduling of when it will
- 21 be available to be shared with -- with other parties so
- 22 that we can schedule our -- our weekends around it, no
- 23 doubt.
- 24 But it would be helpful just to know
- 25 when we might receive it.

6319 MS. PATTI RAMAGE: Mr. Chair, I'm not 1 sure how much we can help Mr. Williams. We got that this morning. It's been sent to the team for CSI 3 review with the request it be done as fast as possible. And they're pretty good, but I -- you know, I don't know what's there and that's the challenge, is if they 7 find nothing they're really quick. If they find questions it -- it takes longer to work through it. 9 MR. BYRON WILLIAMS: Perhaps we could 10 have an update as we get towards the end of the week. I'll be out of province, so we may have to make 11 12 alternative arrangements for delivery of the material, 13 so. 14 THE CHAIRPERSON: Thank you. I don't 15 know if there's anything else to get -- to address 16 today. If not, we're adjourned and we'll see each other again tomorrow morning at nine o'clock. Have a 17 18 good evening, everyone. 19 20 (PANEL RETIRES) 21 --- Adjourned at 5:00 p.m. 22 23 24 25

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 2 Certified Correct,
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7 Ms. Cheryl Lavigne
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