

INTERVENER APPLICATION FORM

Application re Hearing:			
Name of Prospective Intervener (Organization Name or Individual):			
Prospective Intervener Contact Information			
Organization or Individual Address:			
Organization Contact Person(s) (if applicable):			
Contact Information:	Business:		Other Phone:
	Fax Number:		Email:
Representative Contact Information:			
Counsel or Representative Name(s):			
Organization (if different from above) :			
Address (if different from above):			
Contact Information (if different from above):	Business:		Other Phone:
	Fax Number:		Email:
Counsel Seniority:			
Years of Experience	_____ Years	Tariff Rate	\$ _____
Also representing (if applicable):			

Additional Information

(For organizations only) Please describe the mandate of your organization and provide a description of the membership, including the number of members. Please also confirm whether the organization's intervention in this proceeding is supported by a resolution of the governing body, if any. Please enclose the resolution, if any, with your Application, along with supporting documentation of your mandate and membership

Please state your reasons for intervening in this proceeding:

Please state how you are directly affected by the Board's decision in this matter:

Please explain whether and how you represent a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding:

Please describe your experience, information, or expertise relevant to this matter that would contribute to the Board's decision making, including any other prior interventions in regulatory matters before this Board or other decision-makers:

Please list the key issues you intend to address in the proceeding. Please be specific.		
Do you intend to participate fully and actively, including attendance at hearings, submission of evidence, and testing of evidence and cross examination of witnesses? If yes, please describe your intended participation.		
Do you intend to request an award of costs for your participation? Please explain how you meet the criteria for an award of costs.		
Do you intend to retain experts or consultants? If yes, please attach copies of the <i>curriculum vitae</i> for any expert and/or consultant, as well as the following:		
Expert Consultant #1:		
Name:	Experience	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or Organization:	Brief explanation of experience relevant to evidence to be provided:

Expert Consultant #2:		
Name:	Experience:	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or organization:	Brief explanation of experience relevant to evidence to be provided:
Expert Consultant #3:		
Name:	Years of Experience:	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or organization:	Brief explanation of experience relevant to evidence to be provided:

Do you intend to provide evidence from witnesses other than experts and/or consultants? If yes, please provide:	
Witness #1:	
Name:	Evidence to be provided on issues in scope:
Email:	Brief explanation of relevant experience and/or knowledge to issues in scope:
Address and Phone number:	
Do you intent to seek approval for any other form of participation or provision of evidence, including for which you intend to seek an award of costs? If yes, please provide details and an explanation of the relation to issues in scope in the proceeding.	

Attachment A

Overview

This document provides background to the proposed intervention of Winnipeg Harvest and the Manitoba Branch of the Consumers' Association of Canada, together, the Consumers Coalition in the proceeding relating to Manitoba Hydro's 2019/20 rate application. This document provides responses to the questions in the Intervener Application Form, including:

- Who is Winnipeg Harvest?
- Who is the Manitoba Branch of the Consumers' Association of Canada?
- Reasons for proposed intervention;
- How the Consumers Coalition is directly affected by the Board's decision in this matter;
- How the Consumers Coalition represents a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding;
- The Consumers Coalition's experience, information, or expertise relevant to this matter that would contribute to the Board's decision making;
- Key issues the Consumers Coalition intends to address in this proceeding; and
- A description of the Consumers Coalition proposed participation in this proceeding.

Pursuant to the Public Utilities Board's (PUB) Intervener Costs Policy 2019-20, the Consumers Coalition identifies its expert witnesses and consultants in this application, as well as copies of their curriculum vitae.

Should the Consumers Coalition be approved as an Intervener by the PUB, the Consumers Coalition will file a detailed cost estimate within the time prescribed by the PUB.

The Consumers Coalition

Please describe the mandate of your organization and provide a description of the membership, including the number of members. Please also confirm whether the organization's intervention in this proceeding is supported by a resolution of the governing body, if any. Please enclose the resolution, if any, with your Application, along with supporting documentation of your mandate and membership

The Consumers Coalition is comprised of Winnipeg Harvest and the Manitoba Branch of the Consumers' Association of Canada. The Consumers Coalition seeks to present an evidence-based intervention guided by a principled consideration of the consumer interest. It is represented by the Public Interest Law Centre.¹

¹ An independent office of Legal Aid Manitoba.

The Consumers Coalition aims to protect and reconcile the interests of all Manitoba residential consumers, including low and fixed-income consumers, the working poor and those living in remote and rural communities.

For the Consumers Coalition, bringing the voice of consumers directly to the Public Utilities Board is of primary importance in the independent rate-setting process. The Coalition members place a priority on direct consumer input through focus groups, engagement sessions and stakeholder panels.

There is no resolution of the governing bodies of Winnipeg Harvest or CAC Manitoba supporting the intervention in this proceeding. Rather, the decision to participate is made by senior management, following established past practice.

In the following sections, we provide an overview of the Coalition members as well as the unique methodology and perspective they bring to consideration of the Manitoba Hydro General Rate Application.

Winnipeg Harvest

Who is Winnipeg Harvest?

Founded in 1984, Winnipeg Harvest is a non-profit, community-based organization committed to providing food to people who struggle to feed themselves and their families. It seeks to maximize public awareness of hunger while working towards long-term solutions to hunger and poverty. Winnipeg Harvest is governed by a community-based Board which employs the Executive Director to make all operational decisions.

Winnipeg Harvest's Vision is a community that no longer requires the services of a food bank. Winnipeg Harvest's Mission is to:

- share food with hungry families;
- focus attention on hunger within their community and move towards long-term solutions; and
- facilitate training and learning opportunities for their clients.

To achieve its Vision, Winnipeg Harvest provides emergency food assistance to almost 64,000 people a month across Manitoba, redistributing more than 11 million pounds of food a year through food banks and other emergency programs. One-third of the families experiencing hunger are dual wage-earner families (i.e.: the working poor) and approximately 41% of its clients are children living in poor families.²

Winnipeg Harvest shares food with more than 50 Manitoba communities through the Manitoba Association of Food Banks and through partnerships with nearly 400 agencies (including soup kitchens, food banks and youth programs) to distribute surplus food to hungry

² Winnipeg Harvest feeds nearly 27,000 children each month.

families all over Manitoba. The 180 food banks it supports are located throughout Manitoba and include urban centres, First Nations and rural and northern communities.³

While redistribution of food to people in need remains the top priority of Winnipeg Harvest, it also provides access to personal care products, provision of meals and snacks through day care and other agencies, programs and services for First Nations People and newcomers as well as training for life and work skills.

Winnipeg Harvest is also involved in the provision of advocacy services. Its advocacy services are three-fold: education and awareness through publication of reports and dissemination of information; systemic change through community actions and legal advocacy; and one-on-one support and advocacy.

Approximately 50% of Winnipeg Harvest's clients are in receipt of social assistance. An advocate who works with one of Winnipeg Harvest's partner organizations regularly appears before the Social Services Appeal Board on matters relating to the employment and income assistance program. The significant expertise of Winnipeg Harvest on issues relating to poverty and hunger was recognized by Olivier De Schutter, the United Nations Special Rapporteur on the Right to Food who attended a workshop at Winnipeg Harvest during his mission to Canada in 2012.

One of Winnipeg Harvest's priorities is to work with others in the community to explore long-term solutions to hunger and poverty. Winnipeg Harvest is part of Make Poverty History Manitoba, a coalition of anti-poverty organizations. This coalition was instrumental in the adoption by the provincial government of the Rent Assist program.

In terms of education and awareness, Winnipeg Harvest has partnered with organizations such as the Manitoba Keewatinowi Okimakanak and the Public Interest Law Centre to prepare reports on the Right to Food and Milk Prices. Winnipeg Harvest has also been a leader in Manitoba by partnering with the Public Interest Law Centre to research and advocate for a Guaranteed Annual Income.

In collaboration with Campaign 2000 End Child & Family Poverty, Winnipeg Harvest has produced numerous Child and Family Poverty Report Cards, the latest of which was published in November 2016. Sometimes in collaboration with other partners, Winnipeg Harvest also prepares reports on the Acceptable Living Level.⁴

Manitoba Branch of the Consumers' Association of Canada

Who is the Manitoba Branch of the Consumers' Association of Canada?

³ Reaching as far north as Lynn Lake.

⁴ The Acceptable Living Level Reports demonstrate that current welfare rates fall far short of meeting the Acceptable Living Levels and challenges Manitoba's leaders and citizens to respond to the central issue of **how can Manitoba ensure an acceptable living level for all its citizens?**

The Manitoba Branch of the Consumers' Association of Canada is a volunteer, non-profit, independent organization working to inform and empower consumers, and to represent the consumer interest in Manitoba. Formed in 1947, the organization is governed by a volunteer Board of Directors, elected annually at a general meeting of the organization's membership. The Manitoba Branch of the Consumers' Association of Canada is a branch of the national Consumers' Association of Canada, but is financially separate and separately incorporated.

The Manitoba Branch of the Consumers' Association of Canada's policy is guided by its understanding of generally accepted consumer rights, which consist of:

- **The right to satisfaction of basic needs** - To have access to basic, essential goods and services: adequate food, clothing, shelter, health care, education, public utilities, water and sanitation.
- **The right to safety** – to be protected against products, production processes and services that are hazardous to health or life.
- **The right to be informed** – To be given the facts needed to make an informed choice, and to be protected against dishonest or misleading advertising or labeling.
- **The right to choose** – To be able to select from a range of products and services, offered at competitive prices with an assurance of satisfactory quality.
- **The right to be heard** - To have consumer interests represented in the making and execution of government policy, and in the development of products and services.
- **The right to redress** – To receive a fair settlement of just claims, including compensation for misrepresentation, shoddy goods or unsatisfactory services.
- **The right to consumer education** – To acquire knowledge and skills needed to make informed, confident choices about goods and services, while being aware of basic consumer rights and responsibilities and how to act on them.
- **The right to a healthy environment** -To live and work in an environment that is non-threatening to the well-being of present and future generations.

The Manitoba Branch of the Consumers' Association of Canada is also guided by the following consumer responsibilities:

- **Critical awareness** - consumers must be awakened to be more questioning about the provision of the quality of goods and services.
- **Involvement or action** - consumers must assert themselves and act to ensure that they get a fair deal.
- **Social responsibility** - consumers must act with social responsibility, with concern and sensitivity to the impact of their actions on other citizens, in particular, in relation to disadvantaged groups in the community and in relation to the economic and social realities prevailing.
- **Ecological responsibility** - there must be a heightened sensitivity to the impact of consumer decisions on the physical environment, which must be developed to a harmonious way, promoting conservation as the most critical factor in improving the real quality of life for the present and the future.

- **Solidarity** - the best and most effective action is through cooperative efforts through the formation of consumer/citizen groups who together can have the strength and influence to ensure that adequate attention is given to the consumer interest.

The Manitoba Branch of the Consumers' Association of Canada seeks input on its policy positions from consumers through the innovative use of focus groups, and through its ongoing programs and services to the public. In 2016-2017, CAC Manitoba had contact with approximately, 13,000 consumers through its consumer education/information programs, services and consumer research. In addition, the organization seeks other perspectives on relevant issues through the use of policy community advisory committees and interviews

The Manitoba Branch of the Consumers' Association of Canada represents the interests of consumers across Manitoba in a number of areas including food safety and security, patient rights and health care, financial services, access, and inclusion, environmental sustainability, and regulatory review of utilities and Crown's delivering services and products to consumers.

Reasons for the Consumers Coalition's intervention in this proceeding

Consistent with prior interventions, the Consumers Coalition will seek to protect the interests of residential consumers and to ensure their "rates for service" are "just and reasonable".⁵

Winnipeg Harvest and the Manitoba Branch of the Consumers' Association of Canada, as well as their members and clients, have a significant interest in the outcome of this rate application by Manitoba Hydro. The rate that will be approved, if any, will directly impact all residential ratepayers, whether through their bill from Manitoba Hydro or through the amount they pay in rent.

The Consumers Coalition seeks to protect the interests of Manitoba Hydro residential ratepayers and their right to just, reasonable and sustainable rates that are determined in a publicly accessible and transparent process. Residential ratepayers rely on vigorous, independent regulation to hold Crown monopolies, including Manitoba Hydro, accountable.

A particularly challenging aspect of this application is that Manitoba Hydro is seeking final rate approval based upon an application which would appear to be a frail foundation even for an interim rate application. Manitoba Hydro has not prepared an updated integrated financial forecast (IFF).

The Consumers Coalition questions whether the deficiencies of the application can be remedied through a PUB and Intervener discovery process. The critical backbone of a General Rate Application is typically 10 or more detailed component forecasts that are integrated into an IFF.

Credibility is an important issue in this proceeding. The Consumers Coalition has significant concerns regarding the reliability of Manitoba Hydro's 2019/20 Interim Budget for rate setting purposes. The 2019/20 Interim Budget has been developed on piecemeal basis with outdated

5 Section 26 (1) of the CCPRAA and section 77 of *The Manitoba Hydro Act*.

2017 planning assumptions and forecasts of various vintages, with no detailed Operations, Maintenance & Administration (OM&A) budget and little in the way of analysis to assist the PUB and Interveners to test the budget.

Manitoba Hydro also appears to have undertaken no consultation with ratepayers and stakeholders regarding the requested rate and its potential impacts.

Manitoba Hydro appears to have taken the position that its operating results are volatile and largely out of its control, contrary to the PUB recommendations from *Order 59/18* for Manitoba Hydro to exercise control over spending in an era of major capital investment and associated rate pressures.

The Consumers Coalition intends to test the 2019/20 Interim Budget to explore whether no rate increase or a lower than inflationary rate increase is sufficient for 2019/20.

The Consumers Coalition intends to test Manitoba Hydro's analysis of the significant deterioration in actual and projected financial results for 2017/18 to 2019/20, since MH Exhibit 93 was produced at the last GRA.

The proposed Intervener will question whether the potential of the projected losses following the planned in-service of Keeyask (2023/24 to 2026/27) being further exacerbated as a justification for the 2019/20 proposed rate increase is inconsistent with Hydro's proposal for a one-year rate application focused solely on 2019/20 and its inability to produce an updated long-term financial forecast.

Winnipeg Harvest and CAC Manitoba intend to challenge Manitoba Hydro to provide details on its commitment to file a comprehensive GRA in late 2019, including its response to PUB Order 59/18, details of the scope, timing and expected deliverables of the recently disclosed comprehensive review of operations and finances by the new MHEB and the Corporation's plans for stakeholder engagement during this review.

More detailed information regarding the issues that the Consumers Coalition intends to explore in this proceeding will be detailed in subsequent sections of this document.

The Consumers Coalition is directly affected by the Board's decision in this matter

Manitoba Hydro enjoys a retail monopoly in the sale of electrical power in Manitoba. As captive customers of Hydro's monopoly, ratepayers rely on the independent, expert and evidence-based process of the PUB to ensure that the "rates for service" imposed upon them are not unjust, unreasonable or unjustly discriminatory.

The Consumers Coalition represents Manitoba Hydro's largest customer class, with approximately 485,400 Residential electric customers and 19,700 Residential Seasonal customers.⁶

6 Manitoba Hydro 2017/18 & 2018/19 General Rate Application, Tab 9, p 6-7.

The rate increases proposed by Manitoba Hydro are likely to have a significant impact on many residential consumers in Manitoba, especially as they pay for their own energy bills, as well as that of producers, processors, and retailers of the products they purchase. The Coalition is also concerned that the proposed increase will have a disproportionate impact on those consumers who heat with electricity (rural and northern), and on vulnerable consumers including those on low and fixed incomes.

The Consumers Coalition represents a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding

As stated, Winnipeg Harvest and CAC Manitoba together represent the interests of Manitoba's residential consumers, Manitoba Hydro's largest consumer class, totaling well over 400,000 customers.

These customers are not otherwise represented in the scope of this proceeding. Just and reasonable rates are those that are fair to both consumers and the utility. In setting just and reasonable rates for electricity, the PUB must balance two concerns "the interests of the utility's ratepayers, and the financial health of the utility. Together, and in the broadest interpretation, these interests represent the general public interest."⁷

While Manitoba Hydro represents the interests of the utility, the Consumers Coalition proposes to represent the interests of a large class of ratepayers, consisting of residential ratepayers, as it has done in previous rate applications.

The Consumers Coalition's experience, information, or expertise relevant to this matter that would contribute to the Board's decision making

Both Winnipeg Harvest and CAC Manitoba have been active participants in Manitoba Hydro rate setting proceedings for a number of years.

Due to its long-standing experience with matters relating to rate-setting across five industries, Manitoba Hydro, Centra Gas, Manitoba Public Insurance, payday lending and government cheque-cashing, the Consumers Coalition has a deep understanding of issues of law and jurisdiction as it relates to the interactions between the *PUB Act*, the *CCGAA* and the *MH Act*. The Consumers Coalition played an express role in the proceedings leading to the establishment of the rate-setting principles and objectives of the PUB.

The Consumers Coalition has brought the perspective of ratepayers directly to the PUB in past proceedings. For example, a diverse panel of ratepayers, including from within Winnipeg and outside the City, as well as across the income spectrum, presented the impacts of rate increases on their lives during the Manitoba Hydro 2017/18 & 2018/19 GRA.

⁷ *Consumers' Association of Canada (Manitoba) Inc v Manitoba Hydro Electric Board*, 2005 MBCA 55, at para 65. See more generally paras 61-66.

The Consumers Coalition interventions before the PUB reflect a long-standing familiarity with the process for setting just and reasonable rates for Manitoba Hydro within the legislative framework.

Winnipeg Harvest in regulatory proceedings

In addition to providing services directly to communities, households and individuals, Winnipeg Harvest has been an active participant both as an intervener and a presenter on regulatory matters before the Public Utilities Board.

Most recently, Winnipeg Harvest was an intervener as part of the Consumer Coalition in the 2017/18 & 2018/19 General Rate Application, the 2016 Cost of Service Study process, as well as in the Manitoba Hydro 2015/16 and 2016/17 General Rate Application.

Additionally, Winnipeg Harvest partnered with the Manitoba Branch of the Consumers' Association of Canada and the Manitoba Metis Federation in presenting a ratepayers panel during the Needs For And Alternatives To proceeding and also presented policy recommendations aimed at ameliorating the impact of rate increases upon vulnerable consumers.

Specific areas of evidence presented by the Consumers Coalition in previous Manitoba Hydro-related proceedings will be summarized in the description of the Manitoba Branch of the Consumers' Association of Canada. Winnipeg Harvest was an active participant in Manitoba Hydro's working group on bill affordability led in 2016.

Winnipeg Harvest also has intervened as part of a coalition of organizations in each of the Payday Lending hearings before the Public Utilities Board, including jointly presenting the first panel of consumers at a Payday Lending hearing in April 2016. In commenting on the evidence provided by the consumer panel, the Board stated that "it offered the Board valuable insight into real-life experiences with payday loans and the benefits and drawbacks of payday loans from consumers' perspectives."⁸

The Manitoba Branch of the Consumers' Association of Canada in regulatory proceedings

Over the past 28 years, the Manitoba Branch of the Consumers' Association of Canada has been active in rate regulation matters relating to Manitoba Hydro, Centra Gas, Manitoba Public Insurance, government cheque cashing and payday lending rates. In addition, the Manitoba Branch of the Consumers' Association of Canada has extensive and intersecting regulatory experience at the Canadian Radio-television and Telecommunications Commission. It takes pride in its long-standing record of quality, evidence-based advocacy.

Over the past fifteen years, the Manitoba Branch of the Consumers' Association of Canada has been particularly engaged in regulatory matters relating to Manitoba Hydro including:

8

Public Utilities Board Report Payday Lending, June 17, 2016, at p 42.

- every General Rate Application, Cost of Service and Diesel Proceeding (Manitoba Public Utilities Board);
- the 2014 Needs For And Alternatives To (Manitoba Public Utilities Board) and the Wuskwatim Needs For And Alternatives To (joint panel); and
- environmental proceedings relating to the Keeyask Generating Station, the Bipole III Transmission Line, Lake Winnipeg Regulation and Manitoba Minnesota Transmission Line (Clean Environment Commission).

The Manitoba Branch of the Consumers' Association of Canada has a mandate to provide Manitoba consumers with unbiased information. Through interventions at rate hearings, the organization represents the consumer interest on prices and quality of service (“rates for service”).

In recent regulatory proceedings before the Public Utilities Board on Manitoba Hydro matters, the Manitoba Branch of the Consumers' Association of Canada has played an active role in issues such as:

- Financial targets and risk analysis: dating back to 1996, the Manitoba Branch of the Consumers' Association of Canada has provided evidence and analysis on the financial targets of Manitoba Hydro, including debt to equity ratio, financial reserves and interest coverage ratio, such as in the hearings leading to Board Orders 53/96, 7/03, 5/12 and 59/18. In addition, the Coalition has undertaken a consideration of issues relating to risk and risk tolerance including the using of stochastic tools to better examine these issues.
- Sustaining capital: Since the 2007/08 General Rate Application,⁹ the Manitoba Branch of the Consumers' Association of Canada has played a leading role in identifying the challenges of the Corporation is assessing the health of its capital assets and in prioritizing the pace of its day to say capital asset expenditures.¹⁰
- Forecasting: the Manitoba Branch of the Consumers' Association of Canada has extensively tested the credibility of Manitoba Hydro's forecasts especially as they related to its large capital expenditure plans and the reliability of its Integrated Financial Forecasts:
 - Load forecast: the Manitoba Branch of the Consumers' Association of Canada presented evidence during the 2014 Needs For And Alternatives To proceedings, including recommendations on price response and price elasticity, long-term top customers forecast methodology and more sophisticated projections of households using electric and non-electric space heating.
 - Export price forecasting: since the 2010/11 Manitoba Hydro General Rate Application, the Manitoba Branch of the Consumers' Association of Canada has been raising concerns about the reliability of Manitoba Hydro's forecasts.

⁹ See for example Order 116/08, p. 345/346.

¹⁰ See also Orders 43/13, p. 5, 73/15 (in particular, p. 64/65 as well as p. 97 and Order 7) and Order 59/18.

- Capital expenditure forecasts: since the 2010/11 Manitoba Hydro General Rate Application, the Manitoba Branch of the Consumers' Association of Canada has been raising concerns about the reliability of Manitoba Hydro's capital expenditure forecasts, especially major capital projects, such as Bipole III and Keeyask.
- Interest rate forecasting: the Manitoba Branch of the Consumers' Association of Canada has consistently raised concerns about Manitoba Hydro's interest rate forecasting. In the last Manitoba Hydro General Rate Application, 2014/15 and 2015/16, the Manitoba Branch of the Consumers' Association of Canada argued that Manitoba Hydro's interest rate forecast costs were inflated, which was confirmed in the 2015 Integrated Financial Forecast where Hydro documented a \$700 million decline in interest costs over 10 years as compared to its previous forecast.
- Operating, Maintenance and Administration costs: through cross examination as well evidence the Manitoba Branch of the Consumers' Association of Canada has provided insight on the reasonableness and the justification of Operating, Maintenance and Administration costs. For example, their evidence in the proceedings leading to *Order 116/08* assisted in the development of a Board Order relating to appropriate targets.¹¹ Similarly, during the 2015/16 and 2016/17 Manitoba Hydro General Rate Application, the Coalition expressed concerns with Operating, Maintenance and Administration cost containment efforts related to capital spending.¹²
- Debt: in a number of proceedings, the Manitoba Branch of the Consumers' Association of Canada has examined the efficient frontier for Manitoba Hydro's debt portfolio, including consideration of trade offs between risk and opportunities relating to fixed and floating debt.¹³
- Rate design, bill assistance and energy poverty: the Manitoba Branch of the Consumers' Association of Canada has led evidence on barriers to energy efficiency utilization by low-income households,¹⁴ as well as filing evidence in the 2010/11 General Rate Application relating to definitions of energy poverty and program alternatives, including energy efficiency, government support and bill assistance options. The Manitoba Branch of the Consumers' Association of Canada was an active participant in Manitoba Hydro's working group on bill affordability led in 2016.
 - In 2016, the Manitoba Branch of the Consumers' Association of Canada was honoured to be selected by the federal Office of Consumer Affairs to conduct a major research project on energy poverty across Canada.
 - The research for this project, combined with related efforts by both the Manitoba Branch of the Consumers' Association of Canada and Winnipeg Harvest, have led to:
 - i) six Canadian focus groups looking at issues of energy poverty from users perspectives including one centered in a Manitoba First Nation;

11 See Order 116/08, p. 345, Order 6

12 See Order 73/15, p. 34

13 See for example, Order 116/08, p. 344, Order 4.

14 See for example 116/08, p. 341.

- ii) a robust literature review;
- iii) consideration of the strengths and weaknesses of a wide spectrum of options;
- iv) an examination of the legislative framework for energy poverty solutions in selected Canadian jurisdictions;
- v) the beginning of an examination of what led Ontario to move away from a ratepayer funded model for bill assistance and towards a tax-payer funded model
- vi) preliminary consideration of tools (if any) to address one of the major flaws in conventional American bill assistance programs, which is the limited penetration (less than 50%) of even best practice programs; and
- vii) a survey of the prices of certain basic necessities in Northern First Nations (in collaboration with the Manitoba Keewatinowi Okimakanak).

Key Issues intended to be addressed by the Consumers Coalition

As in previous proceedings, the intervention of the Consumers Coalition will be guided by the Public Utilities Board criteria for the consideration of just and reasonable rates. Pursuant to its jurisdiction and the statutory framework in which it operates, the Public Utilities Board has characterized the key elements of its independent review function and rate-setting role as follows:

- Ensuring that forecasts are reasonably reliable;
- Ensuring that actual and projected costs incurred are necessary and reasonable;
- Assessing the reasonable revenue needs of an applicant in the context of its overall general health (including reserves);
- Determining an appropriate allocation of costs between classes; and
- Setting just and reasonable rates in accordance with statutory objectives.¹⁵

The Consumers Coalition expects to be guided by the Board's direction in previous Orders in order to present high quality analysis evidence that will assist the Board in making its determinations and in setting just and reasonable rates.

As detailed in the Intervener Application Form, the Consumers Coalition proposes to retain the services of expert consultants Mr. William Harper, Ms Kelly Derksen and Mr. Darren Rainkie. Further information regarding the Consumers Coalition's expert consultants is found in the Intervener application form.

Legal counsel from the Public Interest Law Centre will be representing the Consumers Coalition in this proceeding. The Public Interest Law Centre is an independent office of Legal Aid Manitoba that represents groups and individual on systemic issues or issues that affect the broader population. The Public Interest Law Centre's areas of practice include:

¹⁵ PUB Order 98/14 at p 28, 37; PUB Order 5/12 at p 27.

- Consumer law;¹⁶
- Environmental law;
- Human rights law;
- Indigenous law; and
- Poverty law.

The Public Interest Law Centre has acted as legal counsel for residential consumers in proceedings relating to Manitoba Hydro both at the Public Utilities Board and at the Clean Environment Commission for more than 25 years.

Assessing the reasonable revenue needs of an applicant in the context of its overall general health (including reserves)¹⁷

Manitoba Hydro's application requests a 3.5% rate increase to generate a net income of \$31 million in 2019/20. Without the requested rate increase, the Corporation forecasts a loss of \$28 million for 2019/20.

It is not uncommon for Manitoba Hydro to experience losses upon the in-service of large assets such as Bipole III. The Corporation accepted projected losses from the preferred development plan as being manageable at the NFAT and given the variability of Manitoba Hydro's financial results, it is not necessarily an unusual or emergency situation to have a small loss. The PUB appears to have understood and accepted projected losses of \$418 million from 2022/23 to 2027/28 that were contained in MH Exhibit 93 from the 2017/28 & 2018/19 GRA in approving the 3.6% overall rate increase for 2018/19 in Order 59/18.

There are no rate-setting criteria that requires rate relief in order to eliminate a loss or produce a positive net income. The relatively small net loss (without a rate increase) projected for 2019/20 is likely not an urgent or emergency situation considering the size of Manitoba Hydro's operations and its current level of retained earnings of approximately \$2.8 billion (Appendix 1 – Page 2). Manitoba Hydro has not made any assertion in the Application that its projected financial results for 2019/20, absent a rate increase, represent an urgent or emergency situation.

Manitoba Hydro's position appears to be that its financial results are largely outside of its control. The PUB findings & recommendations in Order 59/18 send a different message: that the Corporation should use the levers open to it to mitigate the negative financial consequences during the era of major capital investments which put pressure on the financial outlook and requirement for rate increases.

These levers include (1) further reductions in O&A costs, in addition to those derived from the Voluntary Departure Program¹⁸ (2) reductions in Business Operations Capital (BOC) from the

16 Under section 4(2) of the *Legal Aid Manitoba Act*, groups can be found eligible for Legal Aid where the matter involves an objective or interest (a) common to the members of the group; and (b) relating to an issue of public interest including, without restricting the generality of the foregoing, any **consumer or environmental issue**. [emphasis added]

17 This will include the following issues from the Preliminary Issues List: 1. Rate increase requested; 5. Finance expense and debt management strategy changes since Order 59/18.

18 Order 59/18 – Page 142 & Recommendation to MH #4.

historic levels¹⁹ (3) further prioritize DSM spending to ensure the expenditures are cost effective (other than low-income & first nations programming).²⁰

The Consumers Coalition intends to explore whether these levers were used by Manitoba Hydro, which will be discussed in the following sections.

Manitoba Hydro's application argues that the lower projected financial results from 2017/18 to 2019/20 are expected to further exacerbate the \$400 million losses projected over the six (6) year period from 2022/23 to 2027/28 - following the planned in-service of Keeyask.

Manitoba Hydro, however:

1. Has chosen to file a “one-year” rate application focused solely on 2019/20 and without a long-term financial forecast, which is a significant change from the decades old approach of using the IFF to “look-past” the test year(s) to judge the impact of the current proposed rate increase(s) on the financial outlook;
2. has requested a final rate increase for 2019/20 based on outdated planning assumptions;
3. has indicated the Manitoba Hydro Electric Board is conducting a comprehensive operational and financial review - and that it is not in a position to produce an updated IFF at this time;
4. has indicated that it is not prepared to adjust any of its spending, pending the review of the new MHEB and further consultation with the Manitoba Government with respect to DSM.

On an overall basis – the Application appears to reflect the fact that MH is in a “holding-pattern” while it sorts out its future strategic/operational plans and financial outlook.

However, for rate-setting purposes. Manitoba Hydro appears to want it both ways: both by looking to the future through an outdated forecast (produced during the 2016/17 fiscal year) and by containing future losses (some six (6) to twelve (12) years after the forecast was produced) as justification for an expedient rate increase to “tide it over” in the next fiscal year until it can figure out what the future vision and operational/financial plans are.

In a time frame of major transition for MH, with a new MHEB and CEO and a pending move of DSM activities to Efficiency Manitoba, the Manitoba Coalition will question whether the Corporation can rely on losses in an outdated longer-term forecast, which may no longer reflect MHEB/senior management’s vision/strategies/plans, to justify a “one-year” rate increase in 2019/20.

Ensuring that forecasts are reasonably reliable²¹

The Consumers Coalition will explore the reliability of Manitoba Hydro’s forecasts given the past record of significant variances from forecast and the *ad hoc* fashion that it has developed

19 Order 59/18 – Pages 110, 113 & Recommendations to MH # 1 & 2.

20 Order 59/18 – Page 120 & Recommendation to MH # 9.

21 This includes the following issues from the Preliminary Issues List: 4. Interest rate forecast; 10. Export revenue forecast; 11. Load forecast and hydrology.

its 2019/20 Interim Budget with a mix of outdated 2017 planning assumptions and more current forecasts of varying vintages.

With respect to the general consumers sales forecast in the 2019/20 Interim Budget (Pages 20-21), Manitoba Hydro appears to have used the 2017 Load Forecast adjusted for actual consumption experienced in 2017/18 and a DSM savings forecast based on the 15-year DSM supplemental plan from the last GRA, adjusted for actual DSM savings to 2017/18 and the carry-forward effects of changes made to the 2018/19 one-year plan prepared in consultation with the Manitoba Government.

The Consumers Coalition intends to explore whether some form of analysis that supports the adjustments made to the forecasts from the last GRA in order to assess the reasonableness of the forecasts used in the 2019/20 Interim Budget is necessary.

With respect to the net export revenue forecast in 2019/20 Interim Budget (Page 23) – Manitoba Hydro appears to have (1) used export prices from its 2017 Fall Update – which it asserts are 6% to 7% lower than those used in Manitoba Hydro Exhibit 93 (2) assumed average water flows – stating that hydraulic generation is primarily driven by future precipitation which is impossible to forecast accurately beyond a one-week period (3) not projected incremental revenues associated with surplus dependable capacity – noting that it has relatively small levels of unsold dependable energy and capacity for 2019/20t.

For 2019/20, the projected net export revenues (export revenues less water rentals and fuel & power purchased) appears to have decreased from \$152 million in MH Exhibit 93 to \$ 40 million in the Interim Budget presented in the Application. In Section 2.3.1 of the Application (Page 14), Manitoba Hydro indicates that water in reservoir storage was 10% below average at the end of September 2018 and that following nine consecutive months of below average precipitation, water conditions began to improve in September. Despite this improvement, Manitoba Hydro indicates that it expects water flows to be below average through the winter and overall hydraulic generation to be below average (Page 15).

The Consumers Coalition intends to closely monitor the impact of water conditions on net export revenues and will explore whether an update based on actual water conditions to December of 2018 is necessary to ensure the most current information is available to the PUB in determining if it will approve a rate increase for 2019/20.

The Consumers Coalition also will examine whether export forecasts need to be updated based on recent developments in the US market as substantiated by recent SEP filings of Manitoba Hydro.

Manitoba Hydro appears to have utilized interest rates and foreign exchange rates based on its forecast from the Winter of 2017 for the 2019/20 Interim Budget including assuming long-term debt issues based on a weighted average term to maturity (WATM) of 20 years.

Manitoba Hydro asserts that interest rates are trending at about the same level as this forecast (Page 22) but does not appear to offer any analysis to support this assertion. The Consumers Coalition will explore whether additional analysis is necessary.

Ensuring that actual and projected costs incurred are necessary and reasonable²²

The Consumers Coalition will examine the reasonableness of Manitoba Hydro's change to its Consolidated Statement of Cash Flows, and in particular, Manitoba Hydro's election to reclassify capitalized interest from investing activities to operating activities.

The Consumers Coalition will question whether Manitoba Hydro has unilaterally stayed or deferred the implementation of PUB findings/recommendations on lower spending by (1) disclosing that another comprehensive review of operations & forecasts by the new MHEB must occur before a new IFF can be developed (Page 1) (2) indicating it is still in the process of developing detailed O&A budgets for 2019/20 (Page 28) and perhaps the inference that it still does not have an operational plan following the VDP which was essentially complete with the majority of staff departing by March of 2018 (3) indicating that all of its budgeted BOC is already in progress and is all essential to maintaining safe & reliable service (Page 16) (4) taking the position that it has no discretion to lower DSM spending as the DSM plan has already been reviewed by the Manitoba Government (Page 18).

The Consumers Coalition is concerned about the reliability of the O&A forecasts for 2018/19 and 2019/20 for a number of reasons:

- (1) In the absence of a detailed O&A budgets for 2018/19 and 2019/20, it is difficult to understand how Manitoba Hydro is ensuring accountability for operating expenditures and how it is measuring its progress towards its cost containment goals;
- (2) the second quarter O&A report to the PUB (Appendix B – Pages 5-6) indicates that Manitoba Hydro is essentially on-budget for the six months ended September 30, 2018 – and the 2019/20 Interim Budget (Page 25) indicates that Manitoba Hydro is expecting no variance from its \$511 million O&A budget;
- (3) it appears suspect that there would be no expected variance from the MH Exhibit 93 budget in a company the size and complexity of MH and it is not apparent how MH can even make the assertion of accurate forecasting without a detailed budget;
- (4) the 2019/20 O&A budget of \$511 million is based on the 2018/19 budget of \$501 million adjusted for 2% inflation or \$10 million. There is no justification for the 2% increase such as union contract increases or merit increases etc – the application simply states that 2% is aligned with Manitoba inflation (Page 28) (despite the governments legislation to freeze general inflationary increases in government union contracts);
- (5) during the aftermath of a VDP and considering there does not appear to be any operational plan in place and the disclosure of another MHEB review of operations – one might expect that spending on a number of initiatives would be delayed until strategies/plans are firmed up/re-affirmed;
- (6) in the last GRA filing, Manitoba Hydro claimed that it was expecting O&A savings of about \$70 million annually over the next 5 years as a result of the VDP (Tab 2 – Page 51) and in excess of \$10 million O&A savings annually as result of supply chain

22 This includes the following issues from the Preliminary Issues list: 1. Rate increase requested; 3. Cash flow, including presentation methodology, and Order 59/18 Directive 10; 7. OM&A update since Order 59/18; 8. Regulatory Deferral accounts; 9. Payments to government in the test year; 12. Major new capital update; 13. Business Operations Capital update since Order 59/18; 14. DSM spending in the test year.

initiatives (Tab 3 - Page 10). Manitoba Hydro's current Application has no detailed analysis on the cost savings that have been achieved to date and those that are expected in the future. MH only notes that O&A was reduced by \$19 million in 2017/18 and a further \$16 million in 2018/19 (Page 28) for a cumulative total of approximately \$35 million of reductions – but that it is expecting an offsetting inflationary increase of \$10 million for 2019/20. **It is not clear in the Application – why forecast O&A costs are not substantially lower now that the VDP and associated restructuring costs are complete and supply chain initiatives are being implemented – let alone beginning to increase at the rate of inflation in the year after the VDP was completed.**

The Consumers Coalition intends to explore whether Manitoba Hydro should be requested to provide

- (1) an O&A variance analysis to December 31, 2018;
- (2) some form of an update on its progress towards detailed O&A budgets for 2019/20;
- (3) a high-level reconciliation of the savings claimed in the last GRA to the budgets that are provided the 2018/19 and 2019/20 fiscal years.

A review of CEF18 indicates that Business Operations Capital spending for 2018/19 and 2019/20 is projected at \$515 & \$511 million and has been reduced only slightly from CEF16 – by \$2 & \$5 million respectively. This is the case despite the PUB findings/recommendations from Order 59/18 that Manitoba Hydro should significantly defer/reduce BOC spending in an era of major capital investment by Manitoba Hydro.

CEF18 is dated March of 2018 - which is before the issuance of Order 59/18 – so it appears that Manitoba Hydro was unwilling to make any adjustments to the CEF for more current information about the status and completion of projects or the PUB's recommendations in Order 59/18. There are concerns about the reliability of CEF18 for purposes of rate-setting given Manitoba Hydro's history of underspending BOC.

It was noted in Manitoba Hydro's latest annual report for 2017/18 – that BOC for electric operations was only \$461 million in 2017/18 (Appendix 3 – Page 41) – a decrease of \$69 million from \$530 million in 2016/17. The decrease was attributed to a decrease in resource availability as a result of a reassignment of resources to Bipole III and the impacts of the VDP.

The forecast of electric BOC in CEF16 was \$574 and \$526 million for 2016/17 & 2017/18, respectively (CEF16 – Page 2 – Appendix 5.4 last GRA) – resulting in under spending of \$44 and \$65 million, for 2016/17 & 2017/18, respectively. It is also noted that there was a significant unfavorable variance of \$17.5 million of capitalized labour & overhead for the first 6 months of 2018/19 (Appendix 6 – Page 8) – although there was no analysis of the split of this variance between major capital projects and BOC.

The Consumers Coalition will explore whether Manitoba Hydro should provide a variance analysis on BOC spending for 2017/18 and to December 31, 2018.

Manitoba Hydro indicates that it cannot make changes to a DSM budget that has been previously reviewed by the Manitoba Government and as such it cannot reflect the PUB recommendation in Order 59/18. MH has routinely under spent its DSM budget in the past – seemingly without any consequences from the Government of Manitoba. This under spending is what prompted the PUB to direct the establishment of a DSM deferral account back in Order 43/13.

Manitoba Hydro is projecting electric DSM expenditures in CEF18 of \$63 & \$94 million (CEF18 – Appendix 6 – Page 30) in 2018/19 & 2019/20, respectively, which includes a downward adjustment in 2018/19 of \$37 million, but no adjustment had been made to the 2019/20 budget. The recent electric DSM spending – relying on Manitoba Hydro’s 2017/18 annual report was \$50 & \$64 million in 2016/17 and 2017/18, respectively (Appendix 3 – Note 20 - Pages 77-78).

If recent history is any indication – it appears that MH will underspend its DSM budget in 2019/20. The Consumers Coalition will question whether Manitoba Hydro should provide a variance analysis on DSM spending for 2017/18 and to December 31, 2018.

Determining an appropriate allocation of costs between classes²³

As outlined on Pages 34 -35 of the Application, Manitoba Hydro has not prepared a PCOSS, the rationale of which has not been provided. As a result, Manitoba Hydro has applied for an across-the-board rate change stating that notwithstanding the significant implications of Bipole III to COS (and ZOR), any rate differentiation should be paused until it can assess the impacts of Bipole III but that an across-the-board increase will not negatively impact the migration of class revenues and ZOR.

The Consumers Coalition will question whether Manitoba Hydro’s application, which repeatedly speaks to the significance of Bipole III (to depreciation and finance costs as well as to COS itself), conflicts with its own conclusion that an across-the-board rate increase will have no negative impacts. Manitoba Hydro appears to have provided no evidence to support this conclusion and the implications of these changes will have to be assessed.

Just and reasonable rates²⁴

Manitoba Hydro does not appear to have undertaken any consultation with ratepayers and stakeholders regarding the requested rate increase and its impact. The Consumers Coalition intends to explore this issue in the upcoming proceeding.

The Manitoba Hydro comparison of average rates and customer bills provides some contextual information but the Consumers Coalition questions its value given that it is based only on readily available information, is not a complete survey of the Canadian landscape and makes a number of simplifying assumptions such as 2% rate increases for jurisdictions where information is not available (Page 40).

23 This includes the following issues from the Preliminary Issues list: 15. Differentiated rates and Order 59/18 Directive 5; 16. Declining block General Service rates (Order 59/18 Directive 28); 17. Implementation of First Nations Residential On-Reserve Customer Class.

24 This includes the following issues from the Preliminary Issues list: 1. Rate increase requested and 2. Consultations with ratepayers and rate impacts.

The Consumers Coalition will question whether the average rate and bill impact information meets the PUB expectations from Order 59/18 that MH is to assess the broader impacts of rate increases beyond only the financial health of MH in future GRA's (Order 59/18 – Page 172). The Consumers Coalition will explore whether the PUB's order would include providing information with respect to macro-economic impacts and bill affordability.

Consumers Coalition participation

Depending on the ultimate scope of the PUB procedural order, the Consumers Coalition intends to participate fully and actively in this proceeding, including attendance at hearings, submission of evidence and testing of evidence and cross-examination of witnesses.

Consistent with previous proceedings, the Consumers Coalition requests the right to ask Information Requests and to file evidence.²⁵

The piecemeal assembly of data from different time periods and forecasts in this rate application, as well as Manitoba Hydro's endemic challenges with respect to forecasting, has led to materials issues of analytic credibility. The Consumers Coalition recommends that the PUB direct a time-limited, issues-limited oral hearing involving cross-examination on key issues and no direct examination.

Costs award

The Consumers Coalition intends to request an award of costs for its participation in this proceeding.

As stated in the Intervener Costs Policy 2019-20, in any proceeding, the Board may award costs to be paid to any Intervener who has:

- (a) made a significant contribution that is relevant to the proceeding and contributed to a better understanding, by all parties, of the issues before the Board;
- (b) participated in the hearing in a responsible manner and cooperated with other Interveners who have common objectives in the outcome of the proceedings in order to avoid a duplication of intervention;
- (c) represented interests beyond their sole business interest; and
- (d) a substantial interest in the outcome of the proceeding and represents the interests of a substantial number of ratepayers.

The Consumers Coalition will make a significant contribution to this proceeding through its information requests, evidence from its expert witnesses and consultants, as well as its cross-examination of Manitoba Hydro's witnesses and its final submissions. Its intervention will be guided by the PUB's criteria for the consideration of just and reasonable rates.

The Consumers Coalition will participate in this hearing in a reasonable manner and will cooperate with other interveners who have common objectives. The Consumers Coalition's

²⁵ For further information regarding the Consumers Coalition's recommendations regarding process, please see the letter sent to the PUB dated November 16, 2018.

intervention will be limited to those issues that are raised in this application, in recognition that this application is not a full General Rate Application and that many issues will be deferred to the 2020/21 rate application. In addition, the Consumers Coalition will make reasonable efforts to ensure that its participation is not unduly repetitive of other interveners. For example, it has already met with representatives from MIPUG in an attempt to collaborate on any areas of common interest.

As has been described above, the Consumers Coalition represents the interests of all Manitoba residential ratepayers. As a result, it has a substantial interest in the outcome of the proceeding and represents the interests of a substantial number of ratepayers. The Consumers Coalition aims to protect and reconcile the interests of all Manitoba residential consumers, including low and fixed-income consumers, the working poor and those living in remote and rural communities.

Conclusion

Residential ratepayers rely on vigorous, independent regulation to hold Crown monopolies, including Manitoba Hydro, accountable. Through its legal counsel and its team of expert witnesses, the Coalition intends to participate in this proceeding using evidence-based advocacy in the consumer interest.

Subject to approval from the Public Utilities Board, the Consumers Coalition looks forward to participating in this proceeding,

Attachment B

Expert Consultant #1

Name:	William Harper
Experience:	35 years
Telephone #:	905-883-1727
Tariff Rate:	\$225
Address and Email:	107 Baker Avenue Richmond Hill, Ontario L4C 1X5 bharper.consultant@bell.net
Firm or Organization	Independent Consultant
Evidence to be provided on issues in scope:	Collectively, the evidence of the Consumers Coalition's expert consultants will focus on: (1) the reliability of forecasts, (2) whether actual and projected costs incurred are necessary and reasonable, (3) assessing the reasonable revenue needs of Manitoba Hydro in the context of its overall general health (including reserves). While discussions between the Consumers Coalition and MIPUG have taken place, it is premature at this time to determine who will prepare evidence on specific topics until the record of the proceeding has been further developed.
Brief explanation of experience relevant to evidence to be provided:	Mr. William Harper has significant experience in regulatory proceedings relating to Manitoba Hydro. He has served as an expert witness before the Manitoba Public Utilities Board regarding Manitoba Hydro's 2002 Status Update, 2004/05 and 2005/06 General Rate Application, 2008/09 General Rate Application, 2013 Need For And Alternatives To proceeding, and the 2015 Cost of Service Methodology Review. In addition, he appeared as an expert witness before the Manitoba Clean Environment Commission with respect the Wuskwatim Need For And Alternatives To Submission by Manitoba Hydro/Nisichawayasihk Cree Nation. He has also assisted clients in their participation in all other rate applications (General Rate Application, Diesel or Interim) by Manitoba Hydro since 2002.

Expert Consultant #2

Name:	Darren Rainkie
Experience:	30 years
Telephone #:	204.837.7814
Tariff Rate:	\$240
Address and Email:	39 Edenwood Place Winnipeg, MB R3X 0E5 darrenrainkie@gmail.com
Firm or Organization:	Darren Rainkie Consulting
Evidence to be provided on issues in scope:	Collectively, the evidence of the Consumers Coalition's expert consultants will focus on: (1) the reliability of forecasts, (2) whether actual and projected costs incurred are necessary and reasonable, (3) assessing the reasonable revenue needs of Manitoba Hydro in the context of its overall general health (including reserves). While discussions between the Consumers Coalition and MIPUG have taken place, it is premature at this time to determine who will prepare evidence on specific topics until the record of the proceeding has been further developed.
Brief explanation of experience relevant to evidence to be provided:	Mr. Rainkie is the principal of the consulting practice he established in 2017 which leverages his 30-years of experience in energy regulation, utility & financial management and financial advisory services. He specializes in electricity and natural gas energy regulation and financial advisory services. Mr. Rainkie has significant regulatory experience including acting as an executive policy witness for multiple gas and electricity applications before the Manitoba PUB, including on issues relating to revenue requirement, financial outlook, just and reasonable rates, the necessity and prudence of expenditures and forecasts.

Expert Consultant #3

Name:	Kelly Derksen
Experience:	25 years
Telephone #:	204.782.4204
Tariff Rate:	\$240
Address and Email:	14 Timberwood Place East St. Paul, MB R2E 0M4 kderksenconsulting@gmail.com
Firm or Organization	Kelly Derksen Consulting
Evidence to be provided on issues in scope:	Collectively, the evidence of the Consumers Coalition's expert consultants will focus on: (1) the reliability of forecasts, (2) whether actual and projected costs incurred are necessary and reasonable, (3) assessing the reasonable revenue needs of Manitoba Hydro in the context of its overall general health (including reserves). While discussions between the Consumers Coalition and MIPUG have taken place, it is premature at this time to determine who will prepare evidence on specific topics until the record of the proceeding has been further developed.
Brief explanation of experience relevant to evidence to be provided:	Kelly is the principal of the consulting practice she established in 2018 leveraging from nearly 25-years of experience in both a privately-owned natural gas utility and one of Canada's largest publicly-owned, vertically integrated electric and natural gas utilities. She specializes in regulation and ratemaking, with an emphasis on cost of service, and rate design. Her experience relevant to evidence to be provided includes experience with respect to ratemaking and rate design, regulatory accounting, revenue requirement, allocation of costs, just and reasonable rates, the necessity and prudence of expenditures and forecasts.

Darren Rainkie, CPA, CA, CBV

Principal – Darren Rainkie Consulting

STRATEGIC & INNOVATIVE REGULATORY SOLUTIONS FOR THE EVOLVING CHALLENGES OF REGULATED ENTERPRISES

QUALIFICATIONS & EXPERTISE

- Executive Leadership
- Financial Management
- Regulatory Vision & Strategy
- Experienced Witness
- Revenue Requirement Specialist
- Regulation Process Management

CAREER HIGHLIGHTS

- Executive (CFO & Acting CEO) and senior management (Controller & Treasurer) experience at Manitoba Hydro & Centra Gas (2006-2017)
- Senior level experience in broad areas of financial management (2000-2017)
- Deep experience in all aspects of electric & natural gas energy regulation (1990-2018)
- Extensive experience testifying as a policy & subject matter expert at regulatory hearings (2000-2017)

PRIOR EXPERIENCE

- Manitoba Hydro & Centra Gas 1999-2017
- Centra Gas (Westcoast Energy) 1994-1999
- Price Waterhouse 1988-1994

EDUCATION

- Chartered Business Valuator 1993
- Chartered Professional Accountant (Chartered Accountant) 1991
- B. Com. (Hons. – With Distinction), University of Manitoba 1988

PROFILE

Darren is the principal of the consulting practice he established in 2017 which leverages his 30-years of experience in energy regulation, utility & financial management and financial advisory services. He specializes in electricity and natural gas energy regulation and financial advisory services.

Executive Level Vision & Strategy – over 11 years of executive/senior management experience providing leadership to one of the largest integrated electric and natural gas utilities in Canada, developing corporate and business unit strategic plans, leading and developing senior level professionals and successfully managing multiple initiatives/projects simultaneously. Darren has a deep understanding of the challenges facing regulated entities and a proven track record of developing innovative financial and regulatory strategies that are aligned with the overall vision and strategic direction of the organization.

Broad Financial Management Experience – over 17 years of senior level experience in broad areas of financial management including long-term forecasting, budgeting, corporate finance, risk management and financial reporting. Darren has the unique ability to integrate these diverse areas of financial management with ratemaking to develop solutions for clients that are broad-based and practical.

Deep Specialization in Energy Regulation – over 28 years of experience in all aspects of energy regulation including policy, strategy, revenue requirement, cost of capital/capital structure, cost allocation and rate design, major capital project reviews as well as planning and management of regulatory applications and the associated hearing processes, stakeholder engagement and testifying in regulatory proceedings. Darren's passion for and deep specialization in energy regulation enables him to provide a comprehensive suite of high-quality regulatory services to clients.

Collaborative Style & Clear Communication – demonstrated ability to provide policy direction and lead cross-disciplinary project teams and to work collaboratively and build strong relationships with senior management, executive team, boards of directors and government and regulatory officials and stakeholders. Darren's consensus building style and ability to effectively communicate with internal and external stakeholders are essential to developing sustainable solutions for clients.

OVERVIEW OF REGULATORY EXPERIENCE

- Executive policy witness at the 2016 Electric Cost of Service Methodology Review before the Manitoba Public Utilities Board (MPUB) to review the methodology underpinning the allocation of a \$2 billion revenue requirement and \$20 billion rate base among 568,000 customers.
- Executive policy witness and chief regulatory strategist for the 2015 Electric General Rate Application (GRA) before the MPUB which included final approval of interim rates for 2014/15 and rates for 2015/16 as well as the establishment of a process to review interim rates for 2016/17. Applied a top-down strategy driven approach and drove the transformation of rate applications to increase revenues and manage deterioration in the financial outlook and maintain reliable service and stable rates while balancing the interest of ratepayers with the financial integrity of the corporation.
- Executive policy witness at the 2015 Cost of Gas Application before the MPUB and directed the development of the regulatory strategy and principles associated with the prudence review and recovery of additional gas costs of \$46 million incurred during the record cold winter weather of 2013/14.
- Executive policy witness and chief strategist for the finance witness panel at the 2014 MPUB review of the Need For and Alternatives To (NFAT) Manitoba Hydro's proposed Major Generation and Transmission capital projects involving a planned investment of over \$17 billion. The finance panel witness responsibilities included the potential impact on customers rates, financial outlook and financial risk associated with the planned investments.
- Executive policy witness and chief regulatory strategist for the 2013 Gas GRA before the MPUB to set gas costs and non-gas revenue requirement for 2013/14.
- Directed the preparation of the electric and gas revenue requirement filings and represented the corporation as a senior subject matter witness at several MPUB rate hearings between 2008 and 2013 (including 2010 Electric GRA and Risk Review, 2012 Electric GRA) providing witness testimony on financial results, long-term financial and capital forecasts, as well as implementation of IFRS and depreciation studies for rate-setting purposes.
- Represented the Corporation as a subject matter witness at several MPUB rate hearings between 2000 and 2008 (including 2000 Interlake franchise expansion application, 2003 Gas GRA, 2004 Cost of Gas Application, 2005 Gas GRA and 2007 Gas GRA) providing witness testimony on revenue requirements, rate base, return on equity, capital structure, financial feasibility tests and regulatory approvals and procedural matters.
- Oversaw the development of the Primary Gas application and associated processes in 2000 to adjust the cost of gas from western Canada on each gas quarter using an efficient and streamlined regulatory approval process.
- Managed and coordinated the preparation of numerous applications, filings and reports to the MPUB, the post-application/pre-hearing processes and procedures, the public hearing process and procedures and the interpretation and compliance with MPUB decisions from 1997 to 2006.
- Acted as internal expert and provided support to company witnesses at public hearings with respect to business case and feasibility assessments as well as financing, capital structure and cost of capital matters from 1994 to 1997. Prepared the Centra Gas proposal for the first return on equity (ROE) formula to be used to set gas rates in Manitoba in 1994.
- Provided extensive consulting advice to the MPUB and drafted regulatory decisions on capital structure and rate of return on equity (ROE) matters including the last comprehensive decision on the allowed capital structure and ROE for Centra Gas Manitoba in 1991.
- Acted as accounting and finance advisor to the MPUB between 1990 and 1994 on several Centra Gas regulatory applications and a Manitoba Hydro general rate application and drafted numerous regulatory decisions for the MPUB during that timeframe. Provided advice on all aspects of revenue requirements including operating costs, depreciation, finance expense, rate base, working capital and cost of capital.

PROFESSIONAL EXPERIENCE

MANITOBA HYDRO & CENTRA GAS

1999 - 2017

Vice-President, Finance & Regulatory Affairs and Chief Financial Officer

2013 - 2017

- Responsible for the executive leadership of the Finance & Regulatory Affairs business unit (Controller, Treasury, Rates & Regulatory Affairs, Financial Planning and Corporate Risk Management) and Manitoba Hydro International (professional consulting and project management services to energy sectors world-wide).
- Member of the Executive Committee that actively collaborated in the management of the corporation and the formation, revision and achievement of the corporate strategic plan and establishment of business unit goals and strategies that align with the strategic objectives of Manitoba Hydro. Led, developed and mentored a diverse team of senior professionals as well as cross-disciplinary project teams.
- Chair of the Corporate Risk Management and Rates Review committees. Member of the Export Power and Gas Supply Risk Management committees and the Corporate Asset Management Executive Council. Member and Treasurer of the Wuskwatim and Keeyask Limited Partnership Boards working closely with Indigenous partners.
- Guided the development of corporate financial targets and the long-term financial forecast as well as corporate operating, capital and financing plans that are consistent with the overall objectives of the Corporation and obtained endorsement from the Audit Committee and Manitoba-Hydro Electric Board (MHEB). Initiated and provided executive oversight to a comprehensive review of corporate financial targets to determine if they continued to be appropriate during a period of extensive capital investment of over \$17 billion. Provided policy guidance to support the development of increasingly sophisticated financial models to provide scenario analysis (over 15,000 financial projections) on key financial variables (water flows, export prices, interest rates and capital costs) to evaluate the adequacy of financial targets and financial reserves and forecast the long-term rate impacts of major capital projects.
- Initiated target setting process and collaborated with the executive team to develop strategies to substantially reduce the growth in operating expenditures. Championed the establishment of an overall corporate asset management framework and further development of systems to improve the planning and prioritization of sustaining capital expenditures in the generation, transmission, distribution and corporate functions.
- Executive policy witness and chief regulatory strategist for several significant electric and gas regulatory proceedings before the MPUB. Applied a top-down strategy driven approach and drove the transformation of rate applications to increase revenues and manage deterioration in the financial outlook and maintain reliable service and stable rates while balancing the interest of ratepayers with the financial integrity of the corporation.
- Provided executive oversight to the development and execution of financing strategies and plans to obtain long-term debt financing in the order of \$1.5 billion to \$2 billion annually and to effectively manage the corporation's liquidity, foreign exchange and interest rate risks.
- Directed the financial and management reporting and corporate risk management functions and provided regular reports on the financial results and risks of the corporation to Executive Committee, Audit Committee and MHEB. Executive accountable to oversee the transition from Canadian Generally Accepted Accounting Principles (CGAAP) to International Financial Reporting Standards (IFRS).

Acting President and Chief Executive Officer

September to December 2015

- Responsible for the overall leadership of one of the largest integrated electric and natural gas utilities in Canada with over \$20 billion in assets, \$2.3 billion in revenues, 568,000 electricity and 277,000 natural gas customers and over 6,000 employees.
- Maintaining progress on delivery of key strategic objectives, execution on major capital projects and effective transition to the newly appointed CEO while simultaneously managing several complex finance & regulatory projects in the on-going role as CFO.

Corporate Controller, Controller Division**2008 - 2013**

- Led the financial and management reporting functions of the corporation and managed interaction with the provincial Comptroller's Division and external auditors. Guided the provision of financial services to the business unit management teams.
- Oversaw the development of the long-term financial forecast and the coordination of the consolidated operating cost and capital expenditure forecasts and presentation to the Audit Committee and MHEB.
- Directed the preparation of the electric and gas revenue requirement filings and represented the corporation as a senior subject matter witness at several MPUB rate hearings providing witness testimony on financial results, long-term financial and capital forecasts, and implementation of IFRS and depreciation studies for rate-setting purposes.

Corporate Treasurer, Treasury Division**2006 - 2008**

- Led the development of debt management and financing strategies to obtain corporate financing requirements and effectively manage the corporation's liquidity, foreign exchange and interest rate risks.
- Managed interaction with credit rating agencies, the provincial Treasury Division and investment banking institutions.
- Guided cash management, cash forecasting and credit risk management functions and the administration of banking arrangements.

Manager, Regulatory Services Department**1999 - 2006**

- Responsible for regulatory planning and administration and providing recommendations to senior management on regulatory strategy, issues and procedural matters. Acted as a liaison with MPUB staff and advisors.
- Managed the preparation of applications, filings and reports to the MPUB, the post-application/pre-hearing processes and procedures, the public hearing process and procedures and the interpretation and compliance with MPUB decisions.
- Represented the corporation as a subject matter witness at several public hearings providing witness testimony on revenue requirements, rate base, return on equity, capital structure, financial feasibility tests and regulatory approvals and procedural matters.

CENTRA GAS MANITOBA INC.**1994 - 1999**

Senior Coordinator, Regulatory Services Department

1997 - 1999

Senior Financial Analyst, Financial & Accounting Services Department

1994 - 1997

PRICE WATERHOUSE, CHARTERED ACCOUNTANTS (Winnipeg Office)**1988 - 1994**

Assistant Manager, Financial Advisory Group (Accounting & Finance Advisor to MPUB)

1990 - 1994

Audit Senior, Audit & Business Advisory Group

1988 - 1990

Kelly Derksen, BSc., CPA, CMA

Principal – Kelly Derksen Consulting

STRATEGIC & INNOVATIVE REGULATORY SOLUTIONS FOR THE EVOLVING CHALLENGES OF REGULATED ENTERPRISES

QUALIFICATIONS & EXPERTISE

- Regulation Strategy & Execution
- Regulation Process Management
- Ratemaking Specialist
- Quality & Process Improvement
- Experienced & Respected Witness
- Leadership Excellence

CAREER HIGHLIGHTS

- 25 years of Rates & Regulation experience in the utility industry
- A recognized authority on Cost of Service and Rate Design
- An experienced, credible, respected witness having testified in public hearings for 15 years
- Led, developed, and assisted in dozens of regulatory proceedings
- Committed to mentoring and sharing knowledge through collaborative style and routinely conducting training with the Canadian Gas Association

PRIOR EXPERIENCE

- Manitoba Hydro & Centra Gas 1999-2017
- Centra Gas (Westcoast Energy) 1994-1999

EDUCATION

- Chartered Professional Accountant (CMA) 2004
- BSc., (Chemistry & Mathematics) University of Manitoba 1995

PROFILE

Kelly is the principal of the consulting practice she established in 2018 leveraging from nearly 25-years of experience in both a privately-owned natural gas utility and one of Canada's largest publicly-owned, vertically integrated electric and natural gas utilities. She specializes in regulation and ratemaking, with an emphasis on cost of service, and rate design.

Regulation Strategy & Process Management Specialist- Using nearly 25 years of experience-backed judgement and insight, Kelly provides strategic and tactical advice and solutions to complex ratemaking and regulation challenges that balance the public interest with corporate strategic goals and which align with governing legislation and regulatory framework.

Kelly has successfully managed many interim, ex-parte, written, traditional, and unconventional regulatory processes. With the many challenges and nuances associated with achieving success in the regulatory arena, Kelly is a champion of evaluating lessons learned to achieve future success. Including key stakeholders in this evaluation is critical to building solid relationships, and to move forward client goals more efficiently and effectively.

Ratemaking Specialist- Kelly has led, developed and executed many cost of service and rate design studies and methodological reviews. This includes extensive experience developing evidence and providing principled persuasive testimony. Along with practical experience, and continuous monitoring of the evolving utility industry, she also has deep understanding of the academic-based writings of Bonbright and Kahn, as well as the more practical detailed ratemaking manuals such as NARUC. A deep understanding, genuine passion for ratemaking, over two decades of hands-on utility experience, uniquely enables Kelly to deliver solutions that are workable, understandable, and that are also academically sound.

Leadership and Communication Excellence- Demonstrated ability to lead large complex multi-disciplinary teams through a genuine collaborative style that engenders trust and commitment. She also commits to leadership excellence by "paying it forward" through training professionals across Canada. Kelly is known as a principled and collaborative leader with significant experience interacting with a variety of styles and experience levels, strength in translating complex subject matter into workable solutions, and genuine belief that the way one succeeds is by helping others be successful.

OVERVIEW OF RATEMAKING & REGULATION EXPERIENCE

- Promoted through progressively senior analytical and managerial positions in the general area of utility ratemaking and regulation at the privately-owned Centra Gas, and then Manitoba Hydro, a combined publicly-owned vertically integrated hydro-electric utility and disaggregated natural gas utility.
- Over two decades of hands-on experience in developing practical solutions to complex problems that comport with best practice categorized broadly as:
 1. Regulation Strategy and Process Management
 2. Ratemaking
 3. Leadership and Communication

Regulation Strategy and Process Management

- Provided strategic and tactical advice and solutions to Executive Management for the past 15 years on ratemaking and regulatory policy consistent with the strategic goals of the organization and within the context of the governing legislation and regulatory framework.
- Led, developed, and assisted in dozens of rate cases (and other regulatory processes) interfacing with external agencies and the many internal disciplines necessary to support the process. Provided advice and reports to Executive Management regarding appropriate regulatory strategies and developed a common theme and orderly plan with careful execution to achieve strategic, financial and operational deliverables.
- Provided advice to Executive Management regarding the interpretation of regulator decisions and compliance.
- Successfully led numerous traditional, unconventional, interim and ex-parte regulatory processes. This included numerous stakeholder engagement sessions, demonstrating commitment to seeking solutions to best balance multiple conflicting interests, building trust and strengthening relationships.
- With the many challenges and nuances associated with achieving success in the regulatory arena, a champion of evaluating lessons learned for the achievement of successful future outcomes; including key stakeholders in this evaluation is critical to building solid relationships, and to move forward goals more efficiently and effectively.

Ratemaking

- A deep understanding of utility ratemaking including extensive hands-on experience having developed, led, and executed dozens of studies and several cost of service and rate design methodological reviews, through continuous monitoring of the evolving utility industry, a solid understanding of the economics behind investment decisions, the physical workings of the system, a strong understanding of the legislative framework and regulatory construct by which a utility operates, and the academic-based writings of Bonbright and Kahn as well as more practical detailed ratemaking guidance provided by NARUC.
- An experienced and respected witness having represented the Corporation as a subject matter witness before the MPUB for 15 years. Provided testimony on revenue requirements, rate base, cost of service, rate design, treatment of deferral and variance accounts, expansion financial feasibility tests, terms and conditions of service, regulatory approvals and procedural matters.
- Driving force and key witness behind the 2016 electric Cost of Service Methodology Review before the MPUB to review the methodology underpinning the allocation of a \$2 billion revenue requirement, \$500 million of export revenue, and a \$20 billion rate base among over 570,000 customers.

- Developed the 2016 electric Cost of Service Methodology Review case strategy and evidence, hundreds of information requests, led several stakeholder engagement sessions, evaluated Intervenor Expert positions, rebuttal evidence, testimony, and final arguments available on the MPUB’s website: www.pubmanitoba.ca.
- Developed evidence to support several key issues such as: an overall methodology that reasonably balanced the corporation’s financial goals and the public interest given significant external energy market changes subsequent to 2008 (advent of shale gas, plunge in electric and natural gas prices) coupled with significant investment in new hydraulic infrastructure/aging infrastructure; a cohesive overall methodology associated with a largely interconnected hydro-electric utility; the influence of economics (marginal cost to service) on embedded cost to serve; and the interrelation between revenue requirement, cost of service, and rate design and potential unintended consequences (impacts to low income customers, or protecting the utility’s ability to collect its approved revenue requirement).
- Recognized publicly for capabilities having developed an expert level knowledge of electric cost of service over a short timeframe to support a complex regulator review and delivering testimony.
- Led and developed numerous cost allocation and rate design models to analyze the impacts and sensitivities of scenarios.
- Conducted training on rates, cost analysis, methodology, economic feasibility (service extension).

Leadership and Communication

- Extensively interacted with a variety of styles and experience levels having led large multi-disciplinary teams with dozens of professionals and routinely presenting to Executive Management, Board of Directors, Retail Customers, Stakeholders and the Regulator.
- Successfully advanced many regulatory applications and related hearing processes, at times concurrently, accomplished through building cross-departmental co-operation, periodically with disparate in-house teams, with a genuine interpersonal style that engenders trust and commitment. For example, over a 12-month period beginning in the fall of 2006, led and developed 4 major applications including a Cost of Gas Application, a 4-Party Trench Application; a General Rate Application; and a generic competition-related application.
- Managed and mentored a team of professional accountants. By creating a collaborative atmosphere, and encouraging measured autonomy proudly developed a well-respected flexible team with strong expertise.
- Developed productive relationships with regulator staff and advisors, key stakeholders and interest groups.
- Routinely presents at regulatory workshops and industry conferences, to strengthen skills and importantly to share knowledge and experience with others.
- Strength in translating complex ratemaking subject matter, into practical, clear solutions based on traditional and contemporary best practice and the related strategy and evidence development of a regulatory case.

PROFESSIONAL EXPERIENCE

Consultant	2018 - Present
Manitoba Hydro - Manager, Cost of Service & Rates	2009 - 2017
Manitoba Hydro - Manager, Gas Rates & Regulatory Affairs	2006 - 2009
Manitoba Hydro - Senior Analyst, Gas Rates	2002 - 2006
Manitoba Hydro- Analyst, Gas Rates	1999 - 2002
Centra Gas - Analyst, Regulatory Affairs	1998 - 1999
Centra Gas - Coordinator, Regulatory Affairs	1995 - 1998

A SELECTION OF RELEVANT PROJECT EXPERIENCE:

- Reviewed zone of reasonableness policy and developed the related strategy and evidence;
- Addressed the treatment of International Financial Reporting Standards (IFRS) within cost of service;
- Treatment of large hydraulic generation cost measurement within embedded cost to serve;
- Treatment of significant export revenue priced the margin (at times 40% or more of total revenue requirement) within embedded cost to serve (effectively a matter of public policy)
- Treatment of demand side management cost within cost to serve;
- Economic development rates/energy intensive rates/low income rates;
- Uneconomic bi-pass (distributed solar PV); economic bi-pass;
- Costing assumptions in feasibility tests to address divergence between embedded and marginal cost to service and related service extension policy (including to support business expansion and growth opportunities);
- Allocation treatment of revenues and costs (and related rate base) associated with unique partnerships with First Nations developed to support new, multi-billion-dollar hydraulic generation;
- Wheeling tariffs—provided the underlying cost analysis and regulatory advice;
- Treatment and determination of variance accounts (cost trackers);
- Led Revenue Decoupling evidence and testimony during 2008 Centra GRA;
- Evaluated the appropriateness and level of Month Basic Charges, developed evidence and led testimony;
- Evaluated the appropriateness and level of Demand Charges, developed evidence and led testimony;
- Fixed rate alternatives (within and outside of regulated utility);
- Successfully developed a solution for and executed the disposal of \$100 million in gas costs (nearly 40% of total asset investment) accumulated during the natural gas market conditions in early 2001, and the accumulation of \$46 million in gas costs during the 2013/2014 record cold winter;
- Rate unbundling to support service unbundling flowing from natural gas market restructuring to facilitate competition;
- Analysis and research assessing a competition-related role of the utility in the provision of gas supply application;
- Successfully developed a treatment for costs incurred to facilitate competition; and
- Developed codes of conduct between regulated and unregulated utility affiliates.

ECONALYSIS CONSULTING SERVICES

William O. Harper

Mr. Harper has over 35 years experience in the design of rates and the regulation of electricity utilities. While employed by Ontario Hydro, he has testified as an expert witness on rates before the Ontario Energy Board from 1988 to 1995, and before the Ontario Environmental Assessment Board. He was responsible for the regulatory policy framework for Ontario municipal electric utilities and for the regulatory review of utility submissions from 1989 to 1995. Mr. Harper also coordinated the participation of Ontario Hydro (and its successor companies Ontario Hydro Services Company and Hydro One Networks) in major public reviews involving Committees of the Ontario Legislature, the Ontario Energy Board and the Macdonald Committee. He has served as a speaker on rate and regulatory issues for seminars sponsored by the APPA, MEA, EPRI, CEA, AMPCO and the Society of Management Accountants of Ontario. Since leaving Hydro One Networks, Mr. Harper has provided consulting support for client interventions on energy and telecommunications issues before the Ontario Energy Board, Manitoba Public Utilities Board, Québec's Régie de l'énergie, British Columbia Utilities Commission, Saskatchewan Rate Review Panel and CRTC. He has also appeared before the Manitoba's Public Utilities Board, the Manitoba Clean Environment Commission, the Ontario Energy Board and Quebec's Régie de l'énergie.

EXPERIENCE

Independent Consultant October 2018 - Present

Econalysis Consulting Services – Associate August 2011 – September 2018

Econalysis Consulting Services- Senior Consultant July 2000 to July 2011

- Responsible for supporting client interventions in regulatory proceedings, including issues analyses & strategic direction, preparation of interrogatories, participation in settlement conferences, preparation of evidence and appearance as expert witness (where indicated by an asterisk). Some of the more significant proceedings included:
 - Electricity (Ontario)
 - IMO 2000 Fees (OEB)
 - Hydro One Remote Communities Rate Application 2002-2004
 - OEB Transmission System Code Review (2003)
 - OEB Distribution Service Area Amendments (2003)
 - OEB Regulated Asset Recovery (2004)
 - OEB- 2006 Electricity Rate Handbook Proceeding*
 - 2006 Rate Applications by Various Electricity Distributors

- OEB - 2006 Guidelines for Regulation of Prescribed Generation Assets
- 2007 Rate Applications by Various Electricity Distributors
- OEB - 2007 Cost of Capital and 2nd Generation Incentive Regulation Proceeding
- Hydro One Networks 2007/2008 Transmission Rate Application
- 2008 Rate Applications by Various Electricity Distributors
- OEB – Cost of Capital for Ontario’s Regulated Utilities (2009)
- Hydro One Networks 2009/2010 Transmission Rate Application
- 2009 Rate Applications by Various Electricity Distributors
- 2010 Rate Applications by Various Electricity Distributors
- Hydro One Networks 2011/2012 Transmission Rate Application
- 2011 Rate Applications by Various Electricity Distributors
- 2012 Rate Applications by Various Electricity Distributors
- OEB – 2012 Renewed Regulatory Framework for Electricity Distributors
- Hydro One Networks 2013/2014 Transmission Rate Application
- 2013 Rate Applications by Various Electricity Distributors
- 2014 Rate Applications of Various Electricity Distributors
- OEB Residential Rate Design Policy (2014)
- 2015 Rate Applications for Various Electricity Distributors
- Hydro One Networks 2015/2016 Transmission Rate Application
- 2016 Rate Applications of Various Electricity Distributors
- OEB – 2016 Pole Attachment Rate Working Group
- Hydro One Networks 2017/18 Transmission Rate Application
- 2017 Rate Application of Various Electricity Distributors
- 2018 Rate Application of Various Electricity Distributors
- 2019 Rate Application of Various Electricity Distributors

- Electricity (British Columbia)

- BC Hydro IPP By-Pass Rates
- BC Hydro Heritage Contract Proposals
- BC Hydro’s 2004/05 & 2005/06; 2006/07 & 2007/08; 2008/09 & 2009/10; 2010/2011; 2011/12-2013/14 and 2016/17 – 2018/19 Revenue Requirement Applications
- BC Hydro’s CFT for Vancouver Island Generation – 2004
- BC Hydro’s 2005 Resource Expenditure and Acquisition Plan
- BC Hydro’s 2006 Residential Time of Use Rate Experiment Application
- BC Hydro’s 2006 Integrated Electricity Plan
- BC Hydro’s 2007 Rate Design Application
- BC Hydro’s 2008 Residential Inclining Block Rate Application
- BC Hydro’s 2009 GS Rate Design Application
- BC Hydro 2013 Residential Inclining Block Rate Re-Pricing
- BC Hydro’s 2015 Rate Design (and Cost of Service) Application
- BC Transmission Corporation – Open Access Transmission Tariff Application -2004
- BCTC’s 2005/06; 2006/07, 2008/10 and 2010/2011 Revenue Requirement Applications
- BCTC’s – 2005 Vancouver Island Transmission Reinforcement Project

- BCTC's – 2007 Interior-Lower Mainland Transmission Application
- BCTC's 2009-2018 Capital Plan
- BCTC's 2011 Capital Plan Update
- Fortis BC's 2005 Revenue Requirement and System Development Application
- Fortis BC's 2006; 2007, 2008, 2009, 2010, 2011, 2012 and 2013 Revenue Requirement Applications
- Fortis BC's 2007/08 and 2009/10 Capital Plan and System Development Plans
- FortisBC's 2007 Rate Design Application
- Fortis BC's 2009 Cost Allocation and Rate Design Application
- Fortis BC's 2011 Residential Inclining Block Rate Application
- Fortis BC's 2011 Capital Plan
- FortisBC's 2012 Integrated System Plan Review
- BC Hydro/Fortis BC 2013 Purchase Power Agreement
- FortisBC's 2014-2018 PBR Plan and Annual Reviews
- FortisBC's 2015, 2016, 2017, 2018 and 2019 Revenue Requirement Applications
- FortisBC's 2016 Long Term Energy Resource Plan Application
- FortisBC's 2017 Cost of Service and Rate Design Application
- BCUC - 2012 Generic Cost of Capital Review
- BCUC – Residential Inclining Block Rate Report to Government (2017)
- BCUC – Regulation of Electric Vehicle Charging Services (2018)

- Electricity (Quebec)

- Hydro Québec - Distribution's 2002-2011 Supply Plan*
- Hydro Quebec - Distribution's 2002-2003 Cost of Service and Cost Allocation Methodology*
- Hydro Québec - Distribution's 2004-2005 Tariff Application*
- Hydro Québec - Distribution's 2005/2006 Tariff Application*
- Hydro Québec - Distribution's 2005-2014 Supply Plan*
- Hydro Québec - Distribution's 2006/2007 Tariff Application*
- Hydro Québec - Transmission's 2005 Tariff Application*
- Hydro Québec - Distribution's 2006 Interruptible Tariff Application
- Hydro Québec - Distribution's 2006 Cost Allocation Work Group
- Hydro-Québec - Transmission's 2007 Tariff Application
- Hydro-Québec - Distribution's 2007/08 Tariff Application*
- Hydro-Québec - Transmission's 2008 Tariff Application
- Hydro-Québec - Distribution's 2008/09 Tariff Application*
- Hydro Québec - Distribution's 2008-2017 Supply Plan
- Hydro-Québec - Transmission's 2009 Tariff Application
- Hydro-Québec - Distribution's 2009/10 Tariff Application*
- Hydro Québec - Distribution's 2014-2023 Supply Plan

- Electricity (Manitoba)

- Manitoba Hydro's Status Update Re: Acquisition of Centra Gas Manitoba Inc.*
- Manitoba Hydro's Diesel 2003/04 Rate Application

- Manitoba Hydro's 2004/05 and 2005/06 Rate Application*
- Manitoba Hydro/NCN NFAAT Submission re: Wuskwatim*
- Manitoba Hydro's 2005 Cost of Service Methodology Submission*
- Manitoba Hydro's 2007 Rate Adjustment Application
- Manitoba Hydro's 2008 General Rate Application*
- Manitoba Hydro's 2008 Energy Intensive Industry Rate Application
- Manitoba Hydro's 2009 Rate Adjustment Application
- Manitoba Hydro's 2010-2012 General Rate Application
- Manitoba Hydro's 2010 and 2011 Diesel Community Rate Applications
- Manitoba Hydro's 2013-2014 General Rate Application
- Manitoba Hydro's 2013 NFAAT Submission re: Keeyask and Conawapa*
- Manitoba Hydro's 2015-2016 General Rate Application
- Manitoba Hydro's 2016 Interim Rate Application
- Manitoba Hydro's 2015 Cost of Service Methodology Review*
- Manitoba Hydro's 2017/18 & 2018/19 GRA*
- Manitoba Hydro's 2016 NEB Application re: MMTP

- Electricity (Saskatchewan)

- Saskatchewan Power's 2008 Cost Allocation Methodology Review

- Natural Gas Distribution

- Enbridge Consumers Gas 2001 Rates
- BC Centra Gas Rate Design and Proposed 2003-2005 Revenue Requirement
- Terasen Gas (Vancouver Island) LNG Storage Project (2004)
- BCUC – 2012 Generic Cost of Capital Proceeding

- Telecommunications Sector

- Access to In-Building Wire (CRTC)
- Extended Area Service (CRTC)
- Regulatory Framework for Small Telecoms (CRTC)

- Other

- Acted as Case Manager in the preparation of Hydro One Networks' 2001-2003 Distribution Rate Application
- Supported the implementation of OPG's Transition Rate Option program prior to Open Access in Ontario
- Prepared Client Studies on various issues including:
 - The implications of the 2000/2001 natural gas price changes on natural gas use forecasting methodologies.
 - The separation of electricity transmission and distribution businesses in Ontario.
 - The business requirements for Ontario transmission owners/operators.
 - Various issues associated with electricity supply/distribution in remote First Nations' communities
- Member of the OEB's 2004 Regulated Price Plan Working Group

- Member of the OEB's 2005/06 Cost Allocation Technical Advisory Team
- Member of the OEB's 2008 3rd Generation Incentive Regulation Working Group
- Member of the IESO Technical Panel (April 2004 to April 2010)
- Member of the OEB's 2011 Cost Allocation Working Group
- Member of the OEB's 2012 Network Investment Planning Work Group
- Member of the OEB's 2012 Defining and Measuring Performance (4th Generation Incentive Regulation) Work Group
- Member of the OEB's Unmetered Load Cost Allocation Working Group (2012-2015)
- Member of the OEB's 2013 Standby Rate Working Group
- Member of the OEB's 2016 Pole Access Charge Working Group

Hydro One Networks

Manager - Regulatory Integration, Regulatory and Stakeholder Affairs (April 1999 to June 2000)

- Supervised professional and administrative staff with responsibility for:
 - providing regulatory research and advice in support of regulatory applications and business initiatives;
 - ensuring regulatory requirements and strategies are integrated into business planning and other Corporate processes;
 - providing case management services in support of specific regulatory applications.
- Acting Manager, Distribution Regulation since September 1999 with responsibility for:
 - coordinating the preparation of applications for OEB approval of changes to existing rate orders; sales of assets and the acquisition of other distribution utilities;
 - providing input to the Ontario Energy Board's emerging proposals with respect to the licences, codes and rate setting practices setting the regulatory framework for Ontario's electricity distribution utilities;
 - acting as liaison with Board staff on regulatory issues and provide regulatory input on business decisions affecting Hydro One Networks' distribution business.
- Supported the preparation and review before the OEB of Hydro One Networks' Application for 1999-2000 transmission and distribution rates.

Ontario Hydro

Team Leader, Public Hearings, Executive Services (Apr. 1995 to Apr. 1999)

- Supervised professional and admin staff responsible for managing Ontario Hydro's participation in specific public hearings and review processes.
- Directly involved in the coordination of Ontario Hydro's rate submissions to the Ontario Energy Board in 1995 and 1996, as well as Ontario Hydro's input to the Macdonald Committee on Electric Industry Restructuring and the Corporation's appearance before Committees of the Ontario Legislature dealing with Industry Restructuring and Nuclear Performance.

Manager – Rates, Energy Services and Environment (June 1993 to Apr. 95)

Manager – Rate Structures Department, Programs and Support Division (February 1989 to June 1993)

- Supervised a professional staff with responsibility for:
 - Developing Corporate rate setting policies;
 - Designing rates structures for application by retail customers of Ontario Hydro and the municipal utilities;
 - Developing rates for distributors and for the sale of power to Hydro's direct industrial customers and supporting their review before the Ontario Energy Board;
 - Maintaining a policy framework for the execution of Hydro's regulation of municipal electric utilities;

- Reviewing and recommending for approval, as appropriate, municipal electric utility submissions regarding rates and other financial matters;
- Collecting and reporting on the annual financial and operating results of municipal electric utilities.
- Responsible for the development and implementation of Surplus Power, Real Time Pricing, and Back Up Power pricing options for large industrial customers.
- Appeared as an expert witness on rates before the Ontario Energy Board and other regulatory tribunals.

**Section Head – Rate Structures, Rates Department
November 1987 to February 1989**

- With a professional staff of eight responsibilities included:
 - Developing rate setting policies and designing rate structures for application to retail customers of municipal electric utilities and Ontario Hydro;
 - Designing rates for municipal utilities and direct industrial customers and supporting their review before the Ontario Energy Board.
- Participated in the implementation of time of use rates, including the development of retail rate setting guidelines for utilities; training sessions for Hydro staff and customers presentations.
- Testified before the OEB on rate-related matters.

**Superintendent – Rate Economics, Rates and Strategic Conservation Department
February 1986 to November 1987**

- Supervised a Section of professional staff with responsibility for:
 - Developing rate concepts for application to Ontario Hydro’s customers, including incentive and time of use rates;
 - Maintaining the Branch’s Net Revenue analysis capability then used for screening marketing initiatives;
 - Providing support and guidance in the application of Hydro’s existing rate structures and supporting Hydro’s annual rate hearing.

**Power Costing/Senior Power Costing Analyst, Financial Policy Department
April 1980 to February 1986**

- Duties included:
 - Conducting studies on various cost allocation issues and preparing recommendations on revisions to cost of power policies and procedures;
 - Providing advice and guidance to Ontario Hydro personnel and external groups on the interpretation and application of cost of power policies;
 - Preparing reports for senior management and presentation to the Ontario Energy Board.
- Participated in the development of a new costing and pricing system for Ontario Hydro. Main area of work included policies for the time differentiation of rates.

Ontario Ministry of Energy
Economist, Strategic Planning and Analysis Group
April 1975 to April 1980

- Participated in the development of energy demand forecasting models for the province of Ontario, particularly industrial energy demand and Ontario Hydro's demand for primary fuels.
- Assisted in the preparation of Ministry publications and presentations on Ontario's energy supply/demand outlook.
- Acted as an economic and financial advisor in support of Ministry programs, particularly those concerning Ontario Hydro.

EDUCATION

Master of Applied Science – Management Science

- University of Waterloo, 1975
- Major in Applied Economics with a minor in Operations Research
- Ontario Graduate Scholarship, 1974

Honours Bachelor of Science

- University of Toronto, 1973
- Major in Mathematics and Economics
- Alumni Scholarship in Economics, 1972