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Subject: RE: MH Cost of Service Proceeding - Witness Qualifications
Date: August-19-16 8:25:46 AM
Attachments: [image007.png](#)
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[image011.png](#)

The following constitutes the City's written reply on issues not subject to oral hearing and is only with respect to the written submission by Manitoba Hydro.

Manitoba Hydro indicated in its written submission that its accounting records do not support the separation of the dedicated lighting costs that would be required to separate street and sentinel lighting into separate cost categories. With respect, the City submits that there was no evidence on this point from Manitoba Hydro despite the fact that the City raised this issue in its initial evidence. Since Manitoba Hydro must surely know the number of customers billed and the demand associated with those customers based on the wattage of the luminaires in question, it is not evident what data is lacking. However, since no evidence was led by Manitoba Hydro on this point, cross-examination that might have clarified these questions was not possible.

I trust this is satisfactory.



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