



360 Portage Ave (22) • Winnipeg, Manitoba Canada • R3C 0G8
Telephone / N° de téléphone: (204) 360-3257 • Fax / N° de télécopieur: (204) 360-6147 • baczarnecki@hydro.mb.ca

July 3, 2019

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

Dear Mr. Christle:

**RE: CENTRA GAS MANITOBA INC. ("CENTRA") 2019/20 GENERAL RATE APPLICATION –
INFORMATION REQUESTS OF INTERVENER EVIDENCE**

By letter of June 27, 2019, the Public Utilities Board of Manitoba ("PUB") requested that all parties, aside from Centra, provide their positions on which, if any issues, should be the subject of oral evidence together with reasons for such positions by July 5, 2019. In addition, and to assist in the advancement of its consideration of the issues for oral evidence, the PUB requested Centra to provide all parties with an indication of the subjects or areas on which it anticipates it will pose information requests ("IRs") in advance of July 5th. Centra's assessment of the areas that it expects to pose IRs is provided in this letter.

Intervener evidence has been filed by the following parties in this proceeding:

- Consumers Association of Canada (Manitoba) ("CAC"):
 - Evidence prepared by Darren Rainkie & Kelly Derksen
 - Evidence prepared by Richard DeWolf
 - Evidence prepared by METSCO
- Industrial Gas Users:
 - Evidence prepared by Andrew McLaren of InterGroup Consultants Ltd.
 - Evidence prepared by Gil Labonte of France Financial Consulting
 - Evidence prepared by Troy Brown (Koch Energy Services, LP)
- Koch Fertilizer Canada, ULC (Koch):
 - Evidence prepared by Brian Collins (public redacted copy only).

Centra's overall assessment is that the intervener evidence filed largely contains argument and recommendations with limited facts or supporting analysis, many of which relate to future

periods outside of the test year. As such, Centra expects to file a minimal number of IRs seeking clarification on any facts/analysis that are unclear. Further, no significant facts appear to be in dispute with respect to its Application, and the current record for all of the issues raised by these Interveners is complete and sufficiently robust. For the same reasons, Centra does not expect to file extensive rebuttal evidence, but will focus on addressing intervener recommendations and alternatives.

In addition to the general comments noted above, Centra offers the following specific comments on the evidence filed by Interveners:

- With respect to the evidence of Richard Dewolf, Centra can advise that it does not expect to ask any information requests. Centra notes that the PUB has provided an opportunity for CAC and Centra to provide submissions on Tab 9 issues by July 15th.
- Based on the public, redacted version of the evidence filed by Mr. Collins, Centra is of the view that the positions advanced by this Intervener Consultant are to recommend a coincident peak and direct cost allocation alternative for the PUB's consideration, which is primarily argument. Accordingly, Centra expects to have a limited number of IRs to seek clarification on these positions. Centra reserves the right to ask IRs on any additional evidence that may be filed in accordance with Order 91/19.
- Regarding the evidence of METSCO, Centra can advise that it intends to ask a limited number of IRs seeking clarification with respect to the recommendations for specific projects for further consideration by the PUB and Centra.
- Regarding the evidence of Mr. McLaren, Centra will only seek to clarify his recommendation to defer any rate adjustments until after a full cost of service review, and his alternative related to the disposition of the heating value deferral.
- Regarding the cost of service and rate design evidence advanced by Ms. Derksen, Centra notes that this consultant's recommendations are clear and indicate that Centra's long standing cost allocation methodology is reasonable in light of the design and operations of its system, is principled and accepted industry practice. As such, Centra intends to pose a limited number of IRs primarily relating to the recommendation to reinstate the minimum margin guarantee for the Power Station class.
- Regarding the evidence of Mr. Rainkie, Centra intends to ask limited IRs related to his recommendation on Operating & Administrative expenses, and does not intend to ask any IRs on the evidence relating to recommendations for future periods beyond the test year in this Application, the majority of which overlap with the enterprise wide strategic planning process that is underway.
- With respect to the issue of load balancing fees, given that the record is fulsome on this matter, IRs will be limited to clarifying the record and further understanding the arguments/recommendations advanced by interveners.

Yours truly,

MANITOBA HYDRO LEGAL SERVICES DIVISION

Per:



BRENT A. CZARNECKI
Barrister & Solicitor

cc: Rachel McMillin, Assistant Associate Secretary
Bob Peters, Board Counsel
Dayna Steinfeld, Board Counsel
Registered Interveners