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3			November 30, 2	2018
4			CENTRA GAS MANITOBA INC.	
5			2019/20 GENERAL RATE APPLICATION	
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19 Appendices

- 20 6.1 Details of Capital Plant Additions 2012-2020
- 21 6.2 Lead/Lag Study Analysis
- 22
- 23 Note: All numbers are in thousands unless otherwise stated.

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	CENTRA GAS MANITOBA INC.
	2019/20 GENERAL RATE APPLICATION
	RATE BASE & RATE OF RETURN
6.0	OVERVIEW
	This Tab describes each of the components of revenue requirement using the
	rate base/rate of return methodology for the 2019/20 Test Year.
	Under the rate base/rate of return methodology, total revenue requirement is
	comprised of the sum of cost of gas, furnace replacement program, operating &
	administrative expense, other expenses, depreciation & amortization expense,
	capital & other taxes, and return on rate base, minus other income.
	To calculate return on rate base, it is necessary to first calculate rate base. Rate
	base is the total investment that Centra has in plant, intangible assets, and
	regulatory deferral accounts (net of accumulated depreciation/amortization)
	plus an allowance for working capital as necessary to operate the business (less
	contributions in aid of construction). The overall rate of return is the cost of
	capital (debt and equity) expressed as a percentage. Return on rate base is
	calculated as rate base multiplied by the overall rate of return.
	Total revenue requirement using the rate base/rate of return methodology is
	\$311,126 for the 2019/20 Test Year as outlined on Schedule 6.0.0.
	Schedule 6.0.0 presents the income statement line items for fiscal years 2011/12
	to 2019/20 adjusted for the functionalization of net movement relating to
	operating & administrative expense, other expenses, depreciation &
	amortization and capital & other taxes into its associated line items as shown in
	Tab 5, Appendix 5.12, Figures 2 and 3. A detailed discussion on net movement
	can be found in Tab 5, Section 5.2.10.
	6.0

1 The following sections provide the calculations of rate base and the overall rate 2 of return for the years 2011/12 to 2019/20. The details of the other revenue 3 requirement line items are provided in Tab 5 of the Application.

6.1 <u>RATE BASE</u>

Schedule 6.0.0 provides the components that comprise the calculation of rate base for actual results from 2011/12 through to 2017/18, the 2018/19 forecast and the 2019/20 Test Year. The rate base for the 2019/20 Test Year has been calculated at \$653,886.

- 12 The following components are included in the calculation of rate base (using 13-13 month average balances):
- 14 Gas plant in service;
 - Accumulated depreciation;
 - Intangible Assets, excluding assets under development, net of accumulated amortization;
 - Net regulatory deferral debit and credit balances; and
 - Contributions in aid of construction.
- Also included in rate base is the working capital allowance which consists of a
 cash working capital requirement plus gas storage inventory, investment in DSM,
 regulatory and site restoration costs, less customer security deposits.
- Figure 6.1 below provides rate base as calculated for the years 2011/12 through
 2019/20 (as shown in Schedule 6.0.0):

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Figure 6.1: Rate Base

Year	Ra	ate Base
2011/12 Actual	\$	464 864
2012/13 Actual	\$	477 906
2013/14 Actual	\$	486 677
2014/15 Actual	\$	509 823
2015/16 Actual	\$	529 035
2016/17 Actual	\$	559 303
2017/18 Actual	\$	601 750
2018/19 Forecast	\$	626 692
2019/20 Test Year	\$	653 886

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4 6.2 GAS PLANT IN SERVICE

5 Gas plant in service is the largest balance included in the determination of rate 6 base and consists primarily of Centra's natural gas transmission and distribution 7 system assets. The gas plant in service balance used for determining rate base is 8 based on a 13-month average of the gross cost of in-service plant assets. General 9 plant assets, such as computer hardware and tools required to operate the 10 utility, are also included in gas plant in service. These types of assets are 11 acquired and owned by Centra's parent, Manitoba Hydro. The cost and related 12 finance and depreciation expense are charged to Centra through the integrated 13 cost allocation methodology.

14

15 Schedules 6.1.0 through 6.1.8 provide the year-end plant asset balances by 16 account for 2011/12 through to 2019/20. The continuity schedules list the 17 annual plant asset in-service additions, as well as the annual retirements and 18 adjustments. Also included in the schedules, beginning with Schedule 6.1.3, is 19 the net book value adjustment which was applied by Centra for financial 20 reporting purposes upon its 2015/16 transition to International Financial 21 Reporting Standards ("IFRS"). The Net Book Value ("NBV") 22 Adjustment/Drawdown is discussed below.

23

24

6.2.1 Net Book Value ("NBV") Adjustment /Drawdown

25 On transition to IFRS, Centra adopted the NBV of its Property Plant & Equipment 26 ("PP&E") and intangible assets as its opening asset balance, effectively carrying

1 forward the rate regulated unamortized balance of these assets for financial 2 reporting purposes. Rate regulated entities are provided an exemption under 3 IFRS, which allows for the adoption of NBV instead of either revaluation of assets to fair market value or retrospective application of any IFRS changes impacting 4 5 capitalized cost or accumulated depreciation (eg. life to date removal of general 6 and administrative overhead and historical application of changes to 7 depreciation calculations). Centra recorded a high level adjustment of 8 approximately \$246 million to reduce the April 1, 2014 gross cost of its PP&E and intangible assets by the respective April 1, 2014 accumulated depreciation 9 10 balances. This effectively maintained the NBV of its plant and intangible assets as 11 the opening cost value for financial reporting under IFRS. Going forward, the 12 original April 1, 2014 NBV adjustment amount is drawn down annually, for 13 financial reporting purposes, by the April 1, 2014 accumulated depreciation balance of assets retired during the year. Centra continues to use the original 14 15 gross cost and accumulated depreciation of its assets for determining 16 depreciation, and for determining gross cost values for regulatory cost of service 17 allocations.

- 18
- 19 20

The following table provides the year end plant asset balances, gross of the NBV adjustments for each year end from 2011/12 through to the 2019/20.

21 22

Figure 6.2: Utility Plant Balances

		Ye	ar End
Schedule	Year	Ba	alance
6.1.0	2011/12 Actual	\$	637 333
6.1.1	2012/13 Actual	\$	660 570
6.1.2	2013/14 Actual	\$	683 808
6.1.3	2014/15 Actual	\$	709 343
6.1.4	2015/16 Actual	\$	736 653
6.1.5	2016/17 Actual	\$	791 825
6.1.6	2017/18 Actual	\$	822 140
6.1.7	2018/19 Forecast	\$	852 336
6.1.8	2019/20 Test Year	\$	886 401

1 6.2.2 Plant & Intangible Asset Additions

Appendix 6.1 provides information on annual plant and intangible asset additions, including a detailed discussion of the various gas capital programs and projects completed or planned by Centra for 2011/12 through to the 2019/20 Test Year.

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The following table summarizes the annual plant and intangible asset additions for Centra for 2011/12 through to 2019/20.

9 10

Figure 6.3: Plant & Intangible Asset Additions

Year	Plant	In	tangible	Total
2011/12 Actual	\$ 25 620	\$	130	\$ 25 750
2012/13 Actual	\$ 29 338	\$	122	\$ 29 460
2013/14 Actual	\$ 29 504	\$	3 528	\$ 33 032
2014/15 Actual	\$ 29 365	\$	374	\$ 29 739
2015/16 Actual	\$ 34 970	\$	757	\$ 35 727
2016/17 Actual	\$ 61 377	\$	941	\$ 62 318
2017/18 Actual	\$ 35 679	\$	888	\$ 36 567
2018/19 Forecast	\$ 35 456	\$	2 310	\$ 37 766
2019/20 Test Year	\$ 40 097	\$	266	\$ 40 363

- 11
- 12 13

6.2.3 Plant & Intangible Asset Retirements

14 Plant and intangible asset retirements are the removal of assets from service 15 which results in a reduction to the gas plant in service and intangible asset 16 balances. Depending on the circumstances, retired assets may be replaced or 17 permanently removed from service (i.e. terminally retired).

18

Schedules 6.1.0 through 6.1.8 provide the annual retirements by plant account for 2011/12 through to 2019/20. Schedules 6.4.0 through 6.4.8 provide the annual retirements by plant account for 2011/12 through to 2019/20 for intangible assets.

- 23
- The following table provides the total plant and intangible asset retirements, gross of the NBV drawdown for each year from 2011/12 through to 2019/20:

				lr	ntangible	
Schedule	Year	Plan	t Assets		Assets	Total
6.1.0	2011/12 Actual	\$	5 430	\$	4 601	\$ 10 030
6.1.1	2012/13 Actual	\$	6 106	\$	-	\$ 6 106
6.1.2	2013/14 Actual	\$	6 266	\$	-	\$ 6 266
6.1.3	2014/15 Actual	\$	3 829	\$	-	\$ 3 829
6.1.4	2015/16 Actual	\$	6 340	\$	5 304	\$ 11 644
6.1.5	2016/17 Actual	\$	6 205	\$	-	\$ 6 205
6.1.6	2017/18 Actual	\$	5 364	\$	-	\$ 5 364
6.1.7	2018/19 Forecast	\$	5 260	\$	-	\$ 5 260
6.1.8	2019/20 Test Year	\$	6 031	\$	-	\$ 6 031

Figure 6.4: Plant & Intangible Asset Retirements

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6.3 CONSTRUCTION WORK IN PROGRESS

5 Construction Work in Progress ("CWIP") represents the cumulative expenditure
6 balances for capital projects that are not completed by the end of the fiscal year.
7 CWIP balances are excluded from rate base calculations.

8

9 Schedule 6.2.0 provides the year-end CWIP balances by project for 2011/12
10 through to the 2019/20 test year.

11

12 The following table provides the total year-end balances for CWIP for 2011/12 13 through to 2019/20 (as shown in Schedule 6.2.0):

14

15 Figure 6.5: Construction Work in Progress

Year	(CWIP
2011/12 Actual	\$	3 802
2012/13 Actual	\$	4 365
2013/14 Actual	\$	3 872
2014/15 Actual	\$	5 723
2015/16 Actual	\$	12 242
2016/17 Actual	\$	7 860
2017/18 Actual	\$	5 868
2018/19 Forecast	\$	6 358
2019/20 Test Year	\$	8 850

1 6.4 ACCUMULATED DEPRECIATION

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Accumulated depreciation represents the cumulative depreciation balance calculated on plant in service net of plant retirements and salvage costs. Accumulated depreciation is a reduction to the annual rate base calculation. Depreciation expense, as well as the annual year over year change in depreciation expense, is discussed in Tab 5, Section 5.2.6.

8

9 The retirement of PP&E and intangible assets acts to reduce the associated 10 accumulated depreciation balance for the retired asset and also acts to reduce 11 the NBV adjustment balance.

12

Schedules 6.3.0 through 6.3.8 provide the year-end accumulated depreciation
balances by plant account for 2011/12 through to 2019/20. The annual draw
down of the NBV adjustment balance, as discussed in Section 6.2.1 above, is also
reflected in the schedules.

- 17
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The following table provides the total year-end accumulated depreciation balance, gross of the NBV adjustment for 2011/12 through to 2019/20:

19 20

21 Figure 6.6: Accumulated Depreciation

		Ye	ear End
Schedule	e Year	В	alance
6.3.0	2011/12 Actual	\$	224 725
6.3.1	2012/13 Actual	\$	231 883
6.3.2	2013/14 Actual	\$	239 910
6.3.3	2014/15 Actual	\$	249 525
6.3.4	2015/16 Actual	\$	260 636
6.3.5	2016/17 Actual	\$	271 313
6.3.6	2017/18 Actual	\$	283 201
6.3.7	2018/19 Forecast	\$	295 067
6.3.8	2019/20 Test Year	\$	307 475

1 6.5 INTANGIBLE ASSETS

Centra's intangible assets are comprised mainly of computer applicationdevelopment costs and land easements.

6 Schedules 6.4.0 through 6.4.8 provide the year-end cost and accumulated 7 amortization balances by intangible asset account for 2011/12 through to 8 2019/20. The annual draw down of the NBV adjustment balance is also reflected 9 in the schedules.

11 The following table provides the total year-end gross intangible assets balance 12 and accumulated depreciation balance, gross of the NBV drawdown, for 2011/12 13 through to 2019/20:

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15 **Figure 6.7: Intangible Assets**

				Accu	mulated		Net	
		Gro	oss Cost	Dep	reciation	Int	tangible	
Schedule Year		Ba	Balance		Balance		Balance	
6.4.0	2011/12 Actual	\$	9 925	\$	4 046	\$	5 879	
6.4.1	2012/13 Actual	\$	10 044	\$	4 638	\$	5 406	
6.4.2	2013/14 Actual	\$	13 572	\$	5 628	\$	7 944	
6.4.3	2014/15 Actual	\$	13 946	\$	6 632	\$	7 313	
6.4.4	2015/16 Actual	\$	9 365	\$	2 315	\$	7 051	
6.4.5	2016/17 Actual	\$	10 307	\$	2 816	\$	7 490	
6.4.6	2017/18 Actual	\$	11 195	\$	3 336	\$	7 858	
6.4.7	2018/19 Forecast	\$	13 504	\$	3 971	\$	9 533	
6.4.8	2019/20 Test Year	\$	13 770	\$	4 655	\$	9 115	

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18 6.6 REGULATORY DEFERRAL BALANCES

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As a rate-regulated entity, Centra records regulatory deferred debit and credit balances in its financial statements as permitted by international accounting standard IFRS 14 *Regulatory Deferral Accounts*. Such balances represent timing differences between when expenditures are recognized for financial reporting and when expenditures are recognized for rate setting purposes (as endorsed by the PUB). For more detail on Centra's regulatory deferral balances please see Appendix 3.4. The following regulatory deferral accounts are included in the
 calculation of rate base:

6.6.1 DSM, Site Restoration, and Regulatory Costs in Working Capital Allowance

As illustrated in Schedule 6.5.8, Centra is projected to have unamortized expenditures of approximately \$55 million in DSM, \$1.5 million in site restoration and \$3.0 million in regulatory hearing costs as of March 31, 2020.

10 Consistent with the PUB's direction in Order 128/09, Centra has included its 11 investment in DSM as a component of its working capital allowance.

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13 Centra has also included unamortized balances for site restoration and 14 regulatory hearing costs in the working capital allowance for inclusion in rate 15 base. Similar to annual DSM spending, these deferral accounts represent 16 ongoing expenditures that will be recovered from customer rates in future 17 periods (e.g. amortization of site restoration costs over 15 years).

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6.6.2 Other Regulatory Deferrals in Rate Base

In addition to the deferral accounts included in the determination of the working
 capital allowance, Centra has also included in rate base, the cost and
 accumulated amortization for the following regulatory deferral account
 balances:

- 24 a) Ineligible Overhead;
 - b) Impact of 2014 Depreciation Study;
 - c) Change in depreciation rate gas meters (from 25 to 20 year service life);
- 27d) Change in depreciation method (difference between ELG and CGAAP28ASL);
- e) Losses on disposal of assets (asset removal and asset retirement gains
 and losses); and,
- 31f) DSM deferral account from Directive 1d Order 85/13 (the balance in the32debit and credit account equally offset each other such that there is a nil33effect on rate base).

1 The deferral accounts are proposed for inclusion in rate base in order to adjust 2 the IFRS based financial statement values for plant and intangible assets to the 3 PUB endorsed values for rate setting purposes. For example, plant and intangible 4 asset development costs reported under IFRS are lower than they would have 5 been under CGAAP as ineligible overhead amounts are no longer capitalized 6 under IFRS. To comply with the direction provided to Centra by the PUB in Order 7 85/13 (page 17) that Centra make no further accounting changes for ineligible overhead until a further review can be performed, Centra defers \$0.7 million 8 9 annually of overhead not eligible for inclusion in the cost of capital assets. Under 10 CGAAP, the \$0.7 million of ineligible overhead would have been included in the 11 cost of capital assets included in the rate base. If the ineligible overhead deferral 12 account balance is not included in rate base, the capital asset cost value as 13 endorsed by the PUB for rate setting purposes would be understated.

With respect to the changes in depreciation rates and depreciation accounts from the 2014 Depreciation Study, and the increase in the depreciation rate for gas meters, Centra has included the deferral account balances for these items in the calculation of rate base so as to eliminate the impact of the depreciation rate changes on the accumulated depreciation balance used for determining rate base.

22 Similar to the treatment of the ineligible overhead, Centra has included in rate 23 base the regulatory deferral account that captures the difference between the 24 IFRS ELG depreciation method used for financial reporting purposes and CGAAP 25 ASL method used for rate-setting purposes and the losses on the disposal of 26 assets. Centra is proposing to include these deferral account balances in rate 27 base for rate setting purposes to ensure the accumulated depreciation balance 28 used for determining rate base is determined using methods endorsed by the 29 PUB for rate setting purposes.

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Schedules 6.5.0 through 6.5.8 provide the total deferred debit and credit
 balances for each regulatory deferral account for each year for 2011/12 through
 to 2019/20.

- 1 The following figure provides the total year-end net debit and credit balances for 2 the regulatory deferral accounts for each year for 2011/12 through to 2019/20:
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Figure 6.8: Regulatory Deferral Bala	າces
--------------------------------------	------

	Net	Included in	Net	Included	Ot	her Net	Net	Deferral
	Worl	king Capital	Dir	ectly in	Reg	gulatory	Y	ear End
Year	All	owance ¹	Rat	e Base ²	Det	ferrals ³	B	alance
2011/12 Actual	\$	46 735	\$	-	\$	309	\$	47 044
2012/13 Actual	\$	49 252	\$	-	\$	4 383	\$	53 635
2013/14 Actual	\$	51 847	\$	-	\$	66 304	\$	118 151
2014/15 Actual	\$	54 070	\$	-	\$	56 991	\$	111 061
2015/16 Actual	\$	55 456	\$	9 944	\$	22 207	\$	87 606
2016/17 Actual	\$	56 875	\$	15 133	\$	4 167	\$	76 175
2017/18 Actual	\$	58 329	\$	20 154	\$	4 817	\$	83 300
2018/19 Forecast	\$	58 889	\$	24 384	\$	10 795	\$	94 069
2019/20 Test Year	\$	59 732	\$	28 830	\$	16 238	\$	104 800
	Year 2011/12 Actual 2012/13 Actual 2013/14 Actual 2014/15 Actual 2015/16 Actual 2016/17 Actual 2016/17 Actual 2017/18 Actual 2018/19 Forecast 2019/20 Test Year	Net Year All 2011/12 Actual \$ 2012/13 Actual \$ 2013/14 Actual \$ 2014/15 Actual \$ 2015/16 Actual \$ 2016/17 Actual \$ 2017/18 Actual \$ 2018/19 Forecast \$ 2019/20 Test Year \$	Net Included in Working Capital Year Allowance ¹ 2011/12 Actual \$ 46 735 2012/13 Actual \$ 49 252 2013/14 Actual \$ 51 847 2014/15 Actual \$ 54 070 2015/16 Actual \$ 55 456 2016/17 Actual \$ 56 875 2017/18 Actual \$ 58 329 2018/19 Forecast \$ 58 889 2019/20 Test Year \$ 59 732	Net Included in Net Working Capital Dir Year Allowance ¹ Rat 2011/12 Actual \$ 46 735 \$ 2012/13 Actual \$ 49 252 \$ 2013/14 Actual \$ 51 847 \$ 2014/15 Actual \$ 54 070 \$ 2015/16 Actual \$ 55 456 \$ 2016/17 Actual \$ 56 875 \$ 2018/19 Forecast \$ 58 889 \$ 2019/20 Test Year \$ 59 732 \$	Net Included in Working Capital Net Included Year Allowance ¹ Rate Base ² 2011/12 Actual \$ 46 735 \$ - 2012/13 Actual \$ 49 252 \$ - 2013/14 Actual \$ 51 847 \$ - 2014/15 Actual \$ 54 070 \$ - 2015/16 Actual \$ 55 456 \$ 9 944 2016/17 Actual \$ 56 875 \$ 15 133 2017/18 Actual \$ 58 329 \$ 20 154 2018/19 Forecast \$ 58 753 \$ 24 384 2019/20 Test Year \$ 59 732 \$ 28 830	Net Included in Working Capital Net Included Directly in Reg Reg Year Allowance ¹ Rate Base ² Detection 2011/12 Actual \$ 46 735 \$ - \$ 2011/12 Actual \$ 46 735 \$ - \$ 2012/13 Actual \$ 49 252 \$ - \$ 2013/14 Actual \$ 51 847 \$ - \$ 2014/15 Actual \$ 54 070 \$ - \$ 2015/16 Actual \$ 55 456 \$ 9 944 \$ 2016/17 Actual \$ 58 329 \$ 20 154 \$ 2018/19 Forecast \$ 58 889 \$ 24 384 \$ 2019/20 Test Year \$ 59 732 \$ 28 830 \$	Net Included in Working Capital Net Included Other Net Regulatory Year Allowance ¹ Rate Base ² Deferrals ³ 2011/12 Actual \$ 46 735 \$ - \$ 309 2012/13 Actual \$ 49 252 \$ - \$ 66 304 2013/14 Actual \$ 51 847 \$ - \$ 66 304 2014/15 Actual \$ 54 070 \$ - \$ 56 991 2015/16 Actual \$ 55 456 \$ 9 944 \$ 22 207 2016/17 Actual \$ 58 329 \$ 20 15/4 \$ 4 817 2018/19 Forecast \$ 58 889 \$ 24 384 \$ 10 795 2019/20 Test Year \$ 59 732 \$ 28 830 \$ 16 238	Net Included in Working Capital Net Included Other Net Regulatory Net Year Allowance ¹ Rate Base ² Deferrals ³ Base 2011/12 Actual \$ 46 735 \$ - \$ 309 \$ 2011/12 Actual \$ 46 735 \$ - \$ 309 \$ 2012/13 Actual \$ 49 252 \$ - \$ 66 304 \$ 2013/14 Actual \$ 51 847 \$ - \$ 66 6 304 \$ 2014/15 Actual \$ 54 070 \$ - \$ 56 991 \$ 2015/16 Actual \$ 55 456 \$ 9 944 \$ 22 207 \$ 2016/17 Actual \$ 56 875 \$ 15 133 \$ 4 167 \$ 2018/19 Forecast \$ 58 329 \$ 20 154 \$ 4 817 \$ 2018/19 Forecast \$ 58 732 \$ 28 830 \$ 16 238 \$

Notes:

1. Includes deferrals for DSM, Site restoration and Regulatory Costs

2. Includes net deferrals for Ineligible Overhead, Impact of 2014 Depreciation Study, Change in Depreciaiton Rate -Gas Meters, Change in Depreciation Method (Difference between ELG and ASL), Losses on Disposal of Assets, and the DSM Deferral Account

3. Includes net deferrals for Deferred Taxes and the PGVA

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6.7 CONTRIBUTIONS IN AID OF CONSTRUCTION

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9 Contributions in aid of construction are collected from customers, municipalities 10 and other governments to offset construction and operating costs of facilities to 11 ensure the feasibility of a particular project. Construction contributions, net of 12 amortization, are a reduction in the calculation of rate base and are amortized as 13 a reduction in depreciation expense up to fiscal 2014/15. Beginning in 2014/15, 14 under IFRS, contributions are amortized and included in Other Revenue at the 15 same rate as the facilities to which they relate.

16

Schedules 6.6.0 through 6.6.8 provide the total gross contributions in aid of
construction and total amortized balance by plant account for 2011/12 through
to 2019/20.

- The following figure provides the total net year-end balance of the contributions
 in aid of construction (gross contributions net of amortization) for 2011/12
 through to 2019/20:
- 4 5

Figure 6.9: Contributions in Aid of Construction

		Ye	ar End
Schedule	e Year	Ba	alance
6.6.0	2011/12 Actual	\$	51 253
6.6.1	2012/13 Actual	\$	53 223
6.6.2	2013/14 Actual	\$	54 272
6.6.3	2014/15 Actual	\$	56 180
6.6.4	2015/16 Actual	\$	56 970
6.6.5	2016/17 Actual	\$	59 303
6.6.6	2017/18 Actual	\$	59 378
6.6.7	2018/19 Forecast	\$	60 819
6.6.8	2019/20 Test Year	\$	62 281

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6.8 WORKING CAPITAL ALLOWANCE

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10 In addition to the utility plant that Centra finances, it also has an investment in 11 working capital. Working capital allowance consists of a cash working capital 12 requirement, plus the gas storage inventory, investment in DSM, regulatory and 13 site restoration costs, less customer security deposits. To the extent that Centra 14 has an investment in working capital, it must recover the financing costs of 15 carrying the working capital. As such, for regulatory purposes, the total rate base 16 of Centra includes an allowance for working capital.

17

Schedules 6.7.0 through 6.7.8 provide the year-end working capital allowance
balances by item for 2011/12 through to 2019/20.

1 The following table provides the working capital allowance calculations for 2 2011/12 to 2019/20:

3 4

Figure 6.10: Working Capital Allowance

		Work	ing Capital
Schedule	Year	Al	lowance
6.7.0	2011/12 Actual	\$	104 247
6.7.1	2012/13 Actual	\$	104 174
6.7.2	2013/14 Actual	\$	98 800
6.7.3	2014/15 Actual	\$	105 763
6.7.4	2015/16 Actual	\$	106 068
6.7.5	2016/17 Actual	\$	108 811
6.7.6	2017/18 Actual	\$	108 589
6.7.7	2018/19 Forecast	\$	108 505
6.7.8	2019/20 Test Year	\$	112 427

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6.8.1 Cash Working Capital Requirement

8 The conceptual basis of the cash working capital requirement can be explained 9 by considering the manner in which Centra collects its revenue requirement 10 from its customers and the way it pays for the goods and services that it 11 receives.

12

Centra provides service to its customers at rates that are approved by the PUB. The customer is billed by Centra at the end of the period of service, and pays the bill at a later date according to payment terms established by Centra. The period of time from which Centra renders the service to the date when customers pay for it is referred to as the revenue lag. Centra must supply the capital necessary to finance the accounts receivable during this lag period.

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At the same time, Centra receives goods and services and incurs obligations on a daily basis from numerous parties including suppliers and taxing authorities. Centra pays these expenditures according to the established payment terms. Centra has use of the funds from the date that suppliers and others render service to the date that Centra pays for the service (referred to as the payment lead). The payment lead reduces the capital that is required to finance the
 accounts receivable.

The cash working capital requirement is the difference between the capital that is required to finance the revenue lag and the various payment leads, including purchased gas, operating expenses, payroll, capital and other taxes, other expenses, finance expense and non-cost of service tax collections.

9 The cash working capital requirement for 2011/12 through 2019/20 is provided 10 in Schedules 6.7.0 to 6.7.8. The basis for calculating the requested cash working 11 capital requirement is the lead-lag analysis as discussed in Appendix 6.2 to this 12 Tab.

- 14 6.8.2 Gas Storage Inventory
- 15 The gas storage inventory amount included in rate base is \$40,386 for the 16 2019/20 Test Year, based on a 13-month average, as per Schedule 6.7.8.
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6.8.3 Security Deposits

Security deposits are obtained from customers where necessary to ensure payment will be secured for gas supplied. Security deposits are a reduction to rate base because they reduce the investment required by Centra to conduct business. The security deposits balance for 2019/20 is \$900 as shown on Schedule 6.7.8.

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6.8.4 Investment in DSM, Regulatory & Site Restoration Costs

- The investment in DSM, Regulatory Costs, and Site Restoration amounts included
 in rate base are \$54,888, \$2,968, and \$1,608 respectively for the 2019/20 Test
 Year, based on a 13-month average, as per schedule 6.7.8.
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30 6.9 OVERALL RATE OF RETURN

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Centra is financed, or capitalized, by a combination of long-term debt, shortterm debt, and equity. The overall rate of return is calculated by multiplying the cost of the various types of capital with their corresponding capital structure weighting and summing the results of the individual calculations. As such, the
 overall rate of return includes both the cost of debt financing and the required
 return on equity ("ROE").

The overall rate of return calculations for 2011/12 through 2019/20 can be found on Schedules 6.8.0 to 6.8.8.

Centra's calculation of the overall rate of return for the 2019/20 Test Year is based on the following:

- A capital structure for rate setting purposes of 61.2% long-term debt, 8.2% short-term debt, and 30.6% equity for 2019/20.
- A cost of long-term debt of 5.01% for 2019/20 based on a 13-month average
 embedded cost of debt calculation and a cost of short-term debt of 3.15% for
 2019/20.
- A cost of equity financing or ROE of 8.30%, which is within the appropriate
 ROE range for Centra as determined by independent expert Drazen
 Consulting Group Inc. ("DCGI")
- 19The following table provides the overall rate of return for 2011/12 through202019/20:
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22 Figure 6.11: Overall Rate of Return

		Overall Rate of
Schedule	Year	Return
6.8.0	2011/12 Actual	6.62%
6.8.1	2012/13 Actual	6.35%
6.8.2	2013/14 Actual	6.07%
6.8.3	2014/15 Actual	5.87%
6.8.4	2015/16 Actual	5.90%
6.8.5	2016/17 Actual	5.89%
6.8.6	2017/18 Actual	5.84%
6.8.7	2018/19 Forecast	5.81%
6.8.8	2019/20 Test Year	5.86%

1 6.10 COST OF CAPITAL

This section describes the calculation of the cost of various types of capital for 2019/20.

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6.10.1 Cost of Equity

- In past proceedings, Centra's ROE was calculated based on a return on equity formula approved by the PUB in Order 49/95 as follows:
- 10 ROE = Benchmark long Canada bond rate
 - + change in long Canada bond rate from Benchmark rate
 - + implied spread between long Canada bond rate and ROE

14 In the 2013/14 Gas GRA, Centra's evidence concluded that this return on equity 15 formula no longer provided appropriate results in the current economic 16 environment, and that formulas tied to a single variable (long-term government 17 of Canada bonds) were no longer appropriate and resulted in returns on equity 18 which were below a fair return. The PUB agreed with Centra on this matter and 19 in Directive 8 of Order 85/13 directed Centra to propose an update to the return 20 on equity that is reflective of an appropriate return on equity to be used in the 21 feasibility test and for the return on rate base determination.

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Following the GRA, Centra requested approval to continue to use the 2010/11 approved overall Rate of Return of 6.08%, which included an ROE of 8.36%, until such time as Centra proposed and the PUB approved an alternative ROE. On September 25, 2013, the PUB accepted Centra's proposal. Accordingly, Centra has used an ROE of 8.36% in its Rate of Return calculations for 2011/12 to 2017/18.

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To assist Centra in determining an appropriate ROE for the Forecast and Test Years, Centra retained DCGI who concluded that an appropriate ROE for Centra was between 8.30% and 8.70%. For this application, the cost of equity has been assumed at 8.30% for the 2019/20 Test Year. As documented in Tab 3, Centra chose to use the low end of the range of 8.30% for this application in the interest of maintaining a 0.0% increase while still aligning with the 30% equity ratio. In
 doing so, Centra is foregoing a 1.20% rate increase that would have been
 required if rates were set to target an 8.30% ROE. See Appendix 3.5 for DCGI's
 evidence pertaining to the appropriate ROE for Centra.

6 6.10.2 Cost of Long-Term Debt

- The cost of long-term debt calculation includes all of Centra's stand-alone debt issues.
- The cost of long-term debt for 2011/12 through 2019/20 is provided in Schedules 6.9.0 to 6.9.8.
- The following table provides the embedded cost of long-term debt for 2011/12
 through to 2019/20:
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16 Figure 6.12: Embedded Cost of Long-Term Debt

		Embedded Cost of
Schedule	Year	Long-Term Debt
6.9.0	2011/12 Actual	5.94%
6.9.1	2012/13 Actual	5.60%
6.9.2	2013/14 Actual	5.20%
6.9.3	2014/15 Actual	5.21%
6.9.4	2015/16 Actual	5.10%
6.9.5	2016/17 Actual	5.02%
6.9.6	2017/18 Actual	4.99%
6.9.7	2018/19 Forecast	4.98%
6.9.8	2019/20 Test Year	5.01%

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19 Interest on Long-Term Debt

Interest rates for the long term advances to Centra are based on the associated
 cost of financing that was incurred by Manitoba Hydro at the time of the
 advance. The following table lists the specific long term advances between
 Manitoba Hydro and Centra:

Principal			
(in millions)	Coupon Rate %	Maturity Date	Reason For Issue
\$50	4.505	Mar. 5, 2037	To refinance the November 2006 maturity of a
			\$48.5 million advance
\$30	6.300	Oct. 29, 2032	An extension of an October 2007 maturity
\$30	5.175	Mar. 5, 2040	For capital requirements
\$30	4.726	Feb. 22, 2030	To refinance a portion of a \$75 million February
			2010 maturity
\$10	4.638	Aug. 22, 2037	To refinance a portion of a \$75 million February
			2010 maturity
\$20	4.638	Sept. 30, 2037	To partially refinance a \$36.2 million March 2010
			maturity
\$30	4.629	Mar. 31, 2035	For capital requirements
\$20	3.178	Sept. 18, 2022	To refinance a portion of a \$62.7 million
			September 2012 maturity
\$20	3.281	Sept. 18, 2033	To refinance a portion of a \$62.7 million
			September 2012 maturity
\$20	3.413	Sept. 18, 2042	To refinance a portion of a \$62.7 million
			September 2012 maturity
\$10	3.398	June 2, 2023	For capital requirements
\$35	2.902	Sept. 5, 2046	To refinance a \$35 million February 22, 2015
			maturity
\$35	2.549	June 2, 2025	For capital requirements
\$20	3 mths Bankers	Nov. 21, 2019	For capital requirements
	acceptance rate		
	+ 0.1301227%		
\$9.903	3 mths Bankers	Oct. 17, 2027	For capital requirements
	acceptance rate		
	+ 0.2958%		

Figure	6.13:	Specific	Long-T	erm	Advances
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4 5 In addition to the coupon rates, a Provincial Guarantee Fee ("PGF") of 1% is charged on all outstanding debt at each yearend.

Projected new debt issues in fiscal year 2018/19 totaling \$40 million forecast to
be issued March 2019 include a \$20 million CAD fixed rate debt at a projected
rate of 3.500%, and a \$20 million CAD floating rate debt at a projected floating

rate of 3 month Banker's Acceptance Rate plus 0.570%. A 1% PGF fee will be
 charged at year-end as well.

Projected new debt issues in fiscal year 2019/20 totaling \$50 million forecast to be issued March 2020 include \$30 million CAD fixed rate debt at a projected rate of 3.900%, and a \$20 million CAD floating rate debt at a projected floating rate of 3 month Banker's Acceptance Rate plus 0.570%. A 1% PGF fee will be charged at year-end as well.

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10 6.10.3 Cost of Short-Term Debt

The following table provides the embedded cost of short-term debt for 2011/12
through to 2019/20:

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14 Figure 6.14: Embedded Cost of Short-Term Debt

		Embedded Cost of
Schedule	Year	Short-Term Debt
6.9.0	2011/12 Actual	1.90%
6.9.1	2012/13 Actual	1.40%
6.9.2	2013/14 Actual	1.63%
6.9.3	2014/15 Actual	1.17%
6.9.4	2015/16 Actual	2.14%
6.9.5	2016/17 Actual	1.79%
6.9.6	2017/18 Actual	1.58%
6.9.7	2018/19 Forecast	2.50%
6.9.8	2019/20 Test Year	3.15%

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17 The cost of short-term debt is forecast to be 3.15% for the 2019/20 Test Year as 18 shown on Schedule 5.9.8. This rate is based on a short-term interest rate 19 forecast of 2.15% plus the PGF of 1.00%. The 3.15% short-term debt forecast 20 assumed a differential of 1.75% between short-term and long-term interest rates 21 for 2019/20. Long-term bond rates were forecasted at 4.90% (including PGF) for 22 that period.

1 Operating Line of Credit

2 Centra's operating credit is obtained through short-term advances from 3 Manitoba Hydro. Short-term advances are charged an interest rate equal to the 4 3 month Canadian T-Bill rate, given that the 3 month Canadian T-Bill rate is a 5 readily available measure for short-term interest rates. Centra performs a true-6 up adjustment on a quarterly basis to ensure there has been no over- or under-7 recovery of short-term finance costs charged to Centra from Manitoba Hydro.

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6.11 <u>CAPITAL STRUCTURE</u>

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This section discusses the capital structure for Centra and outlines the capitalization calculation for the 2019/20 Test Year.

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6.11.1 Capital Structure

15 In Order 8/94, the PUB approved an equity ratio not to exceed 40% (i.e. 16 approximately 40% equity and 60% debt) as the approved capital structure for 17 Centra. In Order 99/07, the PUB found that given Centra's borrowings are 18 guaranteed by the Province, with the PGF allowed in costs for rate setting, a 19 70:30 debt-equity ratio is adequate, rather than the 60:40 that would be 20 acceptable if there were no PGF.

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The following table provides the equity ratio for 2011/12 through to 2019/20:

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Figure 6.15: Equity Ratio

Schedule	Year	Equity Ratio
6.10.0	2011/12 Actual	33.5%
6.10.1	2012/13 Actual	33.5%
6.10.2	2013/14 Actual	34.4%
6.10.3	2014/15 Actual	34.2%
6.10.4	2015/16 Actual	32.7%
6.10.5	2016/17 Actual	32.7%
6.10.6	2017/18 Actual	32.4%
6.10.7	2018/19 Forecast	31.7%
6.10.8	2019/20 Test Year	30.6%

1 6.11.2 Capitalization Calculation for the 2019/20 Test Year 2 In Schedules 6.8.0 to 6.8.8, Centra has calculated the capital structure weighting 3 for the years 2011/12 through 2019/20 using the PUB approved methodology as follows: 4 5 6 1. The total capitalization is calculated by averaging the forecast year-end 7 balances of the various types of capital. 2. The amount of equity is calculated based on the average of the forecast 8 year-end equity balances. The equity balance includes retained earnings 9 10 and share capital. 11 3. The amount of long-term debt is calculated based on the 13-month 12 average of Centra's debt issues. 13 4. Short-term debt is calculated by subtracting the amount of equity and 14 long-term debt from total capitalization (as determined in 1, 2 and 3 15 above). 16 17 The capital structure that results from the above noted calculations for the 2019/20 Test Year is 61.2% long-term debt, 8.2% short-term debt and 30.6% 18 19 equity as per Schedule 6.8.8. 20 21 6.12 **RETURN ON RATE BASE** 22 23 The total return on rate base of \$39,674 for the 2019/20 Test Year, as per 24 Schedule 6.10.8, is made up of the return on rate base of \$38,328, as discussed 25 in Section 6.12.1, plus financing adjustments of \$1,346, as discussed in Section 26 6.12.2. 27 28 6.12.1 Return on Rate Base 29 Schedules 6.10.1 through 6.10.8 provide a calculation of the return on rate base 30 for the years 2011/12 through 2019/20. Return on rate base for the 2019/20 31 Test Year is calculated by multiplying the overall rate of return of 5.86% 32 (Schedule 6.8.8) by the total rate base amount of \$653,886 (Schedule 6.0.0), plus 33 financing adjustments of \$1,346, as discussed in Section 6.12.2.

- The return on rate base (including financing adjustments) for the years 2011/12
 through 2019/20 are provided in the figure below:
- 3 4

Figure 6.16: Return on Rate Base

		Re	eturn on
Schedule	Year	Ra	te Base
6.10.0	2011/12 Actual	\$	33 559
6.10.1	2012/13 Actual	\$	33 336
6.10.2	2013/14 Actual	\$	31 679
6.10.3	2014/15 Actual	\$	32 048
6.10.4	2015/16 Actual	\$	33 157
6.10.5	2016/17 Actual	\$	34 515
6.10.6	2017/18 Actual	\$	36 951
6.10.7	2018/19 Forecast	\$	38 025
6.10.8	2019/20 Test Year	\$	39 674

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7 6.12.2 Financing Adjustments

8 In addition to the cost of financing rate base items, revenue requirement also 9 includes the cost of financing common assets and inventoried materials as 10 discussed in Tab 5, Section 5.2.5. Figure 5.12 provides the components of the 11 financing adjustments for the years 2011/12 through to 2019/20. The total 12 adjustment for the 2019/20 Test Year is an increase to the return on rate base of 13 \$1,346.