

CENTRA GAS MANITOBA INC.
2019/20 GENERAL RATE APPLICATION
INTERVENER EVIDENCE INFORMATION REQUESTS
CAC
JULY 5, 2019

Centra/CAC I-1

Reference:

Intervener Application Form

Preamble:

Centra seeks to better understand and confirm the position of CAC in this proceeding

Question:

a) Please file the Consumers' Association of Canada (Manitoba) Inc.'s policies and/or describe the past practices that impacted upon its decision to intervene in this application.

b) Please file any Board of Directors resolution or meeting minutes addressing CAC's intervention in this proceeding.

c) Please provide any minutes of meetings or resolutions from CAC's volunteer Board of Directors providing direction to CAC's executives and/or consultants with specific respect to this Application, including any approval or direction for the estimated costs for CAC's intervention and/or the written evidence filed by CAC's consultants as part of this proceeding.

d) Does the CAC adopt the evidence submitted by the following parties: D. Rainkie, K. Derksen, R. DeWolf and METSCO? If the answer is anything but an unqualified yes, please file a revised version of the evidence, removing any portions that are not being adopted as the evidence of CAC.

Response:

CAC finds this IR more irrelevant, than helpful, and seriously questions Centra's motivation in posing them. Nevertheless, please find the following specific responses:

a) Please refer to CAC's application for Intervenor status: CAC's representation at the PUB – Pre-hearing conference; and, its budget submissions.

b) & c) As Centra is well aware, from decades of interaction with CAC at a myriad of hearings, CAC is not the massive organization that Manitoba Hydro is. As such, CAC is a purely volunteer organization which operates on a more informal and less structured

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basis. Consequently, there are no formal resolutions or minutes except at regular quarterly meetings and at the AGM.

In addition, the Board of Directors (“Board”), over many years, has set CAC policies, both specifically (eg: Manitoba should not build Keeyask now), and more globally (eg: CAC typically does not support cross-subsidization of costs with some exceptions).

When a hearing is pending, the Executive Director (“ED”) would inform the Board, sharing any salient issues that may make CAC’s participation on behalf of consumers worthwhile and that CAC is aware of at that early stage, which may take place at a meeting, or through other forms of communication.

If the Board determines that the hearing poses important questions/issues in the best interest of consumers, (keeping in mind that CAC is not compensated for this work by the PUB or anyone else) CAC participates. No motion is made. The Board only makes motions on matters of its own finance, with rare exceptions.

It is the job of the ED to represent the interests of the Board in serving consumers, by working with its legal team to make the day to day decisions on the hearing, including but not limited to:

- * determining issues that should be addressed in the consumer interest and which can be addressed effectively;
- * working with the legal team to bring together a team of experts to provide evidence on these issues AS NECESSARY;
- * ensuring that the case theory is in line with consumer rights, and long-standing principles and policies of CAC, and considers the input of consumers and other stakeholders, where possible.
- * ENSURING THAT CAC’S ENTIRE PARTICIPATION IN THE PROCEEDING IS EVIDENCED-BASED AND BALANCED, AS A MAJOR, OVER-ARCHING CAC POLICY.
- * approving CAC’s proposed budget and final application for costs.
- * developing the organization's final recommendations, working with the legal team and Board members in line with approved CAC policies, principles, and practice in the best interest of the consumers CAC represents.

In order to do this work, the ED is expected to liaise frequently with the legal team, and as needed, with the experts. The ED is expected to be familiar with the big picture on

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each issue, and as much detail as is necessary to advise the Board on final recommendations. The ED is expected to respond to media inquiries, meet with stakeholders, as possible, and engage consumers wherever possible on the issues presented at the hearing. The ED is expected to inform the Board (often informally), of ongoing hearing progress, so it has ample opportunity to raise concerns, share suggestions or ideas. The ED and the Board naturally place heavy reliance on the expertise of its lawyers and experts engaged but ultimately the Board through ED gives the ultimate instructions to its counsel.

If the ED has questions or concerns about any of this work, there is ample opportunity to receive input, direction, and guidance from the Board through various forms of communication. The Board made a decision a few of years ago to minimize documentation of discussion at meetings. As such, there is not a formal document that memorializes the Board's express instruction.

This process was followed in this application.

d) CAC advances evidence which it feels is relevant and valuable to the PUB; otherwise it would not have been submitted. Any final recommendations by CAC are made in final argument after the ENTIRE evidentiary record is completed.

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Centra/CAC I-2

Reference:

Written evidence of METSCO

Preamble:

Question:

- a) Does CAC have any specific recommendation to cancel any project planned by Centra? If yes, please explain fully and provide all supporting analysis and documentation.
- b) Does CAC have any specific recommendation for a specific cost forecast reduction amount relating to any capital project for Centra's test year? If yes, please explain fully and provide all supporting calculations, analysis and documentation.

Response:

a) & b) CAC's evidence is contained in the evidence of its experts filed herein. Any specific recommendation will be informed by the entire hearing record.