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- 34 11.50 Response to Directive 11, Order 43/13

1		MANITOBA HYDRO
2		2015/16 & 2016/17 GENERAL RATE APPLICATION
3		
4		PUBLIC UTILITIES BOARD MINIMUM FILING REQUIREMENTS
5	-	
6	11.0	<u>OVERVIEW</u>
7		
8		Tab 11 includes responses to the Minimum Filing Requirements ("MFR") of the Public
9		Utilities Board ("PUB") which was provided to interested parties on January 16, 2015.
10		The MFRs are organized by category in the sections that follow. Where information has
11		been incorporated in Tabs 3 to 10 of the Application, this has been identified in the
12		sections below.
13		
14	11.1	CORPORATE OVERVIEW
15		
16		MFR #1:
17		Acknowledgment from Utility that all prior evidence from all prior Public Hearings is
18		available to be used in the review of the current application before the Board.
19		
20		Manitoba Hydro will address this issue at the Pre-Hearing Conference scheduled for
21		February 5, 2015.
22		
23		MFR #2:
24		Listing of past Board Directives and copies of all letters and reports to be in
25		compliance with Board Directives
26		
27		Tab 10 of Manitoba Hydro's Application provides a status update on PUB Directives
28		from Orders 43/13, 134/10, and 150/08. Appendix 11.1 provides additional
29		correspondence between Manitoba Hydro and the PUB related to Directive 12 of Order
30		43/13 (DSM Deferral Account).
31		
32		

**MFR #3:** 

Provide an analysis which details all material changes in the Corporation operations since the last final Order of the Board.

A number of significant developments have taken place since the last Order of the PUB, including:

- In August 2013, the Province of Manitoba issued an Environmental Act licence for the Bipole III Reliability project and construction has commenced with a planned inservice date of 2018/19.
- In July 2014, the Province of Manitoba issued an Environmental Act licence for the Keeyask Generating Station and construction has commenced with a planned inservice date of 2019/20.
- As of April 2014, Manitoba Hydro's current Power Smart Plan targets the achievement of 1,136 MW and 3,978 GWh of savings over the next 15 years, and an investment of more than a billion dollars.
- Significant assets have been placed in-service, including the Pointe du Bois spillway replacement (August 2014) and the Riel 230/500kV Station (October 2014).
- Sustaining capital targets were established in CEF14 which considered increased requirements for aging infrastructure based upon asset condition assessments as well as requirements to support customer growth.
- Manitoba Hydro undertook an extensive review of its staff complement and is committed to reducing approximately 300 operational positions over the 3 year forecast period from 2014/15 to 2016/17. This cost saving measure will assist the Corporation in maintaining Operating, Maintenance & Administrative cost increases at an annual average increase of 1% per year (excluding accounting changes that impact OM&A) through fiscal 2016/17.

Manitoba Hydro-Electric Board's ("MHEB") Annual and Quarterly Reports also highlight significant accomplishments and events that are important to the operations of the Corporation.

*MFR #4*:

Corporate Organization chart indicating all affiliated Companies, subsidiaries, joint ventures and other ownership interests.

Please see Appendix 11.2.

1	
2	MFR #5:
3	Detail of all related party transactions with Subsidiaries for the last three fiscal years.
4	
5	Please see Appendix 11.3.
6	
7	MFR #6:
8	Copies of Financial Statements for each of the subsidiaries MH has a material interest.
9	
10	The financial statements for the 2012/13 and 2013/14 fiscal years for the following
11	subsidiaries are provided in Appendix 11.4:
12	<ul> <li>Centra Gas Manitoba Inc. – audited</li> </ul>
13	<ul> <li>Manitoba Hydro International Limited – audited</li> </ul>
14	<ul> <li>Minell Pipelines Ltd. – audited</li> </ul>
15	<ul> <li>Wuskwatim Power Limited Partnership – audited</li> </ul>
16	• 5022649 Manitoba Ltd. (Wuskwatim Power General Partner) – unaudited
17	<ul> <li>Keeyask Hydropower Limited Partnership – audited</li> </ul>
18	• 5900345 Manitoba Ltd. (Keeyask Power General Partner) – unaudited
19	Manitoba Hydro Utility Services Limited – unaudited
20	<ul> <li>Teshmont Holdings LP Ltd. – unaudited</li> </ul>
21	• 4985371 Manitoba Ltd. – unaudited
22	• 6690271 Manitoba Ltd unaudited (2013/14 only)
23	
24	MFR #7:
25	Updated Ownership schematic for WPLP and KHLP.
26	
27	Please see Appendix 11.5.
28	
29	MFR #8:
30	Financial Forecasts for WPLP and KHLP.
31	
32	Please see Appendix 11.6.
33	
34	MFR #9:
35	Most Current Corporate Strategic Plan and report card similar to PUB/MH 1-6 (b)
36	$(2012\ GRA)$ .

Please see Appendix 2.1 of Tab 2 of the Application for Manitoba Hydro's most curren
Corporate Strategic Plan ("CSP"). Please see Figure 10.1 of Tab 10 for Manitoba
Hydro's corporate dashboard comparing actual results against CSP targets for the
2013/14 fiscal year.
MFR #10:
Corporate Risk Analysis Report and Specific Risk Management Plans for all Major
Risks including Drought.
Manitoba Hydro will provide a response to this MFR as Appendix 11.7, as soon as it is
available.
FINANCIAL INFORMATION
MFR #1:
A 20 year IFF for electric operations only, indicating the respective financial targets.
MH14 can be found in Appendix 3.4 to the Application, including the financial ratios
(electric only) for the 20 year forecast period.
MFR #2:
Summary of Reasons for Application Table of operating results (Tables 2.1.1, 2.1.2
2010 GRA) including ten years of record/ (7 years actual and current and test years)
including the retained earnings for electric operations, and the financial targets
interest coverage, capital coverage and debt to equity ratio for electric operations only.
Please see Appendix 11.8.
MFR #3:
For the years 1999/00 through the test years, a details of rate increases requested
approved, the annual revenue increase and prevailing Manitoba CPI in similar basis to
PUB/MH 1-2 (b) (2010 GRA).
Please see Appendix 11.9.

1 **MFR #4:** 2 Quarterly Financial Statements for the previous and current fiscal year. 3 4 Appendix 11.10 includes the following: 5 The Manitoba Hydro-Electric Board ("MHEB") Annual Report for fiscal year ending 6 March 31, 2013; 7 • The MHEB Quarterly Report for the three months ended June 30, 3013; 8 • The MHEB Quarterly Report for the six months ended September 30, 2013; and, 9 The MHEB Quarterly Report for the nine months ended December 31, 2013. 10 11 The MHEB Annual Report for fiscal year ending March 31, 2014 can be found as 12 Appendix 5.1 of the Application. The MHEB Quarterly Reports for the three months ending June 30, 2014, and the six months ending September 30, 2014 can be found as 13 14 Appendix 5.2 and 5.3, respectively. 15 16 Manitoba Hydro will file with the PUB, the MHEB Quarterly Report for the nine months 17 ended December 31, 2014 once it is publicly released, which is expected to be in late 18 February 2015. 19 20 *MFR #5:* 21 A table, which details the debt to equity ratio, capital coverage ratio and interest 22 coverage ratio, net assets, net income, total debt and retained earnings, DBRS bond 23 ratings, total Provincial Debt and total MH debt to total Manitoba debt in each year 24 since 1992. 25 26 Please see Appendix 11.11. 27 28 MFR #6: 29 A table, which details the debt to equity ratio, capital coverage ratio and interest 30 coverage ratio, net assets, net income, total debt and retained earnings for each of the 31 years in the 20-year electric IFF. 32 33 Please see Appendix 11.12.

1	MFR #7:
2	Details of the determination of each of the financial targets for the last five fiscal years
3	and for each of the years in the 20 year forecast
4	
5	Please see Appendix 11.13.
6	
7	MFR #8:
8	Charts and respective data tables for each of the financial targets similar to PUB/MH
9	I-30 (2012 GRA)
10	
11	Please see Appendix 11.14.
12	
13	MFR #9:
14	File 20 year IFF scenarios of revenue requirements/energy depicting post 2003 actual
15	years to date plus future forecast cost components
16	(Finance/Depreciation/Operating/Water Rentals/F&PP/Taxes) for:
17	• 750 MW US Intertie project (CDN & US portions)
18	Keeyask generating station
19	Bipole Ill and Riel station
20	Pointe du Bois spillway & powerhouse
21	Wuskwatim overall project
22	• Base Case (non-major) G+T+D revenue requirement
23	
24	Manitoba Hydro will provide a response to this MFR as Appendix 11.15, as soon as it is
25	available.
26	
27	MFR #10:
28	A schedule detailing General Consumer Revenue for 2005 through the test years
29	detailing rate increases granted in similar format to PUB/MH 1-53 (2012 GRA).
30	
31	Please see Appendix 11.16.
32	
33	MFR #11:
34	A schedule detailing the statement of Income (Schedule 5.1.0, 2012 GRA) with five
35	years historical through the forecast test years. The schedule should provide two
36	columns for the compound annual growth rate for the historical period and for the

1 forecast period using the final year historical as a starting period. (On a similar basis 2 as PUB/MH 1-52 (a) (2012 GRA) 3 4 Please see Appendix 11.17. 5 6 MFR #12: 7 A schedule detailing the actual MH Electric Operations financial statements (i.e. 8 Operating Statement, Balance Sheet and Cash Flow Statement) for last five fiscal years 9 in the same format as the IFF, including the actual electric financial ratios. (PUB/MH 10 1-51 2012 GRA) 11 12 Please see Appendix 11.18. 13 14 11.3 **EXPORT AND DOMESTIC REVENUES** 15 16 **MFR** #1: 17 File average unit revenue/cost calculation for 20 year IFF13 & IFF14 adding actual 18 results for 2008/09, 2009/10, 2010/11, 2011/12, 2012/13 & 2013/14 19 20 Please see Appendix 11.19. 21 22 *MFR #2:* 23 File latest Power Resource Plans based on NFAT Plan 5 (2013/14 and 2014/15) Supply 24 and Demand Tables: 25 system power demand (MW) and dependable energy resources (GWh)/average 26 energy resources at generation • system firm winter peak demand and capacity resources (MW) at generation 27 28 new system firm summer peak demand and capacity resources (MW) at generation 29 30 System firm winter peak demand and capacity resources at generation, system firm 31 energy demand and dependable resources at generation, and system firm energy demand 32 and resources at generation (average of all flow conditions) can be found as Figures 9.1, 33 9.2 and 9.3, respectively, of Tab 9 of the Application. Manitoba Hydro does not produce 34 firm summer peak and capacity resources demand and supply tables as requested in the 35 MFR. 36

1	MFR #3:
2	Re-file Dec 2013 Revised PUB/MH 1-009 (2014 Interim) updated to end of 2014
3	• Monthly NEB data on firm/interruptible by export permit number plus imports
4	Separately summarizes summer and winter components for each year
5	
6	Please see Appendix 11.20 for the monthly NEB data on firm/interruptible by export
7	permit number plus imports. Manitoba Hydro does not compile this information on a
8	seasonal (summer and winter) basis.
9 10	MFR #4:
11	Re-file Dec 2013 Revised PUB/MH 1-008 (2014 Interim) updated to end of December
12	2014
13	• Total Sales Data (CON/US/Merchant)
14	• Total MISO Sales (NEB Reporting)
15	<ul> <li>Opportunity Export tables, separately showing summer and winter components for</li> </ul>
16	each year
17	• Export Revenue tables showing Opportunity Bilateral, Day Ahead, Market, Real
18	Time Market and Merchant Trading, separately showing summer and winter
19	components for each year
20	• Fuel and Power purchases showing system merchant purchases, import power
21	purchases (without wind), wind energy purchases & fuel purchases
22	• Transmission charges, separately showing summer and winter components for
23	each year
24	
25	Information on total sales data and opportunity export sales can be found in Tab 9.
26	Figures 9.6, 9.8 and 9.9. Information on NEB data on firm/interruptible exports by export
27	permit number and imports can be found in the response to Domestic and Export
28	Revenue MFR 3 and Appendix 9.1. Please see Appendix 11.21 for information on export
29	revenue, fuel and power purchases and transmission charges.
30	
31	Manitoba Hydro does not compile the information requested on a seasonal (summer and
32	winter) basis.
33	
34	MFR #5:
35	Re-file MH's response to Directive #5 of Board Order 43/13 updated to December
26	2014

1		Hydraulic generation by watershed
2		Hydraulic Energy in Storage chart
3		Monthly river flows by watershed
4		Lake Winnipeg levels
5		
6		Please see Appendix 9.1 to Tab 9 of the Application.
7		
8		MFR #6:
9		File updated 2012 GRA II-105 (PUB/MH II-105) quarterly report generation
10		summaries
11		
12		Please see Appendix 11.22.
13		
14	11.4	OPERATING EXPENSES
15		
16		MFR #1:
17		Schedule comparing the historical OM&A actual with IFF forecasts with explanations
18		of variances
19		
20		Please refer to Appendix 11.30.
21		
22		MFR #2:
23		Details on all cost containment actions to reduce the growth in OM&A over the last
24		five fiscal years and forecast through the test years.
25		
26		Please see Tab 5, Section 5.14 for details of cost containment measures being undertaken
27		by the Corporation.
28		ACTION 1/2
29		MFR #3:
30		EFT staffing level information for the last five fiscal years and that forecast through
31		the test years by business unit.
32		Diagram A manualin 11 22
33		Please see Appendix 11.23.
34		

1	
2	MFR #4:
3	Schedule which indicates the salary, wages and benefits as a percentage of OM&A,
4	percentage of domestic revenue, and salary wages and benefits capitalized for each of
5	the years 2003/04 through the test years. This analysis should include the total labour
6	and benefits capitalized for each year, total labour and benefits and the percentage of
7	labour and benefits capitalized in a similar level of detail of PUB/MH l-5(c) R &
8	PUB/MH 11-2 from the 2010 GRA.
9	
10	Please see Appendix 11.24.
11	
12	MFR #5:
13	Schedule that average salary per EFT by business unit for the last five fiscal years
14	through the test years.
15	
16	Please see Appendix 11.25.
17	
18	MFR #6:
19	Provide details of the contracted wage settlements currently in place.
20	
21	Please see pages 3 and 4 of Appendix 5.5 of the Application.
22	
23	MFR #7:
24	Schedule of FTE by Business Unit from 2007/08 through the test years.
25	
26	Please refer to Appendix 11.23.
27	
28	MFR #8:
29	A table/ matrix of EFT per 1,000 of GWh, per \$millions of domestic revenue, per
30	domestic customers for the years 2007/08 through the test years in a similar format to
31	PUB/MH I-38 (a) (2012 GRA).
32	
33	Please see Appendix 11.26.

1	MFR #9:
2	Schedule detailing the breakdown of Operating and Administrative expenses by
3	division from 2003/04 through the test years. On this schedule provide two columns
4	for the compound annual growth rate for the historical period and for the forecast
5	period using the final year historical as a starting period. (PUB/MH 1-59 (b) - 2012
6	GRA)
7	
8	Please see Appendix 11.27.
9	
10	MFR #10:
11	Schedule detailing the capitalized OM&A costs by business unit for the years 2003/04
12	through the test years.
13	
14	Please see Appendix 11.28.
15	
16	MFR #11:
17	A comparison of the OM&A per customer for actual and current IFF with that
18	presented at last GRA for comparable years for each year through the test years.
19	(PUB/MH I-8 (c) 2010 GRA)
20	
21	Please see Appendix 11.29.
22	
23	MFR #13: (Please note the PUB did not provide an MFR #12)
24	A schedule which compares Operating, Maintenance and Administrative Cost for fiscal
25	years subject to last GRA to actual results presented in this application with the
26	forecast results provided at the Prior GRA in both dollar change and % change by:
27	• Cost element
28	• Business unit
29	• And explain any differences over 5%.
30	
31	Please see Appendix 11.30.
32	
33	MFR #14:
34	A schedule detailing the operating and administration charged to Centra and Other
35	Affiliates for each of the last five fiscal years through the test years (actual/forecast)
36	by:

1		Cost Element
2		Business Unit
3		
4		Manitoba Hydro will provide a response to this MFR as Appendix 11.31, by the end of
5		February.
6		
7	11.5	PAYMENTS TO GOVERNMENT
8		
9		MFR #1:
10		A schedule of actual and forecast payments made to the Province and Municipalities
11		for five historical years and for the 20-year forecast period.
12		
13		Please see Appendix 11.32.
14		
15		MFR #2:
16		A schedule detailing the calculation of the Net Hydro Guarantee fee for five historical
17		years and through the twenty year forecast period. (Similar to PUB/MH 1-24 (b) 2010
18		GRA)
19		
20		Please see Appendix 11.33.
21		14TD #2
22		MFR #3:
23		A schedule detailing the calculation of the water rental payments for the last five
24		historical years and through the twenty year forecast period. (Similar to PUB/MH 1-24
25		(c) 2010 GRA)
<ul><li>26</li><li>27</li></ul>		Please see Appendix 11.34.
28		Tlease see Appendix 11.54.
29	11.6	CAPITAL EXPENDITURES-DEPRECIATION
30	11.0	CATTAL EXIENDITURES-DET RECTATION
31		MFR #1a:
32		File the most recent Capital Expenditure Forecast, identifying material changes to
33		major and base capital forecasts.
34		···y · · · · · · · · · · · · · · · · ·
35		Please see Appendix 4.1 for Manitoba Hydro's Capital Expenditure Forecast (CEF 14).
36		Tab 4, Sections 4.2 to 4.4 outlines major changes to the capital forecast.
		· · · · · · · · · · · · · · · · · · ·

1	
2	MFR #1b:
3	File a detailed breakdown and justification of any cost revisions to the major capital
4	projects (including Bipole III) that have occurred since the last CEF.
5	
6	Please see Tab 4, section 4.3 for a summary of cost updates with respect to the significant
7	major new generation and transmission projects and electric demand side management.
8	CEF 14, in Appendix 4.1 of the Application, provides updates for each of the major new
9	generation and transmission projects, and major projects.
10	
11	MFR #2:
12	A schedule detailing the breakdown of the balances by component of capitalized costs
13	(wages, overhead etc.) in construction work and process, for each major Generation
14	and Transmission project consistent with the last Annual Report.
15	
16	Please see Appendix 11.35.
17	
18	MFR #3:
19	Provide a breakdown of the total balance of Generation & Transmission costs by each
20	major project and identify the balance related to base capital, in a similar level of detail
21	is PUB/MH I- 45 (b).
22	
23	Please see Appendix 11.36.
24	
25	MFR #4:
26	A schedule that indicates the amount of cash flow from electric operations, forecast
27	electric base capital spending and net cash flow available to finance each Major
28	Generation & Transmission Projects in each of the forecast years and the (electric)
29	capital coverage ratio for the last five historical years and through the 20 year forecast
30	period in a similar format to PUB/MH 1-22 (c) from the 2012 GRA.
31	
32	Please see Appendix 11.37.
33	
34	MFR #5:
35	File 2014 20 year Electric Capital Expenditure forecasts for: NFAT Plan 5

1	Per clarification from PUB counsel, NFAT Plan 5 was intended to request Manitoba
2	Hydro's current Capital Expenditure Forecast (CEF 14) which is provided as Appendix
3	4.1.
4	
5	MFR #6:
6	File Asset Condition reports as directed by Board.
7	• Generation
8	• Transmission
9	• Distribution
10	
11 12	Please see Appendix 4.2 for the Corporation's electric infrastructure assessment condition report.
13	
14	MFR #7:
15	File alternative depreciation approaches:
16	• Average Service Life (ASL)
17	• Equal Group Life (EGL)
18	
19	Manitoba Hydro has previously advised the PUB that it is not able to provide a comparisor
20	of ELG and ASL IFRS compliant depreciation rates based on a full ASL depreciation study
21	As such, Manitoba Hydro has been working on an alternate approach that does not require a
22	full ASL depreciation study, but would demonstrate the impacts of using ELG versus ASL
23	methodologies. Manitoba Hydro anticipates filing a response with respect to these Directives
24	by the end of February.
25	
26 <b>1</b> 1	.7 <u>FINANCE EXPENSE-DEBT LEVELS</u>
27	
28	MFR #1:
29	Table(s) detailing the relied upon interest forecasts by forecaster for both short term
30	and long term interest rates indicating, the date of the forecast, whether the forecast
31	represented end of period data or average and describe what if any adjustments were
32	made to end of period data forecasts to average the results.
33	
34	Please see Appendix 3.2 of Tab 3 of the Application.

1	
2	MFR #2:
3	Copies of the current Economic Outlook.
4	
5	Please see Appendix 3.1 of Tab 3 of the Application for the 2014 Economic Outlook
6	(EO14).
7	
8	MFR #3:
9	Copies of all interest forecasts relied upon for preparing interest rate forecasts
10	
11	Please see Appendix 3.2 of Tab 3 of the Application.
12	
13	MFR #4:
14	A schedule that details for the last five fiscal year through the 20 year current forecast
15	a summary of total interest and finance cost incurred/ forecasted by major category
16	[debt charges, foreign currency gains/losses etc.] both capitalized and expended in a
17	similar level of detail provided in PUB/MH 1-35 ( 2010 GRA).
18	
19	Please see Appendix 11.38.
20	
21	MFR #5:
22	A continuity schedule of the short and long-term debt for the fiscal years 2004 to 2032
23	detailing the retirement of existing debt and the issue of new debt, include the debt
24	ratio. Indicate the proportion of short-term debt to total debt for each of the years.
25	
26	Please see Appendix 11.39.
27	
28	MFR #6:
29	Term sheets related to long term debt issued in the last two fiscal years.
30	
31	Please see Appendix 11.40.
32	
33	MFR #7:
34	A schedule detailing the maturities of MH's current long-term debt issues. (PUB/MH
35	1-67 (f) 2012 GRA)
36	

1		Please see Appendix 11.41.
2		
3		MFR #8:
4		A schedule detailing the current refinancing plans, the weighted average term of
5		outstanding debt, the principle amount and proportions of debt maturing in 10 years,
6		20 years and greater than 20 years.
7		
8		Please see Appendix 11.42.
9		
10		MFR #9:
11		Current Credit Rating Reports for Manitoba Hydro and the Province.
12		
13		Please see Appendix 3.8 to Tab 3 of the Application.
14		
15	11.8	$\underline{\mathbf{DSM}}$
16		
17		MFR #1:
18		A continuity schedule showing spending, amortization expense, amortization rates and
19		balances for demand side management for the years 2004/05 through the test years.
20		
21		Please see Appendix 11.43.
22		
23		MFR #2:
24		An update on the Affordable Energy Fund (AEF) including the projected use of the
25		funds, by program and a detailed description of the programs, including a continuity
26		schedule of program spending since inception.
27		
28		Please see Appendix 11.44.
29		

1		MFR #3:
2		File Inverted Rate Strategy plan of MH as directed by Board.
3		Non-electric Heating Customers
4		Electric Heating Customers
5		
6		As identified in Appendix A.2 of Manitoba Hydro's 2014-17 Power Smart Plan – 15 year
7		supplementary report (Appendix 8.1 to the Application), conservation (or inverted) rates
8		are under consideration by Manitoba Hydro.
9		
10		Manitoba Hydro is not in a position to advance an inverted rate strategy during this
11		proceeding.
12		
13	11.9	LOAD FORECAST AND POWER SMART PLANS
14		MED #1
15		MFR #1:
16		File most current Corporate Approved 2014 Load Forecast and Power Smart Plan
17		With Base Case DSM  With Land DSM
18 19		• With Level 2 DSM
20		The 2014 Electric Load Forecast can be found as Appendix 7.1 of Tab 7 of the
21		Application. The 2014-17 Power Smart Plan can be found as Appendix 8.1 of Tab 8 of
22		the Application.
23		the rapplication.
24		MFR #2:
25		File tabular 12SEP actual load profiles as per PCOSS14 Schedule D-2 for F2009 to
26		F2014 separately depicting
27		Domestic Load by subclass
28		• Firm Exports (5x16)
29		• Peak Opportunity Exports (5x16)
30		• Weekend Exports (2x16)
31		• Off-peak Exports (7x8)
32		
33		Manitoba Hydro is seeking clarification from the PUB Advisors on this MFR. The
34		response will be provided as Appendix 11.45 when available.
35		

1	MFR #3:
2	Re-File NFAT-MH Exhibits #176-1 and #176-2 Domestic & Export Transmission
3	Losses
4	
5	Please see Appendix 11.46.
6	
7	MFR #4:
8	Re-file Power Resource Plan Supply and Demand tables for average energy resources
9	using progressive Incremental (12R)Transmission losses for:
10	<ul> <li>Domestic Load summer and winter (separately) w/o exports</li> </ul>
11	• Adding Peak (5x16) Exports summer and winter (separately)
12	• Further adding Off-peak Opportunity Exports summer and winter (separately)
13	
14	Manitoba Hydro is seeking clarification from the PUB Advisors on this MFR. The
15	response will be provided as Appendix 11.47 when available.
16	
17	MFR #5:
18	Re-file SEP modifications (as updated)
19	
20	Please see Tab 6, Section 6.4 of the Application.
21	
22	MFR #6:
23	Re-file TOU proposal (as updated)
24	
25	Please see Tab 6, Section 6.3 of the Application.
26	