

REFERENCE:

Plan Application – Pages 14-15 of 591

PREAMBLE TO IR (IF ANY):

EM states that “the Plan is aligned with the Directions of Government”

QUESTION:

Given that (1) the Mandate Letter from the Premier to the Minister of Crown Services (October 18, 2019) directs the Minister to assist in “Advancing reconciliation with Indigenous Manitobans...”; (2) the Framework Letter from the Minister of Crown Relations to the Chair of the Efficiency Manitoba Board (April 24, 2019) makes clear that “Government is committed to advancing reconciliation with Indigenous Manitobans through the renewal of its consultation framework to ensure respectful and productive consultations. All government organizations are expected to contribute to reconciliation in their interactions with Indigenous communities and individuals”; and (3) the term “reconciliation” does not appear once in the nearly-600-page Plan application, please:

- a) Describe how reconciliation with First Nations influenced the selection of programs and the distribution of funds in the Plan, and how the objective of reconciliation was weighted against other priorities, such as cost-effectiveness?

RATIONALE FOR QUESTION:

AMC would like to clarify the objectives that influence the selection of programs and the allocation of funds in the Plan.

RESPONSE:

- a) The intention for ongoing, collaborative, mutually respectful dialogue is foundational for Efficiency Manitoba and directly aligned with reconciliation as defined in the Path to Reconciliation Act.

As demonstrated through Attachment 3 – Technical tables (Natural Gas Program Cost-Effectiveness Metrics and Electric Program Cost-Effectiveness Metrics), recognizing unique barriers and challenges faced by Indigenous customers, indigenous programs are comparatively, not as cost effective to Efficiency Manitoba relative to programming for other customer segments. Reconciliation and an appreciation for the important role Efficiency Manitoba will play towards energy affordability in Manitoba was thus given important consideration relative to other priorities including cost effectiveness.

The startup work of Efficiency Manitoba has been guided by the mandate and direction set for the organization through the Efficiency Manitoba Act and corresponding Regulation, the Crown Corporations Governance and Accountability Act, along with mandate and framework letters issued by the Premier and Minister responsible respectively. Section 11 c) of the Efficiency Manitoba Regulation indicates, in reviewing Efficiency Manitoba’s plan, the PUB will consider “whether, if it is practical to do so, at least 5% of Efficiency Manitoba’s budget for demand side management initiatives is allocated to initiatives targeting low-income or hard-to-reach customers”. Efficiency Manitoba has put forward a three-year plan that achieves this consideration inclusive of the organizations’ work with Indigenous customers.

Through the creation of the Energy Efficiency Advisory Group (EEAG), Efficiency Manitoba was pleased to work collaboratively with Manitoba Keewatinowi Okimakanak Inc (MKO), the Southern Chiefs Organization (SCO), and the Manitoba Metis Federation (MMF) to ensure First Nation and Metis perspectives were heard and incorporated into the three-year plan. The Assembly of Manitoba Chiefs (AMC) was also invited to participate. Delivery of the plan anticipates ongoing collaboration with the EEAG and other indigenous communities and groups throughout the province in a spirit of reconciliation.

See also MKO/EM I-2a-c which addresses the topic of reconciliation.

REFERENCE:

Plan Application – Pages 14-15, and 182 of 591

PREAMBLE TO IR (IF ANY):

Equity is one of EM's guiding principles but does not appear in the alignment chart on Page 16 of the Plan Application.

QUESTION:

Please provide responses to the following:

- a) How did the principle of equity influence the selection of programs and the distribution of funds in the Plan for First Nations, and how was the principle of equity weighted against other priorities, such as cost-effectiveness?
- b) Please provide the DSM Scorecard and a detailed explanation of how program equity will influence, vis-à-vis other variables, the planning process and future program development and budgetary allocation;

RATIONALE FOR QUESTION:

The information will help AMC develop a clearer picture for the factors that influenced program design and budget allocations.

RESPONSE:

- a) Equity and access, one of Efficiency Manitoba's guiding principles, was a fundamental consideration in development of the three-year plan. This guiding principle for Efficiency Manitoba is aligned with 'accessible' noted on pdf page 16, section 2.3.

The establishment of an Indigenous customer segment which recognizes the unique barriers and challenges faced by Indigenous customers accessing programs links directly to Efficiency Manitoba's commitment to equity and access. The principle of equity and

access weighted against other priorities, such as cost effectiveness is further addressed in AMC-EM I-1.

- b) Please see response to DAY/EM – 2 a) for the DSM Scorecard. Program Equity will be monitored and measured through Efficiency Manitoba’s DSM Scorecard. The details of the Program Equity Metric can be found on page 18 of the DSM Scorecard. Monitoring and measurement will permit opportunities for analysis and future decision making by Efficiency Manitoba relative to program development and budgetary allocation in the context of Efficiency Manitoba’s mandate.

REFERENCE:

Plan Application – Page 18 of 591

PREAMBLE TO IR (IF ANY):

EM states that it “plans to customize marketing, engagement, and delivery efforts based on unique and diverse customer segment needs”;

QUESTION:

Provide answers to the following requests:

- a) What are the customer needs and participation barriers that EM has identified for on-reserve First Nation customers?
- b) What marketing, engagement, and delivery strategies has EM developed to improve participation of on-reserve First Nation customers in their residential and low-income programs (individual and community approaches)?
- c) What are the customer needs and participation barriers that EM has identified for off-reserve First Nation customers?
- d) What marketing, engagement, and delivery strategies has EM developed to improve participation of off-reserve First Nation customers as part of its residential and low-income programs (individual and community approaches)?

RATIONALE FOR QUESTION:

AMC is concerned that participation rates for First Nation customers as part of the residential and low-income programs will be unduly low without proper outreach and communications.

RESPONSE:

- a) Efficiency Manitoba recognizes the importance of lower utility bills and more energy efficient homes for on-reserve First Nation customers. First Nations on-reserve customers may face barriers such as lack of resources (including First Nations individuals to oversee and complete the work, along with availability of capital funds), quality of

housing stock, the ownership of the home, less disposable income to perform upgrades, and multiple competing priorities for resources such as budget dollars and time within the First Nation. Additional needs and barriers may be identified once programs are in market and Efficiency Manitoba will work to address them in collaboration with Indigenous partners and the participating communities.

- b) The marketing materials for programs dedicated to on-reserve First Nation customers are still in the development stage, but Efficiency Manitoba is open to working with AMC and any First Nation or Indigenous organization to coordinate and design culturally appropriate and relevant materials to assist with outreach and communication. For engagement and delivery strategies, see response to PUB/EM I-3c.
- c) Please see response to PUB/EM 1-3b (off reserve) with respect to needs and participation barriers identified for off-reserve First Nation customers.
- d) For marketing, engagement, and delivery strategies developed to improve overall participation of residential and low-income programs, see response to PUB/EM I-7b.

REFERENCE:

Plan Application – Page 18 of 591

PREAMBLE TO IR (IF ANY):

Concerning First Nation cultural awareness and sensitivity.

QUESTION:

Please provide answers to the following:

- a) Will all customer and technical support workers contracted by EM receive mandatory First Nations sensitivity and cultural awareness training?
- b) Will all third-party contractors and their employees receive mandatory First Nations sensitivity and cultural awareness training?
- c) If the answer to a) and b) is no, is EM willing to work with AMC to ensure staff and contractors have received the aforementioned training?

RATIONALE FOR QUESTION:

AMC wants to ensure that all services provided to First Nation customers as part of the Plan are provided in a way that is culturally sensitive and aware;

RESPONSE:

- a) All customer or technical support workers that are directly contracted by Efficiency Manitoba to delivery programs and services to First Nations customers will have mandatory sensitivity and cultural awareness training.
- b) All third-party contractors and their employees that are directly contracted by Efficiency Manitoba to delivery programs and services to First Nations customers will have mandatory sensitivity and cultural awareness training.
- c) Although the answer to a. and b. above are both affirmative, Efficiency Manitoba would be open to hearing feedback from AMC on whether a specific cultural awareness training program should be considered.

REFERENCE:

Plan Application – Page 22 of 591

PREAMBLE TO IR (IF ANY):

EM provides a breakdown of the annual portfolio budget

QUESTION:

Please answer the following:

- a) Please provide a breakdown of the estimated dollars and percentage of the total budget for each category (except Customer Incentives) that are related to First Nation companies, for both on-reserve and off-reserve companies.
- b) If EM does not have this information, is EM willing to work with AMC to develop contracting targets for First Nation businesses?

RATIONALE FOR QUESTION:

AMC would like greater clarity as to the anticipated non-energy benefits of the Plan to First Nations.

RESPONSE:

- a) Efficiency Manitoba does not estimate dollars or percentage of total budget related to First Nation companies either on-reserve or off-reserve. However, Indigenous energy efficiency programs targeted at on-reserve communities allocates labour dollars for community members to complete the energy efficiency work. The labour dollars get paid to the First Nation, which then may be paid to a community member or a First Nation company.
- b) Efficiency Manitoba is willing to work with AMC on a strategy which encourages more First Nation contractors to participate in the delivery of programs.

REFERENCE:

Plan Application – Page 22 of 591

PREAMBLE TO IR (IF ANY):

EM states that labour represents 13.4% of the combined portfolio budget.

QUESTION:

- a) Please provide response to the following:
How many employment positions by tenure (full-time, part-time) and occupation category does EM expect to provide over the three years of the plan?
- b) Does EM have targets for First Nation staff hires and if so, please provide targets for number and percentage of positions and labour-hours by tenure and occupation category?
- c) If EM does not have targets for First Nation hires, will EM work with AMC to develop a First Nation hiring plan?

RATIONALE FOR QUESTION:

AMC wants to ensure that the Plan provides the greatest socio-economic benefit possible to First Nations, who have experienced many of the costs of hydroelectricity development in Manitoba and who experience poorer socio-economic outcomes.

RESPONSE:

- a) Efficiency Manitoba has not yet finalized the organization structure to deliver on the proposed 3-Year Efficiency Plan and therefore does not have specific details on the number of positions by tenure nor by occupation category.
- b) Efficiency Manitoba has not yet established any employment targets for First Nations staff hires.

- c) Efficiency Manitoba welcomes the opportunity to discuss a First Nations hiring plan or strategy with AMC.

REFERENCE:

Plan Application – Page 37 of 591

PREAMBLE TO IR (IF ANY):

EM estimates that 6% of the electric budget and 32% of the natural gas budget will go to hard-to-reach segments.

QUESTION:

Please provide the following:

- a) An explanation and evidence for why only 6% electric budget goes to hard-to-reach segments while 32% of the natural gas budget goes to the same segments;
- b) An explanation for why the Indigenous natural gas program is not made available to off-reserve First Nation customers.

RATIONALE FOR QUESTION:

As First Nations are underrepresented within the natural gas users, AMC would like an explanation and supporting evidence for the distribution of budget.

RESPONSE:

- a) For an explanation regarding the allocation of electric and natural gas budgets for hard-to-reach segments, see the response to PUB/EM I-5.
- b) As mentioned in PUB I-3c, specific First Nation off reserve programming has not been developed. Off-reserve First Nations customers can participate in any available program including the Income Qualified Program which has the same offers as the Metis Income Qualified Program.

REFERENCE:

Plan Application – Pages 100 and 101 of 591

PREAMBLE TO IR (IF ANY):

EM states that over 2,500 contractors, suppliers, vendors, consultants, engineering firms, architectural firms, government departments, and associations were contacted as part of the stakeholder engagement survey, as well as numerous engagements

QUESTION:

Please respond to the following requests:

- a) Of all those who participated in the Stakeholder Engagement Survey, how many (total number and percentage) were either First Nation individuals or representatives of First Nation governments, organizations, or businesses?
- b) How many “engagement activities” did EM conduct as part of its stakeholder engagement?
- c) Provide the number and percentage of engagement activities that were conducted with First Nation governments, organizations, businesses, and individuals, broken down by type of engagement (in-person meetings, phone calls, presentations, and et cetera);
- d) Provide the results of all stakeholder engagement surveys completed by First Nations governments, organizations, businesses and individuals

RATIONALE FOR QUESTION:

AMC is trying to gauge the level of engagement with First Nations.

RESPONSE:

- a) The Stakeholder Engagement Survey was sent to suppliers, vendors, consultants, engineering firms, architectural firms, government departments, and associations who were participating program suppliers. Only those First Nations businesses who had completed a supplier agreement and also allowed for email contact from Manitoba

Hydro, would have received the survey. The recipient list was not categorized by First Nation or Non-First Nation.

- b) Please see response to COALITION/EM I-129, for a list of engagement activities. As specified, this list is not exhaustive of all engagement but identifies many examples. Please also see response to COALITION/EM I-126 for additional details.
- c) Engagement activities such as emails, meetings, and phone conversations are part of the regular work and are not tracked on a daily basis and therefore an exhaustive list cannot be produced. One particular engagement activity to note is the request Efficiency Manitoba to be a part of the Manitoba Indigenous Housing Capacity Enhancement and Mobilization Initiative (MIHCEMI) Working Group. This initiative has representation from all 63 First Nations and the Tribal Councils. Manitoba Hydro, on behalf of Efficiency Manitoba presented at the Manitoba First Nations Housing Forum, June 11 & 12. As this relationship is on-going subsequent engagement has occurred, with preliminary conversations on future projects. Through the Energy Efficiency Advisory Group (EEAG), there was also First Nation representation from Southern Chiefs Organization and Manitoba Keewatinowi Okimakanak. Please see 2020/23 Efficiency Plan, Attachment - Energy Efficiency Advisory Group Reporting, p.448-505 of 591 for meeting minutes and discussions. Please see response to COALITION/EM I-126 for additional details.
- d) The results of the stakeholder engagement survey discussed on page 100 of the Plan survey were anonymous and cannot be attributed to specific respondents.

REFERENCE:

Plan Application – Pages 139-142 of 591

PREAMBLE TO IR (IF ANY):

EM estimates the one-time rate increase and the estimated customer impact of programs for electric and natural gas customers.

QUESTION:

Please provide the following:

- a) The average customer bill impact of the one-time rate increase for First Nation residential and commercial customers, for both on-reserve and off-reserve, as well as First Nation community-owned buildings;
- b) The estimated average energy savings and customer bill impacts for First Nation residential participants in the Indigenous program bundles, both in terms of bill impact amount and percentage change;

RATIONALE FOR QUESTION:

The information will help AMC assess the potential impacts of the proposed Plan on First Nation customers.

RESPONSE:

- a) Manitoba Hydro's customer billing system cannot identify First Nation off reserve customers. The bill impact for an average First Nation on reserve customer using an LRI of 0.019 cents/kWh consuming approximately 30,000 kWh/year would be \$5.70 / year (0.24 %). The bill impact for an average First Nation Commercial on reserve customer consuming approximately 109,500 kWh/year would be \$20.80/year (0.24%).
- b) The Plan, Section 5.5.1 (Table 5.8, p. 142 of 591) provides a table that demonstrates the average electric customer bill savings, including specifically the Indigenous customer segment. This table has been subsequently revised within Coalition/EM I-102.

REFERENCE:

Plan Application – Page 146 of 591

PREAMBLE TO IR (IF ANY):

Table 5.10 provides EM’s acquisition costs.

QUESTION:

Please provide the estimated acquisition costs for programs within the Indigenous segment, as well as explaining how these costs were estimated and providing any underlying research that was used to make these determinations.

RATIONALE FOR QUESTION:

The information will help AMC understand the estimated acquisition costs.

RESPONSE:

As referenced in the Plan submission on PDF page 145: First-year acquisition costs = the total costs of the portfolio divided by total savings achieved in year 1.

The chart below illustrates the acquisition costs for the Indigenous customer segment. The numbers were derived by dividing the budgets of the Indigenous portfolio by total estimated savings to be achieved in the Indigenous segment for that year.

Electric Acquisition Cost = Total Indigenous Electric Budget / Total Indigenous Electric Savings (kWh);

Natural Gas Acquisition Cost = Total Indigenous Natural Gas Budget / Total Indigenous Natural Gas Savings (m³)

Fiscal year	Electric acquisition cost	Natural gas acquisition cost
2020/21	\$0.63/kWh	\$5.84/m ³
2021/22	\$0.61/kWh	\$6.60/m ³
2022/23	\$0.63/kWh	\$7.24/m ³

REFERENCE:

Plan Application – Page 164 of 591

PREAMBLE TO IR (IF ANY):

EM states that residential, income qualified, and Indigenous segments account for 33.9% of energy consumption.

QUESTION:

Please provide the following:

- a) Please break down the 33.9% figure into its residential, income qualified, and Indigenous segments, as well as separating the Indigenous segment between on-reserve First Nation and Metis;
- b) Please provide a breakdown of the number of electric and natural gas accounts, average electricity and natural gas consumption, and average electric and natural gas bill amounts for the residential segment by off-reserve First Nation, Metis, and whole segment;
- c) Please provide a breakdown of the number of electric and natural gas accounts, average electricity and natural gas consumption, and average electric and natural gas bill amounts for the low-income segment by off-reserve First Nation, Metis, and whole segment;

RATIONALE FOR QUESTION:

AMC would like more information on the distribution of these three segments to ensure First Nation customers are adequately supported by the Plan.

RESPONSE:

- a) This breakdown cannot be provided by Efficiency Manitoba. The 33.9% is in reference to aggregate residential electricity sales presented in Manitoba Hydro's 2017/18 Annual Report.

- b) This data is not available. There is no method to identify who an off-reserve First Nation or Metis customer is by energy use data.

- c) This data is not available. There is no method to identify who low-income off-reserve First Nation or Metis customers are by energy use data.

REFERENCE:

Plan Application – Page 212-216 of 591

PREAMBLE TO IR (IF ANY):

EM discusses program delivery approaches and lists key customer and industry associations.

QUESTION:

Please answer the following:

- a) Provide a list of existing and new First Nation businesses that will be relied upon as critical services providers and delivery partners for its electric and natural gas programs;
- b) What obstacles has EM identified to the participation of First Nation businesses as critical service providers and delivery partners?
- c) What strategies has EM developed to increase the participation of First Nation businesses as critical service providers and delivery partners?

RATIONALE FOR QUESTION:

This information will help AMC determine the potential non-energy benefits of the proposed Plan to First Nations.

RESPONSE:

- a) Efficiency Manitoba will rely on Aki Energy, a First Nation business, as an existing critical delivery partner for the Community Geothermal Program. Other specific critical service providers and delivery partners have not yet been determined.
- b) Efficiency Manitoba is currently unaware of any obstacles which may exist for First Nation businesses as critical service providers and delivery partners. Efficiency Manitoba welcomes feedback and input from the AMC to allow opportunities to anticipate and address obstacles AMC may be aware of.

- c) Efficiency Manitoba's procurement policies are under development and as such, a strategy to increase First Nation businesses as critical service providers and delivery partners has yet to be established. Please also see MKO/EM I-10a-b. There remains opportunity for discussion between Efficiency Manitoba and AMC.

REFERENCE:

Plan Application – Page 229 of 591

PREAMBLE TO IR (IF ANY):

This section states that the Plan considers factors beyond quantified electric and natural gas savings, and lists program non-energy benefits.

QUESTION:

Please provide responses to the following:

- a) How did EM determine what non-energy benefits to consider? Please provide the documents consulted to make these determinations.
- b) Has EM quantified any non-energy benefits as part of its program selection and evaluation processes? If so, which ones and explain how benefits were quantified?
- c) Explain why quantitative factors such as distributional equity and reductions in energy poverty, and non-quantitative factors such as energy security for First Nations were not included in the list of non-energy benefits?
- d) Describe how, if at all, non-energy benefits are integrated into the Impact Evaluation and Cost-Effectiveness Analyses?
- e) Will EM commit to working with AMC to discuss a more visible and meaningful integration of non-energy benefits into the selection of programs, the allocation of budgets, and the evaluation of programs?

RATIONALE FOR QUESTION:

AMC seeks greater clarity on the factors considered in the selection of programs, the allocation of budgets, and the evaluation of programs. AMC is concerned that the criteria used biases current and future programs excessively towards the most cost-effective programs at the expense of more expensive options, even when those options can achieve more significant per capita decreases in energy consumption and can have more meaningful impacts for energy poor First Nation customers and reduce inequality.

RESPONSE:

- a) When screening measures and programs, Efficiency Manitoba included those non-energy benefits that were quantifiable.
- b) Currently, reduced greenhouse gas emissions and reduced water consumption are the only non-energy benefits quantified and included in the program selection and evaluation.
- c) Even though these factors would not enter into a PACT test, Efficiency Manitoba welcomes the opportunity to discuss with AMC any current data they may have on how energy efficiency leads to distributional equity and reductions in energy poverty, and non-quantitative factors such as energy security for First Nations.
- d) The value of non-energy benefits is only included as an additional benefit in the Total Resource Cost (TRC) test. As per the Efficiency Manitoba Regulation 119/2019 Section 12 (1) and (2), the cost-effectiveness of Efficiency Manitoba's portfolio will be measured by the Program Administrator Cost Test (PACT) which, by definition, does not include any non-energy benefits.
- e) Yes. Efficiency Manitoba welcomes the opportunity to work with AMC to discuss alternative non-energy benefits for consideration into program design and evaluation.

REFERENCE:

Plan Application – Page 281 of 591

PREAMBLE TO IR (IF ANY):

EM mentioned the 2017 Residential Energy Use Survey (REUS)

QUESTION:

Please provide the full results of the 2017 REUS.

RATIONALE FOR QUESTION:

The data would assist AMC to determine the potential impacts of the Plan to First Nations customers.

RESPONSE:

Please see the response to PUB/EM I-8.

REFERENCE:

Plan Application – Page 329 of 591

PREAMBLE TO IR (IF ANY):

EM writes that “Manitoba’s Indigenous population will have more supplementary positive impacts along with greater participation and overall energy savings.”

QUESTION:

Please provide responses to the following:

- a) Please describe those supplementary positive impacts and identify how these were identified, including citations and provision of source material;
- b) Explain how these supplementary positive impacts were incorporated into the process of program selection, budgetary allocation, and program evaluation?

RATIONALE FOR QUESTION:

The information will assist AMC to understand how programs were selected and budgets allocation for the Plan.

RESPONSE:

The preamble includes a portion of the paragraph from the 2020/23 Efficiency Plan, Section A6, p. 329 of 591 which influences the interpretation of the sentence. The full paragraph is “The objective of offering specific and targeted Indigenous programs is to assist with alleviating barriers to participation that may prevent energy efficiency upgrades or offers from being undertaken. Efficiency Manitoba also recognizes that creating programs and offers in coordination with, and targeted to, Manitoba’s Indigenous population will have more supplementary positive impacts along with greater participation and overall energy savings.”

- a) Efficiency Manitoba's intent is to create positive and open relationships with Indigenous partners. Providing an avenue for consistent engagement and feedback from Indigenous customers, organizations, and governments creates the foundation for positive working relationships where open dialogue is welcome. This engagement which will lay the foundation for positive relationships is a supplementary positive impact outside energy savings, which was identified by Efficiency Manitoba. Another supplementary positive impact, identified by Efficiency Manitoba, is that the feedback from Indigenous partners can assist in making adjustments to programs in real time, which can increase participation and overall energy savings. As the Plan is implemented Efficiency Manitoba will continue its engagement with the Energy Efficiency Advisory Group (EEAG) as well as aim to establish an Indigenous Energy Efficiency Advisory Group, and continue to work with the Manitoba Indigenous Housing Capacity Enhancement Mobilization Initiative Working Group to solicit feedback around program design and delivery.
- b) The supplementary positive impacts were not incorporated into the process at the program selection, budgetary allocation, or program evaluation level. They were incorporated at the overall customer segment level with the establishment of an Indigenous customer segment.

REFERENCE:

Plan Application – Page 330 of 591

PREAMBLE TO IR (IF ANY):

EM will work with First Nations to develop community energy plans, community-led Demand-Side Initiatives (DSM), and education strategies and outputs.

QUESTION:

Please provide the following:

- a) What resources and supports will EM provide to First Nations to develop community energy plans?
- b) What is the budget allocation for the development of community energy plans, both per plan and in total?
- c) How many First Nations does EM estimate will be able to participate in the development of community energy plans over the three years, given the budget allocations and projected costs of plan development?
- d) What is the estimated cost per person and total budget for the Community Energy Advocate positions on First Nation reserves?
- e) Given the budget, how many Community Energy Advocates on First Nation reserves does EM anticipate funding?
- f) What is the estimated cost per reserve and budget allocation for on-reserve education programs?
- g) How many reserves does EM estimate it can collaborate with to develop educational resources?

RATIONALE FOR QUESTION:

AMC would like greater clarity on the funding and coverage of these programs proposed for on-reserve First Nations.

RESPONSE:

- a) As part of an Indigenous Community Energy Efficiency Plan, Efficiency Manitoba will provide First Nations communities with a community energy profile that will provide an overview of historical energy use in the community. Efficiency Manitoba will also offer technical expertise, energy efficiency education resources, and funding towards a Community Energy Advocate. The programs within the Indigenous Program portfolio can be used as the starting point for energy efficiency in the community and assist in reducing energy consumption. Efficiency Manitoba’s technical and program support staff will provide training to the Energy Advocate through sharing of materials and resources. As the Plan is implemented, Efficiency Manitoba will work with First Nations communities to assess if the design and delivery of the program is meeting the communities’ needs.
- b) The total budget allocation for the development and ongoing support for the Indigenous Community Energy Efficiency Plans is \$247,000 for the first three years. The Indigenous Community Energy Efficiency Plan can leverage not only the programs under the Indigenous program portfolio but all Efficiency Manitoba energy efficiency programs. The budgets associated with these other programs are not reflected in the Community Energy Efficiency Plan budget.

	2020/2021	2021/2022	2022/2023
Total Annual Budget	\$63,000	\$92,000	\$92,000
Planned Participation (# of communities)	1	2	2
Budget Per Community	\$63,000	\$46,000	\$46,000
Budgeted Energy Advocate Compensation	\$25,000	\$50,000	\$50,000

*Budgets outlined above include the initial program start-up costs as well as assistance with plan development and ongoing support for participating communities.

- c) Efficiency Manitoba estimates 2-3 communities will participate in the development of a Community Energy Efficiency Plan in the first three years. As this is a new initiative,

these are conservative estimates. In the event interest for the program is larger than anticipated, Efficiency Manitoba may re-evaluate the budget to accommodate additional interest.

- d) Efficiency Manitoba anticipates the commitment to a Community Energy Efficiency Plan will be 2 years. Efficiency Manitoba has budgeted \$25,000 for compensation for each Energy Advocate position per year.
- e) Efficiency Manitoba anticipates funding 2-3 First Nation Community Energy Advocates to participate in the development of Community Energy Efficiency Plans over three years. This is a preliminary budget and it will be adjusted as more information is gathered about the interest in the program.
- f) The budget has not been allocated per reserve. Over three years, \$83,000 has been allocated for on-reserve education programs. This is not captured in the Community Energy Plan budget, but in a separate First Nation Education Initiative budget.
- g) Efficiency Manitoba has been in preliminary discussions with the Manitoba Indigenous Housing Capacity and Enhancement Mobilization Initiative (MIHCEMI) Working Group on the potential to collaborate in the development of energy efficiency educational resources. This potential collaboration will be comprehensive as Efficiency Manitoba understands that there is representation from all 63 First Nations and the Tribal Councils in this initiative.

REFERENCE:

Plan Application – Page 334 of 591

PREAMBLE TO IR (IF ANY):

EM reviews Indigenous customer segment offers and identifies those programs that are new and those that are continuing programs with enhancements.

QUESTION:

Please provide the following:

- a) One table with all First Nation energy efficiency programs offered by Manitoba Hydro in the three most recent years. For each program and for each year, identify the number of participants, the total budget, and the energy savings per participant;
- b) Provide a second table that summarizes the First Nation offerings (not Métis and distinguish between the anticipated First Nation and Métis participants of the Indigenous Small Business program) proposed by EM for the three years of the Plan. For each program and for each year, identify the number of First Nation participants, the total budget allocated (for First Nations, not Métis), and the anticipated energy savings per participant.
- c) Where EM is proposing to continue existing programs but with enhancements, explain what those enhancements are and provide estimates for their cost and savings compared to the existing program;

RATIONALE FOR QUESTION:

AMC would like to compare existing Manitoba Hydro energy efficiency programs offered to First Nations with those programs proposed by EM.

RESPONSE:

- a) Please see the tables below for the number of participants, total budgets, and energy savings per year per participant for First Nations energy efficiency programs offered by Manitoba Hydro for the last three years.

First Nations Planned Participation Manitoba Hydro Community Geothermal Program	2017/18	2018/19	2019/20
Number of Geothermal Systems	135	125	75
Budget	\$900,000	\$900,000	\$500,000
Avg Annual Energy Savings per Participant (kW.h)	15,556	16,000	14,667

First Nations Planned Participation Manitoba Hydro Affordable Energy Program	2017/18	2018/19	2019/20
Insulation Participants	281	246	50
Direct Install Participants	1500	1500	200
Budget	\$ 861,237	\$ 841,305	\$160,511
Avg Annual Energy Savings (Insulation Only) per Participant (kW.h)	3,029	2,052	2,052
Avg Annual Energy Savings (Direct Install) per Participant (kW.h)	556	772	778

- b) The tables below summarize the number of participants, total budgets, and the anticipated annual energy savings by participants for offers targeted to First Nations on-reserve customers within the Indigenous customer segment. For the newly offered Indigenous Small Business Program, there was no assumed participation split between First Nations and Metis customers.

Planned Participation Efficiency Manitoba Community Geothermal Program	2020/21	2021/22	2022/23
No. of Homes	50	90	90
Budget	\$323,000	\$505,000	\$515,000
Avg Annual Energy Savings per home (kW.h)	15,400	13,777	13,777

Planned Participation Efficiency Manitoba First Nation Insulation & Direct Install	2020/21	2021/22	2022/23
Insulation	50	75	80
Direct Install	50	75	100
Budget	\$196,000	\$256,000	\$272,000
Avg Annual Energy Savings (Insulation Only) per Participant (kW.h)	2,239	3,132	3,132
Avg Annual Energy Savings (Direct Install) per Participant (kW.h)	841	841	841

Planned Participation Indigenous Small Business	2020/21	2021/22	2022/23
No. of Buildings	30	30	40
Budget	\$313,000	\$370,000	\$472,000
Avg Annual Energy Savings per Building (kW.h)	12,333	12,333	11,000

- c) Please see the proposed enhancements including the costs and savings of the new eligible technologies in the First Nation Insulation and Direct Install Program below.

First Nation Direct Install Offer Enhancement	2021/22 Enhancement		2022/23 Enhancement	
	Cost	Savings	Cost	Savings
Smart Thermostats	\$2,675	1,847 kW.h	\$3,636	2,462 kW.h
Clothes Washers	\$4,077	2,348 kW.h	\$6,649	3,523 kW.h

Efficiency Manitoba has also included new strategic approaches as noted on pdf pages 330-333, Appendix A – Section A6. To support Indigenous programs there will be an education component as well as Community Energy Efficiency Plans that will be funded out of the enabling strategies budget.

REFERENCE:

Plan Application – Page 339 of 591

PREAMBLE TO IR (IF ANY):

EM estimates that for the Indigenous Insulation and Direct Install program, that “Once efficiency opportunities are identified, qualifying upgrades will be pursued at little to no cost to the resident of the home.”

QUESTION:

What does EM estimate the average cost will be for participants in the Indigenous Insulation and Direct Install program? What funding does EM anticipate will be provided by the federal government or Indigenous Services Canada? What will the average cost be for participants if no funding is received from the federal government or Indigenous Services Canada?

RATIONALE FOR QUESTION:

AMC would like clarification as to what is meant by “little to no”.

RESPONSE:

The incentives provided for the Insulation and Direct Install program are sufficient to cover the material costs and also to pay First Nation community members to do the installations without a cost to participants. Efficiency Manitoba has not considered potential federal funding in the design of this offer. If Federal funding dollars become available, Efficiency Manitoba anticipates the potential to either enhance or increase the reach of programming provided the requirements set by the federal government to access the funds are met.

REFERENCE:

Plan Application – Page 345 of 591

PREAMBLE TO IR (IF ANY):

EM has designed a specific Métis Income Qualified Program (MIQP) and give consideration to Métis businesses as part of the Indigenous Small Business (ISB) Offers.

QUESTION:

Please provide answers to the following:

- a) Why was no program similar to the MIQP designed for off-reserve First Nation customers? Please provide the rationale and support evidence as available.
- b) How many Métis commercial accounts does Manitoba Hydro have compared to off-reserve First Nation commercial accounts?
- c) What is the expected distribution of number of participants, budget, and energy savings between First Nation and Métis as part of the ISB program?

RATIONALE FOR QUESTION:

The AMC wants to know why EM considered Métis customers sufficiently distinct as to require a specific program but not off-reserve First Nation customers and to ensure that the distribution of resources is equitable.

RESPONSE:

- a) All residential programs are available to off-reserve First Nation customers.

With Efficiency Manitoba's legislated energy savings targets which are materially higher than past energy savings in Manitoba, new methods and approaches to program awareness and participation needed to be considered. Efficiency Manitoba included a Metis Income Qualified Program as a new approach to work with the Manitoba Metis Federation to capture a market that had been largely underserved and assist in reaching

the mandated energy savings targets. The Metis Income Qualified Program has the same offers as the Income Qualified Program. Therefore, off-reserve First Nation customers have access to the same program and the same offers as customers in the Metis Income Qualified Program. Efficiency Manitoba would be open to working with AMC to have them assist in the identification of off-reserve income qualified customers.

- b) The number of Metis commercial accounts and off-reserve First Nation commercial accounts cannot be provided as the energy use data that Efficiency Manitoba obtains from Manitoba Hydro does not categorize accounts by these characteristics.
- c) The Indigenous Small Business program is budgeted and energy savings are projected as whole and not divided between First Nation and Metis participants.

REFERENCE:

Plan Application – Page 370

PREAMBLE TO IR (IF ANY):

EM discusses the marketing mix and strategies for commercial, industrial, and agricultural programs.

QUESTION:

Please provide answers to the following:

- a) What obstacles has EM identified to the participation of off-reserve First Nation businesses?
- b) What specific strategies has EM developed to market its offerings to off-reserve First Nation businesses and improve participation?

RATIONALE FOR QUESTION:

More than 40% of First Nation businesses in Manitoba are located off reserve. AMC would like to see a specific marketing strategy for off-reserve First Nation businesses to enhance their participation in EM's commercial offerings.

RESPONSE:

- a) Efficiency Manitoba welcomes input on specific participation barriers to off-reserve First Nation businesses. With business customers generally, barriers may include but are not limited to budgetary restrictions, limited time, staffing and other resources.
- b) As commercial program marketing strategies are still in development for implementation at Efficiency Manitoba, a specific strategy for off-reserve First Nation businesses has not been defined. Efficiency Manitoba would like an opportunity to receive more data from AMC on where First Nation businesses in Manitoba are located,

and any known barriers to participation so that marketing and communication strategies can appropriately address.

REFERENCE:

Plan Application – Page 407 of 591

PREAMBLE TO IR (IF ANY):

EM has proposed a new Solar Energy Program

QUESTION:

Please answer the following:

- a) Will the Solar Energy Program be available to First Nations governments, organizations, and businesses (both on and off reserve)?
- b) What obstacles has EM identified to First Nation participation in the Solar Energy Program?
- c) What strategies has EM developed to encourage First Nation participation in the Solar Energy Program?

RATIONALE FOR QUESTION:

AMC would like more information on potential First Nation participation in the new Solar Energy Program.

RESPONSE:

- a) Yes, the Solar Energy Program will be available to all First Nation governments, organizations, and businesses. Anyone applying must be applying for a site in Manitoba to which they are the Manitoba Hydro account holder. The Solar Energy Program will be only for those first intending to reduce energy usage at their premise and not for solely selling energy back to the grid.
- b) The obstacles to participating in the Solar Energy Program are the high capital cost of the technology and the longer customer payback, relative to other energy efficiency measures. An additional barrier to participation in the Solar Energy Program is that

system upgrades to Manitoba Hydro's electrical grid, which may have to be paid for by the Solar Energy Program applicant, may be necessary in order for the electrical grid to accommodate the addition of a distributed energy resource, such as solar photovoltaic energy generation. These barriers are not unique to First Nations.

- c) Through Efficiency Manitoba's proposed Indigenous Energy Efficiency Working Group, Efficiency Manitoba will work to promote and encourage all energy efficiency initiatives and offers. Which energy efficiency programs or offers First Nations and Indigenous customers choose to pursue will be based on their energy efficiency needs and wants. Efficiency Manitoba will assist First Nations through the application processes and provide information as needed to assist in the decision-making process.

REFERENCE:

Plan Application – Page 583 of 591

PREAMBLE TO IR (IF ANY):

The consult recommends “A socio-economic study to assess non-energy program impacts. The study could consist of two main components: (1) estimating the economic impacts, such as job creations attributable to Efficiency Manitoba’s programs, initiatives and activities overall; and (2) determining the social-economic benefits of Efficiency Manitoba’s programs, initiatives and activities, such as reducing operation and maintenance costs, conserving resources, or improving workplace safety, comfort and productivity. This study would be conducted once during the three-year plan and consider all of Efficiency Manitoba’s activities.”

QUESTION:

Please answer the following:

- a) Will EM commit to conducting a socio-economic study to assess non-energy benefits?
- b) Will EM commit to working with AMC to ensure that any socio-economic study to assess non-energy benefits captures benefits to First Nations?

RATIONALE FOR QUESTION:

AMC is concerned that the non-energy benefits of efficiency programs to First Nations are not adequately represented in the present selection and evaluation methodologies.

RESPONSE:

- a) Efficiency Manitoba will be reviewing the Additional Study’s section of Econoler’s Evaluation Framework Report with the intent to implement all recommendations that are deemed to have a valuable impact on the corporation’s ability to meet its mandate and strategic goals. This includes a review of the socio-economic study that was recommended to assess the non-energy benefits of energy efficiency.

- b) If Efficiency Manitoba chooses to invest in a socio-economic study, a discussion with AMC would be welcomed. Efficiency Manitoba will work with members of the EEAG, AMC and other Indigenous partners to assist in ensuring program design and implementation details are considering socio-economic factors.

REFERENCE:

PUB/EM - 4

PREAMBLE TO IR (IF ANY):

Discusses the use of the Multi-Criteria Decision Analysis (MCDA) to make program-specific adjustments.

QUESTION:

Provide the same table and information requested in the reference but for each program within the Indigenous bundle, comparing the budgeted costs and savings per the Plan and per the preliminary plan prior to adjustments made based on the MCDA.

RATIONALE FOR QUESTION:

This will help AMC better understand the process of selecting programs and making budgetary allocations for the Indigenous program bundle.

RESPONSE:

PUB/EM I-4 provides a description of the changes to the natural gas and electric portfolio program bundles that were driven by the results of the multi-criteria decision analysis considering both quantitative and qualitative perspectives. PUB/EM I-4 also identifies additional changes between the preliminary portfolio and the portfolio included within the 2020/23 Efficiency Plan (“Plan”) resulting from methodology changes and general quality control corrections. Resulting changes are listed by program bundle and include comparisons of the budgeted costs, savings and cost-effectiveness test results for both the electric and natural gas portfolios. As per PUB/EM I-4, changes made to the Indigenous program bundle included the following:

- Insulation and Direct Install Program Bundle:
 - No change between preliminary and Plan portfolios.

- Small Business
 - Changes reflect increased participation to Metis communities through targeted efforts and collaboration with Manitoba Metis Federation.
 - Included budget for indigenous small business natural gas programming.
- Community Geothermal
 - No change between preliminary and Plan portfolios.
- Metis Income Qualified
 - A Metis Income Qualified program bundle was not contemplated within the preliminary portfolio. This change increased electric and natural gas energy savings and overall electric and natural gas portfolio budgets.

REFERENCE:

PUB/EM - 7

PREAMBLE TO IR (IF ANY):

References the bill affordability collaborative process.

QUESTION:

Please provide the information requested in this reference to AMC.

RATIONALE FOR QUESTION:

This information will provide a more complete picture for AMC of the factors and options considered in the Plan and for future iterations of the Plan.

RESPONSE:

Please see the response to PUB/EM I-7a (i-iii).

REFERENCE:

Plan Application – Page 63 of 591

PREAMBLE TO IR (IF ANY):

EM states that if additional sources of funding become available these amounts will reduce the amount of funding provided by Hydro Manitoba and Centra Gas for the Plan.

QUESTION:

If Efficiency Manitoba receives funding from the federal government or Indigenous Services Canada as anticipated in certain programming under the Indigenous program bundle, will that funding also be used to offset the funding provided by Hydro Manitoba and Centra Gas for Indigenous programming?

RATIONALE FOR QUESTION:

The AMC wants to understand what assumptions have been made by EM about federal contributions to energy efficiency programs for First Nations, and what impact the assumptions will have on programming.

RESPONSE:

Efficiency Manitoba has not incorporated assumptions about federal contributions to energy efficiency programs for First Nations, including with limitation from Indigenous Services Canada, in the design of Indigenous programming within the Plan.

REFERENCE:

Plan Application – Page 81 of 591

PREAMBLE TO IR (IF ANY):

The Plan states that the commercial program budget includes municipal buildings, schools, hospitals, etc.

QUESTION:

- a) What programs and budgets address energy efficiency concerns for First Nation community buildings, such as government buildings, medical centres, schools, etc. What are the budget allocations and estimated energy savings per customer for these programs?
- b) Please provide energy usage data for First Nation owned community buildings.

RATIONALE FOR QUESTION:

The AMC wants to ensure that EM's energy efficiency programs are accessible to all First Nation rate payers, including First Nation governments and other organizations.

RESPONSE:

- a) Efficiency Manitoba's energy efficiency programs are accessible to all First Nation community buildings, such as government buildings, medical centres, and schools. Energy efficiency concerns for First Nation community buildings are addressed by way of a variety of offers through Indigenous programs as well as the Commercial, industrial & agricultural program area of the plan, as highlighted below.

Indigenous Small Business Offers – Offered to First Nation on-reserve buildings and off-reserve band owned buildings, and Metis businesses. Eligible small businesses receive free and easy-to-install devices, (such as faucet aerators and basic lighting measures), a lighting assessment, and an incentive on qualifying lighting retrofits identified in the assessment.

Small Business Offers – Includes incentives to promote the use of energy-efficient commercial kitchen appliances and energy-efficient commercial refrigeration equipment.

In-Suite Efficiency – Provides a full-service direct installation of energy-efficient devices for multi-unit residential buildings including apartments, townhouses, and condominiums.

Renovation Offers – Includes lighting technologies and controls as well as building envelope technologies. Provides financial incentives and technical assistance for customers within this segment to influence the adoption of energy-efficient technologies and practices by reducing the incremental cost of renovations.

HVAC & Controls Offers – Provides incentives to influence the adoption of higher efficiency heating, cooling, and ventilation (HVAC) equipment in various commercial, industrial, and agricultural retrofit applications.

New Construction & High-Performance Buildings Offers – The various programs, incentives, and initiatives provided within this category take a whole-building approach that encourages energy efficiency in commercial, large multi-unit residential and industrial facilities. Provides technical support for each participant from the initial application stage through to project completion. Offers within this bundle include the New Buildings Program, Enhanced Building Operations Program, Manitoba Race to Reduce, energy scoping audits, and deep energy retrofits.

Custom Offers – Provides technical support and financial incentives for feasibility studies and energy management initiatives and supports the purchase and installation of numerous higher efficiency technologies and systems. Programs cover both typical technologies within these customer segments while accommodating the flexibility to encompass unique customer-specific technologies or projects.

Load Displacement Offers – Supports the development of customer-sited electric generation using readily available low-cost industrial by-product streams or biomass resources as fuel.

With the exception of Indigenous Small Business Offers, which sets both budget and savings targets specific to the Indigenous customer segment, the remaining offers described above set both budget and savings targets at an aggregated level across all customer segments served (Indigenous commercial, commercial, industrial, agricultural). Accordingly, budget and savings targets for these remaining programs cannot be identified for the First Nation customers specifically.

With respect to Indigenous Small Business Offers, as per the 2020/23 Efficiency Plan, Section A6.3, p.340 of 591, the budget and savings is summarized as follows:

Indigenous Small Business Offers	2020/21	2021/22	2022/23
Participating Customers	30	30	40
Budget	\$313,000	\$370,000	\$472,000
Budget per Participating Customer	\$10,433	\$12,333	\$11,800
Savings (GWh)	0.37	0.37	0.44
Savings (kWh) per Participating Customer	12,333	12,333	11,000

- b) Analysis of First Nation energy usage data by Efficiency Manitoba was conducted utilizing consumption data provided by Manitoba Hydro, which does not differentiate between First Nation owned and non-First Nation owned buildings

REFERENCE:

Plan Application – Page 207 of 591

PREAMBLE TO IR (IF ANY):

EM states that high-performing technologies which have traditionally accounted for substantial energy savings are reaching market saturation, such as high-efficiency heating equipment and LED lighting.

QUESTION:

What are the market saturation rates for these technologies for First Nations on-reserve residential customers, First Nations businesses, First Nations off-reserve residential customers, and First Nations community owned buildings, compared to non-Indigenous residential, business, and municipal buildings?

RATIONALE FOR QUESTION:

The AMC wants to know how First Nations programming is addressing market saturation rates for high performing technologies for First Nations customers in particular, and if there is room to promote these technologies for First Nations customers due to the lack of saturation of the technologies in First Nations homes and businesses.

RESPONSE:**First Nations on-reserve residential and commercial customers**

Efficiency Manitoba believes there is still room to promote high-efficiency heating equipment and LED lighting for First Nations on-reserve for both residential and commercial customers.

This is evidenced by First Nations on-reserve residential customer responses to Manitoba Hydro's 2017 Residential Energy Use Survey (2017 REUS) and by past program participation including the 3,756 residential customers who participated in Manitoba Hydro's Direct Install Program, which includes the installation of LED lighting (please see MKO-EM-I-13 Attachment for background), and the 380 customers who participated in Manitoba Hydro's Community

Geothermal Program. Additionally, this is represented by past participation of approximately 200 First Nations on-reserve businesses through Manitoba Hydro’s commercial energy efficiency programs.

Residential market saturation for high-efficiency heating equipment and LED lighting was measured in the 2017 REUS; please see the response to PUB/EM I – 8 for a link to the publicly available document. Market saturation is further detailed below.

Residential High-Efficiency Space-Heating

Respondents were asked “*What is the main heating system used to heat this residence?*” (PDF page 213 of the 2017 REUS). The heating type with number and percentage of homes is provided in the chart below. The data is broken down by Overall and First Nation on-reserve. The chart does not include natural gas furnaces, propane furnaces, or the other category as shown in the 2017 REUS as the number and percentages are 0 for First Nation on-reserve.

Heating Type	Electric Baseboard		Electric Furnace		Electric Boiler		Geothermal Heat Pump		Air Source Heat Pump		Wood Stove		Oil Furnace		Shared Heat	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Overall	51,150	10.6%	9,990	64.6%	4,728	1.0%	7,556	1.6%	882	0.2%	2,342	0.5%	2,477	0.5%	36,289	7.5%
First Nation On Reserve	4,028	26.1%	2,027	13.1%	68	0.4%	783	5.1%	0	0.0%	262	1.7%	262	1.7%	63	1.4%

*Source: PDF pages 38-39 of the 2017 REUS

Residential LED Lighting

Respondents were asked “*Approximately how many of each type of light bulbs do you have installed at this residence? (including exterior lights but excluding seasonal or holiday lights – check one for each lighting type)*” (PDF page 220 of the 2017 REUS). The number and percentage of homes by range of LED bulbs installed is provided below. The data is broken down for Overall and First Nation on-reserve.

Lighting Type	None		1-5 LEDs		6-10 LEDs		11-20 LEDs		21-30 LEDs		31+ LEDs	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Overall - Light Emitting Diode (LED)	134,918	27.8%	94,386	19.5%	76,053	15.7%	134,527	27.7%	27,957	5.8%	16,970	3.5%
First Nation on Reserve – Light Emitting Diode (LED)	7,734	50%	2,027	13.1%	1,529	9.9%	3,941	25.5%	93	0.6%	131	0.8%

*Source: PDF pages 101 of the 2017 REUS

First Nations off-reserve residential and commercial customers

As Efficiency Manitoba is unaware of who the First Nations off-reserve customers are by using Manitoba Hydro consumption data, Efficiency Manitoba welcomes the opportunity to work with AMC in order to identify off-reserve First Nations customers to ensure that they are aware of, and have access to, Efficiency Manitoba programs.

REFERENCE:

Plan Application – Page 209 of 591

PREAMBLE TO IR (IF ANY):

EM states that traditional customer support services will be included to ensure accessibility for all customers.

QUESTION:

What traditional customer support services will be provided for First Nation customers?

RATIONALE FOR QUESTION:

First Nation customers are traditionally harder to reach and may require specific customer service initiatives. The AMC wishes to ensure that EM's programming is accessible to First Nation customers.

RESPONSE:

Efficiency Manitoba recognizes that First Nation customers may require specific customer service initiatives, which is why traditional customer support will be available. The Indigenous customer segment provides opportunities to recognize and respond to needs including dedicated staff for Indigenous programs, presentations on energy efficiency initiatives held in the community, and telephone and email support, in addition to the CRM/DSM system outlined on page 51 of the submission and further described in Section 7.1. Alternative methods of access will also be considered and made available to address needs as required.

REFERENCE:

Plan Application – Page 316 of 591

PREAMBLE TO IR (IF ANY):

EM states that alternative documents other than income tax statements can be used for income verification.

QUESTION:

What alternative documents may be used for income verification?

RATIONALE FOR QUESTION:

First Nation customers may be less likely to have income tax documentation and the AMC would like to ensure accessibility of programming for off-reserve First Nation customers.

RESPONSE:

To help minimize barriers to participation in the income qualified program, proof of recent participation in the following programs may be used for alternative income verification:

- Manitoba Employment and Income Assistance;
- Canadian Tire Jumpstart;
- KidSport Manitoba;
- Manitoba Camping Association Sunshine Fund;
- Community Volunteer Income Tax Program;
- Homeowner Renovation Assistance Program;
- Manitoba Emergency Repair Program;
- Residential Adaptations for Disabilities Program;
- Legal Aid;
- SEED Inner City Homebuyer Program;
- SEED Individual Development Account;

- SEED Access to Benefits Program;
- SEED Saving Circle.

First Nations customers who live on-reserve are not required to provide income verification to participate in programming offered through Efficiency Manitoba. If the listed alternative forms of income verification are not available for off-reserve First Nation customers, Efficiency Manitoba will work with AMC to find the appropriate income verification documents that will facilitate access to participation.