How our buildings use energy touches nearly every part of Manitobans' daily lives. Manitoba Hydro's Integrated Resource Plan isn't responsible for every aspect of how our buildings operate, but it would be naive to sidestep the opportunity it provides given buildings account for roughly a third of Manitoba's energy use. This IRP is a genuine chance for Manitoba to invest seriously in energy efficiency and demand-side management.

Thank you for having me here today! My name is Laura Tyler and I am the Executive Director of Sustainable Building Manitoba. For over 20 years, our organization has represented architects, engineers, and builders across the province, with a mandate to educate and advocate for sustainable building.

Manitoba Hydro asks this Board to evaluate the IRP against four themes: cost, environment, socio-economic impact and reliability, and we want to use these themes to show the Board how demand-side management should be a bigger consideration. We also think it is important that the IRP highlight policy actions required to meet its objectives and ensure that plans consider the future beyond the current 10 year planning window.

Demand-side management, as I am sure the Board knows, is everything on the customer's side of the meter that reduces or reshapes how much power the system needs.

All of Manitoba Hydro's ten potential development plans include gas turbines, even the plans explicitly built to minimize reliance on them. Meanwhile, DSM was tested across a range of technologies, but at exactly one incentive setting: maximum cost, maximum incentive. By using the most expensive incentives for DSM, the model renders DSM less competitive with other options. While turbines were modeled at a range of capacity and price points, DSM got a single all-or-nothing data point.

Regarding Costs:
DSM is ratepayer-funded via Efficiency Manitoba and already part of how the utility operates. DSM builds local improvements that create local jobs, income, and tax revenue, and can improve equity by lowering monthly costs across the board.

Efficiency Manitoba's 2025 annual report shows a 51.2 megawatt winter peak reduction from programs that weren't even designed to target peak demand. EM's own testimony puts total savings at 190 megawatts for $143 million spent over the last five years, under 10% of what a Wuskwatim-sized dam costs, with those savings landing in Manitobans' pockets not just for one year, but for decades.

Turbines exist to cover a handful of extreme winter peak hours, exactly the kind of demand DSM is already proving it can chip into. That $3 billion adds to Hydro's debt and gets recovered through rates for decades, whether the turbines run or not. DSM carries no such risk, it scales incrementally instead of committing all at once. Using less energy costs less than building new supply, full stop, and a system that delays DSM now pays steeper costs later with fewer options left.

BC Hydro's mandate puts energy efficiency first: DSM levels are set before the supply-side optimization even runs. This IRP tested DSM only at its most expensive setting.

Regarding the Environment:
Hydro's own executive summary defines net-zero as emissions "netted to zero on an ongoing cumulative basis." Yet the plan does not project reaching net-zero before 2050, the very last year of its modelling, and is relying on unproven carbon capture technology to get there. As the federal Net-Zero Advisory Body puts it, don't get caught in the net: prioritize real reductions, and treat removal and offsets as a last resort, not a finish-line strategy. The Advisory Body has also warned against locking into systems or technologies that will need to be replaced at great cost before net-zero is reached, a $3 billion, decades-long commitment to combustion turbines is precisely that kind of locked-in risk, and DSM isn't. Every tonne emitted before then stays in the atmosphere, exacerbating the impacts of climate change and associated cost to society through destructive wildfires and extreme weather events.

DSM lets Manitoba start cutting emissions now instead of banking on offsets at the finish line. It reduces operational emissions immediately, and unlike a new turbine, it doesn't add embodied carbon from steel and concrete in the first place. A true cumulative approach means investing in DSM today, not waiting until the last possible moment.

Regarding Socio Economic Impacts:
There's an economic case here too, separate from the energy rates billed to Manitobans. DSM also helps address affordability directly: a more efficient home costs less to heat, which means more Manitobans have money left over to spend elsewhere in the local economy.

Money spent on efficiency and retrofits pays local contractors, tradespeople, and suppliers, and it circulates inside Manitoba's economy. “The Economic Impact of Improved Energy Efficiency in Canada” report finds up to $7 in GDP growth for every $1 invested in energy efficiency. Turbine spending, by contrast, flows largely out of province for specialized equipment that Manitoba doesn't manufacture.

These benefits go beyond dollars and cents. Efficiency Manitoba's own testimony this month acknowledged that its legislated cost-effectiveness test doesn't capture the full value of energy efficiency, including improved thermal comfort, reduced financial stress, and better health outcomes for occupants. None of that shows up in a supply-side cost comparison, but it's real value the IRP's evaluation is leaving out.

Regarding Reliability:
Manitoba Hydro's own reliability metric is specific: adequate supply, resource diversity, and technology maturity so whether the system as a whole can meet forecast load. Under cross-examination, Manitoba Hydro's own witness confirmed that this metric explicitly does not include things like power disruptions or transmission and distribution reliability. In other words, by Hydro's own definition, reliability is about whether enough power gets generated, not about what happens to a home, a family, or a business when the system is actually under stress.

That's resilience, and right now it sits outside the metric entirely. A well-built, well-insulated home holds its heat and keeps its occupants safe during an outage or an extreme cold event in a way that generation alone cannot. We'd ask the Board to press Manitoba Hydro on why resilience, what happens when something breaks, isn't part of this plan's core evaluation at all.

Resource diversity also looks thin in this plan. Solar and geothermal are largely absent from the potential development plans altogether. Other parties are better positioned to speak to the technical case for either, but for a plan meant to serve Manitoba's buildings for decades, leaving proven, longer-term options off the table is worth the Board's attention.

Regarding policy asks:
The National Building Code's top efficiency tiers move toward net-zero-ready construction, targeting roughly a 60% reduction in energy use over the base code. Manitoba sits at the lowest tier today, and Hydro confirmed under cross-examination that it hasn't analyzed what adopting a higher tier would do to demand even though Manitoba is legislated to adopt a higher tier by 2027, well within this plan's own ten-year window. Every building built to a low code today locks in decades of avoidable demand before it's even occupied and necessitates difficult and costly retrofits in the future. Building codes are just one policy example that has massive impacts that Hydro could be championing to help meet its objectives. An affordable, reliable, and resilient Manitoba depends on getting this right across the board.

Regarding planning beyond 10 years:
Natural gas is still how most Manitoba homes are heated today. A real net-zero future means those homes eventually switch to efficient electric heat, a significant amount of new demand headed Hydro's way over the coming decades, well beyond this plan's ten-year window. Investing in efficient buildings and heat pumps now makes that transition manageable later, by ensuring the added demand comes from buildings that use power well instead of buildings that waste it. A plan built around turbines and an unproven capture technology does nothing to prepare for that shift.

We're asking the Board to recognize that DSM has not been fairly evaluated in this plan, and that it deserves to be tested on equal footing with the proposed combustion turbines. Following Hydro's own criteria, we recommend:

1. **Cost** - Test all resource options, including DSM, at a real base case rather than best- or worst-case assumptions.
2. **Environment** - Measure and evaluate embodied carbon and cumulative emissions.
3. **Socio-economic impacts** - Quantify and compare the local economic benefits of all development plan options, including GDP and jobs, in the evaluation.
4. **Reliability** - Treat resilience as core to this plan, and reassess the near-absence of solar and geothermal, given both resilience and resource diversity are already part of Hydro's own reliability metric.
5. **Policy** - Clearly state what policy support, like building code adoption, Hydro needs.
6. **Beyond 10 years** - Require this plan to show how it positions Hydro for long-term success.

Thank you for your time, attention and care. Truly.