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December 13, 2013

Mr. H. Singh
The Public Utilities Board
400 - 330 Portage Avenue
WINNIPEG, Manitoba R3C 0C4

Dear Sir:

**RE: MANITOBA HYDRO NFAT
SCHEDULES AND TIMELINES**

Further to Manitoba Hydro's letters of November 28, 2013 and December 4, 2013 (dealing with time estimates to complete various work being requested of the Corporation), Manitoba Hydro has attempted to determine what work can realistically be completed within the timelines of the NFAT hearing. While Manitoba Hydro has not received specific direction regarding prioritization of work, it has conducted its assessment mindful of the PUB and IEC's interest in alternative cases, such as an all CCCT plan and review of enhanced DSM.

In this regard Manitoba Hydro believes it can evaluate the five new cases set out in the chart below prior to the commencement of the oral hearing phase on March 3, 2014:

| <i>Case Description</i> | <i># of Cases – Economics</i> | <i>Expected Completion Date of Economics</i> | <i># of Cases – Financials</i> |
|--|--|--|--|
| <i>Keeyask deferred to 2020 with 2013 load forecast & reference scenario assumptions</i> | <i>1</i> | <i>January 9</i> | <i>1</i> |
| <i>Enhanced DSM</i> | <i>20(approx.)</i> | <i>February 28</i> | <i>20</i> |
| <i>No New Generation</i> | <i>27</i> | <i>January 9</i> | <i>27 (not likely to be completed)</i> |
| <i>All CCCT</i> | <i>27</i> | <i>Complete</i> | <i>27 (not likely to be completed)</i> |
| <i>All CCCT – 5 yr. drought</i> | <i>4</i> | <i>January 9</i> | <i>4 (not likely to be completed)</i> |
| <i>Detailed SPLASH Extraction</i> | <i>Partial completion is anticipated</i> | <i>By end of December</i> | |

The Public Utilities Board should be aware that in order to complete the above described case evaluations, it will be necessary to direct key staff to focus their time on this effort. The unavoidable result will be that responses to many Information Requests will not be completed. Manitoba Hydro has analyzed what can feasibly be accomplished in these circumstances. The analysis of outstanding Round I IRs takes into consideration those IRs that require the attention of the same key staff whose time is vital to the completion of the case evaluations (and other critical ongoing business activities) and those which can be undertaken by other staff:

| ROUND I | Key staff | Other staff |
|---|---|--|
| PUB "B" (36 outstanding) | None | None |
| LCA (approximately 200 IRs outstanding) | 120 assigned Answer - 20(approx.) | 80 assigned Answer - 80(approx.) |

Manitoba Hydro's analysis of its ability to complete Round II IRs is as follows:

| ROUND II - 860/1000 left to file after filing of December 13 | IRs filed as of December 13 | Remaining to Complete | Expected to be Completed and Filed by January 30 |
|---|------------------------------------|------------------------------|---|
| Round II IRs | 140 | 860 | 140 + 400 = 540 |

In determining these time frames, and assessing the number of cases and information requests which can be completed within the timeframes, Manitoba Hydro has taken into consideration the fact that commencing in mid-January, 2014 it will begin to receive evidence filed on behalf of the Independent Expert Reports and also on behalf of Intervenor early February. Given the number of IECs and Intervenor experts retained, it is anticipated that Manitoba Hydro will receive and be expected to critically examine up to 30 different reports or pieces of evidence. The timelines associated with reviewing this volume of material, and posing Information Requests of the material are very tight, and it is expected that key Manitoba Hydro staff will be required to devote their full attention to this review. As such, Manitoba Hydro expects that it will not be in a position to file or undertake further case analysis, or provide responses to remaining Information Requests after that time. The current schedule will require that Manitoba Hydro move immediately from receipt and review of IEC and Intervenor evidence to preparation and filing of Manitoba Hydro's Rebuttal evidence and then into the evidentiary phase of the hearing. As such, Manitoba Hydro wishes to make clear to the PUB that it should not expect receipt of further Information Request responses or case analysis after the end of January 2014.

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Manitoba Hydro wishes to ensure the PUB is aware of the level of information that the Corporation expects to be able to provide by March 3, 2014. Manitoba Hydro cannot respond to Information Requests while the oral hearing is ongoing nor can significant case evaluations be conducted. As communicated previously, Manitoba Hydro needs to make significant contractual commitments over the next couple of months to continue protecting a July 2014 start of Keeyask construction; consequently it is imperative that if there are concerns with the expected level of information provided, that such concerns be voiced immediately, and in any event prior to the end of December, 2013.

Yours truly,

MANITOBA HYDRO LAW DIVISION

Per:



PATRICIA J. RAMAGE
Barrister & Solicitor