

Manitoba Hydro Feedback

Re: CER Review of Proposed GHG Changes to CER Filing Manuals

Please see the following for Manitoba Hydro's written feedback regarding the Canada Energy Regulator's (CER) proposed Filing Manual Updates.

- **Do these updates provide sufficient guidance to proponents to prepare their applications? If not, please elaborate on what is missing?**

In the context of filing requirements for "Upstream Emissions", the updates could explicitly exclude the "throughput" of electricity along powerlines; or consider all new powerlines to be "expansion projects" (from a regional grid perspective). Powerline operation is complex and includes bi-directional flow and the potential sourcing of electricity from a wide range of regional generation sources, including sources in both Canada and the US. What is "upstream" and "downstream" can be unclear and difficult to project/model.

With the "GHG Emissions and Climate Change" tables being identical in both the "filing manual" and "Electricity Filing Manual", it is unclear whether upstream powerline emissions are a concern for Canada's Energy Regulator or whether these sections were written specifically for fossil fuel pipelines. We would suggest electrical powerlines shouldn't be a "upstream emissions" concern as typically new powerlines will support the reduction in overall grid intensity (e.g., support the integration of variable renewables) as we move towards a net-zero future, even if they link with regions that currently have higher GHG intensities. From a grid-wide perspective, incremental flow on a new powerline is often relatively small as most flow would have been occurring on other existing powerlines in a Baseline Scenario.

- **Do you have views on the proposed scalable approach for filing requirements, based on GHG emissions thresholds?**

The proposed scalable approach is an appropriate one. It is best to lower the administrative burden on low emitting projects. ECCC could consider adding a third tier (versus the current binary format) to the approach.

- **What are your views on the level of information currently required in the proposed updates to filing requirements in relation to the potential GHG emissions thresholds (for both construction and operation)?**

The level of information currently required for projects below the thresholds is too high. Less administrative burden should be placed on low emitting projects. For example:

- If a project's emissions are low, then requesting a quantified "percentage of total sector-based emissions" is not relevant as it will typically round to 0%.
- If a project's emissions are low, then requesting a quantified "percentage of provincial and national reported GHG emissions" is not relevant as it will typically round to 0%.
- There is currently minimal difference between the information required for "operational GHG emissions" for projects both below and above the threshold.
- The Project Example for "Construction GHG Emissions" was "construction of a meter station", which is essentially equivalent to the construction of a small building. It can be challenging to accurately quantify construction and operation emissions for projects that are

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so small in scale. The estimate range can be large and the results not particularly meaningful.

- **Does the draft Greenhouse Gas Emissions and Climate Change Supplemental Guidance document provide useful additional context to proponents in the preparation of an application? Please elaborate.**

The Supplemental Guidance document does provide useful additional context. The “possible guiding questions” are particularly useful.

The supplemental guidance document could, however, provide more information on what would be deemed a “credible” net-zero plan. Any net-zero plan will be heavily dependent on assumptions outside the control of project proponents and difficult to predict with a high degree of confidence. We’d suggest that ECCC list some economy-wide assumptions that would be deemed “credible” for proponents to assume. This could be done in filing manuals or other reference documents. For example:

- Whether or not non-emitting (e.g., EV) heavy-duty vehicles can be assumed to be available at a large scale and over a broad range of technologies (e.g., all types of construction vehicles).
- Whether the electricity grid can be assumed to be net-zero or not.
- Whether it can be assumed that there will be a large-scale availability of renewable/non-emitting fuels or not.
- Whether it can be assumed that there will be a large-scale availability of offset credits or not.

If you have any questions with respect to this feedback, please contact

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