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August 19, 2016

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

Dear Mr. Christle:

**RE: MANITOBA HYDRO'S 2015 COST OF SERVICE METHODOLOGY REVIEW – WRITTEN REPLY
SUBMISSION ON ISSUES NOT SUBJECT TO ORAL HEARING**

As per the Revised Hearing Timetable issued by the Public Utilities Board (“PUB”) in Order 84/16, please find attached Manitoba Hydro’s Written Reply Submission on Issues Not Subject to Oral Hearing.

Should you have any questions with respect to the enclosed, please contact the writer at 204-360-3633 or Janelle Hammond at 204-360-4161.

Yours truly,

MANITOBA HYDRO LAW DIVISION

Per:

A handwritten signature in blue ink, appearing to read 'Odette Fernandes', written over a horizontal line.

ODETTE FERNANDES
Legal Counsel

Att.

**MANITOBA HYDRO’S REPLY SUBMISSION
WITH RESPECT TO ISSUES NOT SUBJECT TO ORAL EVIDENCE
2015 COST OF SERVICE METHODOLOGY REVIEW**

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1 **1.0 INTRODUCTION**

2

3 The following is Manitoba Hydro's reply to written submissions of the Manitoba Industrial
4 Power Users Group ("MIPUG"), The Consumers Association of Canada/Winnipeg Harvest
5 ("Coalition"), the Green Action Centre ("GAC"), the City of Winnipeg ("COW") and the
6 General Service Small ("GSS") and General Service Medium ("GSM") Classes filed August 12,
7 2016, in accordance with the timeline established by the Public Utilities Board ("PUB") in Order
8 84/16.

9

10 Manitoba Hydro notes that a number Interveners have provided comments on topics which
11 overlap between the issues subject to written submissions and issues subject to the oral hearing,
12 such as suggested updates to data, studies and the COS model. In order to provide a fulsome
13 response and avoid duplication between matters in the written and oral processes, Manitoba
14 Hydro will reply to these issues in its September Reply Submission.

15

16 **2.0 COAL GENERATION**

17

18 Manitoba Hydro has previously indicated that the improved precision arguably gained by the
19 exclusion of coal from the allocation to Dependable Exports is trivial when looking at the
20 increased complexity associated with the creation of an additional generation pool (Manitoba
21 Hydro Written Submission, August 12, 2016, page 2).

22

23 MIPUG does not appear to accept this rationale and appears to misunderstand Manitoba Hydro's
24 position:

25

26 *"There also appears to be no rationale to consider coal generation costs to be*
27 *insufficiently large to merit specific consideration. If that were the case, there would be*
28 *no basis to overturn the past Board-approved methodology."* (MIPUG Written
29 Submission, August 12, 2016, page 1-3)

30

1 Manitoba Hydro's perspective is not that the overall cost of Coal Generation (\$29M) is
2 immaterial and as such a separate allocation is not needed, but rather that the potential over-
3 assignment of Coal costs to Dependable Exports (\$4.5 million) is not significant (Manitoba
4 Hydro Written Submission, August 12, 2016, page 2). In the context of Manitoba Hydro's
5 overall revenue requirement of \$1.8 billion (PCOSS14) and total export revenue of \$345 million
6 this amount is not significant.

7
8 MIPUG further inappropriately states that Manitoba Hydro's view should then be that it would
9 be acceptable to assign virtually all coal costs to the Export Class as per 116/08. Accepting \$4.5
10 million as a tradeoff in order to simplify and improve the understandability of the cost allocation
11 methodology does not equate to assigning the bulk of the costs associated with Coal Generation
12 against the Export class which is not appropriate due to *The Climate Change and Emissions*
13 *Reductions Act*, C.C.S.M. c. C135.

14
15 Mr. Bowman's comparison of a specific consideration for Coal to the treatment of the Uniform
16 Rate Adjustment or the Affordable Energy Fund based on the size of their respective revenue
17 requirements is also flawed. As demonstrated below, it is not only the amount but also the nature
18 of the costs that affect the class revenue cost coverage ratios, both of which must be weighed
19 against trade-offs in complexity and understandability when selecting the most appropriate
20 allocation methodology.

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22 The following table provides the RCC changes compared to PCOSS14-Amended.
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Customer Class	Coal to Domestic Only*	Eliminate URA**
Residential	0.0%	-1.8%
General Service - Small Non Demand	0.0%	0.2%
General Service - Small Demand	0.0%	1.3%
General Service - Medium	0.0%	1.6%
General Service - Large 0 – 30 kV	0.0%	1.6%
General Service - Large 30-100 kV	-0.1%	1.6%
General Service - Large >100 kV	-0.1%	1.6%
Area & Roadway Lighting	0.1%	-0.6%

2 * COALITION/MH I-63a

3 ** MIPUG/MH I-11a

4

5 **3.0 CUSTOMER SERVICE COSTS**

6

7 As noted in Manitoba Hydro's Written Submission of August 12, 2016, Manitoba Hydro uses a
8 weighted allocator for Customer Service Costs that is based on estimates of the efforts various
9 departments devote to each customer class, which are then weighted by the budget for each area.
10 MIPUG's Written Submission of August 12, 2016 argues that the GSL30-100kV and GSL
11 >100kV classes should be excused from the allocation of \$1.2 million of general customer
12 service costs on the basis that it has an insufficient understanding of how or why these costs have
13 been allocated to these classes (MIPUG Written Submission, August 12, 2016, page 5-5).

14

15 The MIPUG Written Submission (page 5-4) argues that services such as line locates are "not
16 relevant to large industrials, who make use of none of these services". The majority of costs
17 associated with line locates and Safety Watches are for contractors doing work on public streets
18 and roadways. This work is done on behalf of all customers and it is appropriate that all
19 customers, including GSL customers, share in these costs. Manitoba Hydro has committed to
20 reviewing the C10 allocator in conjunction with the preparation of its next PCOSS (Manitoba
21 Hydro's Written Submission, August 12, 2016, page 19) in order to verify that the shares
22 attributed to all customer classes are reasonable. As such, it would be inappropriate to exclude
23 any class from a subset of these costs in advance of this review.

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4.0 SUBTRANSMISSION

Manitoba Hydro's Cost of Service Study identifies the Subtransmission function as consisting of lower voltage (66 kV and 33 kV) subtransmission lines, the low voltage portion of the substations and a share of communication equipment, administration buildings, general equipment, and substation transformers in stock. These facilities are required to bring the power from the common bus network to specific load centres (Appendix 3.1 of Manitoba Hydro's December 4, 2015 Submission, page 23).

Manitoba Hydro classifies Subtransmission costs as 100% Demand, allocated to all classes except General Service Large > 100 kV (as this class does not make use of these facilities because it is served at voltages higher than 100 kV) on the basis of non-coincident demand ("NCP"). The 2012 Christensen review noted that demand related classification is common throughout the industry and that "*industry practice suggests that either CP or NCP demands may be appropriate – selection is an empirical issue.*" It is also a longstanding industry practice that customers served at higher voltages are not allocated costs of lower voltage systems (as noted for example in the NARUC Electric Utility Cost Allocation Manual, page 73).

In the current proceeding, Mr. Chernick, on behalf of GAC, accepts the classification of Subtransmission as Demand-related, but does not accept its functionalization separate from grid transmission and does not accept class NCP as the allocator. No other intervenor has taken a firm position that is contrary to Manitoba Hydro's current approach. In its Written Submission, the Coalition notes that Manitoba Hydro should be directed to fully address the question as to whether subtransmission lines are used as an economic alternative to transmission (Coalition Written Submission, August 12, 2016, page 18).

4.1. Functionalization of Subtransmission

GAC opines that “*sub-transmission is an integral part of the Transmission system, reduces Manitoba Hydro’s cost and should be functionalized, classified and allocated with all other load related transmission*” (GAC Written Submission, August 12, 2016, page 3). Manitoba Hydro disagrees that Subtransmission plays an identical role to Transmission for the following reasons:

1. The key distinction between Transmission and Subtransmission roles is the significant system wide reliability role played by Transmission. High voltage meshed systems provide a network of alternative paths to sustain system level reliability under various conditions including contingency events; essentially, system-level contingency events are supported by the entirety of the high voltage network. Subtransmission, on the other hand, is a matter of comparatively local, non-meshed transport service, performed with radial facilities. Flows on the transmission system change in response to load changes anywhere on the system; flows on a particular subtransmission system do not vary with load in other parts of the system (Manitoba Hydro Written Submission, August 12, 2016, page 5).
2. There are almost no customers served from the Subtransmission system that do not also make use of the main grid transmission system. Only 26 km (of approximately 7700 km) of Subtransmission lines are served directly from generation.
3. The inclusion of Subtransmission costs in the Transmission function as recommended by GAC removes the need for any distinction between $GSL > 100$ kV and $GSL 30-100$ kV and effectively treats them as if they incurred the same cost, which they do not.
4. Cost and load data is available, accurate and complete for separate COS treatment of Transmission and Subtransmission.
5. Inclusion of Subtransmission in the Transmission function would suggest that both the Dependable Export Class and the General Service > 100 kV class should be allocated a share of the cost of facilities which they do not and cannot use. With respect to the Export Class, Mr. Chernick agrees that it should not be allocated any of these costs (Intervener Workshop, June 22, 2016, Tr.:628-629). However, GAC believes it is appropriate to

1 adopt an approach to functionalization which would lead to such an allocation, absent an
2 arbitrary decision to treat Exports differently from $GSL > 100$ kV.

- 3 6. Contrary to the implication in GAC's Written Submission (page 6), for utilities that do
4 not specifically identify a Subtransmission function, it cannot be automatically inferred
5 that they treat these voltages in an identical fashion to main grid Transmission. There
6 may be a variety of reasons utilities do not explicitly functionalize Subtransmission,
7 including that utilities may sub-functionalize their Transmission according to type of use,
8 materiality reasons or alternatively, these costs may be included in the Distribution
9 function. Further, there is ample regulatory precedent for separating Subtransmission
10 from Transmission which is best summed up by the quote from the NARUC Cost of
11 Service Manual (found in Mr. Bowman's Rebuttal Evidence, pages 16-17).

12
13 In summary, Manitoba Hydro views that its treatment of Subtransmission is well founded,
14 recognizes well accepted cost causation principles, and supports its overall rate structure and
15 regulatory practice. Manitoba Hydro does not expect that further study or analysis will be more
16 instructive and submits that the current treatment should be retained as there is sufficient
17 evidence on the record of the current proceeding to support this treatment.

18
19 **4.2. Exclusion of a Portion of Distribution Load from the Allocation of**
20 **Subtransmission Costs**

21
22 If a separate Subtransmission function is retained, GAC's Written Submission indicates that a
23 portion of the loads of classes served at Distribution voltages should be exempt from
24 responsibility for Subtransmission cost (GAC Written Submission, August 12, 2016, pages 3-4).
25 Manitoba Hydro disagrees for the following reasons:

- 26
27 1. The full costs of Subtransmission facilities are not avoided by serving distribution
28 directly off transmission.

29

1 GAC asserts that because approximately 1/3 of distribution loads bypass subtransmission, all of
2 that cost should be exempted from customers taking service at the distribution level. Whether or
3 not distribution level customers are served from the subtransmission system, Manitoba Hydro's
4 facilities take power at transmission voltage in order to make it available at distribution voltage.
5 In these cases, Manitoba Hydro may have avoided the cost of subtransmission facilities (lines
6 and lower voltage substations) but it still has incurred cost to transform from a higher voltage.

7
8 In addition, costs are incurred on the transmission system that would not have been incurred
9 absent a decision to take power at transmission voltage directly into the distribution system.
10 These costs are incurred on the high voltage side of the substations. Today these costs are
11 properly functionalized as Transmission, because they support the transmission system, but they
12 would not have been incurred absent a decision to connect the distribution system directly to
13 transmission.

14
15 2. COS utilizes average and not individual customer costing.

16
17 A separate Subtransmission function in which costs are allocated to all customers who take
18 service below (but not above) may not be an exact match with all load flows. For example, a
19 residential customer may be served right off of a transmission line with a simple transformation,
20 yet this residential customer will be costed as if his/her load traveled through the distribution
21 function. Because of the overall ratemaking framework that Manitoba Hydro operates which
22 pools as reasonably as possible similarly situated customers in groups that take similar service
23 and which impose similar costs, it is appropriate that all distribution level customers share
24 Subtransmission costs (or the alternate costs incurred to transform high voltage power to
25 distribution level power) because all distribution customers require this service.

26
27 It is therefore not correct to conclude that distribution customers should be exempted from
28 Subtransmission costs as GAC argues. Manitoba Hydro continues to believe its method of using
29 all distribution load in the allocation of Subtransmission is reasonable, logical and appropriate
30 and should be retained.

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4.3. The Appropriate Allocator for Subtransmission Costs

Manitoba Hydro allocates the Demand-related Subtransmission costs on the basis of class NCP. This is a standard industry practice, although, as Christensen Associates has noted, class Coincident Peak (CP) is also used by some utilities.

GAC is recommending that Manitoba Hydro change its allocator for Subtransmission cost to CP based on an estimate of class contribution to the peak loads on the subtransmission lines (GAC Written Submission, August 12, 2016, page 4).

Manitoba Hydro does not dispute that the costs of these facilities are related to peak load on the lines. However, as Christensen Associates has also noted, whether class system CP or NCP is a better estimate of subtransmission peak loads is an empirical matter (CA Report dated June 8, 2012, filed as Appendix 5 of Manitoba Hydro's December 4, 2015 Submission, page 16) and Manitoba Hydro does not have the data or infrastructure to resolve this issue empirically. Mr. Chernick's analysis (Rebuttal of Paul Chernick, August 5, 2016, page 30) is not helpful because it uses weighted monthly system peaks, not substation peaks and, in effect, assumes its conclusion that CP is superior.

Manitoba Hydro's rationale for the use of NCP is that at lower levels in the system (e.g. subtransmission as compared to transmission) class loads peak at different times than they peak at the common bus so that class peaks coincident with overall system peak are not likely to represent the class contribution to peaks on the subtransmission or distribution facilities. In general, the further downstream on the system, the less likely is coincident peak to reflect the actual time of peak loading on these lower voltage systems.

For example, substations in the Central Winnipeg area (for which accurate peak load measures are available) peak mostly during the winter but at a variety of times, with the most common times being January in the mid to late morning or late afternoon (GAC/MH I-13). While most

1 subtransmission facilities serve a variety of classes, the variety may be quite different from the
2 class mix at overall system peak. Some subtransmission systems will serve predominantly
3 industrial load, others different mixes of residential and commercial load. One would expect a
4 Central Winnipeg subtransmission to be significantly influenced by commercial loads, while
5 rural subtransmission would be more influenced by residential and agricultural loads which tend
6 to peak at different times. As such, different subtransmission systems throughout the province
7 peak at different times and reflect, at least in part, the different distributions of class loads among
8 these systems.

9
10 Intuitively, Manitoba Hydro believes also that there is a tie to local reliability provided by
11 subtransmission distinct from system-wide reliability provided by the transmission system and
12 NCP vs CP allocation. Specifically, NCP allocation for Subtransmission aligns well with greater
13 load diversity at subtransmission voltages. For this reason, CP demand allocation for (high
14 voltage) reliability – driven by concerns of system-wide coincident peak demands – does not
15 appear to fit with subtransmission.

16
17 No evidence has been provided in this proceeding to demonstrate that CP provides a superior
18 measure of cost causation in the allocation of Subtransmission and Distribution costs. Manitoba
19 Hydro submits that NCP is accepted within the industry and should be retained unless and until
20 infrastructure and data are available to demonstrate otherwise.

21 22 **5.0 DISTRIBUTION CLASSIFICATION OF POLES AND WIRES**

23
24 Manitoba Hydro classifies Distribution Poles and Wires as 60% demand related and 40%
25 customer related. GAC argues for a 100% demand classification as “*Distribution lines (poles,*
26 *conductors, cable and conduit) are installed due to load*” (GAC Written Submission, August 12,
27 2016, page 4).

28
29 Manitoba Hydro has addressed this matter in its Rebuttal Evidence and Written Submission
30 (page 10). Manitoba Hydro is of the view that these facility costs are not driven only by load

1 requirements of customers. In fact, many utilities incorporate a customer component into both
2 Poles and Wires and Distribution Transformers on this basis. Distribution radial facilities are put
3 in place in order to provide, jointly, interconnection services and peak load service. The facilities
4 are sized (designed) and driven by expectations for number of customers and total peak load. So,
5 if the number of interconnection services (number of customers) were reduced by half – e.g.
6 facility was reduced by approximately half – the impact/reduction on total facility costs is
7 substantial – perhaps lower by 40%. On the other hand, if total loads were to be cut by half, the
8 effects on total poles and wires costs are far less – likely a reduction of 0-10%. In fact, the total
9 cost of Poles and Wires is hardly peak-load related, in isolation, of the customer share of total
10 costs. Further, attributing the total cost of Poles and Wires to peak load only denies any role that
11 interconnection and transport play in the delivery of power to distribution customers.

12

13 Manitoba Hydro maintains that it is entirely reasonable to include a customer component in
14 Poles and Wires. When combined with Distribution Transformers (which are classified 100%
15 Demand-related), Manitoba Hydro treats nearly 70% of these combined costs as demand-related.
16 Further, a case could be made that there is a customer component to Distribution Transformers
17 which would reduce the amount of demand-related classification, not increase it to 100%, as
18 GAC argues. Manitoba Hydro's classification of Distribution costs is conceptually sound, is
19 supported by its Consultant, Christensen Associates and also is supported by current and well
20 accepted industry practice. Manitoba Hydro believes the Board has sufficient evidence as well as
21 its own judgment to conclude on this matter.

22

23 **5.1. Allocation of Demand-Related Distribution Cost**

24

25 Manitoba Hydro uses class NCP to allocate demand related cost of Distribution (a similar
26 rationale as used with Subtransmission). As previously discussed, the further downstream on the
27 system, the less likely is coincident peak to reflect the actual time of peak loading on these lower
28 voltage systems.

29

1 While Manitoba Hydro accepts GAC's recommendation that the preferred allocator for these
2 facilities would be class contribution to the peak loads on those facilities, Manitoba Hydro does
3 not currently or in the foreseeable future have the metering infrastructure to determine the hours
4 when these facilities peak nor does it have the class loads specific to the individual substations.
5 Further, to use such a technique might also require that the accounting cost of a specific facility
6 be tracked along with the peak load for the facility. Accordingly, NCP is recommended as a
7 preferred substitute for contribution to the diverse range of peaks on the many distribution
8 systems throughout the province.

9
10 Manitoba Hydro notes the comments and suggestions regarding Distribution-related matters put
11 forth by the Coalition in the Appendices to its Written Submission. Manitoba Hydro has
12 reviewed these matters and notes that, in large part, these matters have been addressed by
13 Manitoba Hydro in its Written Submission and/or as part of this proceeding. For clarity of the
14 record, Manitoba Hydro has provided Attachment 1 to this Reply Submission, where Manitoba
15 Hydro's perspectives can be found.

16 17 **6.0 MARGINAL COST**

18
19 GAC references a directive contained in Order 117/06 (GAC Written Submission August 12,
20 2016, page 3) related to Manitoba Hydro including supplemental information with respect to
21 Marginal Cost of Service, and requests that the PUB re-iterate this directive.

22
23 It should be noted that GAC's Written Submission does not incorporate any discussion of the
24 evolution of this matter subsequent to the issuance of Order 117/06. In fact, Manitoba Hydro
25 provided a Marginal Cost of Service as part of the 2008 GRA. The PUB concluded, in Order
26 116/08, that the Marginal Cost of Service analysis prepared required refinement. In Order
27 150/08, flowing from Manitoba Hydro's Review and Vary Application regarding 116/08, the
28 PUB agreed with Manitoba Hydro (page 51) that its directive was unclear and stated that
29 Manitoba Hydro meet with Board Staff and/or Advisors. That meeting occurred November 24,
30 2009, the outcome of which was Manitoba Hydro alternatively agreeing to undertake an external

1 review of its embedded Cost of Service Methods. That review was completed, and its external
2 consultant, Christensen Associates, provided its advice in their 2012 Report, including discussion
3 regarding marginal cost of service.
4

5 In its response to CA's Report dated June 8, 2012 (Appendix 4 of Manitoba Hydro's December
6 4, 2015 Submission, page 17), Manitoba Hydro acknowledged that Marginal Cost of Service
7 may be instructive to rate determination in parallel with traditional embedded cost of
8 service. Manitoba Hydro stated that it was not prepared to engage in enhancements or
9 modifications to the marginal cost by class previously prepared in the absence of specific
10 direction of the PUB as to what modifications are required. Manitoba Hydro views its
11 requirement flowing from Order 150/08 as satisfied. Manitoba Hydro notes, however, that it
12 routinely provides the PUB with marginal cost data by function (Generation, Transmission and
13 Distribution) and it also incorporates marginal cost concepts within its embedded cost of service
14 study, in particular the use of a weighted energy to classify and allocate generation related
15 embedded cost.
16

17 Manitoba Hydro takes the position that there is no evidentiary basis in this proceeding for a
18 reiteration of this directive. The focus in the current proceeding is rightly placed on resolving
19 longstanding issues in the embedded cost of service methodology.

Topic	Subtopic	Appendix B Reference	Coalition Position	Manitoba Hydro Position
Common Costs	Distribution Plant - Subfunctionalization of common costs (Buildings, Communication, General Equipment and certain SCCs)	Pg 3 - Pt 4	At some point in the future, Manitoba Hydro should re-assess the sub-functionalization to ensure consistency.	Manitoba Hydro concurs and will subfunctionalize Distribution common costs based on relative operating costs in future studies.
	Functionalization of System Control Costs	Pg 5 - Pt 1	The factors used to functionalize Operating and Depreciation should be reassessed due to age.	Manitoba Hydro concurs, and intends on reviewing the weighting factors as time and resources allow.
	Functionalization of Communication Costs - Rate Base	Pg 5 - Pt 2	The factors used to functionalize rate base should be reassessed due to age.	Rate base for Communication is functionalized on the same basis as Communication Operating and Depreciation. Manitoba Hydro does not believe there are any factors used in the functionalization of Communication that need to be reviewed.
	Functionalization of Communication Costs - Depreciation & Operating	Pg 6 - Pt 1	Depreciation and Operating costs associated with Communications should be functionalized as part of the COS model to reflect changes in the initial functionalization of assets/activities.	Complete.
	Refunctionalization of Subtransmission to Transmission and Distribution	Pg 6 - Pt 3	Schedules C6 & C12 do not show re-assignment of Common Subtransmission costs and would be more transparent if incorporated in the model.	Schedules will be corrected in future studies.
	Subfunctionalization of Common SCCs, Regulated Assets, Buildings, Communication & Control and General Equipment	Pg 6 - Pt 4	Model should be refined to allow subfunctionalization of common cost to permit these costs to be re-functionalized when assets/activities re-assigned between functions.	Complete.
Customer Weightings	Customer Service General	Pg 4 - Pt 9	Customer weighting factors should be updated.	Manitoba Hydro accepts. Please see Written Submission page 19.
	Meter Reading, Meter Investment, Meter Maintenance, Billing and Collections, Service Drops	Pg 4 - Pt 11 Pg 5 - Pts 3,4 & 6	Manitoba Hydro's weighting factors should be updated.	Manitoba Hydro accepts and intends on reviewing the weighting factors as time and resources allow.
Multi-Tenant Units	Poles & Wires/Service Drops	Pg 3 - Pt 7	Customer counts should be adjusted to remove the double counting related to multi-tenant units.	Please see Manitoba Hydro's Written Submission page 19.
Primary / Secondary	Distinct functions for Primary and Secondary	Pg 3 - Pt 5	Primary and Secondary should be treated as distinct functions and Manitoba Hydro should update the split.	Manitoba Hydro accepts these recommendations. Please see Written Submission pages 12-13. MH does not object to use estimated shares to split Distribution Poles & Wires into Primary and Secondary subfunctions, rather than making an adjustment to the allocators for classes that do not use secondary distribution.
	Allocation of Primary and Secondary to Classes	Pg 4 - Pt 8	GSM allocators used for Poles and Wires needs to be adjusted to account for the different Demand /Customer classification for primary as opposed to secondary (similar to AR&L)	Adjustments to the GSL 0-30kV allocators will no longer be required with the separation of Distribution Poles & Wires into Primary and Secondary subfunctions.
Revenue	Allocation of Late Payment Revenues	Pg 2 - Pt 1	Improve Manitoba Hydro's allocation of Late Payment Revenue and Customer Adjustments by pro-rating based on historic late payment revenue by Class as opposed to total revenue.	Please see Manitoba Hydro's Written Submission pages 18-19.
	Other Revenues	Pg 6 - Pt 2	Functionalize "Other Revenue" as part of the model	Complete. Please see Manitoba Hydro's Written Submission page 20.
ARL	Weightings for Sentinel and Streetlighting	Pg 4 - Pt 13	Update the various customer related allocation factors to separate out Sentinel Lights and Street Lights	Please see Manitoba Hydro's Written Submission pages 20-21.