

**Efficiency Manitoba 2020-2023 Efficiency Plan
Consumers Coalition Information Requests to the Assembly of Manitoba Chiefs**

December 13, 2019

CC/AMC – 1 Reference: Page # 23, 2nd half of first paragraph under Design Priorities

Question:

Please provide documentation to support the statement that “these [First Nations] initiatives produce the greatest residential per person energy savings.”

Rationale:

To understand the basis of the claim.

Response: There is a word missing from the sentence. The sentence should have read: “these initiatives produce the greater residential per person [customer] energy bill savings.” The sentence has been revised to read “these initiatives can produce the greatest residential per customer energy bill savings” and can be found on Page 23 of the revised report. This claim is based upon Table 5.8, located on page 142 of the Plan. The table estimates that the Indigenous residential programs will produce an average annual electric bill savings of \$260/house, compared to the income qualified average of \$60/house and the residential average of \$80/house.

CC/AMC – 2 Reference: Page # 24

Question:

Please confirm that the use of the term “cost-effective” in the statement “Indigenous programming is significantly less cost-effective...” and throughout this section of the report does not refer to the extent to which Indigenous programs comply with statutory cost-effectiveness requirements, but rather denotes that the program cost per unit of energy saved is higher than for some other programs in the

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EM portfolio.

Rationale:

To clarify what the author's position is with regard to program costs.

Response: Confirmed that the term “cost-effective” refers to program costs per unit of energy saved.

CC/AMC – 3 Reference: Page # 35, Section on Horizontal Equity

Question:

Please explain whether savings that EM plans to capture through Codes and Standards would meet a horizontal equity test.

Rationale:

Exploring the extent to which specific elements of the plan might meet horizontal equity from AMC point of view

Response: In theory, yes, but in practice, not necessarily. For example, building codes on First Nation reserves are often non-existent or not adequately enforced, which can contribute to substandard housing on reserves.¹ Over time, the improvement in provincial building codes, for instance, could potentially increase the gap between the energy efficiency of on and off reserve housing.

¹ Senate Committee on Aboriginal Peoples, *Housing on First Nation Reserves: Challenges and Successes – Interim Report of the Senate Committee on Aboriginal Peoples*, 2015.

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CC/AMC – 4 Reference: Figures 8,9,10,11,12

Question:

Please provide workpapers in electronic, executable format with formulas intact

Rationale:

To understand the analysis that supports the figures.

Response:

The data for Figure 8 was drawn directly from Efficiency Manitoba, *2020/2023 Efficiency Plan Submission*, p. 516.

Figure 9 was calculated using an LRI of 0.019 cents/KWH (as used by Efficiency Manitoba in AMC/EM I-10b) and an average electricity annual consumption drawn from the DAYMARK/EM I-95a.

Figures 10-12 contained an error and a lack of conceptual clarity between units of analysis. The section titled “Assessment of Potential Impacts to First Nations” has been revised and resubmitted to the Board to correct the error and separate out the question of on and off-reserve First Nation customers. The revised figures and discussion can be found on Pages 36-40 of the revised report.

CC/AMC – 5 Reference: 38, and All figures that compare LICO-125 with First Nations

Question:

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Please confirm that the LICO-125 figures exclude First Nations.

Rationale:

The report states that “the First Nation population is approximately 80% of the LICO-125 population.” It is not clear whether that implies that the population, budget, etc. represented by LICO-125 in the figures also includes First Nations numbers.

Response: The section of the report referenced contained an error and reflected a lack of conceptual clarity between units of analysis. This has been revised and resubmitted to the Board to correct the error and separate out the question of on and off-reserve First Nation customers. The revised figures and discussion can be found on Pages 36-40 of the revised report.