



Legal Services Department • Services juridiques

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File No.:

February 23, 2016

The Manitoba Public Utilities Board
400-330 Portage Avenue
Winnipeg, Manitoba R3C 0C4

Attention: Mr. D. Christle
Secretary and Executive Director

Dear Sir,

Re: Cost of Service Study Review – Model

This is in response to the letter from Manitoba Hydro to the Public Utilities Board dated February 22, 2016.

The City of Winnipeg has a number of concerns with respect to the position taken by Manitoba Hydro in its letter. In general, they have been very aptly stated by Messrs. Orle and Williams in their letters of earlier today. Specifically, however, the City would like to emphasize the following:

- The City is concerned that Manitoba Hydro describes that there will be provision of a “working model” – this is acceptable only if the “working model” exactly replicates the input assumptions and the outputs of Manitoba Hydro’s model and if it produces results that are recognized as legitimate by all parties, including Manitoba Hydro, given the assumptions and cell definitions that are specified;
- The model should be made available to counsel as well as experts, for the reasons set out in the letters provided to the Public Utilities Board earlier today;
- It is not acceptable for all evidentiary versions of the runs to be in the control of Manitoba Hydro, for the reasons set out in the letters provided to the Public Utilities Board earlier today;

- In an effort to ensure no confusion over the basis for any particular run produced by any particular party, it should be mandatory that any run be accompanied by a description of all assumptions and all cell definitions.

Should there be any questions in respect of any of these matters, please feel free to contact me.

Yours truly,

KRISTA L. BORYSKAVICH
Director of Legal Services and
City Solicitor

Per:



DENISE A. M. PAMBRUN
Solicitor
DAMP/ki

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