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**EM/COALITION I-1**

**Reference:**

Evidence of Jim Grevatt, recommendations pages 3 and 4.

**Preamble:**

General recommendations

**Question:**

In your opinion, what flexibility should be afforded to Efficiency Manitoba for it to make adjustments to program offerings within an approved efficiency plan in order to:

- a) Capture market opportunities;
- b) Address emerging technology opportunities;
- c) Address shortfalls in past year results?

**Response:**

- a) Mr. Grevatt's program implementation experience has led him to conclude that a certain amount of flexibility can lead to better outcomes in situations where some programs are underperforming while others are exceeding projections. Flexibility to shift funding from one program to another, or to increase or decrease incentive amounts, or modify marketing and outreach strategies are often time-sensitive decisions. Requiring regulatory approvals, as is the case in some jurisdictions, can unreasonably hamper a program administrators' ability to react to changing market conditions, and may result in missed opportunities. However, allowing a program administrator to exercise such flexibility should be guided, either by boundaries on the size or types of changes that can be made without consulting the Board and other parties, or by a set of performance indicators by which the program administrator's performance will be measured. The risk of not having either boundaries and limits or performance indicators could put the administrator in a position where it could make decisions that would conflict with desired

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outcomes. For example, if the administrator was behind in meeting savings targets, it might choose to ignore potentially more expensive savings for residential customers in favor of, say, increased industrial load displacement. Having the flexibility to make such a change at the sector level would not, in Mr. Grevatt's view, lead to the sort of balanced opportunities that he believes represent good policy. However, having the flexibility to shift funding from a commercial lighting budget to commercial refrigeration, should market changes indicate that the savings opportunity in refrigeration exceeded initial projections, could make sense.

- b) Given the three-year planning cycle, Mr. Grevatt believes that it is not likely that emerging technologies that were unknown at the outset of a planning cycle will emerge within the three-year implementation period with such vigor that they must be addressed mid-cycle. However, if such a case did occur, Mr. Grevatt would hope that Efficiency Manitoba would bring the matter to the Board, and that a procedural mechanism would exist that would allow the opportunity to be pursued.
- c) Mr. Grevatt interprets the question to refer to the flexibility to shift unspent budgets from the first or second year of an approved three-year plan to the second or third year of the plan. If that interpretation is correct, Mr. Grevatt's view is that Efficiency Manitoba should have this flexibility. Mr. Grevatt recommends that the Board approve an overall three-year plan, including three-year budgets and savings targets, rather than three, one-year budgets within a three-year plan (though he also believes that, for planning purposes, anticipated one-year budgets and savings projections should be included in the plan). Such an approval would give Efficiency Manitoba the flexibility to carry funds forward within the three-year program cycle without requiring additional regulatory approval.

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**EM/COALITION I-2**

**Reference:**

Evidence of Jim Grevatt, pages 3 and 4.

**Preamble:**

Mr. Grevatt provides his recommendations to the Public Utilities Board on pages 3 and 4, where he states:

"1. Efficiency Manitoba should develop and file with the Board a well-documented project management plan for launching and implementing its 2020/23 programs. The of project management plan should demonstrate that Efficiency Manitoba has identified critical milestones and has clearly established processes for achieving them. *The project management plan should identify significant risks to the successful launch and implementation of programs and achievement of participation and savings targets and should document potential risk mitigation strategies.*" (emphasis added)

**Question:**

- a) To Mr. Grevatt's knowledge, does Efficiency Vermont provide a project management plan, including a risk management strategy, in its regulatory filings? Please provide a copy.
- b) To Mr. Grevatt's knowledge, does Vermont Gas Systems provide a project management plan, including a risk management strategy, in its regulatory filings? Please provide a copy.
- c) To Mr. Grevatt's knowledge, does Efficiency Maine Trust provide a project management plan, including a risk management strategy, in its regulatory filings? Please provide a copy.
- d) Please identify, in the MASS Save plan filed by Mr. Grevatt, where the project management plan, including risk management strategy, is located.

**Response:**

As a general response to the question on each of the portfolios identified in the questions above, Mr. Grevatt points out that the referenced portfolios differ greatly from Efficiency Manitoba because none of them are "start-up" operations. Indeed

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Massachusetts and Vermont have been among the highest ranked states in the American Council for an Energy Efficient Economy's ("ACEEE") State Energy Efficiency Scorecard for many years. The reliability of the referenced portfolios in meeting their targets year over year suggests that such a filing requirement for project management plans, if it was relevant in the past, is no longer so, because these providers have proven over and over again that they reliably achieve their targets.

It is hard to conceive how Efficiency Manitoba, as a start-up operation with ambitious goals, would be able to succeed without effective project management plans, regardless of whether such plans are required to be filed with the PUB or not. If Efficiency Manitoba has, as Mr. Grevatt hopes, developed such plans it does not seem burdensome for the PUB to require the opportunity to review them. If Efficiency Manitoba has not developed such plans, in Mr. Grevatt's view the risk that it will fail to meet its targets is high indeed. Thus Mr. Grevatt recommends that the start-up Efficiency Manitoba be required to file its project management plans.

- a) To Mr. Grevatt's knowledge Efficiency Vermont does not provide a project management plan, including a risk management strategy, in its regulatory filings. However, when Mr. Grevatt was on the management team at Efficiency Vermont, project plans, with clearly identified milestones, task dependencies, accountability, and risk mitigation strategies were the status quo for internal teams that were responsible for the launch of new programs.
- b) To Mr. Grevatt's knowledge Vermont Gas does not provide a project management plan, including a risk management strategy, in its regulatory filings. Mr. Grevatt left the employ of Vermont Gas in 2005 and has not had occasion to review its regulatory filings in the ensuing years, however even fifteen years ago, under Mr. Grevatt's leadership, Vermont Gas was identified by ACEEE as a provider of exemplary natural gas efficiency programs, and as such gave regulators no cause to require such filings.
- c) Mr. Grevatt does not address Efficiency Maine in his evidence and has had no occasion to review its regulatory filings. Mr. Grevatt does not have knowledge of regulatory filing requirements regarding the Efficiency Maine Trust.

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- d) Mr. Grevatt cited the Massachusetts Technical Reference Manual in his evidence and filed an excerpt including the table of contents to illustrate the detailed measure information that is available to support planning for Massachusetts' energy efficiency planning. Mr. Grevatt did not file a MASS Save plan or other Massachusetts documents. Mr. Grevatt does not have knowledge of whether the Massachusetts utilities provide a project management plan, including a risk management strategy, in regulatory filings, however Mr. Grevatt again points out that as the highest-ranking state in the ACEEE scorecard for many years, regulators may feel they can comfortably rely on other evidence in concluding that Massachusetts' utilities will achieve their savings targets.

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**EM/COALITION I-3**

**Reference:**

Evidence of Jim Grevatt, pages 3 and 4, and Manitoba Minister of Crown Services Framework Letter to Efficiency Manitoba - 4th directive, referenced in Efficiency Manitoba's Plan Submission, Section 2, page 7:

"Find ways to obtain the same or better outcomes as formerly obtained under the "Power Smart" program, but at significantly smaller percentage of the cost and materially less labour costs."

**Preamble:**

Mr. Grevatt provides his recommendations to the Public Utilities Board on pages 3 and 4, where he states:

"3. Efficiency Manitoba should *increase its proposed residential and income-eligible program budgets*, participation, and savings to better meet the needs of Manitoba's households, consistent with the evidence of Mr. Neme."  
(*emphasis added*)

**Question:**

- a) By how much does Mr. Grevatt suggest that Efficiency Manitoba should increase its proposed budget?
- b) Given the Government of Manitoba's direction to Efficiency Manitoba on delivering energy efficiency programs "at a significantly smaller percentage of the cost and materially less labour costs", which of Efficiency Manitoba's other programs or incented measures does Mr. Grevatt suggest be lowered or eliminated? Please provide the rationale.

**Response:**

- a) Mr. Grevatt did not make a specific recommendation in his evidence because, as he stated, "the Plan and Interrogatory Request Responses ("IRR") did not provide all the information that is required to make more specific

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recommendations.”<sup>1</sup> However, Mr. Grevatt believes that the increase must be significant. As indicated in his evidence, residential customers have few opportunities to participate in energy efficiency programs because Efficiency Manitoba proposes to achieve the vast majority of both electric and gas residential sector savings from codes and standards, which only save energy for customers who are buying a new home or purchasing new equipment that is covered by such codes and standards. Program opportunities for customers who are not making purchases where minimum efficiency is dictated by codes and standards are limited in the Efficiency Manitoba plan.

- b) The referenced Manitoba Minister of Crown Services Framework Letter to Efficiency Manitoba indicates that it is a “priorit[y]” to “[f]ind ways to obtain the same or better outcomes as formerly obtained under the “Power Smart” program, but at a significantly smaller percentage of the cost and materially less labour costs.” Mr. Grevatt interprets this to mean that in planning to achieve its statutory requirements and to fulfill its mandate to provide savings opportunities for all classes of customers,<sup>2</sup> Efficiency Manitoba should strive to be as efficient as possible. Further, the cited statement does not indicate whether the priority is to reduce absolute costs, or to reduce costs relative to the benefits that Efficiency Manitoba provides—in other words, to reduce the levelized cost of saved energy in comparison with the levelized cost achieved by Manitoba Hydro. With this interpretation, Mr. Grevatt would not suggest that “other programs of incented measures...be lowered or eliminated.”

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1 Testimony of James (Jim) Grevatt, Energy Futures Group, Inc. For Consumers’ Association of Canada (Manitoba) And Winnipeg Harvest, p.4.

2 See, e.g., Efficiency Manitoba Act 11(4)(c) “In reviewing an efficiency plan and making recommendations to the minister, the PUB must consider [...] (c) whether Efficiency Manitoba is reasonably achieving the aim of providing initiatives that are accessible to all Manitobans.”

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**EM/COALITION I-4**

**Reference:**

Evidence of Jim Grevatt, pages 3 and 4.

**Preamble:**

Mr. Grevatt provides his recommendations to the Public Utilities Board on pages 3 and 4, where he states:

"4. Efficiency Manitoba should provided significantly more detail in future filings to better serve the needs of the Board and stakeholders. Future Plan filings should include at the program level: assumed *measure* quantities, *measure* cost and savings assumptions, and *measure* incentive levels."  
(*emphasis added*)

**Question:**

Does Mr. Grevatt believe that EM should be screening its energy efficiency efforts at the measure level, as opposed to the portfolio level? Why or why not?

**Response:**

Mr. Grevatt believes that it is critical in planning to understand the extent to which energy efficiency measures are cost-effective and recommends that cost-effectiveness testing is conducted at the measure level in the program planning process. This is consistent with the approach that is generally used in potential studies, in which "economic potential" is developed based on a full accounting of the technically available measures that are also cost-effective according to whichever test is being applied. However, there are caveats to this recommendation, and Mr. Grevatt does not propose that only cost-effective measures should be promoted by Efficiency Manitoba:

- The costs and benefits that are included in the cost-effectiveness tests that are used must be comprehensive. For example, it is often the case when jurisdictions use the TRC test to determine cost-effectiveness that all the costs are included, but that many of the benefits, including some energy-related and non-energy benefits, are not. As stated in the National Standard Practice Manual for Energy Efficiency, "[i]t is important that both the costs and

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the benefits be included in a symmetrical way. Otherwise, the test may be skewed and provide misleading results.”<sup>3</sup>

- Measure level cost-effectiveness testing should not be the only determinant of whether to include measures in programs. For example, if emerging technologies are expected to become cost-effective with market maturation, it may be appropriate for programs to promote such measures to advance the development of the market, thus potentially contributing to future cost reductions, even though they may not be cost-effective in the near term. Similarly, including certain measures that are not themselves cost-effective in measure bundles, as Efficiency Manitoba proposes to do, can be appropriate when doing so leads to an overall better result.

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<sup>3</sup> National Standard Practice Manual for Assessing Cost-Effectiveness of Energy Efficiency Resources, p. 12. [https://nationalefficiencyscreening.org/wp-content/uploads/2017/05/NSPM\\_May-2017\\_final.pdf](https://nationalefficiencyscreening.org/wp-content/uploads/2017/05/NSPM_May-2017_final.pdf)

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**EM/COALITION I-5**

**Reference:**

Evidence of Chris Neme, Part VII. Conclusions and Recommendations, page 19

**Preamble:**

Mr. Neme provides his recommendations to the Public Utilities Board on page 19, where he states:

“2. Direct Efficiency Manitoba to increase its emphasis on heat pumps as an electric efficiency measure promoted through its Home Renovations program. *That should include increased financial incentives.*” (*emphasis added*)

**Question:**

a) Has Mr. Neme assessed the cost-effectiveness of cold climate heat pumps in Manitoba? If so, please provide a copy.:

b) Has Mr. Neme conducted an assessment of the appropriate incentive amount for heat pumps in Manitoba? If in the affirmative, please provide:

- i. A copy of your assessment;
- ii. your recommendation as to the increase sought;
- iii. the Benefit/Cost ratio (PAC test) and unit cost at current incentive levels;
- iv. the Benefit/Cost ratio (PAC test) and unit cost at Mr. Neme’s recommended incentive levels; and
- v. an estimate of the increased budget that Mr. Neme’s recommendation would entail, accounting for both increased per-unit incentive and increased participation.

**Response:**

See my responses to PUB-5 and MIPUG-1.

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**EM/COALITION I-6**

**Reference:**

Evidence of Chris Neme, Part VII. Conclusions and Recommendations, page 19

**Preamble:**

Mr. Neme provides his recommendations to the Public Utilities Board on page 19, where he states:

“3. Direct Efficiency Manitoba to offer heat pumps as an electric efficiency measure for electrically heated low-income customers eligible to participate in its Income Qualified program. *Such measures should be offered at no cost* to the participating low-income customers. Furthermore, efforts should be made to ensure that such measures are installed in both single family and multi-unit residential buildings.” (*emphasis added*)

**Question:**

a) From a program design perspective, should Efficiency Manitoba:

Pay only the cost of the heat pump, or its installation by a qualified contractor as well?

i. If installation, what additional cost, on top of the unit cost itself, do you foresee?

ii. If not, what risks do you foresee for low-income customers?

b) Offer income-qualified customers a free annual service inspection, to address maintenance issues (refrigerant leakage, etc.) on top of the unit itself?

i. If so, what additional cost do you foresee?

ii. If not, what risks do you foresee for low-income customers?

c) Based on his experience, can Mr. Neme provide an estimate, even approximate, of the anticipated cost to Efficiency Manitoba (budgetary) and savings (annual or discounted lifetime) from his recommendation?

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**Response:**

- a) In my experience, low income efficiency programs across the continent typically pay the full installed cost of major efficiency measures. As noted in my response to MIPUG-1, based on both my personal experience with equipment installed in my own home as well as data I have seen from other jurisdictions, I would expect the installed costs of a cold climate, single head ductless mini-split heat pump to be \$5000 (CDN) or less, at least once a program to promote them begins to gain traction in the market. In some applications – e.g. where they could be installed in volume, such as in multi-unit residential buildings – the installed costs per unit could be lower.
- b) I would not necessarily recommend paying for a free annual inspection service. The substantial electric bill savings should allow customers to cover any maintenance costs. Again, based in part on my own experience, I would not expect maintenance costs to be very substantial. That said, I would recommend that as part of the roll-out of a substantial effort to promote heat pumps that EM assess over the next couple of years the extent to which maintenance issues may arise.
- c) I have not developed such estimates. That said, EM has estimated that its low income program will serve about 500 electrically heated homes per year.<sup>4</sup> If it retrofitted one single head cold climate ductless heat pump into each of those homes,<sup>5</sup> the cost would be on the order of \$2.5 million per year.

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4 EM response to Coalition I-102.

5 For a variety of reasons – e.g., some homes may already have heat pumps, some customers may not want one, and/or there may be technical or other constraints – it may not make sense to retrofit a heat pump into every low income home. On the other hand, it may make sense to install more than one ductless mini-split – or a centrally ducted cold climate heat pump – in some homes. Thus, this estimate is truly just a rough ballpark of potential budgetary implications.

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**EM/COALITION I-7**

**Reference:**

Evidence of Chris Neme, page 19, recommendations 2, 3 and 4; and Manitoba Minister of Crown Services Framework Letter to Efficiency Manitoba - 4th directive, referenced in Efficiency Manitoba's Plan Submission, Section 2, page 7:

"Find ways to obtain the same or better outcomes as formerly obtained under the "Power Smart" program, but at significantly smaller percentage of the cost and materially less labour costs."

**Preamble:**

General recommendations.

**Question:**

- a) Does Mr. Neme believe that Efficiency Manitoba should be bound by this directive?
- b) In the affirmative, please explain which other measures should be eliminated or reduced (e.g. through lower incentives or marketing efforts) in order to offset the higher budget cost of Mr. Neme's recommendations.
- c) In the negative, please explain why not.

**Response:**

- a) EM should consider all direction from the Act, the regulations adopted by the Board and Ministerial directives in developing its plans.
- b) It is not clear why EM investment in other measures should be eliminated or reduced in order to offset the higher budget cost of my recommendations. EM states in its plan that its average annual spending over the three-year period from 2020/21 through 2022/23 is \$69.9 million. However, that is the average expressed in nominal dollars. As shown in the table below, using EM's estimated inflation rate of 1.92%,<sup>6</sup> I estimate the average to be \$67.2 million in real (i.e., inflation adjusted) 2019 dollars. EM also reports in its plan that Manitoba Hydro spent \$76.4 million in 2015/16.<sup>7</sup> When I adjust that value for inflation (i.e. by

<sup>6</sup> EM Plan, Appendix A, Section A2, p. 28.

<sup>7</sup> EM plan, Section 1, p. 23.

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7.32% based on the Bank of Canada's inflation calculator),<sup>8</sup> it becomes \$82.0 million in 2019 dollars. Thus, when expressed in the same current (2019) dollars, EM's planned average annual budget is almost \$15 million lower than Manitoba Hydro's. Thus, there is a lot of "headroom" for adding spending on heat pumps while staying below Manitoba Hydro's spending levels – and while acquiring substantially greater savings. Obviously, if EM were to reduce spending on other measures, just to keep its planned savings levels as in its filed plan (rather than to keep its budget unchanged from its filed plan), there would be even greater headroom for spending on heat pumps.

	type of dollars	2015/ 16	2020/ 21	2021/ 22	2022/ 23	3-Year Average
<b>Manitoba Hydro</b>						
Total	Nominal	\$76.4				
Total	Real 2019	\$82.0				
<b>EM Plan</b>						
Total	Nominal		\$63.2	\$72.4	\$74.0	\$69.9
Total	Real 2019		\$62.0	\$69.7	\$69.9	\$67.2
<b>Difference between MH and EM</b>						
Total	Real 2019		\$20.0	\$12.3	\$12.1	\$14.8

c) Not applicable.

<sup>8</sup> <https://www.bankofcanada.ca/rates/related/inflation-calculator/>

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**EM/COALITION I-8**

**Reference:**

Evidence of Chris Neme, Part VII. Conclusions and Recommendations, page 19

**Preamble:**

Mr. Neme provides his recommendations to the Public Utilities Board on page 19, where he states:

*“5. Direct Efficiency Manitoba to change the way it counts impacts of electrification measures to one that is conceptually similar to what is currently done in Illinois and Vermont. Specifically, impacts on gas (or other fossil fuel) consumption should not be counted towards gas savings goals and electric savings should be computed as the difference between a standard electric efficiency technology (e.g., electric resistance heat) and the more efficient electric technology promoted by Efficiency Manitoba’s programs (e.g., a high performance heat pump).” (emphasis added)*

**Question:**

Please confirm whether and to what extent this recommendation aligns with Mr. Dunsky's recommendations.

**Response:**

I am unaware of a recommendation from Dunsky regarding how to count savings from electrification measures. The Dunsky memo that I reference in my testimony was focused on how to allocate costs (not savings) of such measures. That said, my proposal for allocation of fuel-switching savings would appear to align with one of the two cost allocation methods recommended by Dunsky – i.e., the “savings breakdown” method.

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**EM/COALITION I-9**

**Reference:**

Evidence of Patricia Fitzpatrick, pages 4-5.

**Preamble:**

On pages 4 and 5 of her evidence, Dr. Fitzpatrick states:

"Importantly, a well-designed process must ensure that the public has a chance to be heard - so it is important to solicit input on multiple occasions, using a variety of techniques which reflect the different economic , social, demographic and cultural backgrounds of the constituency."

**Question:**

- a) What public engagement techniques provide the appropriate environment to solicit input from low-income and hard to reach customers?
- b) What challenges exist in engaging the public with regards to the technical aspects of an energy conservation plan? In your opinion, what strategies, tools and techniques are necessary to achieve the appropriate results for such a public engagement?
- c) What are the appropriate time lines for designing and implementing an effective public consultation process?
- d) What is an appropriate budget for an organization like Efficiency Manitoba to undertake a well-designed public engagement in the manner described in your evidence?
- e) From your experience, please identify other companies or organizations in Manitoba that have demonstrated the practices you have recommended in your evidence?

**Response:**

- a) What public engagement techniques provide the appropriate environment to solicit input from low-income and hard to reach customers?

It is important to plan out public input strategies from the outset. Setting out a clear purpose for the initiative is essential as it will inform all aspects of the

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program, including types of participants, technique(s) for soliciting information, approach to data analysis, and mechanism(s) for reporting findings. For example, the design of an involvement strategy to seek input into the design of efficiency programs would likely differ from that used to evaluate and modify a program.

Seeking guidance from organizations that interact with or represent target constituencies is important. Not only does it provide specific insight into the most appropriate methods to reach a group, this can also build relationships in the community. To this end, it is important to follow-up on information provided.

Another mechanism with increasing uptake is establishing specific community liaison positions. Appointing a member of the community you wish to reach can strengthen the engagement process.

- b) What challenges exist in engaging the public with regards to the technical aspects of an energy conservation plan? In your opinion, what strategies, tools and techniques are necessary to achieve the appropriate results for such a public engagement?

It sounds from this question that, in addition to a public involvement program focusing on a range of program delivery options, Efficiency Manitoba may be interested in developing an Outreach and Education Program. While all input techniques provide for some degree of learning<sup>9</sup>, increased collaborative decision-making necessarily requires more technical (and communicative) learning outcomes. An effective collaborative process requires a variety of components, including access to information, adequate time and resources to understand material, opportunity to engage in active deliberation, among others.

In other instances, an Outreach and Education program could be built around the communications strategy. In doing so, this program would focus on increasing knowledge of, and enthusiasm for energy conservation, identify existing (and future) mechanisms to participate, etc.

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<sup>9</sup> E.g., Fitzpatrick, P., & Sinclair, A. J. (2003). Learning through public involvement in environmental assessment hearings. *Journal of Environmental Management*, 67(2), 161-174.

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- c) What are the appropriate time lines for designing and implementing an effective public consultation process?

Drawing from a variety of experience and best-practice guidance (not limited to environmental assessment), the Multi-Interest Advisory Committee on Environmental Assessment identified several principles of a meaningful participation program. This includes <sup>10</sup>:

- Participation begins early in the decision process, is meaningful, and builds public confidence;
- Public input can influence or change the outcome/project being considered;
- Opportunities for public comment are open to all interested parties, are varied, flexible, include openings for face to face discussions and involve the public in the actual design of an appropriate participation program;
- Adequate and appropriate notice is provided;
- Ready access to the information and the decisions at hand is available and in local languages spoken, read and understood in the area; and
- Programs recognize the knowledge and acumen of the public.

*Please note that each bullet is a direct quote, but I have edited the text. Specifically, I selected only the bullets that seems to speak most directly to the question. See the reference for the full list.*

- d) What is an appropriate budget for an organization like Efficiency Manitoba to undertake a well-designed public engagement in the manner described in your evidence?

The budget can be scaled, and should take into account the stage of the engagement process, the specific purpose, and the choice of methods among others.

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<sup>10</sup> <https://blogs.dal.ca/melaw/2018/02/23/meaningful-public-participation-in-the-proposed-canadian-impact-assessment-act-ciaa/>

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- e) From your experience, please identify other companies or organizations in Manitoba that have demonstrated the practices you have recommended in your evidence?

Here are some examples of engagement programs I have knowledge of in the province.

The development of the 2017 University of Winnipeg Campus Sustainability Plan<sup>11</sup> had an extensive engagement strategy<sup>12</sup> including:

- A written survey (2401 respondents)
- Written submission (1)
- Speaking tree (approximately 25 participants)
- Lunch Session (approximately 50 participants)
- Half-day workshop with University leaders (approximately 40 participants)

The City of Winnipeg 2010 Plan<sup>13</sup> designed the SpeakUp Winnipeg<sup>14</sup> process, which included open houses, written submission and an interactive website to engage the public. Speakup Winnipeg (<https://speakupwinnipeg.ca/>) continues to serve as one portal for public input.

In their participation in two hearings before the Canadian Radio-Television and Telecommunications Commission, the Manitoba Coalition<sup>15</sup> conducted extensive consumer engagement in Manitoba on issues relating to telecommunications retail sales practices and wireless (cell phone) services. In both proceedings, the engagement included:

- Quantitative surveys of 1,000 Manitobans;
- Quantitative survey promoted by community organizations to gain insight into the experiences of Manitoba consumers who may face challenges or barriers in the marketplace;
- Qualitative engagement through various consumer engagement sessions, including with newcomers to Canada, consumers with limited income,

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<sup>11</sup>[https://www.uwinnipeg.ca/sustainability/docs/plans/2017\\_07\\_Sustainability\\_InstitutionalStrategy\\_V04.pdf](https://www.uwinnipeg.ca/sustainability/docs/plans/2017_07_Sustainability_InstitutionalStrategy_V04.pdf)

<sup>12</sup>[https://www.uwinnipeg.ca/sustainability/docs/plans/what\\_we\\_learned\\_final.pdf](https://www.uwinnipeg.ca/sustainability/docs/plans/what_we_learned_final.pdf)

<sup>13</sup> <https://www.winnipeg.ca/interhom/CityHall/OurWinnipeg/pdf/OurWinnipeg.pdf>

<sup>14</sup> <https://www.winnipeg.ca/interhom/CityHall/OurWinnipeg/pdf/CallToAction.pdf>

<sup>15</sup> Comprised of CAC Manitoba, Winnipeg Harvest and the Aboriginal Council of Winnipeg.

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consumers with disabilities, Indigenous consumers, students seniors and rural consumers.<sup>16</sup>

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<sup>16</sup>See CRTC 2019-57, Further Comments of the Manitoba Coalition and Attachments, online: <https://services.crtc.gc.ca/pub/ListeInterventionList/Documents.aspx?ID=278739&en=2019-57&dt=fu&lang=e&S=C&PA=t&PT=nc&PST=a>; CRTC 2018-246, Intervention of the Manitoba Coalition and Attachments, online: <https://services.crtc.gc.ca/pub/ListeInterventionList/Documents.aspx?ID=276600&en=2018-246&dt=i&lang=e&S=C&PA=a&PT=nc&PST=a>.

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**Reference:**

Evidence of William Harper, Appendix "A" page 2, "Duties"

**Preamble:**

"The Public Interest Law Centre retained Mr. Harper to assist the Consumers Coalition with its participation in the Public Utilities Board review of the 2020/23 Efficiency Plan on issues relating to: The overall approach taken by Efficiency Manitoba in developing its proposed Efficiency Plan (the "Plan") with focus on the general approach used and *parallels with integrated resource planning*." (emphasis added)

**Question:**

- a) As "integrated resource planning" was not specifically mentioned in the list of "Additional factors to be considered by PUB" (Section 11 of Efficiency Manitoba Regulation 119/2019, as referenced on pages 5 and 6 of Mr. Harper's evidence), please explain a requirement to examine the Plan with regards to the "parallels with integrated resource planning".
- b) Is Mr. Harper aware of jurisdictions that follow integrated resource planning processes that also include mandated resource requirements such as prescribed percentages of renewable energy in the supply mix and/or mandated energy conservation targets? If so, please explain.

**Response:**

- a) Section 11 a) of the Efficiency Manitoba Regulation states that the PUB must consider, when reviewing the efficiency plan, "the appropriateness of the methodologies used by Efficiency Manitoba to select or reject demand-side management initiatives". As outlined in Section 1.0 (pages 1-6) and Section 3.0 (pages 7-8) of Mr. Harper's Evidence, given the history leading up to the creation of Efficiency Manitoba, the PUB's recommendation regarding the future use of integrated resource planning and the strong parallels between Efficiency

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Manitoba's undertaking to develop an Efficiency Plan and Manitoba Hydro's undertaking to develop a Power Resource Plan, a key consideration for the PUB in its review of Efficiency Manitoba's current Plan vis-à-vis Section 11 a) should be the extent to which Efficiency Manitoba's approach to developing its proposed Plan conforms with the principles of integrated resource planning.

- b) Yes, in British Columbia BC Hydro is subject to mandated resource requirements in terms of demand-side management and renewable energy. Section 2 of the province's Clean Energy Act sets out the province's energy objectives wherein:
- Section 2 b) states: "to take demand-side measures and to conserve energy, including the objective of the authority reducing its expected increase in demand for electricity by the year 2020 by at least 66%" (Note: The Definitions section of the Act defines the "authority" as the British Columbia Hydro and Power Authority – i.e., BC Hydro)
  - Section 2 c) states: "to generate at least 93% of the electricity in British Columbia from clean or renewable resources and to build the infrastructure necessary to transmit that electricity".

A copy of the Clean Energy Act can be found at:

[http://www.bclaws.ca/civix/document/id/complete/statreg/10022\\_01#section2](http://www.bclaws.ca/civix/document/id/complete/statreg/10022_01#section2)

BC Hydro followed an integrated resource planning process (IRP) in the development of its 2013 Integrated Resources Plan and the British Columbia Utilities Commission's Resource Planning Guidelines set out a process consistent with integrated resource planning. The Commission's Resource Planning Guidelines can be found at:

[https://www.bcuc.com/Documents/Guidelines/RPGuidelines\\_12-2003.pdf](https://www.bcuc.com/Documents/Guidelines/RPGuidelines_12-2003.pdf)

FortisBC (another BC electric utility) also follows the BCUC's Resource Planning Guidelines in the preparation of its long-term energy plan. While not subject to Section 2 b) of the Clean Energy Act, FortisBC voluntarily adopted the target in its most recent 2016 Long Term Energy Resource Plan.

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**EM/COALITION I-11**

**Reference:**

Evidence of William Harper, Section 3.0 Efficiency Plan Development Process, pages 7 to 9

**Preamble:**

On page 9, Mr. Harper states:

“Identify a Preferred Plan: This typically involves developing multiple resource portfolios (i.e. candidate plans) based on the feasible options; assessing each of the candidate plans based on its attributes and how they align with the objectives and then identifying a preferred plan. This is frequently referred to as multi-criteria or multi-attribute analyses. In the case of Efficiency Manitoba the candidate plans would reflect different combinations of DSM initiatives.”

**Question:**

- a) Given the existence of prescribed savings targets in the case of Efficiency Manitoba, can Mr. Harper provide his perspective on the relative weighting of the objectives that Efficiency Manitoba should consider?

**Response:**

- a) Please see the response to PUB/Coalition 22 b) for Mr. Harper’s views regarding the other evaluation criteria the PUB should consider. In Mr. Harper’s view multi-criteria analysis is not a mathematical exercise where one places numeric weights on the various evaluation criteria and determines, in a formulaic manner, the preferred portfolio. The selection of the preferred portfolio is matter of assessing the merits of each candidate portfolio vis-à-vis the evaluation criteria and, based on judgment, determining which portfolio achieves the most appropriate balance.

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**Reference:**

Evidence of William Harper, Table #9, page 48

**Preamble:**

The percentages for electricity and natural gas appear to be transposed for Total Program Costs and Program Staff Costs.

**Question:**

Please confirm that the percentage data in Table 9 has been transposed between electricity and natural gas.

**Response:**

Confirmed.