



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

August 12, 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
("GRA") – WRITTEN SUBMISSIONS ON ISSUES NOT IDENTIFIED FOR ORAL EVIDENCE**

Pursuant to Order 98/19, please find enclosed Centra's Written Submissions on Issues not Identified for Oral Evidence. Should you have any questions or require clarification, please do not hesitate to contact the writer or Paul Chard at 204-360-5146.

Yours truly,

MANITOBA HYDRO LEGAL SERVICES DIVISION

Per:

A handwritten signature in blue ink, appearing to read 'Brent Czarnecki', with a stylized flourish at the end.

BRENT CZARNECKI
Barrister & Solicitor

cc : Mr. B. Peters, Fillmore Riley
Ms. Dayna Steinfeld, Fillmore Riley
All Intervenors of Record

PUBLIC UTILITIES BOARD

WRITTEN SUBMISSION OF CENTRA GAS MANITOBA INC.

REGARDING ISSUES NOT IDENTIFIED FOR ORAL EVIDENCE

2019/20 GENERAL RATE APPLICATION

August 12, 2019



**CENTRA GAS MANITOBA INC.
2019/20 GENERAL RATE APPLICATION**

WRITTEN SUBMISSION REGARDING ISSUES NOT IDENTIFIED FOR ORAL EVIDENCE

INDEX

1.0 SUMMARY	1
2.0 UNCONTESTED ISSUES.....	1
2.1 IFRS Related Accounting Changes / New Regulatory Deferral Accounts (Issue #6)1	
2.2 IFRS Related Depreciation Expense Methodology Changes / New Regulatory Deferral Accounts (Issue #7)	5
2.3 DSM Deferral Account (Actual vs. Planned Spending) (Issue #13).....	6
2.4 Bill Impacts – Relating to Carbon Levy (Issue #14).....	7
2.5 Terms and Conditions of Service (Excluding Balancing Fees and CEPP) (Issue #22)	8
2.6 Load Forecast (Issue #15)	8
2.7 Western Transportation Service (Issue #18).....	8
2.8 Fixed Rate Primary Gas Service (“FRPGS”) (Issue #19).....	8
2.9 Gas Costs (Issue #16).....	8
2.10 Feasibility Test True-Ups for Main Extensions over 500 Meters (Issue #20)	9
2.11 Liability Insurance (Issue #10).....	9
2.12 Approval of Interim Orders: Primary Gas Rates, Franchises and Crossing Agreements (Issue #21)	10
3.0 ISSUES CONTESTED BY INTERVENER EVIDENCE	10
3.1 Return on Rate Base including Return on Equity (Issue #12).....	10
3.2 Financial Targets (Issue #3).....	12
3.3 Changes in Finances and Financial Assumptions since Order 85/13 (excluding Accounting Treatment of Gas Meter Exchange) (Issue #4)	14
3.4 Finance Expense including Interest Rate Forecast and Debt Management Strategy (Issue #5).....	15
3.5 Integrated Cost Allocation Methodology (Issue #9).....	15

3.6	Gas Costs – Use of a Third Party Consultant (Issue #16)	16
3.7	Centra’s Strategic Plan (Issue #2).....	17
3.8	Compliance with Orders and Directives (per Order 85/13 page 62) (Issue #23)..	18

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35

**CENTRA GAS MANITOBA INC.
2019/20 GENERAL RATE APPLICATION**

CLOSING SUBMISSION ON ISSUES NOT IDENTIFIED FOR ORAL EVIDENCE

1.0 SUMMARY

Centra Gas Manitoba Inc. (“Centra”) filed its 2019/20 General Rate Application (“GRA” or “Application”) on November 30, 2018. By Order 24/19, the PUB identified a list of 24 issues that were within scope of this proceeding. In the same Order, the PUB established a public process to consider Centra’s Application that included opportunities for Interveners to ask information requests of Centra and file written evidence.

By Order 98/19, the PUB identified nine issues which are the subject of oral evidence and submissions. The PUB directed the remaining issues to be heard and determined on the basis of the written record of this proceeding. The following provides Centra’s written position on the approvals sought in this Application, and where possible, Centra categorized its submissions utilizing the PUB’s characterization of issues as set out in Order 98/19. Section 2.0 includes issues that were not contested by the Interveners to this application and Section 3.0 includes issues that the Interveners contested within their filed evidence.

2.0 UNCONTESTED ISSUES

Interveners did not file evidence with respect to many of the issues identified by the PUB for this proceeding. Given the lack of Intervenor evidence contesting these matters, Centra respectfully requests that the PUB grant the approvals as applied for in the Application.

The following sections address the issues uncontested by the Interveners and reiterates Centra’s requests of the PUB with respect to such issues.

2.1 IFRS Related Accounting Changes / New Regulatory Deferral Accounts (Issue #6)

Centra recognized regulatory deferral accounts (e.g. Demand Side Management and Site Restoration expenditures) for certain expenditures under Canadian Generally Accepted Accounting Principles (CGAAP) prior to its transition to International Financial Reporting Standards (IFRS). Such accounts record the differences in the timing for when certain expenses and revenues are recognized into income for financial reporting purposes and

1 when those same amounts are recognized for rate setting purposes, as endorsed by the
2 PUB. IFRS 14 *Regulatory Deferral Accounts* also requires the recognition of regulatory
3 deferral accounts when such timing differences exist.

4
5 Upon Centra's 2015/16 transition to IFRS, Centra was required to change the timing of
6 when it recognizes certain expenses and revenues into income. To the extent that the PUB
7 has not endorsed such changes in the timing of recognition of expenses and revenues for
8 rate setting purposes, IFRS 14 requires Centra to establish regulatory deferral accounts. For
9 any new regulatory deferral accounts, Centra's external auditors require the endorsement
10 of the PUB as to the amortization period (i.e. timing) over which such amounts are to be
11 recognized for rate setting purposes. Such endorsement provides the audit evidence
12 needed to validate that Centra's financial statements appropriately reflect the directives of
13 the PUB.

14 15 **2.1.1 Ineligible Overhead Charges**

16 Centra is requesting PUB endorsement with respect to the following:

- 17 • the establishment of a new regulatory deferral account to defer the annual impact
18 of the \$0.7 million of ineligible overhead costs effective April 1, 2014; **and**
- 19 • to amortize the cumulative deferred balance for this account for rate setting
20 purposes over a 34 year period commencing April 1, 2017.

21
22 Upon its transition to IFRS, Centra identified \$0.7 million of overhead ineligible for
23 capitalization. Since its 2014/15 fiscal year, Centra has annually deferred the \$0.7 million of
24 ineligible overhead costs in a regulatory deferral account. Centra commenced amortizing
25 this balance for rate setting purposes over a 34 year period starting in 2017/18 to be
26 consistent with the direction received by Manitoba Hydro in Order 59/18 for its ineligible
27 overhead deferral account. CGM18 assumes that annual ineligible overhead costs of \$0.7
28 million will continue to be deferred over the forecast period in a regulatory deferral account
29 and amortized into income over a 34 year period for rate setting purposes.

30
31 Alternatively, the PUB could endorse the recognition of the additional \$0.7 million of
32 ineligible overhead into income for rate setting purposes on a go forward basis commencing
33 April 1, 2019. Such endorsement would further require PUB endorsement of an
34 amortization period for the approximately \$3 million of ineligible overhead that has been
35 deferred from 2014/15 through to 2018/19.

36

1 **2.1.2 2014 CGAAP Depreciation Study**

2 Centra is requesting PUB approval to commence using the 2014 CGAAP Average Service Life
3 (ASL) Depreciation Study accounts and depreciation rates for rate setting purposes effective
4 April 1, 2019. The full study can be found as Attachment 2 in Appendix 3.4.

5

6 Centra's last PUB approved CGAAP ASL depreciation study was conducted in 2010. Upon its
7 transition to IFRS, Centra conducted an updated CGAAP ASL study for asset balances as of
8 March 31, 2014. The overall impact of the 2014 Depreciation Study resulted in an annual
9 **reduction** in depreciation expense of approximately \$1.0 million.

10

11 The more significant service life changes identified in the 2014 study include:

12

- 13 • **Services:** Decrease in the CGAAP ASL depreciation rate from 1.63% (55 years) to
14 1.36% (62 years);
- 15 • **Meters:** Increase in the CGAAP ASL depreciation rate from 4.15% to 4.86%; and
- 16 • **Distribution Mains:** Decrease in the CGAAP ASL depreciation rate from 1.42% (65
17 years) to 1.33% (68 years)

17

18 In addition to the changes in service lives, Centra added three new depreciation accounts
19 for circumstances where the service lives of the respected expenditures were much shorter
20 than the account the expenditures were previously recorded in. The three new accounts
21 are as follows:

22

- 23 • **Gas Meter Testing/sampling:** Centra is required to maintain compliance with
24 Measurement Canada regulations for the sampling and replacement of meters. This
25 new account has been assigned a 10 year life.
- 26 • **Cathodic Protection (Transmission):** This account captures costs for the
27 maintenance of the cathodic protection systems which require a continuous effort
28 as anodes and the performance of impressed current ground beds deteriorate over
29 time. These costs were previously captured in the Transmission-Mains account and
30 have been assigned a 25 year life.
- 31 • **Cathodic Protection (Distribution):** This account has been established for the same
32 reasons as the Cathodic Protection (Transmission) account, but has been assigned a
33 15 year life as the distribution pipeline system is primarily protected by shorter-lived
34 sacrificial anodes. These costs were previously captured in the Distribution-Mains
35 account.

35

36

2.1.3 2014 CGAAP ASL Depreciation Study Regulatory Deferral

Centra is requesting PUB endorsement with respect to the following:

- to establish a new regulatory deferral account to defer the impact of the 2014 CGAAP ASL Depreciation Study on depreciation expense effective April 1, 2014 through to March 31, 2019; **and**
- to amortize the cumulative deferred balance for this account for rate setting purposes over a 34 year period effective April 1, 2019.

Given that the PUB has yet to approve the results of the 2014 CGAAP ASL depreciation study, Centra is required to continue to calculate depreciation expense for rate setting purposes based on the rates included in the 2010 CGAAP ASL Study. Centra has deferred the impact of the 2014 CGAAP ASL Study in a regulatory deferral account effective April 1, 2014. No amortization of the deferral account has been recognized to date.

2.1.4 Updated Gas Meter Depreciation Rate and Deferral Account

Centra is requesting PUB endorsement with respect to the following:

- the establishment of a new regulatory deferral account to defer the annual impacts on depreciation expense of the change in the gas meter depreciation rate effective April 1, 2015 through to March 31, 2018; **and**
- to amortize the cumulative deferred balance for rate setting purposes for this account over a 20 year period commencing April 1, 2019

Centra is requesting PUB approval to commence using the updated CGAAP ASL depreciation rate for gas meters for rate setting purposes effective April 1, 2019.

Subsequent to the completion of the 2014 CGAAP ASL Depreciation Study, Centra experienced 2 years of accounting losses on retirements of gas meters. Based on this experience, a review of the service life of the meters was performed which indicated the service life should be reduced from 25 to 20 years; resulting in a change to the CGAAP ASL depreciation rate from 4.86% to 6.31%. The change to the 20 year service life was adopted by Centra for financial reporting purposes on a prospective basis on April 1, 2015 for its 2015/16 fiscal year. Centra continued to use the previously approved 25 year service life for rate setting purposes from 2014/15 through to 2018/19. Centra established a regulatory deferral account for the period April 1, 2015 to March 31, 2019 to defer the annual difference in depreciation expense between the 25 and 20 year depreciation rates. No amortization of the deferral account has been recognized to date.

2.1.5 New Depreciation Account – Gas In-Line Inspections

Centra is requesting PUB approval with respect to the following:

- to commence using the new depreciation account for Gas In-line Inspections for rate setting purposes effective April 1, 2019; and
- to use a 5 year depreciation period for this account commencing April 1, 2019.

Subsequent to the completion of the 2014 Depreciation Study, Centra established a new depreciation account to capture costs associated with the implementation of the use of In-Line Inspection (ILI) tools to assess the integrity of the aging natural gas pipeline system. ILI was implemented by Centra in 2015 and is used to measure metal loss and deformation anomalies. This new account has been assigned a 5 year service-life.

2.2 IFRS Related Depreciation Expense Methodology Changes / New Regulatory Deferral Accounts (Issue #7)**2.2.1 Impact of Change to the IFRS Compliant Equal Life Group (ELG) Method**

Centra is requesting PUB endorsement to establish a new regulatory deferral account to defer the annual impacts on depreciation expense of the change to the IFRS compliant ELG method of depreciation effective April 1, 2014.

Upon its 2015/16 transition to IFRS, Centra changed from the CGAAP ASL method of depreciation to an IFRS compliant ELG method so as to comply with the more stringent depreciation requirements under IFRS. This change, as based on the 2014 Depreciation Study for IFRS compliant ELG based depreciation rates, resulted in annual increases in depreciation expense of approximately \$2 million and was made for financial reporting purposes only. Effective April 1, 2014, Centra established a regulatory deferral account to defer the annual impact of the change for rate setting purposes. To date no amortization of the deferral account has been recognized and no future amortization of the account is forecast.

2.2.2 Asset Removal Costs and Retirement Gains and Losses

Centra is requesting PUB endorsement with respect to the following:

- The establishment of a new regulatory deferral account to defer the annual impacts on depreciation expense of the recognition of asset removal costs and retirement gains and losses effective April 1, 2014; and

- 1 • to amortize the cumulative deferred balance for rate setting purposes for this
2 account over a 34 year period commencing April 1, 2019

3
4 Under CGAAP, Centra deferred asset removal costs and asset retirement gains and losses in
5 accumulated depreciation. The cumulative balance of these amounts would be recognized
6 into income as part of future year's depreciation expense by way of adjustments to
7 depreciation rates as determined in future year's depreciation studies. As required under
8 IFRS, for those circumstances when an asset is retired from service and not replaced (i.e. a
9 terminal retirement), asset removal costs are included in depreciation expense in the year
10 incurred. In addition, under IFRS Centra is required to discontinue the CGAAP approach of
11 deferring asset retirement gains and losses (i.e. the extent to which an asset is over or
12 under depreciated on its retirement) in accumulated depreciation. Under IFRS, asset
13 retirement gains and losses are to be recognized in income in the year incurred.

14
15 Centra established a regulatory deferral account effective April 1, 2014 to defer the net
16 income impacts of recognizing both asset removal costs on terminal asset retirements and
17 asset retirement gains and losses in net income immediately. No amortization of the
18 deferral account has been recognized to date.

19 20 **2.3 DSM Deferral Account (Actual vs. Planned Spending) (Issue #13)**

21 Effective March 31, 2019, Centra is seeking the PUB's endorsement to discontinue the
22 Demand Side Management deferral account for annual differences in actual and planned
23 DSM spending and is further requesting to write off the \$8.2 million accrued balance (as
24 discussed in Appendix 3.4 of the Application).

25
26 This request is consistent with Order 59/18 where the PUB directed Manitoba Hydro to
27 discontinue recognizing its DSM deferral account. Consistent with the PUB's direction to
28 Manitoba Hydro, Centra did not defer an amount to this account for fiscal 2017/18. CGM18
29 assumes that the DSM deferred regulatory asset and corresponding credit will be written-
30 off as of March 31, 2019. Notably, there will be no net income impact of the write-off as the
31 deferred debit and credit accounts will completely offset each other.

32
33 This request is also consistent with the upcoming change in the responsibility for the
34 administration and implementation of DSM programming in Manitoba. As described in Tab
35 7, in June 2017 the Government of Manitoba passed *The Efficiency Manitoba Act*, which
36 moves the responsibility for the planning, design and implementation of demand side
37 management to a new Crown corporation called Efficiency Manitoba. The legislation also

1 sets minimum average annual targets over a 15 year period of 0.75 per cent of the previous
2 year's natural gas volume. While Efficiency Manitoba is still in its formative stage, Centra
3 continues to deliver DSM programming on a "business as usual" basis to meet the needs of
4 Manitoba customers. This "business as usual" approach is reflected in the one year 2018/19
5 DSM Plan that was prepared in consultation with the Province as outlined under *The Energy*
6 *Savings Act*.

7

8 **2.4 Bill Impacts – Relating to Carbon Levy (Issue #14)**

9 On January 16, 2019, Centra filed a letter informing the PUB of Centra's legal obligations as
10 a distributor of natural gas in Manitoba pursuant to *the Greenhouse Gas Pollution Pricing*
11 *Act*, S.C. 2018 c. 12 ("GGPPA"), and the draft regulations proposed.

12

13 In addition to background information regarding the GGPPA, Centra's submission also
14 described the proposed implementation and customer communication plan related to the
15 mandatory fossil fuel charge (or "Federal Carbon Charge") as of April 1, 2019. Pursuant to
16 the above referenced statutory requirements, Centra sought written concurrence from the
17 PUB to implement the Federal Carbon Charge, as outlined in its submission, on natural gas
18 customers' bills as of April 1, 2019.

19

20 By way of letter dated January 28, 2019, the PUB approved the addition of the Federal
21 Carbon Charge (and applicable taxes) to Centra's customers' bills. The PUB further directed
22 Centra to:

- 23 1. Provide the Board with confirmation as to whether either PST or the City of
24 Winnipeg Tax is applicable to the Federal Carbon Charge and if so;
 - 25 a. File Centra's updated Federal Carbon Charge customer education
26 materials with the Board (including a sample natural gas bill); and
 - 27 b. Update Centra's customer education materials relating to the Federal
28 Carbon Charge (e.g. website materials and bill inserts).
- 29 2. At least two months prior to any changes, revisions, or amendments to the
30 Federal Carbon Charge, Centra is to seek the Board's written authorization for
31 further changes to the customers' bills (inclusive of the expected customer
32 communication plan).

33

34 Centra provided the requested information and intends to comply with the direction going
35 forward. Centra is not seeking any additional approvals regarding this issue as part of this
36 Application.

1 **2.5 Terms and Conditions of Service (Excluding Balancing Fees and CEPP)**
2 **(Issue #22)**

3 Centra is seeking approval of the changes to the Terms and Conditions of Service as
4 discussed in Tab 12 of its Application, in addition to the changes filed with the Pre-Hearing
5 Update filed on July 24, 2019.

6

7 To date, no Intervener has submitted evidence contesting the proposed changes to
8 reconnection fees, meter test fees, late payment charges or company labour rates.

9

10 **2.6 Load Forecast (Issue #15)**

11 As part of its Application, Centra provided its 2015, 2016, 2017 and 2018 Natural Gas
12 Volume Forecast. Tab 7 discusses changes in forecasting methodologies since the 2012
13 Natural Gas Forecast as presented during Centra's 2013/14 General Rate Application.
14 Centra is not requesting any approvals of the PUB as a part of this Application

15

16 **2.7 Western Transportation Service (Issue #18)**

17 Centra has not proposed any changes to the Western Transportation Service in this
18 Application.

19

20 Centra was directed by the PUB in Order 85/13 to file a report on the costs it incurs in
21 administering the Western Transportation Service. Centra responded to this Directive from
22 Order 85/13 by letter to the PUB dated December 24, 2013. Centra considers this directive
23 to be complete and is seeking the PUB's confirmation that this directive has been satisfied.

24

25 **2.8 Fixed Rate Primary Gas Service ("FRPGS") (Issue #19)**

26 Centra is not seeking any changes to the FRPGS program design, risk thresholds or rate
27 setting mechanism in this Application. Program results are provided quarterly to the PUB.

28

29 Centra is seeking approval to update the FRPGS Program Cost Rate from \$31.37 per 10³m³
30 to \$24.18 per 10³m³ effective November 1, 2019. The decrease is primarily the result of
31 lower forecasted program administration costs for the 2019/20 Test Year.

32

33 **2.9 Gas Costs (Issue #16)**

34 Centra is seeking final approval of actual gas costs accrued in the Gas Years 2014/15,
35 2015/16, 2016/17, and 2017/18. Centra is also seeking approval to implement non-Primary
36 Gas rate riders effective November 1, 2019 to dispose of the prior period Purchased Gas

1 Variance Account (“PGVA”) balances, including outlook amounts to October 31, 2019, over
2 a 12-month period ending October 31, 2020.

3
4 In addition, Centra has provided a gas cost forecast for the 2019/20 Gas Year totaling
5 \$185.0 million. This forecast is proposed to form the basis of the non-Primary Gas base
6 rates Centra is seeking approval to implement effective November 1, 2019.

7
8 There are no facts in dispute with respect to the operation of Centra’s gas supply portfolio
9 as detailed in Tab 8, and no party has presented evidence challenging the prudence of any
10 gas costs incurred or forecast by Centra. The expert evidence of Mr. DeWolf, the consultant
11 engaged by CAC on Tab 8 matters, concluded that Centra acted in a prudent and
12 responsible manner in its gas supply management.¹ CAC endorsed Mr. DeWolf’s conclusion
13 in its July 15, 2019 submission on Tab 8 and Tab 9 matters. Centra submits the PUB should
14 approve its actual gas costs and proposed non-Primary Gas rate riders as set out within the
15 Application and Pre-Hearing Update.

16 17 **2.10 Feasibility Test True-Ups for Main Extensions over 500 Meters (Issue #20)**

18 In Order 49/95, the PUB directed that Centra file a summary of all main extensions in excess
19 of 500 metres at all future GRAs. Appendix 13.2 provides a summary of all main extensions
20 in excess of 500 metres completed since the last GRA. Centra is not seeking any approvals
21 related to main extensions as a part of its Application.

22 23 **2.11 Liability Insurance (Issue #10)**

24 By letter dated May 4, 2016, the PUB approved Centra’s liability insurance amount and
25 directed Centra to file the following information as part of its next GRA:

- 26
- 27 • Evidence as to Centra’s existing liability insurance coverage and any planned
28 changes to such coverage;
 - 29 • Evidence as to the cost of the liability insurance coverage;
 - 30 • A summary of the rationale for the coverage limit, and, if external reports were
31 obtained to arrive at the coverage limit, a copy of such reports; and
 - 32 • A listing of all pending claims, if any, that together exceeds a threshold of \$20
million.

¹ Evidence of Mr. DeWolf, page 14 lines 20-21 and page 15 line 1

1 Centra complied with the PUB's direction and filed the above information in Appendix 13.3.
2 No additional approvals related to liability insurance are requested as part of this
3 Application.

4

5 **2.12 Approval of Interim Orders: Primary Gas Rates, Franchises and Crossing**
6 **Agreements (Issue #21)**

7 Centra is seeking Final approval of interim orders as outlined in Appendix 13.1 of the
8 Application and final approval of any further interim ex-parte Orders issued by the PUB for
9 Centra prior to the conclusion of the hearing of this Application. Appendix 13.1 has been
10 updated as an attachment to this submission to include additional interim orders since the
11 original Application filing on November 30, 2018.

12

13 **3.0 ISSUES CONTESTED BY INTERVENER EVIDENCE**

14

15 The following provides Centra's positions with respect to the issues that were not identified
16 for Oral evidence in this proceeding and that are contested within the evidence submitted
17 by the intervenors to this Application.

18

19 **3.1 Return on Rate Base including Return on Equity (Issue #12)**

20 On page 10 of CAC's evidence, Mr. Rainkie recommends:

21

22 *"That the PUB reject the recommendation of Drazen Consulting Group Inc.*
23 *(DCGI) that Centra's rates be set using a 30% deemed Equity ratio and a 8.3%*
24 *ROE, given that this recommendation is inconsistent with the policy intent*
25 *when MH purchased Centra and the appropriate application of a MCOS*
26 *approach."*

27

28 Furthermore, on page 86 of CAC's evidence, Mr. Rainkie states that:

29

30 *"Acceptance of the DCGI recommendations amounts to importing investor*
31 *owned utility RBROR concepts (Equity ratios and ROE's) into the MCOS rate-*
32 *setting of a government business enterprise, as well as artificially increasing*
33 *rates through higher net income levels, without any justification in terms of*
34 *risk."*

35

1 Contrary to Mr. Rainkie’s allegations, Centra retained DCGI in direct response and to comply
2 with the PUB’s directive from Order 85/13 (page 33) that requested Centra to propose an
3 update to the return on equity that is reflective of an appropriate return in the current
4 economic climate. The DCGI report, and the materials filed in relation to the Rate Base Rate
5 of Return (“RBROR”) (Tab 6) of Centra’s Application, are not intended to justify higher levels
6 of net income or propose an alternate rate setting methodology.

7
8 Notably, the PUB is required under its legislation to approve both a rate base and the rate
9 of return on shareholder equity when setting rates. The PUB has consistently indicated its
10 intention to utilize both RBROR and cost of service methodologies when setting natural gas
11 rates. Further, the PUB found that material related to RBROR assists with rate setting as
12 indicated in Order 135/05:

13
14 *“Again, the Board intends that rate increases approved by the Board will not*
15 *produce revenue requirements in excess of the annual revenue requirement*
16 *determined by the Board under Rate Base Rate of Return over the long term.*
17 *Through reliance on both regulatory approaches, the Board’s regulatory*
18 *objective of fixing just and reasonable rates in the public interest will be*
19 *furthered.”*

20
21 The PUB has previously stated in Order 135/05, *“...it is the Board’s determination that the*
22 *Rate Base Rate of Return methodology is to be used as a test of maximum revenue*
23 *requirement.”* The return on equity (ROE) is a key input to the RBROR calculation. Based on
24 the independent review performed by DCGI with respect to the directive in Order 85/13,
25 Centra has used an 8.30% ROE (the low end of the range cited as appropriate by DCGI) to
26 calculate the total revenue requirement under the RBROR methodology as a benchmark to
27 assist the PUB in setting just and reasonable rates for Centra. Centra is seeking the PUB’s
28 confirmation that Directive 9 of Order 85/13 is satisfied.

29
30 Centra has supplemented its filing under the Cost of Service approach with a comparison of
31 revenue requirement under the RBROR methodology including RBROR calculations and
32 schedules similar to those found in previous general rate applications, as it is required to do
33 by Directive 4 of Order 135/05. Centra has not requested the PUB to focus solely on the use
34 of a RBROR methodology in setting rates. Rather, the material has been included to meet a
35 legislative requirement and to assist the PUB in its rate setting task as articulated above.

36
37

1 Inclusions in Rate Base

2 In addition, on page 83 of CAC's evidence, Mr. Rainkie questions the inclusion of the
3 regulatory deferrals in rate base. Inclusion of these costs in rate base provides a return to
4 Centra that reflects the investment of cash prior to the collection of these costs from
5 ratepayers. Centra notes that if the regulatory deferrals are not included in rate base, then
6 revenue requirement would also need to be adjusted to reflect the difference. For example,
7 if the difference between ASL and ELG depreciation is not included in rate base then
8 revenue requirement would need to be adjusted to reflect ELG depreciation as the net plant
9 asset balances reflect ELG depreciation rates. Centra's response to CAC/Centra 1-11a-e
10 provides further justification for those deferral accounts which Centra is now requesting
11 PUB approval to include in rate base.

12
13 **3.2 Financial Targets (Issue #3)**

14 On page 91 of CAC's evidence, Mr. Rainkie recommends:

15
16 *"that the PUB direct the consideration of the establishment of a Minimum*
17 *Retained Earnings Test for future Centra GRA's for rate-setting purposes,*
18 *based on a comprehensive assessment of risk and required reserve levels."*

19
20 In addition, on page 92 Mr. Rainkie states that:

21
22 *"It is Recommended that In the Interim Period Until the Development of a*
23 *Minimum Retained Earnings Test for Centra that a \$3 million Net Income and*
24 *the Consolidated MH Target of 25% Equity Be Used for Rate-Setting*
25 *Purposes"*

26
27 It is premature for the PUB to consider establishing either a new test or adopting a new
28 equity target prior to undertaking the directive from the PUB (Order 59/18) with respect to
29 a technical conference for Manitoba Hydro's Electric operations. The PUB clarified in its
30 August 9, 2018 letter to Manitoba Hydro and approved Intervenors that:

31
32 *"Order 59/18 did not require that a minimum retained earnings test be*
33 *established and that all other financial metrics be abandoned. Rather the*
34 *Board directed that a technical conference be held as a forum for*
35 *stakeholders to discuss and explore the use of rule-based regulation that*

1 *considers the level of financial reserves required by Manitoba Hydro.”*

2 (Emphasis added)

3

4 Directive #9 from Order 69/19 reiterates the PUB’s clarification made in the August 9, 2018
5 letter indicating that the re-issued directive for Manitoba Hydro to participate in a technical
6 conference no longer specifies or references the term “*minimum retained earnings test*”. As
7 such, Mr. Rainkie’s recommendation is not aligned with the PUB’s re-issued directive
8 related to a technical conference and is advocating a rate setting methodology prior to any
9 research, discussion and analysis being undertaken. As a first step, the outcomes of the
10 technical conference for the Electric operations should be evaluated in terms of any
11 applicability to Centra.

12

13 In addition, Mr. Rainkie’s recommendation to change the debt-to-equity target on an
14 interim basis is unsupported and wholly inconsistent with past decisions of the PUB with
15 respect to Centra. The 30% equity ratio target has been a guiding metric established and
16 used by the PUB for Centra for many years. In Order 99/07, the PUB stated that:

17

18 “...given Centra’s borrowings are guaranteed by the Province, with the fee for
19 the guarantee allowed in costs for rate setting, a 70:30 ratio is adequate,
20 rather than the 60:40 model that would be acceptable if there were no
21 provincial guarantee.”

22

23 In almost every order since the acquisition of Centra by Manitoba Hydro, the PUB has
24 reiterated its position from Order 99/07 “... *a 70:30 ratio is adequate*” and has referenced
25 Centra’s actual debt-to-equity ratio in its findings.

26

27 There is no evidence of any fundamental change to Centra’s operating environment, capital
28 program or risk assessment in establishing or justifying that equity should fund less than
29 30% of the utility’s capital requirements on an interim or other basis. Maintaining the 70:30
30 debt to equity ratio ensures equity is funding what the PUB has historically deemed to be an
31 acceptable portion of the business requirements of the utility. Mr. Rainkie’s
32 recommendation to alter the PUB approved debt to equity ratio on an interim basis should
33 be rejected.

34

35

36

1 At page 80 of the CAC evidence, Mr. Rainkie states that:

2

3 “Centra Appears to Have Adopted a 30% Equity Ratio as the Basis for Its
4 More Recent Financial Forecasts (CGM16 & CGM18) and Indicative Rate
5 Increase Projections”
6

6

7 CGM18 was prepared to illustrate that the \$3 million net income level and 70:30 deemed
8 debt-to-equity ratio are mutually exclusive in that restricting net income to \$3 million
9 annually results in a steady decline to the equity ratio. Although no formal financial targets
10 have been set for Centra by its Board of Directors, Centra’s equity ratio (PUB approved
11 methodology) under Manitoba Hydro ownership has remained slightly above 30% since
12 2002/03 as show in Figure 1 below.

13

14 **Figure 1 Centra’s Retained Earnings and Equity Ratio** (Source: Figure 3.5 from Centra’s Application)

(In Millions)	Historic																	Forecast	
	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	
Actual Closing Retained Earnings as at March 31	35.0	27.1	25.4	20.1	21.1	27.4	34.4	33.4	40.1	34.3	42.1	61.9	66.4	65.0	68.8	75.6	78.9	81.2	
Equity Ratio	32%	34%	35%	33%	31%	31%	31%	32%	33%	34%	34%	34%	34%	33%	33%	32%	32%	31%	

15

16

17 While CGM18 was approved by Centra’s Board, the rate increases beyond the Test Year
18 were indicative and for illustrative purposes only and would be subject to revision based on
19 the outcome of the Corporation’s long term strategic planning process.

20

21 **3.3 Changes in Finances and Financial Assumptions since Order 85/13 (excluding**
22 **Accounting Treatment of Gas Meter Exchange) (Issue #4)**

23 Centra supports Mr. Rainkie’s statement on page 26 of CAC’s evidence:

24

25 *“that the current non-gas revenue requirement is consistent with the level*
26 *reviewed at the last GRA (approximately \$148 million) and the rate pressures*
27 *that were forecast in CGM12 with RRA have been offset by accounting*
28 *changes and lower than expected operating costs and interest rates.”*

29

30 As noted on page 23 of Mr. Rainkie’s evidence, the decrease of \$18 million in projected
31 revenue requirement between CGM18 and CGM12 for 2019/20 is primarily driven by lower
32 O&A costs. This reflects the Corporation’s decision to implement significant cost
33 containment efforts including the implementation of the Voluntary Departure Program

1 beginning in June 2017. Despite a significant growth in its asset base, Centra has
2 maintained the non-gas revenue requirement at a level consistent with 2013/14 and as a
3 result Centra has not requested a general rate increase for non-gas costs in the 2019/20
4 Test Year.

5
6
7 **3.4 Finance Expense including Interest Rate Forecast and Debt Management Strategy**
8 **(Issue #5)**

9 On pages 58 and 59 of his Pre-Filed Evidence, Mr. Rainkie recommends that the PUB direct
10 Centra to review and report back on the two aspects of its debt management strategy. As
11 described in section 4 of Centra's Rebuttal Evidence, Centra has considered each of the
12 issues Mr. Rainkie raised and determined its debt management and interest rate risk
13 policies and guidelines are prudent and appropriately balance costs and benefits to
14 ratepayers. Centra submits Mr. Rainkie's recommendations should not be adopted by the
15 PUB.

16
17 **3.5 Integrated Cost Allocation Methodology (Issue #9)**

18 On page 51 of CAC's evidence, Mr. Rainkie is recommending:

19
20 "that the PUB Direct Centra to Develop an Integrated Cost Allocation
21 Methodology (ICAM) Report That Can Be Used to Support the Allocation of
22 Consolidated Operating Costs and Shared Costs Between Centra and MH at
23 Future Rate-Setting Proceedings."

24
25 As outlined by Mr. Rainkie on page 51, a technical conference was held on November 30,
26 2016 in response to Order 108/15 which directed Centra to file a terms of reference for a
27 study of Centra's ICAM. The technical conference outlined the changes made in the
28 allocation of costs to Centra subsequent to the implementation of IFRS, an assessment of
29 the reasonableness of a fair and equitable allocation of costs and an understanding that no
30 cross-subsidization between gas and electric operations exists.

31
32 As discussed in Appendix 5.9 (page 5), the primary changes to the ICAM following the
33 implementation of IFRS was to improve the transparency by removing common overhead as
34 a percentage add-on to all gas programs and in turn, establish unique organizational
35 support programs with costs allocated to each program using various natural gas cost
36 drivers. As such, Centra is of the opinion that the technical conference has satisfied the

1 requirements of the directive by providing the PUB and Intervenors with a clear
2 understanding of the overall function of the ICAM such that it can be relied upon for rate
3 setting purposes.

4
5 Centra is concerned that Mr. Rainkie's recommendation prescribes more of a detailed audit
6 approach rather than a reasonable governance approach. For example on page 53, he
7 suggests the report "*perform detailed tests of the resulting allocations and systems that are*
8 *used (including system postings and overhead allocations)*". Rather than develop a complex
9 and detailed report on an annual basis and incur the significant costs associated with doing
10 so, Centra is prepared to engage in a second technical conference if clarification or further
11 understanding of the ICAM is required and deemed necessary by the PUB.

12 13 **3.6 Gas Costs – Use of a Third Party Consultant (Issue #16)**

14 While CAC does not challenge or dispute the cost consequences of Centra's Western
15 Canadian supply contracts, it relies upon the evidence² of Mr. DeWolf in recommending the
16 PUB order Centra to retain a third party consultant to provide assistance in advance of
17 entering into new Western Canadian (Primary Gas) supply contracts.

18
19 Centra notes that in Order 108/19, the PUB found:

20
21 *"that the cost associated with a third party consultant engaged by Centra to*
22 *review future changes to the approved storage and transportation*
23 *arrangements is unnecessary. However, the Board expects Centra to make*
24 *use of outside consultants in advance of potential future changes to its*
25 *storage and transportation arrangements should Centra identify internal*
26 *gaps in market knowledge...or following significant natural gas market*
27 *changes."*

28
29 To the extent that Mr. DeWolf made the same recommendation in relation to Centra's
30 contracting for its Western Canadian supply, Centra believes that the same Board finding in
31 108/19 should apply equally here for the following reasons:

² Response to PUB/CAC-DeWolf-16(b).

- 1 • Centra's Western Canadian supply contracting is conducted by RFP and Centra is
2 very experienced in conducting the RFP process in such a manner as to obtain supply
3 that is reliable, economical and flexible to respond to Manitoba's weather extremes;
- 4 • Unlike external consultants, Centra is a member of both the NGTL Tolls, Tariff,
5 Facilities & Procedures (TTFP) committee and the TCPL Mainline Tolls Task Force
6 (TTF) industry groups, providing Centra with the most up-to-date insights in pipeline
7 and supply developments relevant to Centra's Western Canadian supply contracting.
8 In addition to the pipelines, membership in these industry groups include Western
9 Canadian producers, gas marketers, and other LDCs; and
- 10 • As Centra typically contracts for its main Western Canadian supply every two years,
11 bi-annual consultant use would be a significant ongoing and unnecessary cost.

12
13 While Centra agrees that the use of a consultant may be appropriate in certain
14 circumstances, it is not necessary in support of Western Canadian supply contracting for the
15 reasons noted above. Going forward, Centra will assess the need for consultant support on
16 a case by case basis.

17 18 **3.7 Centra's Strategic Plan (Issue #2)**

19 In its Application and through IR responses, Centra provided information about its strategic
20 direction and its managerial structure. Centra reminds the PUB of the important fact that
21 Manitoba Hydro has recently embarked on a Long Term Strategic Planning process. While it
22 is too early to know what the outcome will be, the process that is underway is
23 comprehensive and aimed at ensuring Manitoba Hydro is well positioned to serve all
24 customers, including natural gas customers, in an uncertain future.

25
26 CAC's witness Mr. Rainkie recommends that the PUB direct Centra to address concerns
27 about strategic direction, risk assessment and management structure as part of Manitoba
28 Hydro's Long Term Strategic Planning process, asserting that Centra has been unresponsive
29 to these concerns. Centra disagrees with Mr. Rainkie's assertion as set forth below.
30 However, and in any event, Mr. Rainkie's recommendation is ill-timed and completely
31 unnecessary. The strategic planning process is already well in progress. Built into the
32 ongoing process, perhaps for the first time in history, was a comprehensive stakeholder
33 engagement process that involved more than 60 stakeholders including the PUB and
34 intervenors. While the outcome of the Long Term Strategic Plan is undetermined, it is highly
35 likely that more detailed implementation planning will take place in various forms over the
36 ensuing months.

1

2 In Mr. Rainkie's evidence at page 65 he states:

3

4 *"there does not appear to be any changes that directly respond to or address*
5 *the PUB's concerns from Order 108/15, as those managers that have specific*
6 *responsibility for gas operations continue to report to senior managers with*
7 *broad areas of responsibilities in the MH consolidated organization."*

8

9 As detailed in CAC/Centra II-123 b) Centra revised its gas management structure as part of
10 the overall corporate restructuring such that all gas operations reported to a single Vice
11 President. The PUB is also aware, as part of its Safety and Loss Management System, that
12 Centra has put in place a Gas Executive Operations Committee consisting of that Vice
13 President and the Directors with gas operations responsibility. The changes Centra has
14 detailed in this GRA demonstrate that Centra has adequately addressed the PUB concerns.

15

16 Similarly, on page 62 of his evidence, Mr. Rainkie criticizes much of the information put on
17 the record by Centra in that it, "mainly relates to electric operations." This characterization
18 is incorrect and misleading. In reality, the information mainly relates to customers. The fact
19 that every customer of Centra is also a customer of Manitoba Hydro means that initiatives
20 to improve customer service are taken on an integrated basis. These are the types of
21 benefits that customers should expect and receive from an integrated utility.

22

23 Centra provided this evidence as part of this GRA to clarify that within an integrated utility
24 there is no distinction of a "pure" gas utility customer. The services customers receive are
25 from the integrated utility, which is very much focused on improving customer service and
26 the customer experience. The operation of Centra and Manitoba Hydro as an integrated
27 utility has led to common management, common systems, common approaches, common
28 administration, and one-stop customer service which drives significant benefits for
29 customers every day.

30

31 **3.8 Compliance with Orders and Directives (per Order 85/13 page 62) (Issue #23)**

32 CAC has filed limited evidence relating to Centra's compliance with Orders and Directives.
33 Mr. Rainkie commented upon Centra's compliance with Directive 3, Order 85/13; Directive
34 11, Order 128/09; Directive 5, Order 85/13; and Directive 23, Order 118/03. Centra has
35 commented upon Directive 3 of Order 85/13 on page 6 of Tab 13 and Directive 11 of Order
36 128/09 in section 3.5 above.

37

1 Directive 5, Order 85/13 – Debt Management Policy

2 In response to Directive 5 of Order 85/13 to “further articulate its debt concentration policy
3 including consideration of limiting the concentration of debt maturing in any particular 12-
4 month period and report back to the Board at the next General Rate Application”, Centra
5 filed information relating to its debt concentration policy in Tab 3 of its Application.
6 Additional information and clarification was provided through information request
7 responses. As such, Centra submits that this Directive has been satisfied.

8

9 Mr. Rainkie further recommends that the information contained with CAC/Centra I-9 a-k
10 and CAC/Centra II-130 a-e form a minimum filing requirement for all future general rate
11 applications. Centra questions whether the level of detail requested in CAC/Centra I-9 a-k
12 and CAC/Centra II-130 a-e is routinely required in order for the PUB to discharge its primary
13 obligation to set just and reasonable rates.

14

15 Directive 23, Order 118/03

16 Mr. Rainkie recommends at page 74 of his Pre-Filed Evidence that the “PUB Reiterate the
17 Directive from Order 118/03 that Centra Establish Regular GRA Reviews Every Three Years
18 Given the Rate Pressures Forecast in CGM18”.

19

20 Centra submits that there is no need to reiterate this directive as it continues to be ongoing.
21 Following this proceeding, Centra expects to engage with the PUB with respect to the
22 efficiency, effectiveness and timeliness of the regulatory process for all matters, including
23 the appropriate intervals for general rate applications.

PUB Interim Orders		
Order No.	Date	Natural Gas Sales Rates
10/13	January 29, 2013	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after February 1, 2013, reflecting approval to maintain the current Primary Gas Sales rate.
40/13	April 26, 2013	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after May 1, 2013, reflecting approval of a new Primary Gas Sales rate.
89/13	August 2, 2013	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after August 1, 2013, reflecting interim approval of a new Primary Gas Sales rate, as well as new Supplemental Gas, Transportation (to Centra), and Distribution (to Customers) sales rates flowing from Centra's 2013/14 GRA
123/13	October 22, 2013	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after November 1, 2013, reflecting approval of a new Primary Gas Sales rate.
6/14	January 23, 2014	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after February 1, 2014, reflecting approval of a new Primary Gas Sales rate.
42/14	April 23, 2014	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after May 1, 2014, reflecting approval of a new Primary Gas Sales rate.
85/14	July 24, 2014	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after August 1, 2014, reflecting interim approval of a new Primary Gas Sales rate, as well as new Transportation (to Centra) and Distribution (to Customers) sales rates reflecting the removal of non-primary gas rate riders.
123/14	October 30, 2014	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after November 1, 2014, reflecting interim approval of a new Primary Gas Sales rate, as well as new Transportation (to Centra) and Distribution (to Customers) sales rates reflecting the implementation of non-primary gas rate riders.
140/14	December 16, 2014	Granting interim approval of the Schedules of Rates to replace the rate schedules appended in Order 123/14.
12/15	January 29, 2015	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after February 1, 2015, reflecting interim approval of a new Primary Gas Sales rate and Distribution (to Customers) sales rates reflecting the implementation of new Supplemental Gas rate riders to accelerate the recovery of the Supplemental deferral account approved for disposition in Orders 123/14 and 140/14.
43/15	April 23, 2015	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after May 1, 2015, reflecting approval of a new Primary Gas Sales rate.
72/15	July 25, 2015	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after August 1, 2015, reflecting approval to maintain the current Primary Gas Sales rate.
108/15	January 4, 2016	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after November 1, 2015, reflecting approval of a new Primary Gas Sales rate, as well as new Supplemental Gas, Transportation (to Centra), and Distribution (to Customers) sales rates flowing from Centra's 2015/16 Cost of Gas Application.
4/16	January 11, 2016	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after February 1, 2016, reflecting approval of a new

		Primary Gas Sales rate.
57/16	April 27, 2016	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after May 1, 2016, reflecting approval of a new Primary Gas Sales rate.
98/16	July 27, 2016	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after August 1, 2016, reflecting approval of a new Primary Gas Sales rate.
137/16	October 27, 2016	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after November 1, 2016, reflecting interim approval of a new Primary Gas Sales rate, as well as new Transportation (to Centra) and Distribution (to Customers) sales rates reflecting the removal of non-primary gas rate riders.
7/17	January 25, 2017	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after February 1, 2017, reflecting approval of a new Primary Gas Sales rate.
44/17	April 26, 2017	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after May 1, 2017, reflecting approval of a new Primary Gas Sales rate.
79/17	July 28, 2017	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after August 1, 2017, reflecting interim approval of a new Primary Gas Sales rate, as well as new Supplemental Gas, Transportation (to Centra), and Distribution (to Customers) sales rates reflecting the reversion of the non-gas components of Centra's rates for all customer classes, except Special Contract and Power Station classes, to 2010 levels..
117/17	October 26, 2017	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after November 1, 2017, reflecting approval of a new Primary Gas Sales rate.
16/18	January 19, 2018	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after February 1, 2018, reflecting approval of a new Primary Gas Sales rate.
55/18	April 26, 2018	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after May 1, 2018, reflecting approval to maintain the current Primary Gas Sales rate.
93/18	July 20, 2018	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after August 1, 2018, reflecting approval of a new Primary Gas Sales rate.
143/18	October 23, 2018	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after November 1, 2018, reflecting approval of a new Primary Gas Sales rate.
16/19	January 28, 2019	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after February 1, 2019, reflecting approval of a new Primary Gas Sales rate.
47/19	April 23, 2019	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after May 1, 2019, reflecting approval of a new Primary Gas Sales rate.
102/19	July 23, 2019	Granting interim approval of the Schedules of Rates to be effective for all gas consumed on and after August 1, 2019, reflecting approval of a new Primary Gas Sales rate.

PUB Interim Orders		
Order No.	Date	Franchise Applications
53/16	April 25, 2016	Approving a Franchise Agreement between Centra and the Rural Municipality of Minto-Odanah and financial feasibility test for the extension of natural gas service to one commercial customer within the expansion, subject to certain amendments to the By-Law, Schedule and Feasibility Test.
55/17	May 30, 2017	Approving a Franchise Agreement between Centra and the Rural Municipality of Grassland and financial feasibility test for the extension of natural gas service to one commercial customer within the expansion.
56/18	April 26, 2018	Approving a Franchise Agreement between Centra and the Rural Municipality of St. Francois Xavier required for the extension of natural gas service to one agricultural customer located in the existing franchise area of the Rural Municipality of Rosser.
48/19	April 23, 2019	Approving a Franchise Agreement between Centra and the Rural Municipality of Minto-Odanah, financial feasibility test for a service extension in the Rural Municipality of Minto-Odanah and the addition of new Atmospheric Pressure Zone 5 to Section IV. D) 12) b) of Centra's Schedule of Sales and Transportation Services and Rates.
85/19	June 24, 2019	Approving a Franchise Agreement between Centra and the Rural Municipality of Glenella-Lansdowne and Rural Municipality of North Cypress-Langford and the financial feasibility test for the Municipality of Glenella-Lansdowne.