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February 3, 2014

The Public Utilities Board of Manitoba
Attention: Mr. Hollis Singh, Executive Director and Board Secretary
400 - 330 Portage Avenue
Winnipeg, MB R3C 0C4

Dear Mr. Singh:

Re: NFAT - Socio-Economic Impact Proposal

Thank you for the opportunity to submit a joint proposal on behalf of CAC MB and the MMF to undertake to present a community rate-payer panel focusing on the direct impacts of rate increases on vulnerable Manitoban rate-payers.

In its drafting, CAC MB and the MMF have made concerted efforts to frame their proposal in a manner which will provide a unique and cost efficient product, intended to meaningfully enhance the record before the Board.

Overview

The NFAT Terms of Reference provide that:

- The Public Utilities Board provide a report to the Minister which is to include "recommendations to the Government of Manitoba on the needs for Hydro's preferred development Plan and an overall assessment as to whether or not the Plan is in the best long-term interest of the province of Manitoba when compared to other options and alternatives";
- "The public will be encouraged to provide input and comment on the Plan as part of the NFAT "; and,
- That the scope of the NFAT review will include "[t]he impact on domestic electricity rates over time with and without the Plan and with alternatives" and "[t]he socio-economic impacts and benefits of the Plan and alternatives to northern and aboriginal communities".

Based on this direction, CAC MB and the MMF noted a significant gap in the proposed record before the Board: the direct perspective of vulnerable rate-payers.

Cognisant of Board Order 67/13 which encouraged interveners to discuss possible coalitions and the joint presentation of evidence on Order No. 67/13 specific issues, the MMF and CAC MB have spent the last month collaborating on a proposal intended to respond to this deficiency.

The Joint-Evidence Proposal

Overview of the Issue

In conjunction with the evidence of Mr. Philippe Dunskey, Mr. Rick Hendricks,

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Dr. Wayne Simpson and Mr. Harvey Stevens, CAC MB and the MMF are proposing a panel of vulnerable consumers who will provide context to the realities of heating and lighting a home on a limited budget.

Overview of the Proposed Product

Based on home energy audits and oral presentation, CAC MB and the MMF propose to introduce a panel of six Manitoban rate-payers who will draw out the energy use and rate-paying realities of Métis, newcomer, low income and those from remote communities. Incorporating a human element into the numbers analysis before the Board, these panel members will speak to their current experiences paying their energy bills and will present on the expected, personal impacts of the proposed rate increases. This panel's input will link the individual human perspectives of the proposed rate increases with the big picture analysis already before the Board.

The proposed product will include two proponents:

1. Home Energy Audit
 - A home energy audit will be conducted on the homes of up to three of the proposed panelists. The ultimate findings will be submitted in an effort to demonstrate the reality of energy efficiency and energy use in the panelists' homes.
2. Rate-Payer Panel
 - A panel of 6 rate-payers, drawing from their perspectives as Métis, newcomer, low income and remote Manitobans, will make short presentations on the state of their current energy bills and the reality of how they will be personally impacted by the proposed rate increases of the Preferred Development Plan, the All-Gas Plan and Plan 4. It is possible that the panel members will provide brief power points to accompany their presentations.
 - In coordinating these presentations, CAC MB and the MMF may seek assistance from other interveners or other parties who have previously applied for intervener status.

It is important that this proposal is distinguished from the written and oral public presentations sought by the PUB.

Organized by intervener counsel, the proposed audits and panel are intended to provide a perspective that is directly linked to the record and that can be tested through cross-examination by counsel and the Board.

Although CAC MB and the MMF recognize the value derived from public presentations organized by the PUB, we feel that a more formal format is necessary for our proposed rate-payer panel as it will allow for a more thorough examination of the personal realities and impacts of rate increases. We are of the view that the examination to be completed in this panel could not be achieved through an informal presentation that could not be fully tested.

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Additionally, it is important that this proposal is distinguished from the perspective that has been offered in the Clean Environment Commission (CEC) hearings.

As observed in its recent proceedings, the CEC has heard from community panels comprised of members who have offered their perspectives on matters of importance related to the particular project under consideration. In contrast, the proposed joint panel would speak to a topic which is exclusively before the PUB and which has not been considered by the CEC or other tribunals: the direct impacts of rate increases relating to the Preferred Plan and its alternatives.

CAC MB and the MMF feel that the NFAT is the only forum where this perspective can be provided. Given the numerous alternatives and the particular mandate in the Terms of Reference, a consideration of rate impacts at the grassroots level is unlikely to occur in other related PUB proceedings or be duplicated at a later date.

A detailed outline of the budget estimate can be found in Appendix A.

The Legal Team

CAC MB

CAC MB will not be seeking legal costs to present the home audit and panel.

MMF

The legal costs to present the home audit and panel will be budgeted within MMF's currently approved amount for legal fees and will be recorded in accordance with the billing protocol.

Relevant elements of the Terms of Reference:

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Proposed evidence

The proposed evidence accompanying this panel will consist of the energy audits of three rate-payers and may possibly include brief powerpoints accompanying each member's presentation. CAC MB and the MMF do not believe that pre-filed evidence is required in these circumstances and will ask the PUB to dispense with its rules for pre-filed evidence in this matter.

Conclusion

Thank you for the opportunity to submit this proposal and for your consideration of these comments. Should you have any questions please feel free to contact Meghan Menzies at 204-985-5240 or Jessica Saunders at 204-926-4182.

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Yours truly,



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Counsel to CAC MB



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cc. CAC Manitoba
MMF
Interveners
PUB Counsel
Manitoba Hydro

Enclosures