

Order No. 77/22

Order in Respect of Manitoba Hydro's Application to Review and Vary Order 9/22

July 21, 2022

BEFORE: Robert Gabor, Q.C., Chair
Marilyn Kapitany, B.Sc., (Hon), M.Sc., Vice Chair
Hugh Grant, Ph.D., Member
Shawn McCutcheon, Member
Irene A. Hamilton, Q.C., Member

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1.0 Executive Summary

By this Order, Manitoba Hydro's Application to Review and Vary Order 9/22 is dismissed.

The Public Utilities Board ("Board") has determined that interim Order 9/22 and the directives raised by Manitoba Hydro should not be rescinded, changed, altered or varied.

2.0 The Board's Review Mandate

The Board's mandate with respect to the regulation of Manitoba Hydro (or "the Utility") is derived from *The Public Utilities Board Act*, CCSM c P280 ("Board Act"), *The Crown Corporations Governance and Accountability Act*, CCSM c C336 ("Crown Act"), and *The Manitoba Hydro Act*, CCSM c H190 ("Hydro Act").

Pursuant to subsection 25(1) of the Crown Act, the prices charged by Manitoba Hydro with respect to the provision of power ("rates for services") are reviewed by the Board under the Board Act. No change in rates for services can be made and no new rates for services can be introduced without the approval of the Board. Manitoba Hydro is required to submit proposals regarding rates to the Board for approval.

Under Manitoba law, the Board must set electricity rates for Manitoba Hydro's customers that are just and reasonable. In so doing, as confirmed by the Manitoba Court of Appeal, the Board balances two concerns: the interests of Manitoba Hydro's ratepayers and the financial health of Manitoba Hydro. Together, and in the broadest interpretation, these interests represent the general public interest.

When Manitoba Hydro applies to the Board for rate increases, Manitoba Hydro bears the statutory onus of demonstrating that the increases sought are just and reasonable. While the focus of Manitoba Hydro may be on the financial risks faced by the Utility, the Board's role is broader. As noted above, to set rates in the public interest, the Board considers not only the financial health of Manitoba Hydro, but also the interests of ratepayers.

3.0 Procedural History

Board Order 59/18, finalized Manitoba Hydro interim rate increases that were effective August 1, 2016, and August 1, 2017. This Order also approved revised Manitoba Hydro rates effective June 1, 2018. In November of 2018, Manitoba Hydro sought another rate increase from the Board because the Utility projected a net loss in the 2019/20 fiscal year (ending March 31, 2020). Manitoba Hydro further advised that, with the most recent appointments to the new Manitoba Hydro-Electric Board of Directors (“Manitoba Hydro-Electric Board”), a comprehensive review of Manitoba Hydro’s operations, forecasts, and financial plans was being undertaken to allow the Manitoba Hydro-Electric Board to establish a long-term financial plan for the Utility. As such, Manitoba Hydro was not in a position to file a long-term Integrated Financial Forecast (“IFF”) for review by the Board. Manitoba Hydro further advised that, upon completion of the IFF incorporating the direction of the Manitoba Hydro-Electric Board for Manitoba Hydro’s financial plan, the Utility would submit a full General Rate Application to the Board, anticipated to be filed in late 2019. The Board’s Order 69/19 contained the summary of the evidence and the findings and decisions of the Board related to the rate increase approved.

No General Rate Application was filed by Manitoba Hydro in late 2019.

The next electricity rate increase was effective December 1, 2020. It was a 2.9% rate increase to most of Manitoba Hydro’s customer classes enacted through *The Budget Implementation and Tax Statutes Amendment Act, 2020*, SM 2020 c 21 at s 233.

On March 26, 2021, the Consumers Coalition filed an Application seeking the Board to convene a Status Update Hearing. The Board established a process and issued Orders 53/21 and 89/21 related to this Status Update Application.

On September 22, 2021, the Minister of Crown Services issued a Ministerial Directive to the Manitoba Hydro-Electric Board providing specific instruction for Manitoba Hydro to take all necessary steps to proceed with an Interim Rate Application to the Board for the

2021/22 fiscal year ending March 31, 2022, as well as directing Manitoba Hydro to engage with the Board on the timing and parameters of Manitoba Hydro's next multi-year General Rate Application.

On November 15, 2021, citing an immediate and pressing need for interim rate relief because of the extreme drought conditions, Manitoba Hydro's 2021/22 Interim Rate Application ("Interim Application") was filed with the Board seeking a 5% increase in General Consumers Revenue, effective January 1, 2022.

On December 1, 2021, the Board heard oral public presentations from Bannerman Green Housing Co-op Inc, Gerda Long Steel North America – Manitoba Mill, Electrochem (a Division of Chemtrade Logistics Inc.), Interchurch Council on Hydro power, and in addition received 64 written comments from ratepayers concerning the Interim Application.

On December 10 & 13, 2021 the Board heard oral testimony by Manitoba Hydro witnesses, including its President & Chief Executive Officer and its Vice President & Chief Financial Officer.

On December 14 & 15, 2021 the Board heard oral closing submissions from Interveners and Manitoba Hydro.

On December 16, 2021, Manitoba Hydro filed its written Reply to the Interveners' closing submissions.

On December 24, 2021, the Board issued Order 137/21 which varied Manitoba Hydro's 5% requested interim relief and ordered interim electricity rate increases effective January 1, 2022, sufficient to increase Manitoba Hydro's General Consumers Revenue by 3.6%.

On December 31, 2021, the Board issued Order 140/21 which approved the specific interim rates to be effective January 1, 2022.

On January 26, 2022, the Board issued Order 9/22 which contained additional reasons for the January 1, 2022, interim rate increases and Board Directives.

On February 25, 2022, Manitoba Hydro filed its Application to Review and Vary Order 9/22 (“R&V Application”).

On March 31, 2022, the Board invited submissions on the R&V Application from the Interveners that participated in the public hearing process leading to Order 9/22.

On April 14, 2022, the Manitoba Industrial Power Users Group and the Consumers Coalition provided submissions to the Board.

On April 25, 2022, Manitoba Hydro filed its Reply to the submissions by the Manitoba Industrial Power Users Group and the Consumers Coalition.

4.0 Manitoba Hydro’s Application and Reply

Pursuant to section 44(3) of *The Public Utilities Board Act* and section 36 of the *Public Utilities Board’s Rules of Practice and Procedure*, Manitoba Hydro filed its Application to Review and Vary Order 9/22 (“R&V Application”).

The R&V Application references section 36 of the Board’s Rules of Practice and Procedure:

Review

36. (1) *The Board may, on its own initiative or on application by a person, review, rescind, change, alter or vary any decision or order by it.*

(2) *An application for a review under subsection (1) must be in writing and contain the following:*

a) a clear and concise statement of facts relevant to the application;

- b) the grounds on which the application is made;*
- c) a brief explanation as to the nature of the prejudice or damage that has resulted or will result from the order, decision or direction;*
- d) a brief description of the remedy sought; and*
- e) the applicant's name, address in Manitoba, telephone number, fax number and, if available, e-mail address.*

(3) An application for a review must be filed and served on the parties to the proceeding for which the order or decision of the Board was made within 30 days of the date of the order or decision.

(4) The Board shall determine, with or without a hearing, in respect of an application for review, the preliminary question of whether the matter should be reviewed and whether there is reason to believe the order or decision should be rescinded, changed, altered or varied.

(5) After determining the preliminary question under subsection (4), the Board may:

- a) dismiss the application for review if,*
 - i) in the case where the applicant has alleged an error of law or jurisdiction or an error in fact, the Board is of the opinion that the applicant has not raised a substantial doubt as to the correctness of the Board's order or decision; or*
 - ii) in the case where the applicant has alleged new facts not available at the time of the Board's Hearing that resulted in the order or decision sought to be reviewed or a change of circumstances, the Board is of the opinion that the applicant has not raised a reasonable possibility that the new facts or*

the change in circumstances as the case may be, could lead the Board to materially vary or rescind the Board's order or decision; or

b) grant the application; or

c) order a hearing or proceeding be held.

The R&V Application seeks:

- a. Additional Findings in support of the determination that the 3.6% interim rate increase awarded balanced customer interests and the financial health of the Utility:

Manitoba Hydro seeks expanded reasons related to the Board's Findings that:

Bearing in mind the foregoing limitations related to interim rate applications, and based on the evidentiary record of this Interim Application, the Board finds that it is just and reasonable to approve a total of a 3.6% General Consumers Revenue increase effective January 1, 2022. This increase recognizes the financial consequences of the drought and the Board's objective to avoid rate shock by smoothing the rate increases required to address the costs of major capital projects entering service.

...

While the drought and the resulting \$398 million of reduced Net Extraprovincial Revenue were major factors considered by the Board in reaching its decision to approve a 3.6% increase in Manitoba Hydro's General Consumers Revenue, the Board was also concerned with the increasing annual revenue requirements for the recently completed and soon to be completed capital projects.

Manitoba Hydro seeks to assess whether the 3.6% interim rate ought to be varied before the filing of the Utility's next General Rate Application or alternatively varied or confirmed with the next General Rate Application to be filed in the fall of 2022.

In its Reply submissions, Manitoba Hydro clarifies that it is not alleging a breach of procedural fairness in its R&V Application, but rather a lack of reasons. Seeking clarification and review in compliance with the Board's Rules in advance of the November 15, 2022 filing date for its next General Rate Application is seen by Manitoba Hydro as appropriate to ensure it meets the Board's requirements and expectations.

b. To Review and Vary Directive 4 – for Manitoba Hydro to provide a long-term financial forecast in the next General Rate Application:

Manitoba Hydro recognizes that the PUB may direct the Utility to prepare documents to assist in the Board discharging its rate-setting mandate. However, Manitoba Hydro intends to restrict the financial forecasts used in the management of its business to two or three years.

Manitoba Hydro acknowledges that, in some circumstances, longer-term financial scenarios are prepared for the limited purpose of demonstrating the Utility's self-sufficiency to credit rating agencies. However, such long-term financial scenarios are not reflective of Manitoba Hydro's long-term financial planning or rate strategy as they do not incorporate inputs related to the evolving energy landscape nor are they approved by the Manitoba Hydro-Electric Board.

For the Board's use only in rate-setting at the next General Rate Application, Manitoba Hydro offered to provide a 20-year financial scenario that incorporates the two to three-year financial forecast approved by the Manitoba Hydro-Electric Board and used by management in the operations of the Utility.

c. To Review and Vary Directive 6 – to demonstrate savings in Business Operations Capital spending:

Manitoba Hydro acknowledges the Board's authority to consider several factors related to capital expenditures when setting electricity rates. However, the Utility reminds the

Board that it does not have the legal jurisdiction to approve specific capital projects or order Manitoba Hydro to reduce its capital spending.

Manitoba Hydro is prepared to provide a narrative explanation of its processes for assessing and optimizing Business Operations Capital expenditures for the next General Rate Application. Further, Manitoba Hydro is prepared to provide a comparison between the Business Operations Capital expenditures (actual and forecasted) relative to those included in the 2021/22 Interim Rate Application.

d. Review and Vary Directive 7 – to demonstrate savings in Operating & Administrative expenses:

Similar to its above position related to capital expenditures, Manitoba Hydro acknowledges the Board's authority to consider Manitoba Hydro's operating, maintenance, and administrative expenses when setting rates, but Manitoba Hydro maintains the Board cannot direct the Utility to reduce or alter operating expenses.

Manitoba Hydro is prepared to provide a narrative explanation of its processes for assessing and optimizing operating and administrative expenditures for the next General Rate Application. Further, Manitoba Hydro is prepared to provide a comparison between the operating and administrative expenditures (actual and forecasted) relative to those included in the 2021/22 Interim Rate Application.

e. Additional Findings - as to the requirement for additional expert evidence to determine what, if any, additional drought forecasting options may exist to mitigate Manitoba Hydro's drought risk:

Manitoba Hydro seeks to better understand the Board's intention and expectation for the Utility on this matter, specifically whether the Board expects Manitoba Hydro to retain an expert. Without such guidance, Manitoba Hydro is concerned that it may act in a manner

it reasonably believes amounts to compliance, but ultimately does not reflect the Board's expectation.

Manitoba Hydro also submits it is premature to require expert evidence on this topic as Manitoba Hydro has not had the opportunity to present to the Board its full process. The Utility submits the most efficient way forward would be to allow Manitoba Hydro to provide evidence on this topic at the next General Rate Application and thereafter the Board can determine whether it requires additional information.

5.0 Interveners' Positions

Manitoba Industrial Power Users Group

The members of Manitoba Industrial Power Users Group are users of substantial amounts of electric power, and are in the Manitoba Hydro General Service Large customer classes. Members of these classes annually purchase approximately 7000 GWh in total, accounting for approximately 33% of Manitoba Hydro's domestic electricity sales.

In its submissions, the Manitoba Industrial Power Users Group maintains that each of Manitoba Hydro's requests to Review and Vary Order 9/22 needs to be assessed in light of two overriding considerations:

- The Board process respecting an Interim Rate Application was based on an expedited and incomplete record, which lacked the usual General Rate Application information. It also truncated the fundamental right of Interveners to adduce evidence. Interim Rates will at some point need to be finalized, either at the same level or at a different level, in light of a proper and fair evidentiary record and hearing process.
- Even ignoring that Hydro is the explicit cause and beneficiary of the current incomplete record, Hydro still has the opportunity to put proper and fulsome

evidence before the Board to seek remedies different than those awarded in Orders 137/21 and 9/22, when it finally comes forward with a transparent application that reflects the public interest.

In its submissions, the Manitoba Industrial Power Users Group maintains Manitoba Hydro's attack on Order 9/22 is entirely void of any merit and ought to be rejected, including for the following reasons:

- There is no suggestion the Board misstated or misunderstood the legal test it had to apply in approving the interim rates which Manitoba Hydro sought on an emergency basis pending the filing of a full General Rate Application in the fall of 2022;
- Manitoba Hydro acknowledged that interim rate applications are not subject to the same rigour and standard as are final rate applications;
- Neither the position of Manitoba Hydro nor of any of the Interveners as to the appropriate interim rate was accepted by the Board;
- The Board's requirement to provide reasons for its decision arise from procedural fairness and that requirement is "inherently flexible and context-specific", in accordance with the Supreme Court of Canada's *Vavilov* decision;
- There is no basis to suggest the Board fundamentally misapprehended or failed to take into account the evidence before it or relied on irrelevant evidence, again in accordance with *Vavilov*;
- The Board meaningfully accounted for the central issues and concerns raised by the parties and the courts do not expect the Board to "respond to every argument or line of possible analysis" or to "make an explicit finding on each constituent element, however subordinate, leading to its final conclusion," as articulated in *Vavilov*;
- The Board made a finding of fact that "In this Interim Application, the Board did not find sufficient evidence to allow it to divide the awarded increase into separate categories of "drought rate increase" and "base operations rate

increase”, and given the truncated hearing and deficiency of the evidentiary record, this was a finding of fact that the Board was entitled to make;”

- Given the finding of the Board as to the importance of long-term forecasts in exercising its discretion to balance customer interests with the financial health of the utility and given the choice of Manitoba Hydro not to honour its commitment to file an IFF in 2019, Manitoba Hydro is disingenuous in criticizing the Board’s reasons as having “no specific Board findings related to the interest of ratepayers”;
- Manitoba Hydro has the onus to prove its case in a final rate request scheduled for the fall of 2022;
- The brief reasons in Order 137/21, as further detailed in the 96-page reasons for decision in Order 9/22, meet or exceed the test in *Vavilov*. When read with the record as a whole the reasons are “based on an internally coherent and rational chain of analysis and that is justified in relation to the facts and law that constrained the decision-maker”;
- After considering the record, both the reasoning process and the outcome of the decision are reasonable in the context of an interim process which will be subject to a full hearing in the fall of 2022.

Consumers Coalition

Harvest Manitoba, the Manitoba Branch of the Consumers' Association of Canada, and the Aboriginal Council of Winnipeg have combined their interventions as the “Consumers Coalition”.

Consumers Coalition maintains that while specifically mindful of the guidance by the Supreme Court of Canada, Board Orders 137/21 and 9/22 set out “an internally coherent and rational chain of analysis” that is intimately connected to the legislative framework, the evidence before the PUB, and the insight of regulatory decisions dating back over 18 years. Further, Manitoba Hydro failed to recognize and act on Board

regulatory guidance from Orders 59/18 and 69/19 and Manitoba Hydro attempts to treat Order 9/22 in isolation from the prior decisions.

Consumers Coalition submits the Board's regulatory decisions are cumulative and that Order 9/22 must be read in the context of Orders 59/18 and 69/19. Further, the kinds of questions and clarifications that Manitoba Hydro seeks in its Application to Review and Vary are in large part found in these two prior Board Orders.

In its submissions, Consumers Coalition maintains Manitoba Hydro's Application to Review and Vary Order 9/22 should be dismissed, including for the following reasons:

- The Board observed Supreme Court authority that “interim rates are set without the benefit of a full evidentiary record, involve an abbreviated process, and are adjudicated against a less onerous legal standard than are final rates.”
- Board Order 137/21 noted a limitation in Manitoba Hydro's Interim Rate Application, which was “acknowledged by Manitoba Hydro and all Interveners, was that there currently is no long-term financial forecast being used in the management of Manitoba Hydro.” The Board found that “without such a current planning document, the Board and all Parties are at a disadvantage when considering the important concepts of rate smoothing and reasonable rate trajectories when balancing the interests of ratepayers with the financial health of Manitoba Hydro.”
- The 3.6% interim rate increase granted was intended to recognize both “the financial consequences of the drought and the Board's objective to avoid rate shock by smoothing the rate increases required to address the costs of major capital projects entering service.”
- The Board's approach in Order 9/22 is consistent with prior Board decisions dating back over 18 years holding that adverse circumstance such as a drought should be met with a combination of responses including rate increases, the drawing down of retained earnings, and the exploration of opportunities for

operational efficiencies. Order 9/22 is consistent with recent Board decisions regarding Manitoba Hydro's managing Operating & Administrative expenses as well as Business Operations Capital.

- Order 9/22 also tracks the general range of recent Board-approved rate increases undertaken in the same context of responding to the cost pressures of major capital projects entering service while trying to mitigate rate shock.
- It is open to Manitoba Hydro to decide, in the management of its business, that it does not want to prepare long-term forecasts for its own planning purposes. However, the Board has signaled both in Order 9/22 and in prior decisions that it requires long-term forecasts in order to exercise its responsibility to set just and reasonable rates.
- Long-term forecasts are necessarily just that – forecasts. They are expected to change as circumstances change. However, the Board cannot set final rates in a void without any indication of what the longer term might bring. Doing so would be irresponsible rate setting and not in line with established practice and prior Board findings.
- It is recognized by Manitoba Hydro, the Board, and Intervenors that the Board cannot order Manitoba Hydro to spend or not spend on specific projects, and the Board does not have jurisdiction to approve, reject, or vary capital projects. However, the Board's jurisdiction to review whether Manitoba Hydro's expenses are necessary and prudent is clear and settled law, as these expenses have a direct impact on rates.
- Directives 6 and 7 of Order 9/22 expressly reference information required "at the 2022/23 General Rate Application." The Board is not directing Hydro to spend or not to spend on particular projects, which would not be within its jurisdiction. Rather, the Board is seeking information regarding the prudence and reasonableness of expenditures for the purposes of better assessing the expenses to be included in the revenue requirement for the purposes of rate setting.

Consumers Coalition concludes its submissions by noting Order 9/22 sets out a careful chain of reasoning grounded in the evidence before the Board, the legislative scheme, and prior Board decisions. Order 9/22's 96 pages of analysis go above and beyond the requirements for an interim rate decision subject to finalization at a General Rate Application.

6.0 Board Findings

The Board Act permits the Board to make interim decisions in the first instance and reserve further directions for the public hearing into the Utility's Application to vary or finalize the interim rates approved in Orders 137/21, 140/21, and 9/22.

As found by the Board in previous Orders, interim rates are set without the benefit of a full evidentiary record, involve an abbreviated process, and are adjudicated against a less onerous legal standard than are final rates. This finding by the Board is consistent with Manitoba Hydro's acknowledgment of the Supreme Court of Canada's fundamental principle that interim applications are "made in an expeditious manner on the basis of evidence which would often be insufficient for the purposes of the final decision." Additionally, as previously found by the Board, an interim rate application is not the appropriate forum to consider and rule upon contentious issues.

In accordance with the legislation, the interim rates approved by the Board in this proceeding must be the subject of a further public hearing process before the Board to alter or finalize any such interim rates. The public process to finalize the interim rates approved in this hearing process will follow in a General Rate Application proceeding before the Board in the fall of 2022. Manitoba Hydro has indicated a November 15, 2022 filing date for its next General Rate Application. The scope of the General Rate Application and any issues related to the matters raised by Manitoba Hydro will be finalized through a Pre-Hearing Conference.

In compliance with Manitoba law, and for Manitoba Hydro's 2021/22 interim rates, the Board varied the Utility's requested 5% increase in General Consumers Revenue and found that a 3.6% increase was just and reasonable and in the public interest. In so doing, the Board balanced the financial health of Manitoba Hydro and the interests of the monopoly Utility's customers.

In Order 137/21 the Board found, *"This increase recognizes the financial consequences of the drought and the Board's objective to avoid rate shock by smoothing the rate increases required to address the costs of major capital projects entering service."*

In Order 9/22 the Board found, *"In this Interim Application, the Board did not find sufficient evidence to allow it to divide the awarded increase into separate categories of "drought rate increase" and "base operations rate increase". This is a matter that the Board will consider further at the 2022/23 General Rate Application when Manitoba Hydro seeks to finalize the 2021/22 interim rates."*

All Parties recognize that when Manitoba Hydro applies to finalize its 2021/22 interim rates, it may file evidence seeking to confirm, or alternatively vary, the interim 3.6% increase approved by the Board in Order 9/22.

The Board found that a limitation in the Utility's Interim Application, acknowledged by Manitoba Hydro, was that it does not currently have a long-term financial forecast being used in the management of the Utility. For reasons explained by Manitoba Hydro's management, the last such long-term financial forecast utilized by Manitoba Hydro was its updated Integrated Financial Forecast IFF16, notwithstanding that Manitoba Hydro represented at the 2019/20 GRA that it would file a new IFF in the next GRA, anticipated before the end of 2019. Without such a current planning document, the Board was at a disadvantage when considering the important concepts of rate setting, rate smoothing, and reasonable rate trajectories when balancing the interests of ratepayers with the financial health of Manitoba Hydro. These concepts and the Board's corresponding findings are explained in detail in prior Board Orders, including Orders 59/18 and 69/19.

For the purposes of its rate-setting at Manitoba Hydro's next General Rate Application, the Board expects the long-term financial forecast presented by Manitoba Hydro will include disclosure of all the underlying assumptions, including the financial metrics used in its preparation. The Board understands that the financial information Manitoba Hydro provides the bond rating agencies consists of assumptions and financial projections. The Board further recognizes that the long-term financial forecast(s) provided may be neither approved by the Manitoba Hydro-Electric Board nor used past the short-term by the Utility's management.

In its Orders, the Board found that it does not have the legal jurisdiction to approve specific capital programs or order Manitoba Hydro to reduce its capital spending. In its interim Orders the Board has not directed any specific cuts to individual Business Operations Capital expenditures nor any Operating & Administrative expenditures. The Board will assess Manitoba Hydro's efforts to control costs when adjudicating the final rate increases as these expenses have a direct effect on rates.

The Board has not directed Manitoba Hydro to engage additional expert evidence to determine what, if any, additional drought forecasting options may exist to mitigate the utility's drought risk.

Manitoba Hydro has submitted it is now premature to require expert evidence on this topic as the Utility has additional evidence that it has yet to present on this topic. The Board will determine whether to engage an independent expert consultant, with such a determination expected prior to the Pre-Hearing Conference for Manitoba Hydro's General Rate Application to be filed on November 15, 2022.

The Board finds that Order 9/22 should not be rescinded, changed, altered, or varied. The Board concludes that Manitoba Hydro has not established an error of law, jurisdiction, or fact and has not raised new facts or a change in circumstance which casts substantial doubt on the correctness of Order 9/22.

7.0 IT IS THEREFORE ORDERED THAT:

1. Manitoba Hydro's Application to Review and Vary Order 9/22 **BE AND IS HEREBY DISMISSED.**

Board decisions may be appealed in accordance with the provisions of Section 58 of *The Public Utilities Board Act*, or reviewed in accordance with Section 36 of the Board's Rules of Practice and Procedure. The Board's Rules may be viewed on the Board's website at www.pubmanitoba.ca

THE PUBLIC UTILITIES BOARD

"Robert Gabor, Q.C."
Chair

"Rachel McMillin, B.Sc."
Associate Secretary

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Associate Secretary