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April 21, 2016

Mr. D. Christie
Secretary and Executive Director
Public Utilities Board
400-330 Portage Avenue
Winnipeg, Manitoba
R3C 0C4

Dear Mr. Christie:

RE: MANITOBA HYDRO'S COST OF SERVICE METHODOLOGY REVIEW – INFORMATION REQUESTS

On March 14, 2016, Manitoba Hydro received Information Requests (“IRs”) from the Public Utilities Board of Manitoba (“PUB”) with an additional number of IRs being received on March 24, 2016. On March 17, 2016, the Consumers' Association of Canada and Winnipeg Harvest (“COALITION”) filed its first set of IRs with Manitoba Hydro and an additional number of IRs received on March 23 2016. The Manitoba Industrial Power Users Group (“MIPUG”), the Green Action Centre (“GAC”), and the City of Winnipeg (“COW”) all filed their IRs on March 24, 2016.

The number of IRs by party (including parts) can be roughly broken down as follows:

Party	Number of IRs
Coalition	321 (42%)
PUB	241 (31%)
GAC	103 (13%)
MIPUG	75 (10%)
COW	31 (4%)
Total	<u>771</u>

During the meeting with all legal counsel on March 3, 2016, Manitoba Hydro had advised all parties that the majority of the IRs would be responded to by Cost of Service Department, which consists of three (3) individuals. These are the same individuals who have been

working with and assisting Daymark in terms of answering questions with respect to the model, discussing potential changes to the model and attempting to prioritize other matters related to the Cost of Service review. Given the apparent challenges with having a small number of staff responding to the majority of these requirements, Manitoba Hydro has worked diligently to complete all the tasks requested; however, the volume of IRs (in particular the sheer number posed by the Coalition with respect to matters of questionable significance to the COSS Review) and other requirements have far exceeded the capacity of the specialized internal experts to fully respond by the due date.

In its best efforts to comply with the IR deadline, enclosed please find Manitoba Hydro's responses to a substantial number (60%) of IRs from the PUB, Coalition, MIPUG, GAC, and the COW, which have been completed at this time. Manitoba Hydro is continuing its review and completion of the outstanding IRs on a best efforts basis and anticipates filing additional responses next week.

Manitoba Hydro does not expect the delay in filing all Information Requests to affect the schedule as adopted by the PUB and therefore is not requesting any amendment to the schedule. Unlike a typical hearing process, Intervenors are not in a position where they will be required to file Intervenor Evidence shortly after the receipt of Information Requests, as Intervenor Evidence is not due until June 10, 2016.

If you have any questions, please contact the writer at 204-360-3633 or Janelle Hammond at 204-360-4161.

Yours truly,

MANITOBA HYDRO LAW DEPARTMENT

Per:



ODETTE FERNANDES
Barrister and Solicitor