

“APPENDIX I”

INTERVENER REQUEST FORM

1. Application Re Hearing:		
2017/18 2018/19 General Rate Increase		
2. Name of Requesting Party:		
Manitoba Keewatinowi Okimakanak Inc. (MKO)		
3. Address of Requesting Party:		
6-338 Broadway Avenue, Winipeg, MB R3C OT2		
4. Phone Number:	Business:	Residence
	204-927-9184	
	Fax Number:	E-mail:
	204-927-7509	manderson@mkonorth.com
5. Contact Person(s):		
Michael Anderson (MKO) ; George J. Orle Q.C. Legal Counsel		
6. Address:		
Michael Anderson same as # 3; George J. One Q.C. 3-430 River Ave. Winipeg, MB R3L 0C6		
7. Phone Number:	Business:	Residence:
	M. Anderson 949-9184 G. Orle 204-947-1830	
	Fax Number:	E-mail:
	M. Anderson 949-9185; G. Orle 943-0461	manderson@mkonorth.com; gorle@woodorle.mb.ca
8. State reasons for the proposed intervention (please be specific).		
See Schedule A		



**9. State nature of proposed intervention.**

a) Do you intend		Yes	No
(i)	to appear throughout the hearing:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii)	to participate in the production of evidence:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii)	to participate in the testing of evidence:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv)	to present final argument:	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b) Do you intend to call witnesses:	Yes	No
	<input checked="" type="checkbox"/>	<input type="checkbox"/>

c) If yes to No. 9b), please provide witness':		
(i)	Name:	not yet available
(ii)	Address:	
(iii)	Qualifications:	
(iv)	Subject of submission (please note date for filing submission):	

MKO will be sharing some experts and expects to call one of their own.

10. Will you be applying for costs under Board Order No. 163/87:	Yes	No
	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If yes: Refer to Section 43 of Rules of Practice and Procedure.  
Provide detailed budget as per the attached Appendix II.

**11. Comments and other information:**

## **SCHEDULE A To Intervener Application of MANITOBA KEEWATINOWI**

### **OKIMAKANAK INC. (MKO)**

MKO represents more than 65,000 treaty First Nation citizens in northern Manitoba. MKO has been in existence for over 33 years and is a nonprofit advocacy organization governed by the elected Chiefs of the 30 sovereign First Nations in northern Manitoba.

All citizens of the MKO First Nations and the MKO First Nation government facilities receive electrical service solely from Manitoba Hydro. The citizens of MKO First Nations are residential ratepayers and the First Nation governments are general service ratepayers. The three diesel First Nations which pay electricity bills for the schools are also First Nation education rate customers. In the past MKO has been the only intervener which represents both residential and general service customers.

Manitoba Hydro's proposal to apply a 7.9% general rate increase in General Consumers' rates effective August 1, 2017 affects the 30 MKO First Nations, each of whom are General Service and Residential customers of Manitoba Hydro, as well as the General Service and Residential customers who are citizens of the MKO First Nations.

The proposed rate increases will disproportionately affect MKO in that many of the benefits to be generated by the increases will flow to the provincial government to be used for general purposes and MKO First Nations receive little or no benefit from provincial disbursements.

In reviewing the proposed rate increase MKO would be concerned with the following factors:

1. are Manitoba Hydro forecasts reliable;
2. are the actual and projected costs of Hydro necessary;
3. has Manitoba Hydro demonstrated that its revenue requirements are reasonable.

MKO would examine the application with respect to the recognition and implementation of specific mitigation measures such as:

1. removal of mitigation costs from rates
2. allocation of greater share of net export revenue to First Nations customers
3. establishment of a "equivalent to gas" rate for heat portion of bills
4. allocation of net export revenue to reduce diesel cost of service
5. removal of water rental fees from rates to First Nations.

In particular MKO has been and continues to be of the opinion that Manitoba Hydro has deliberately inflated and distorted its needs for additional revenue. At the NFAT hearings the independent expert consultants retained by the Public Utilities Board, indicated that the Hydro plan is expected to result in annual electricity rate increases of about 4 percent, or about double the rate of inflation, for the next eighteen (18) to twenty two (22) years. In the 2015 GRA Manitoba Hydro suggested that it would require continued increases of at least 3.5% for the future. Over the course of the next year Manitoba Hydro increased its revenue needs to continual increases of 7.9% per year. MKO does not accept the rationale set out

in the current Application. MKO if granted intervener status would ask that Manitoba Hydro set out in detail each and every change in the forecast made in the current application that differs from the information set out in the NFAT and 2015 GRA. MKO would then ask that each and every assumption that is being made for each change be set out in detail. MKO is not as interested in embarking on a complete new evaluation but wants a thorough examination of what facts warrant the variation of the forecast earlier made and which was relied upon by the PUB and the intervenors.

MKO intends on presenting a ratepayers panel limited to First Nations Residents. MKO will also be relying upon the Bill Affordability study and needs to know if the report will be considered as evidence or if the makers of the report and the authors of the statistics will be required to testify before the information is given status as evidence.

To accomplish this investigation MKO will be relying upon experts that it will share with other intervenors. MKO will be filing the Diesel Agreement and will submit that the MFR it submitted relating to Diesel be approved and will be calling expert testimony with respect to long range planning with respect to provision of energy to current Diesel communities.