

**NEEDS FOR AND ALTERNATIVES TO (NFAT) REVIEW OF
 MANITOBA HYDRO'S PROPOSED DEVELOPMENT PLAN
 INTERVENER REQUEST FORM**

1. Name of Requesting Party:	
Green Action Centre	
2. Address of Requesting Party:	
3rd floor, 303 Portage Ave., Winnipeg, Manitoba R3B 2B4	
3. Phone Number:	Business: Residence
	(204) 925-3770 (204) 452-9017
	Fax Number: E-mail:
	n/a p.miller@mymts.net
4. Contact Person(s):	
Peter Miller	
5. Address:	
1101 Riverwood Ave., Winnipeg, Manitoba R3T 1L5	
6. Phone Number:	Business: Residence:
	n/a (204) 452-9017
	Fax Number: E-mail:
	n/a p.miller@mymts.net
7. How many members does your organization have?	
~2000	
8. How many years has your organization been in existence?	
28	
9. Please provide a list of the executive members of your organization:	
<p>Randall McQuaker - Executive Director Colin Crolley - President of the Board Peter Miller - Vice-President of the Board Sara Thrift - Secretary of the Board Robin Beukens - Treasurer of the Board</p>	

10. What is the purpose/mandate of your organization?

Green Action Centre's mission is to promote greener and better living by sharing practical solutions and advocating for change. We are a registered charity, governed by an elected community board. We promote greener living through environmental education and encourage practical green solutions for homeowners, workplaces, schools, communities and the Province. Our primary areas of work are green commuting, composting and waste, sustainable living, resource conservation, and energy and climate change policy.

11. To what extent are the members of your organization affected by the outcome of this review?

Green Action Centre intervenes in the public interest for public goods. Manitoba Hydro's policies and activities have a central role in Manitoba's "green prosperity" and thus a process to examine alternative forms these can take is important to optimize the impacts of Manitoba Hydro - economically, socially, and to realize the goal for Manitoba "to be one of the most sustainable places to live on earth" (TomorrowNow, p. 4 at <http://gov.mb.ca/conservation/tomorrownowgreenplan/>).

12. What issues are of specific concern to your organization?

See page 4

13. State the reasons for the proposed intervention, to the extent not captured above.

Green Action Centre is guided by principles of sustainability and justice. Manitoba Hydro's health, policies and practices have significant impacts and potential for the "green prosperity" of Manitoba. The identified issues have bearing on these broad considerations.

14. Nature of the proposed intervention.

a) Does your organization intend		Yes	No
(i)	to appear throughout the review:	X	
(ii)	to participate in the production of evidence:	X	
(iii)	to participate in the testing of evidence through cross-examination:	X	
(iv)	to present final submissions to the Board:	X	
b) Does your organization intend to call witnesses:		Yes	No
		X	

c) If yes to No. 14b), please list the proposed witness(es) (use separate pages if necessary):

(i)	Name:
(ii)	Address:
(iii)	Qualifications:
(iv)	Subject of submission:

See section 17 below.

15. Will your organization be applying for costs under Part IV of the PUB's Rules of Practice and Procedure:		Yes	No
		X	

If yes: Refer to Section 43 of Rules of Practice and Procedure.

Provide detailed budget as per the attached Appendix II.

16. Are you planning a joint intervention or collaboration with other proposed interveners on any issues? If so, please set out the extent of your joint intervention or collaboration:	
<p>Green Action Centre is prepared to collaborate with other parties. In this process, we are submitting a joint motion with CAC Manitoba on process to initiate clarification and change. In the just-concluded GRA, we also jointly sponsored expert testimony from Philippe Dunsky with CAC Manitoba.</p> <p>Discussion has also begun with other parties concerned with climate and energy issues to see if they wish to pursue this formal route to examining Manitoba Hydro's plans and alternatives. One possible outcome of these discussions would be a joint intervention with Green Action Centre.</p> <p>We think it important to allow not only collaborators but also joint participants the opportunity to make separate final submissions, if they wish to do so, to reflect the perspectives of their organizations in interpreting and building a case on the evidence.</p>	

17. Please provide a work plan defining the major proposed activities of all participants and the estimated hours:
(e.g.: Jane Smith – Review MH filing; prepare information requests regarding socioeconomic impacts; draft & submit report on socioeconomic impacts; oral testimony at hearing)

Although we have identified issues we wish to see addressed, we are at this point unready to define a work plan and identify expert witnesses for several reasons. (1) The 13 days notice is too short, (2) our organization has many other activities underway, and (3) we are unclear about what kind of process we are to engage in.

On this last point, we note that the Terms of Reference issued by IEM appear to contemplate a different process than the pre-hearing notice signifies. The former only makes mention of and provision for experts hired by the PUB and legal counsel, but not for experts retained by intervenors, unlike the PUB notice of pre-hearing conference and this form. Green Action Centre and the Consumers Association of Canada (Manitoba Branch) have filed a joint motion to the PUB to clarify and rectify matters to provide a fair and productive process.

Once the nature of the process is clarified we will be in a better position to develop a work plan for expert witnesses.,

12. What issues are of specific concern to your organization?

1. Forecasts of domestic electricity consumption, existing firm export commitments and potential firm exports
2. Forecasts of firm and opportunity export pricing
3. Factors influencing 1 and 2 and their probabilities and associated risks.
4. Range of MH or provincial potential control over 1 and 3 through DSM and alternative energy initiatives.
5. Review and evaluation of DSM potential study (yet to be released) – also extended to a renewable energy potential study.
6. Strategic proposals for enhancing DSM and RE deployment.
7. Determination of marginal costs by several approaches – (a) longterm value of incremental exports, (b) long-term cost of incremental supply from construction of new hydro generation and associated transmission, (c) medium term cost of incremental supply as reflected in operating and carrying costs/kWh for first 10-20 years of new supply.
8. Determination of marginal costs of DSM and alternative energy supply for comparison with above.
9. Assessment and comparison of other attributes of alternative supply or conservation sources and their integration into a diversified portfolio, including contributions to risk management.
10. Long-range planning beyond 20-year horizon. Note that domestic demand is forecast to grow 1.6% annually all the way out, which exceeds the capacity of Conawapa and Keeyask by another Keeyask 35 years out. The formula to meet steadily growing demand by continuous development of hydro-electric capacity is unsustainable in the long.