MH/SB I-1

Part and Chapter:	Evidence prepared by Bruce Duggan	**Page #:**	
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PREAMBLE:

QUESTION:

a) Please provide a copy of Bruce Duggan's written retainer letter or agreement. Please also provide any instructions received with respect to the retainer.

RATIONALE FOR QUESTION:

To understand the scope of the consultant's engagement, including the issues the consultant was instructed to examine and the instructions provided in relation to that work.

RESPONSE:

No written retainer letter or agreement was prepared. Sustainable Brandon's instructions to Mr. Duggan in preparing evidence for this proceeding were to follow the PUB's order about that evidence. The relevant portions of the Order read as follows:

> **1.0 Executive Summary**
>
> This order approves and restricts the scope of the application of Sustainable Brandon for intervener status, in the Public Utilities Board's ("Board") ongoing review of Manitoba Hydro's 2025 Integrated Resource Plan ("IRP") and proposed Major New Facilities ("MNF").
>
> **3.4 Board Findings**
>
> The Board approves Sustainable Brandon's application to intervene in this proceeding, but with a limited scope. The Board finds the perspectives of Brandon's residents to be relevant in the scope of the MNF review and those perspectives on in-scope issues can be provided through Sustainable Brandon's intervention….

> The Board finds that dismissing Sustainable Brandon's application to intervene because of the timing of its application would not be in the public interest. It is unreasonable to expect a prospective intervener to submit an application to intervene if the applicant has not yet filed its application.
>
> The Board finds that from its application to intervene, the scope of Sustainable Brandon's intervention is limited to:
>
> - consideration of alternative renewable energy options - including how and why renewables have been ruled out;
> - consideration of specific renewable options that may be viable;
> - consideration and examination of the nature of Manitoba Hydro's peak demand including the number of days annually that peak demand occurs, at what time of the day, differences between peak demand and base load generation, and how peak load has been projected for the future, and to what extent were load shifting and peak shaving options considered to reduce peak demand; and
> - consideration of a possible dual-fuel option, using biodiesel….
>
> Sustainable Brandon is not approved to intervene on the issues of health risks and health costs related to methane and natural gas combustion turbines. The Board finds that these issues are better addressed th[r]ough a subsequent review proceeding that is to be conduc[t]ed under The Environment Act.….

Sustainable Brandon also directed Mr. Duggan to base the evidence on verifiable and credible sources.