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February 3, 2023

THE PUBLIC UTILITIES BOARD OF MANITOBA  
400-330 Portage Avenue  
Winnipeg, Manitoba  
R3C 0C4

ATTENTION: Dr. D. Christle, Board Secretary and Executive Director

Dear Dr. Christle:

**RE: MANITOBA HYDRO'S 2023/24 & 2024/25 GENERAL RATE APPLICATION – MANITOBA  
HYDRO'S RESPONSES TO ROUND 1 INFORMATION REQUESTS**

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Please find enclosed Manitoba Hydro's responses to the Information Requests issued by the Public Utilities Board ("PUB"), the Assembly of Manitoba Chiefs ("AMC"), the Consumer Coalition (Manitoba Branch of the Consumers' Association of Canada, Harvest Manitoba, Aboriginal Council of Winnipeg) ("Coalition"), the General Service Small and General Service Medium Customer Classes ("GSS/GSM"), the Manitoba Industrial Power Users Group ("MIPUG"), and the Manitoba Keewatinowi Okimakanak Inc. ("MKO").

As part of the first round Information Request (IR) process, Manitoba Hydro received over 1650 individual questions. With the exception of a very few, all of have been answered with this submission which consists collectively of 4,700 pages of evidence. Manitoba Hydro has sought to provide informative responses that will assist the Board and parties to better understand Manitoba Hydro's evidence and positions and assist the Board in determining the issues in this proceeding.

Manitoba Hydro appreciates the Board's specific direction in Order 130/22 that the second round of information requests are to be limited to following-up on Round I information requests in an effort to avoid repetition and inefficiency in Round II of the information request process. Manitoba Hydro respectfully asks all interveners to be mindful of the Board's direction before asking further information requests in Round II of the information request process.

Pursuant to Order 130/22, Manitoba Hydro is filing responses to Information Requests containing confidential information with the PUB and has provided redacted copies herein. Manitoba Hydro has relied upon the same redaction criteria which have been considered and relied upon by the PUB in previous applications and has inserted codes corresponding to the categories in the Redaction Criteria directly in the responses to the information Requests. For ease of reference, attached hereto as

Appendix A is a copy of the Redaction Criteria.

With respect to Coalition/MH I-36 d), which the PUB directed to be answered in Order 9/23, there is a significant work effort required and Manitoba Hydro intends on providing this response with the rest of the Round II information requests.

Several IRs request documents in Excel format, some seeking detailed spreadsheets with formulas intact. Where the Excel document was readily available, Manitoba Hydro has provided these documents to the PUB and registered interveners.

Should you have any questions with respect to the foregoing, please do not hesitate to contact the writer at 204-360-3257.

Yours truly,

**MANITOBA HYDRO LEGAL SERVICES**

Per:



Brent Czarnecki  
Senior Counsel

## Manitoba Hydro Redaction Criteria

- 1 Party/Contract Specific Detail (information provided to MH with an expectation that confidentiality will be maintained) *for example:***
  - a. Detailed business arrangements with third parties to construct/operate/own facilities.
  - b. Specific pricing, terms, conditions in contracts or third-party responses to request for proposals related to the construction procurement of a generation, transmission or distribution resource on the MH system;
  - c. Specific domestic customer load information, current or forecast;
  - d. Specific affected parties including mitigation or compensation not already available in public forum;
  - e. Information subject to statutory or contractual confidentiality provisions.
  
- 2 Technical Information or Intellectual Property**
  - a. Owned by Manitoba Hydro e.g. Consensus Export Price Forecast
  - b. Owned by a third party
  
- 3 Power Contracts, Revenue & Price Forecast Information *for example:***
  - a. Specific data, forecast, terms, conditions, prices, revenue projections contained in reports, agreements, contracts, proposals, term sheets together with information which facilitates back calculation of the foregoing information;
  - b. MH commodity price forecasts for electricity, natural gas and carbon including annual pricing escalators including third party proprietary input forecasts;
  
- 4 Documents Related to Risk/Benefit Identification, Quantification and Strategic Actions *for example:***
  - a. Sales and marketing strategies/initiatives;
  - b. Identification of risks and benefits with details on relative significance, quantification, strategic actions and timeframes. Identification of specific parties who have an interest in or ability to influence the risk/benefit outcomes.
  
- 5 Sensitive Analysis and Operational Data Facilitating Back Calculation *for example:***
  - a. Resource planning assumptions and analysis including the generation component of marginal cost;
  - b. Committed and uncommitted capacity and energy surplus quantities for export;
  - c. Breakdown of export sales quantity or revenue by product type, customer or province.
  
- 6 Utility Practice Techniques *for example:***
  - a. Detailed solution techniques utilized in MH's short- and long-term planning of capacity, energy and water management with specific reference to the mathematical representation of the hydraulic or transmission system and the electricity market.

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- 7 Resource, Project or Sale Cost and Benefit Analysis where such information could negatively impact Manitoba Hydro's negotiating power for example:**
- a. Detailed cost estimates of new resources planned or in development on MH system, budget and contingency information related to projects and/or specific project components;
  - b. Estimate of economic or financial benefits (i.e., Net Present Value, revenue projections, Internal Rate of Return) of development plans or sales evaluations.
- 8 Sensitive Relationship Management Information for example:**
- a. Employment, labour relations, counterparty or stakeholder information, which if disclosed could result in labour issues, work stoppages, contract breach or demands for renegotiation
- 9 Centra Gas Sensitive Information for example:**
- a. a. Natural gas load forecast information and impact of weather on Manitoba market demand and gas supply operations (i.e., Effective Heating Degree-Day (EHDD) balance point, actual and forecast EHDD).