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March 17, 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: Public Utilities Board's Needs For and Alternatives To (NFAT)
Review of Manitoba Hydro's Preferred Development Plan
– Socio-Economic Evidence of CAC Manitoba**

Thank you

CAC Manitoba appreciates the opportunity to present evidence relating to socio-economic impacts for consideration in the Needs For and Alternatives To (NFAT) review of Manitoba Hydro's Preferred Development Plan (PDP). In particular, CAC Manitoba notes with gratitude the PUB's flexibility in granting an extended time frame for the provision of the attached evidence.

Overview

By this letter, CAC Manitoba files the 2 expert reports of:

**Ms Marla Orenstein and Dr. Murray Lee
Dr. Jerry Buckland and Dr. Melanie O'Gorman**

In addition, enclosed in this letter are the biographies of each report writer as well as their *Curriculum Vitae*.

Overview of CAC Manitoba's evidence

In accordance with 2(h) of the NFAT Terms of Reference and the definition of "socio-economic" in Board Order 92/13, the expert evidence presented by Ms Orenstein and Drs Lee, Buckland and O'Gorman provide high level summaries of the potential effects on Manitobans, particularly Northern and Aboriginal persons on issues including employment, training and business opportunities; infrastructure and services; personal family and community life; and resource use.

A summary of their evidence is provided below:

Socio-Health

A Review of Community Health Issues Related to Manitoba Hydro's Needs For and Alternatives To (NFAT) Preferred Development Plan – Ms Marla Orenstein, Dr. Murray Lee

The review of health issues conducted by Ms Orenstein and Dr. Lee discusses the health-related issues that have been identified by a wide range of stakeholders as representing key health supports in the area affected by the NFAT project. For each of these issues, the review describes how large hydro development projects such as Manitoba Hydro's NFAT proposal could influence community health either through the development of opportunities or vulnerabilities.

Socio-Economic

Re-envisioning the North? A Critical Socio-economic Assessment of Manitoba Hydro's 2012/13 to 2047/48 Preferred Development Plan - Dr. Jerry Buckland, Dr. Melanie O'Gorman

The report presented by Dr. Buckland and Dr. O'Gorman provides a critical assessment of the socio-economic consequences on Northern and Indigenous Manitobans of Manitoba Hydro's PDP and select alternative plans. The report explores the history of the impact of dams on developing countries and communities, including Manitoba Indigenous communities, and examines the World Bank dams-for-development guidelines. It then examines the PDP and select alternatives and identifies the most important features of the PDP that affect Northern and Indigenous people.

Next, drawing on key informant interviews and an analysis of the transcripts and closing arguments from the 2013-14 Manitoba Clean Environment Commission Hearings on Keeyask, the report describes and analyzes the principal perspectives around the PDP's impact on Northern and Indigenous people.

Finally, the report assesses how different perspectives align with views about the PDP and recommends ways in which the PDP might result in more equitable sharing of benefits consistent with international good practice.

Alignment with proposal

As per CAC Manitoba's letter of February 5th, the evidence submitted on socio-economic matters is unique and has not resulted in a regurgitation of the evidence provided in the Keeyask Environmental Impact Assessment.

Unlike the Clean Environment Commission's hearings, the report produced by Ms Orenstein and Dr. Lee differs from that provided in the Keeyask EIS. Rather than focusing on "good practice" within the specific context of the Keeyask proposed project, the attached evidence provides a broad review of the construction of hydro-electric projects on Northern First Nation communities, presenting information on relevant health conditions and attempting to identify potential health vulnerabilities and opportunities specifically related to Manitoba Hydro's PDP.

Similarly, the evidence of Drs Buckland and O'Gorman provides a "big picture" analysis of the NFAT filing, reviewing the potential impacts of both Keeyask and Conawapa on all Manitobans, including Northern and Indigenous communities and extending beyond the four Cree Nations who have partnered on Keeyask (York Factory First Nation, Fox Lake First Nation, Tataskweyak Cree Nation and War Lake Cree Nation).

This analysis is informed by a broad range of perspectives on hydroelectric projects, accessed through a review of leading literature, a content analysis of the EIS transcript and interviews with stakeholders/commentators on energy alternatives for Manitoba, both in Winnipeg and in Northern

Manitoba. Further, this analysis is informed by and based on international guidelines for dam development provided by the World Bank.

Further distinctions between the evidence presented in the EIS and the NFAT include:

- The development of a framework to analyze perspectives (i.e. market-driven change, managed capitalism, anti-capitalism, and post-development);
- A preliminary review of the implications of what appears to be a different model for Conawapa;
- A review of the implications of significant rate increases on economically vulnerable Northern Aboriginal communities; and,
- The provision of recommendations focused on making the PDP more consistent with international good practice. These recommendations include proposals to make provision for other Nelson River communities to share in the benefits flowing from ongoing Hydro operations and provisions aimed at mitigating rate impacts upon vulnerable Northern Aboriginal consumers.

Conclusion

As outlined in this letter and as is evident by the attached reports, the socio-economic evidence submitted on behalf of CAC Manitoba is in compliance with its proposals of January 28 and February 4th as well as the PUB's approval letter of February 7, 2014. In accordance with 2(h) of the NFAT Terms of Reference, these reports are within the scope of these proceedings as contemplated by the Minister.

With that in mind, CAC Manitoba thanks you again for the opportunity to submit this evidence and for your consideration of these comments. Should you have any questions please feel free to contact Byron Williams at 204-985-8533 or Meghan Menzies at 204-985-8540.

Yours truly,



MEGHAN MENZIES
ATTORNEY

cc. CAC Manitoba
Interveners
PUB Counsel
Manitoba Hydro

Enclosures

MM/sk