NFAT opening remarks from Green Action Centre (Peter Miller)

Green Action Centre is a non-profit governed by an elected community board and committed to advancing applied sustainability. We try to identify, educate about, advocate and facilitate sustainable choices and practices for individuals, organizations, governments and society. "Living green, living well" is our motto. Our NFAT intervention is part of that mission. Principles of sustainability and justice guide our interventions.

In these remarks I wish to highlight aspects of that perspective brought to bear on Manitoba Hydro's development plans and alternatives in this proceeding.

We agree that our society is unthinkable without electricity. Manitobans are indeed fortunate to have a premium source of reliable, storable, renewable, dispatchable low-carbon hydro-electricity.

We know that the supply of electricity comes with a variety of environmental, social and financial risks and costs along with the benefits. We share with other parties in this proceeding the concern that these be properly weighed as well as mitigated and compensated where possible.

We know that it is economically and environmentally costly to waste electricity. Hence our focus on DSM. Generally speaking, using electricity for heat when other alternatives are available is a wasteful and environmentally harmful use system-wide. Hence our attention to fuel-switching.

We were thus pleasantly surprised to see in the just-filed Rebuttal that Manitoba Hydro plans a major reassessment of its achievable DSM potential including fuel-switching, conservation rates and new technologies. MH hopes to file their new Power Smart plan and implications for resource planning in the course of this NFAT.

The hydroelectric potential in Manitoba is a renewable, but limited resource. Thus we view with alarm a domestic demand curve that raises winter peak demand by 2900 MW over 35 years – the equivalent of two Conawapas or of Conawapa plus two Keeyasks. This looks to be unsustainable. We believe that, not only Manitoba's DSM potential, but also the potential of hydropower to multiply renewable energy supply in combination with intermittent renewables by creating a hybrid product should be explored. Hence our attention to the wind potential. We will also want to explore the 750 MW intertie as a potentially strategic asset in this regard, where hydro capacity can backstop U.S. wind.

An NFAT requires that an appropriate range of alternative portfolios be evaluated. We were thus disappointed that the filing presented a fixed set of alternatives that were so time-consuming for MH to analyse that no new alternatives could be contemplated despite the PUB's directive that they should be prepared to model some. Thus alternatives with a load-flattening level of DSM and/or of wind plus an intertie were omitted. It remains to be seen what level of analysis MH can provide for the integration of its new DSM projections into the NFAT scenarios and whether there is opportunity for interveners or independent experts to consider, analyse and respond to the new results. One option is to extend the hearing process sufficiently to permit this opportunity.

Thank you.