

Subject	Preamble	Question	Reference
socioeconomic	<p>"The literature also suggests that best means of mitigating such affects on those most affected will be to aggressively pursue energy efficiency and reduction initiatives. While MH is known for such programs, continued emphasis on such programs is suggested, along with on-going monitoring, in light of the proposed rate increases."</p> <p>There is an interaction between supply, demand management and electricity prices that appears to go unrecognized in this comment. The effectiveness of DSM as a means to reduce electricity rates (and bills) for ratepayers (particularly lower and fixed income) critically depends on ensuring that supply at a higher marginal cost than demand management is not brought onto the system prematurely. If that occurs, demand management programs will have to be curtailed - even though they are more cost-effective than supply-side resources - in order to avoid further rate increases. This problem is occurring in Ontario, Quebec and BC among other jurisdictions, and is illustrated by the following comment in BC Hydro's recently released IRP where the most effective and cost-effective DSM Option 3 was curtailed due to surplus supply-side resources.</p> <p>"For DSM Option 3, the ability to reduce current expenditure levels was considered but dismissed. Option 3 features increased program activities and expenditures to target the greatest level of DSM program savings currently considered deliverable. It is BC Hydro's professional judgement that to reduce near-term expenditures but continue to rely upon the longer term savings is not believable or prudent in the case of DSM Option 3." (Section 4.2.5.2 Delay Planned Ramp-ups in Spending on DSM Activities)</p>	<p>Discuss Typlan's understanding of the meaning of the following phrase that appears in the Executive Summary:</p> <p>"Optimizing demand side management (DSM) will be critical moving forward to manage impacts to ratepayers."</p>	<p>TyPlan Report Executive Summary</p>
socioeconomic	<p>"The MA-BCA assesses the preferred and three alternative resource development plans, and include:"</p> <ul style="list-style-type: none"> · the Preferred Development Plan; · the Smaller Interconnection Plan (K19/Gas 24/250MW Interconnection); · Keeyask with No Interconnection (K2/Gas); and · Gas Thermal with on new Interconnection (all Gas)." 	<p>Please discuss the limitations with respect to socio-economic benefits to Manitobans, including Aboriginal groups throughout Manitoba, of not considering a resource development plan in the MA-BCA analysis that includes wind resources.</p>	<p>TyPlan Report Executive Summary</p>
socioeconomic	<p>"The MA-BCA assesses the preferred and three alternative resource development plans, and include:"</p> <ul style="list-style-type: none"> · the Preferred Development Plan; · the Smaller Interconnection Plan (K19/Gas 24/250MW Interconnection); · Keeyask with No Interconnection (K2/Gas); and · Gas Thermal with on new Interconnection (all Gas)." 	<p>Please discuss to what extent, in the opinion of TyPlan, that the four alternative development plans considered in the MA-BCA represent a false dilemma for achieving socio-economic benefits between large hydroelectric resources and large gas resources.</p>	<p>TyPlan Report Executive Summary</p>
socioeconomic	<p>"The assumptions regarding proportioning the net economic rent (the additional wages earned net of) that would be derived, is based on project location and the employment/unemployment characteristics in that region. Northern regions with greater unemployment would result in greater net benefits, and the PDP is preferred." This argument depends on the reasons for the unemployment in northern regions, and appears to suggest that the primary (or even only) barrier to employment of northern Aboriginals is lack of opportunity.</p>	<p>Please identify and discuss, making references to appropriate literature, the underlying causes of underemployment in the northern regions of Manitoba, including in relation to: availability, accessibility and cost of appropriate training; availability and accessibility of opportunities; competition for opportunities from southern Manitobans (i.e. travelling consultants, rotation workers, etc.); language and cultural barriers to training and employment, etc.</p>	<p>TyPlan Report Executive Summary</p>

The energy efficiency initiatives refer, in part to DSM, but specifically the Power Smart programs available to Manitobans to reduce energy consumption and improve efficiency. TyPlan reporting focuses comments upon those most affected (low income and those fixed income) moving forward. Performance measures of such Power Smart programs should be specific to the ability of households to reduce bills and improve efficiency. Performance measures should be specific, measurable, achievable, realistic and time oriented (SMART).

Wind resources were considered in Appendix 7.2 -Range of Resource Options which identified 16 preferred resource options (that included 12 hydroelectric options, three thermal options and one wind resource) for further study. Wind was subsequently dropped from evaluations based on socio-economic criteria utilized.

The Manitoba Hydro approach towards the evaluation of resource supply options (Appendix 7.2 Range of Resource Options) provided a systematic comparative assessment to define a short list of options, considering socio-economic criteria. The MA-BCA provides an evaluation of short listed options, considering a combination of gas and hydro and interconnections which provided an opportunity to evaluate the alternatives and identify trade offs and incremental revenues. It provides context to the most likely options to be pursued based on the resource option analysis.

Our review considered the socio-economic characteristics of Manitoba as outlined in the EIS and agrees with the concept of economic rent. The underlying cause of under employment was not studied but was considered in context to training and employment opportunities associated with the PDP, intended in part to create capacity within all northern communities.

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socioeconomic	<p>The SoW undertaken by TyPlan is described as including: "...a critical analysis of the socio-economic impacts and benefits of Manitoba Hydro's PDP and alternative plans. This should include examination of potential effects to the people of Manitoba, especially Northern and Aboriginal communities, including employment, training and business opportunities; infrastructure and services; personal, family, and community life; and resource use..." (p.1). This analysis, in turn, is to include northern and aboriginal community-based impacts, as well as community access improvements and benefits.</p> <p>MMF has previously commented that the NFAT is deficient in the identification and assessment of impacts on, and benefits to, the Metis, as a distinct Aboriginal community.</p>	<p>(a) In the analysis of the PDP conducted by TyPlan, please confirm whether the examination of potential impacts and benefits to "Aboriginal communities" included Metis as well as First Nations.</p> <p>(b) Please comment as to whether the PDP components could be anticipated to impact the Metis, as an Aboriginal community, distinctly and separately from First Nations and Northern/non-Aboriginal communities.</p>	<p>TyPlan Report Section 1 - Introduction and Scope of Work</p>	<p>The TyPlan review is based, in accordance with the Canadian Environmental Assessment Act requirements regarding the determination of a "local study area" focused on those First Nations and communities within the local study area (LSA). In accordance with the EIS guidelines and CEAA regulatory requirements a "local study area" is established in that " the project has the potential to effect in a material way the economy of the local study area communities and to a lesser extent other communities in the regional study area". The local study area includes Gillam and Thompson, some residents of which are assumed to be Metis.</p> <p>The PDP components (I assume scope of work) applies to northern communities, aboriginals and Manitobans. The Metis (as a distinct and separate community) have the same general opportunities as all Manitoban's to participate via employment in the PDP.</p>
socioeconomic	<p>Table 2 in the TyPlan report outlines lessons learned from Wuskwatim, and states that the Keeyask Project "...will be developed with full support of the local area First Nations as outlined in the Joint Keeyask Development Agreement (JKDA) signed by all First Nations," (p.12).</p>	<p>Please comment as to what extent Manitoba Hydro has (a) considered lessons learned from Wuskwatim on the Metis, as an Aboriginal community in the project area, distinct and separate from First Nations and Northern communities, and (b) applied the lessons learned, regarding the impacts of Wuskwatim on the Metis, to the PDP?</p>	<p>TyPlan Report Section 2 - Manitoba Hydro's Preferred Development Plan (PDP), and lessons learned from other hydroelectric projects</p>	<p>The local area First Nations are those identified within the local study area boundaries and those that signed the JKDA. The Deloitte report entitled "Wuskwatim Training and Employment Initiatives - Evaluation Report- Final" provides a series of recommendations or considerations going forward that can applied to all local First Nations by Manitoba Hydro.</p>
socioeconomic	<p>The TyPlan report refers to the Joint Keeyask Development Agreement (JKDA), signed between Manitoba Hydro and the four Keeyask Cree Nations (KCNs), and states that it represents "...aspects of industry best practices that MH has not only met but exceeded. On-going and post project monitoring regarding the success of this approach should be undertaken to ensure lessons learned are incorporated into future projects."</p> <p>MMF has previously articulated concerns, given that many, if not most, of the specific mitigation and offsetting measures contained in the JKDA, (and in the Adverse Effects Agreements signed with each of the KCNs) are not available to the Métis. Further, given the distinct history and culture of the Metis, it cannot be assumed that mitigation measures extended to the general populations of Thompson and Gillam will be adequate to address effects on Metis residents in those communities and other LSA communities.</p>	<p>(a) As the Metis are excluded from many of the provisions in the JKDA designed to mitigate and offset adverse effects and enhance positive effects, please comment as to whether it could be anticipated that the Metis may experience project impacts, distinctly and separately from First Nations, that will go unmitigated and unaddressed.</p> <p>(b) In the absence of an assessment of Keeyask project impacts on the Metis, consistent with the level of assessment that was conducted with the KCNs, please comment on the importance and extent of monitoring that would be required to detect and respond to project impacts on the Metis.</p>	<p>Typlan Report Section 3.5 - Northern and aboriginal community based impacts in terms of employment opportunities, incomes community tax base, skills development and community business opportunities</p>	<p>TyPlan cannot make a statement regarding the determination of the socio-economic local study area as defined in the EIS, which defines the extent to which expected project impacts are evaluated. Only that the expected project effects are anticipated to impact those communities and groups within that local study area as per requirements of CEAA.</p> <p>Ongoing project monitoring within the local study area inclusive of the communities of Gillam and Thompson is a requirement of the EIS. In 2006, based on the 2001 census 65,000 metis resided in Manitoba and with 31.2 % of the population of Thompson being aboriginal, it is likely that and assumed some of population in Thompson is Metis, and therefore monitoring in context to the Local study area communities may consider Metis issues at a community level.</p>
socioeconomic	<p>The TyPlan report makes the following observation with regard to Community Health: "Manitoba Hydro has been proactive in identifying health issues based on the Cree perspective of community health and has identified appropriate mitigative measures, inclusive of on-going monitoring," and with regard to Cultural Benefits: "Manitoba Hydro has been proactive in identifying cultural issues, appropriate mitigation and on-going monitoring," (p.37).</p>	<p>Please comment as to whether the observations with regard to (a) Community Health, and (b) Cultural Benefits apply to the Metis.</p>	<p>Typlan Report Section 3.6 - Community Access Improvements Related to Health, Education and Culture</p>	<p>As the socio-economic (EIS) Supporting Volume Socio-economic Environment and Resource Use and Heritage Resource appendices focused upon the local study area, and the populations that reside within.</p>
socioeconomic	<p>"The Smaller Interconnection Plan (K19/Gas24/250MW)" "Pathways (footnote 45) Commits to the development of Keeyask and a small interconnection. What transpires after the development of Keeyask could change. One variant would be the development of Conawapa instead of gas to accommodate domestic load." Footnote 45: "The concepts of pathways recognize that the long-term development plans may be modified in the future as new information becomes available. In this sense pathways defines what is set and what adjustments to the plan may be considered after initial decisions and commitments are made following the NFAT review."</p>	<p>Please discuss, based on experience in neighbouring jurisdictions (e.g. Minnesota and Ontario) how development of wind resources as a replacement or a complement to natural gas resources would change the conclusions of the MC-CBA for the Smaller Interconnection Plan</p>	<p>TyPlan Report Section 5.1, Table 12</p>	<p>The MA-BCA was specific to the scenarios evaluated. The concept of pathways and the flexibility therein to review variations to the plan over time is provided. TyPlan cannot comment on the potential of Manitoba Hydro to consider wind, it will be dependent upon economic feasibility.</p>

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socioeconomic	"Equity ownership and management and administrative assistance also help in building capacity within the organization. Manitoba Hydro's approach in this regard represents an industry best practice." Equity ownership also presents risks, particularly when the ownerships is achieved through equity borrowing.	If equity ownership by First Nations in large-scale hydroelectric development (as opposed to smaller-scale electricity development) represents "industry best practice" why, in the opinion of TyPlan or based on the available evidence, do the two comparative agreements in Quebec and Labrador not included equity participation by the affected Aboriginal groups?	TyPlan Report Section 6.4.2.2