

Regarding the additional PUB request in its letter dated August 9, 2018 for intervenors to provide positions on the process proposed by Manitoba Hydro for Time Of Use rates, as set out in Directive 29 of Order 59/18:

MIPUG has reviewed Hydro's letter of July 26, 2018 regarding Directive 29 including its time-of-use (TOU) rate design process. Hydro has proposed timelines that appear appropriate given the work required, as opposed to rushing the exercise to meet tighter deadlines. As the process unfolds, it should become clear whether more time may be required or not. In general, MIPUG finds Hydro's process to be reasonable, with the exception that MIPUG encourages Hydro to undertake engagement with customers and customer groups at the stage where "key inputs and considerations" have been updated, to confirm the key criteria of a desirable TOU rate, before Hydro unilaterally defines the "updated TOU rate design options" that will be further discussed with customers. This may require more substantive exchanges in the "kick-off" stage to cooperatively refine the options, before Hydro sets off one-on-one with customers to review the implications of the options.

Thank you for the opportunity to respond on this.

-Melissa Davies