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MANITOBA HYDRO 2012/13 & 2013/14 GENERAL RATE APPLICATION

VOLUME II

PROPOSED RATES AND CUSTOMER IMPACTS

10.0 OVERVIEW OF TAB 10

Tab 10 provides the proposed rates and customer impacts for the proposed rate changes in this Application. Section 10.1 provides Manitoba Hydro's general rate making objectives; Section 10.2 provides details of the proposed rates by customer class; Section 10.3 discusses the customer bill impacts of the proposed rate changes; Section 10.4 outlines the interim Orders for which Manitoba Hydro is seeking final approval in this Application; and Section 10.5 provides a comparison of Manitoba Hydro's electricity rates with other utilities.

Manitoba Hydro is applying to the Public Utilities Board ("PUB") for the following:

• Interim approval of rate schedules which reflect an across-the-board increase of 2.5% for rates effective September 1, 2012 for grid customers. (This represents a 3.6% increase for the fiscal year when combined with the 2.0% April 1, 2012 increase.) The September increase will produce additional revenue of \$19.9 million over the balance of the fiscal year. On a class basis, the increase in revenue is as follows:

Customer	2012/13
Class	Additional \$
	(millions)
Residential	\$8.8
GS Small	\$3.9
GS Medium	\$2.5
GS Large	\$4.5
A&R Lighting	\$0.3
Misc. & DSM	(\$0.1)
Total GCR	\$19.9

A Proof of Revenue for the seven months September 1, 2012 to March 31, 2013 is provided in Appendix 10.1. Proposed rate schedules for rates effective September 1, 2012 are provided in Appendix 10.2 and Bill Comparisons comparing the April 1, 2012 rates to the September 1, 2012 rates are provided in Appendix 10.3.

• Approval of a 3.5% increase in overall revenue effective April 1, 2013. A Proof of Revenue, rate schedules and bill comparisons pertaining to this increase will be filed following Manitoba Hydro-Electric Board ("MHEB") approval expected in August 2012.

• Interim approval of Diesel rate schedules which reflect a 6.5% increase in the full cost portion of the rate to be effective September 1, 2012, sufficient to generate additional revenue \$0.2 million over the balance of fiscal 2012/13. (Refer to Tab 11 for more details).

 • Confirmation that the Board accepts the rate approval process given proposed modifications to the Curtailable Rate Program to be effective April 1, 2013, as outlined in Section 10.2 below. Appendix 10.4 provides a copy of the Proposed Terms and Conditions and Appendix 10.5 provides a copy of the most recent report on the Curtailable Rate Program covering the period April 1, 2011 to March 31, 2012.

• Confirmation that the Board accepts the rate approval process given proposed modifications to the Terms and Conditions of the Surplus Energy Program to be effective April 1, 2013, as outlined in Section 10.2 below. Appendix 10.6 provides a copy of the Proposed Terms and Conditions and Appendix 10.7 provides a copy of the most recent report on the Surplus Energy Program covering the period November 1, 2010 to October 31, 2011.

• Approval of various interim and *ex parte* approved PUB Orders as outlined in Appendix 10.9.

The proposed rate schedules are compatible with Manitoba Hydro's general rate making objectives and long-term direction as follows:

1. Manitoba Hydro's long-term target is to have all class Revenue Cost Coverage (RCC) ratios in the range of 95% to 105%, and further that all classes should be gradually moved toward RCC's of unity.

2. In conformity with the principles of gradualism and sensitivity to customer impacts, annual adjustments to revenues by customer class are less than two percentage points greater than the overall proposed increase.

3. Whenever possible, rates should be designed with a view to sending the appropriate price signal regarding the cost of energy to those parts of the rate design affecting the use which would be most sensitive to such a signal.

4. Maintain Manitoba Hydro's competitive position with respect to rates charged by other Canadian utilities for all rate classes.

5. The combined impact of proposed class average rate increases and adjustments to rate structure results in customer monthly impacts which fall within Manitoba Hydro's guidelines:

For Residential customers, no customer will experience a bill increase which
exceeds the greater of \$3.00 per month or three percentage points more than
the class average increase.

 For General Service customer, no customer will experience an increase in their average monthly bill over a year which exceeds the greater of \$5.00 per month or five percentage points more than the class average increase.

10.2 PROPOSED RATE CHANGES BY CUSTOMER CLASS

As a hearing in respect of this application is not expected until November 2012 or possibly early 2013, Manitoba Hydro is requesting interim approval of an across-the-board increase of 2.5% for grid rates and a 6.5% increase in the full cost portion of the

rates in the diesel zone, both to be effective September 1, 2012. A brief summary of the rates by customer class is provided below.

Residential

The monthly Basic Charge will remain the same at \$6.85 per month. The total increase in class revenue will be derived solely from the Energy Charge which will increase by 2.7%.

General Service Small and Medium

Manitoba Hydro is continuing to consolidate the General Service (GS) Small and Medium rate classes. Full consolidation is expected with the proposed rates to be filed effective April 1, 2013. Currently the rates between the two classes vary only with respect to the monthly Basic Charge / Three Phase Charge.

Designing the rates for the Small / Medium class is complex, as the split in revenue derived from each component of the rate varies significantly amongst the three customer sub-groups. This poses a problem specifically when setting the blocked energy rates, as increasing each block charge by the same percentage results in an over-collection of revenue for Small Non-Demand customers and an under-collection of revenue from the Medium customers. The blocked energy charges therefore need to increase incrementally so as to obtain the desired revenue requirement. The two tables below illustrate the differences among the sub-groups (based on 2012/13 forecast data at proposed rates):

Percentage of Total Revenue Derived from Each Rate

|--|

	Basic Charge	Energy Charge	Demand Charge
Small Non-Demand	10%	90%	-
Small Demand	3%	82%	15%
Medium Demand	0%	67%	33%
	Distribution of	Engage Ligger by Diggle	

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33		Distribution of Energy Usage by Block		
34		1 st Block	2 nd Block	Tail Rate
35	Small Non-Demand	94%	6%	-
36	Small Demand	55%	21%	24%
37	Medium Demand	15%	8%	77%

The Basic Charge for GS Small customers is proposed to increase by 2.7% for single phase customers and 2.9% for three phase customers. The Basic Charge for GS Medium customers will remain unchanged. The proposed rates for April 1, 2013 (to be filed at a later date) should reflect full consolidation of the Basic Charge for Small Three Phase customers to be equal to the Basic Charge of Medium customers.

The proposed Energy Charge for rates effective September 1, 2012 reflects an increase of 2.4% for the first block, 3.2% for the second block and 4.0% for the run-off rate. The larger increase in the tail block rate is necessary given that no increase in the demand charge is being sought.

General Service Large

The proposed revenue increases for the three subclasses of the General Service Large class will be obtained solely through the energy component of the rate. The demand charges will remain unchanged. This will allow for continued rebalancing of the demand and energy charges. This translates to energy rate increases of 3.9% for Large 750V-30 kV customers; 3.5% for Large 30-100 kV customers; and 3.3% for Large >100 kV customers.

Upon approval from the MHEB, which is expected in August 2012, Manitoba Hydro is planning to also introduce Time-of-Use rates for Large >30 kV customers in its proposed April 1, 2013 rate schedules.

Area and Roadway Lighting

Manitoba Hydro is proposing a 2.5% rate increase for Area and Roadway Lighting for rates effective September 1, 2012.

Diesel Rates

This Application proposes changes to both the grid portion of the rate structure (equal to that proposed for grid customers) and the full cost portion of the rate structure effective September 1, 2012. The grid portion of the diesel rates will increase by 2.5%, while the full cost portion will increase by 6.5%. The 6.5% represents the accumulation of grid rate increases since the most recent diesel full cost rate increases (2.0% April 1, 2011,

2.0% April 1, 2012), as well as the 2.5% proposed for September 1, 2012). (Refer to Tab 11 for more details).

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The proposed rates and bill impacts can be found in Appendices 10.2 and 10.3 respectively.

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Limited Use of Billing Demand Rate Option ("LUBD")

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The rates proposed for Small and Medium LUBD customers are tied to the rates proposed for regular General Service Small and Medium classes. The monthly Basic Charge for Small LUBD customers will increase to the same level as regular GS Small customers. The Demand Charge is set at approximately 25% of the Demand Charge of the corresponding regular General Service class, with the energy charge calculated to provide revenue neutrality at a load factor of approximately 18%.

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Appendix 10.8 provides a copy of the most recent report on the LUBD program covering the period April 1, 2011 to March 31, 2012.

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Flat Rate Water Heating ("FRWH")

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Both Residential and General Service FRWH customers will see increases equivalent to those applied to the Residential and General Service Small rate classes, that being 2.5%.

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Curtailable Rate Program ("CRP")

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Appendix 10.4 provides a copy of the amended Terms and Conditions of the Curtailable Rate Program. Manitoba Hydro is making several changes to the CRP Terms and Condition as detailed below, to be effective April 1, 2013 unless otherwise noted.

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- A change in the defined hours for peak and off-peak periods to correspond to the hours being defined for a potential time-of-use rate offering.
- Curtailment Options "C" and "CE" will no longer be made available. The one customer under Option C (there are no customers on Option CE) will be allowed to remain on this Option for one year from the date of confirmation of the rate approval process associated with the amendments of the CRP Terms and Conditions by the PUB (the sunset date). The customer will have the ability to switch their curtailable

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- load to Option A provided they do so prior to the sunset date, otherwise their curtailable load will convert to firm service.
- Effective immediately upon confirmation that the PUB accepts the rate approval process given the modifications to the CRP Terms and Conditions, the cap limitations for CRP load will be reduced to 50 MW for Option R load (from the current 100 MW) and 180 MW for Option A and C loads (currently 230 MW), assuming that the Option C load converts to Option A. Should Option C load revert to firm service, then the cap for Option A will be reduced to 150 MW.
- Customer's ability to designate varying monthly curtailable load amounts will no longer be available. This feature has never been utilized.
- The current Terms and Conditions do not allow customers to go back onto the CRP if they have switched their curtailable load to firm service. The amended Terms and Conditions will allow customers back onto the program provided one year has passed since they went off the program and provided that there is curtailable load available under the cap constraints.
- The "Failure to Curtail" clause will be revised from "Manitoba Hydro may exclude customers from the Curtailable Rate Program if cumulative additional charges during any contract period equal or exceed cumulative discounts" to "Manitoba Hydro may exclude customers from the Curtailable Rate Program if a second or subsequent failure to curtail occurs in any twelve month period."

Each year Manitoba Hydro files an annual report with the PUB on the status of the CRP. The current report covering the period April 1, 2011 to March 31, 2012 is included in Appendix 10.5.

Surplus Energy Program ("SEP")

The PUB, by Order No. 57/09 dated April 28, 2009, approved the extension of the SEP to March 31, 2013. Manitoba Hydro is now proposing to make the SEP a permanent rate offering.

The only other change to the SEP Terms and Conditions is a minor change to Option 1 whereby customers will be allowed to have a different Reference Demand for each of the three pricing periods. The highest designated Reference Demand will be used in determining the customer's monthly billed demand.

A copy of the amended SEP Terms and Conditions are included in Appendix 10.6.

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Each year Manitoba Hydro files an annual report with the PUB on the status of the SEP. The current report covering the period November 1, 2010 to October 31, 2011 is included in Appendix 10.7.

10.3 CUSTOMER IMPACTS OF THE PROPOSED RATE CHANGES

Provided below is a brief summary of the bill impacts for the major rate classes. More detailed bill impacts for all customer classes can be found in Appendix 10.3.

Residential

Based on the proposed September 1, 2012 rates, residential customers will experience increases in their bill ranging from 1.9% to 2.6% depending on monthly consumption. A typical residential customer without electric space heat using approximately 1,000 kWh a month on average will see an increase in their monthly bill of \$1.80 or 2.4%. A residential customer with electric space heat, using an average 2,000 kWh a month will experience an average monthly increase of \$3.60 or 2.5% per month.

Seasonal residential customers will not experience as high of an increase due to their lower average use of electricity.

General Service Small

Small commercial customers will experience increases ranging from 2.0% to 3.1% depending on monthly consumption and load factor. The overall class average increase for General Service Small customers for rates effective September 1, 2012 is 2.5%.

General Service Medium

Medium commercial / industrial customers will experience rate increases ranging from 1.7% to 3.0% depending on monthly consumption and/or load. The overall class average increase is 2.5%.

General Service Large

Increases to General Service Large customers vary depending on the voltage level the customer is served at and the load factor of each customer. Since Demand Charges for General Service Large customers are proposed to remain the same with only the Energy Charge increasing, customers with higher load factors will receive slightly higher percentage increases.

Customers served at 750 V-30 kV will see increases in their monthly bill ranging from 1.7% to 3.0% with the average increase being 2.5%. Customers served at 30 kV to 100 kV will experience increases ranging from 1.6% to 2.7% with the average increase being 2.4%. General Service Large customers served at over 100 kV will see increases ranging from 1.6% to 2.6% per month, with the average being 2.4%.

10.4 REQUEST FOR FINAL APPROVAL OF INTERIM AND EX PARTE ORDERS

Manitoba Hydro is seeking final approval of interim and *ex parte* Orders relating to various General Consumers and Diesel rate increases, the Curtailable Rate Program and the Surplus Energy Program. Appendix 10.9 includes a complete list of interim and *ex parte* Orders up to July 4, 2012 which require final approval.

10.5 RATE COMPARISONS WITH OTHER UTILITIES

Manitoba Hydro uses its own annual "Survey of Canadian Electricity Bills" (included as Appendix 10.10) to compare bills paid by Manitoba customers with those of other major Canadian utilities. The survey continues to show that Manitobans have amongst the lowest electric bills in Canada.

One of the objectives in Manitoba Hydro's Corporate Strategic Plan is to have the lowest overall electricity rates in North America. To measure performance in the overall North American context, Manitoba Hydro uses the results of both the Edison Electric Institute ("EEI") survey as well as monthly statistics obtained from the United States Department of Energy ("DOE"). Unlike the EEI data which provides investor-owned utility comparisons, the DOE data provides comparisons by State which includes numerous utilities within that state. The following table provides the Total Retail Average Rate for the top ten Provinces and States based on December 2011 DOE data and Winter 2012 EEI data, using the March 30, 2012 noon exchange rate of 1.0009 CAD/USD. It is

important to note that the appreciation of the Canadian dollar relative to the United States dollar may have a significant impact on the results when compared to previous years.

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TOTAL RETAIL AVERAGE RATE (Canadian \$)		
State / Province	Cents per kWh	
Manitoba	5.86	
Idaho	6.18	
Quebec	6.32	
Wyoming	6.77	
British Columbia	6.86	
Louisiana	6.98	
Utah	7.00	
Kentucky	7.02	
Iowa	7.09	

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10.6 <u>UPDATE ON BOARD FINDINGS ORDER 5/12, SECTION 20.12.0</u>

Washington

<u>Status</u>

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The Board requires MH to file preliminary reports (and status updates on):

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a) Inverted Rates, with a view to creating a significantly higher-priced second energy block, but providing an accommodation to electric heat customers, some of which do not have access to natural gas for heating;

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Manitoba Hydro has studied and continues to study an implementation strategy for the reintroduction of inverted rates (for the Residential Class) with accommodation for those customers that heat electrically. Manitoba Hydro has established a working group to study this rate proposal which includes analysis of experiences in other jurisdictions with inverted rates.

With respect to GSS (D) and GSM customers Manitoba Hydro is of the view that such a rate design is impractical for these customers. Manitoba Hydro does not intend to pursue inverted rates for these customer classes.

b) GSS and GSM Class consolidation with a view to defining the end-product and the specified timeframe for completion;

Status

Manitoba Hydro has been consolidating the General Service Small and Medium classes through the past several rate hearings. The consolidation smoothes the transition of customers between the two classes of service and avoids any adverse impacts to customers during this transition. Assuming the Corporation's proposals in this application for rate increases are approved for September 1, 2012 and April 1, 2013 the consolidation will be complete.

c) Demand/Energy Rate Rebalancing with a view to defining the optimum balance and timeframe to achieve that balance through the allocation of Class Rate increases to the energy component;

Status

Manitoba Hydro has also been in the process of rebalancing the demand/energy split for all demand billed customers. The primary method to enable this change is by limiting approved rate increases to the energy charge and decreasing the demand charge when rate reductions are implemented such as in 2003. The purpose of rebalancing is intended to reflect that the rates charged to customers are reflective of cost allocation as in the Cost of Service Study ("COS"). The last report to the Board (July 2009) indicated that rebalancing was progressing, with the result based on PCOSS11 showing further progress. Manitoba Hydro will update reporting subsequent to the filing of PCOSS13.

d) Time-of-Use Rates with a view to applying these in the near future to Top Consumers and industrial customers that already have the necessary metering capability;

<u>Status</u>

During 2010 and 2011 Manitoba Hydro met on a number of occasions with MIPUG membership and consultants. During this period, the parties reviewed the potential for introduction of mandatory Time of Use ("TOU") rates for large industrial customers. Manitoba Hydro also met with other General Service Large customers who are potentially affected by TOU rates.

Introduction of TOU rates enable Manitoba Hydro to comply with the majority of issues which previous energy intensive rate proposals were intended to address, including broad application to all load growth and time of use pricing for on and off peak usage. Such a rate also partially addresses Manitoba Hydro's concerns about load growth by energy-intensive industries and the potential impact that such growth may have on export sales. It also addresses many of the customers concerns raised with respect to EIIR options that require complex calculations, determination of baselines, and application of two-tier rates.

Manitoba Hydro anticipates that the MHEB will review a TOU proposal at its August 2012 meeting.

e) Limited-Use Demand billing with an update of the continued need for this rate in light of the elimination of the Winter Ratchet;

24 <u>Status</u>

Manitoba Hydro has consistently maintained that the elimination of the winter ratchet does not in any way affect the need to have the LUBD rate available to customers. In fact the majority of customers on this tariff were not affected by the winter ratchet prior to its elimination in November 2009. The LUBD program is useful for customers whose load factor is approximately 18% or lower as it reduces their overall energy bill compared to the applicable class rate. In addition LUBD customers typically have lower coincidence factors than other customers in the class thus reducing the cost to Manitoba Hydro to serve them.

f) The Energy Intensive Rate, with justification for either abandoning the rate proposal or providing an alternative on-peak rate scenario as directed in Board Order 112/09; and,

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3	<u>Status</u>
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5	Please see response to item d) above.
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7	g) The Service Extension Policy, including a proposal for the Board's review and
8	possible acceptance in accordance with Order 112/09.
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10	<u>Status</u>
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12	Please see response to item d) above.