

December 09, 2024

Yukon Utilities Board
Box 31728
Whitehorse, Yukon Y1A 6L3

**Attention: Colleen Henry
Executive Secretary**

**Re: ATCO Electric Yukon (AEY)
AEY's Response to Carol Church's Billing Complaint**

In accordance with the Yukon Utilities Board's (the Board) email of November 18, 2024, regarding a customer complaint from Carol Church (the Customer) dated October 7, 2024, about the recalculation of their residential and business electrical bills, ATCO Electric Yukon's (AEY) provides the following response. AEY takes all customer inquiries and complaints seriously and welcomes the opportunity to address this issue.

Background:

By way of background, the customer contacted AEY a number of times between April and October 2024. During this time period, the Customer spoke with a Customer Service Representative (CSR) regarding both their residential electricity bills and business electricity bills. Although the conversations were pleasant (as the Customer acknowledges in their complaint), they did not fully resolve the customer's concerns.

Realizing AEY, in the Customer's view, could not provide further assistance, the Customer emailed the Board on October 7, 2024, detailing issues with their residential and business electricity bills. The Customer reported that their residential bill was recalculated, resulting in a charge of over \$700, which was double the usual amount. Similarly, their business bill was recalculated due to an incorrect "demand charge rate" applied since January 2024, resulting in a charge of over \$2,500, which was \$1,000 more than expected. The Customer understood that the recalculation stemmed from two months' worth of estimated demand over a 10-month period, leading to a new consolidated bill.

The Board acknowledged the Customer's email on October 15, 2024, requesting additional information to initiate the formal complaint process. The Board requested from the Customer a history of correspondence regarding the issue with AEY, a detail of the charges, and the months affected for both locations. On October 22, 2024, the Customer responded, summarizing their complaint and providing redacted bills. They expressed frustration with the estimation of charges rather than actual meter reads and noted their intention to take monthly meter readings themselves.

The Customer questioned why AEY can retroactively adjust bills for mistakes made up to ten months prior and expects consumers to pay the revised amounts. The Board sent an email to AEY on November 18, 2024 requesting a response to the Customer's concerns by December 9, 2024.

AEY's Response:

AEY submits that the estimation of demand and subsequent billing adjustments are in accordance with AEY's Terms and Conditions of Service (T&Cs), specifically Article 7.1, which allows for meter readings to be based on estimates when actual readings are not available.

7.1 Reading and Estimates

Unless otherwise specifically provided in a contract with a Customer, meters shall be read monthly or bi-monthly or at such other intervals as are practical in the circumstances. Customers' bills will be based on meter readings made by the Company or on estimates for those billing periods when the meter is not read. Whenever a bill is based on an estimate, an adjustment to reflect actual Energy consumption and Demand (if applicable) used will be made when the meter is next read.

The estimating ability approved in the T&Cs strikes a balance between timeliness, weather- and access- dependent manual meter reading processes, and competing operational requirements. For the residential property, AEY staff have confirmed that access was not available due to a blocked gate and snow resulting in multiple periods of estimation. The commercial business was accessible and was read in a timely fashion with only one month of meter reading estimates. Estimated readings are typically based

on past usage or the usage patterns. As part of the modernization efforts in AEY's distribution system, the company is planning to upgrade the meter fleet to Advance Metering Infrastructure (AMI) meter to minimize meter reading estimates and increase the billing timing and accuracy.

In addition to Section 7.1 of the T&Cs, the Board-approved price schedule allows AEY to bill customers on estimates as shown in Figure 1 for the 2160 General Rate Schedule:¹

Figure 1: General Service Rate Components

BILLING DEMAND:	The billing demand may be estimated or measured and will be the greater of the following: (a) The highest metered demand during the billing period. (b) The highest metered demand during the 12 months ending with the current billing month, excluding the months April through September. (c) The estimated demand. (d) 5 kilowatts.
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Residential Bill Analysis

Due to inaccessibility as discussed above, the Customer's residential usage was estimated for the billing periods November 2023 to February 2024. The April 04, 2024 bill adjusted the estimated usage to match the actual usage and included the amount for the normal billing period from February 13, 2024 to March 13, 2024. As shown in Table 1, while there are fluctuations between actual and estimates from month to month, the adjusted amount for the periods that were estimated between November 2023 to February 2024, was \$14.82. AEY submits that the extended period of estimating was due to the access restrictions where manual metering reading was not possible at the residential location. Given the forgoing, the Customer statement on "*My electric bill at home was recalculated and I was sent a bill for over \$700... twice what it usually is*" is incorrect in relation to the adjustments made between estimate and actual as outlined in Table 1 below.

¹ <https://www.atcoelectricityukon.com/content/dam/web/electric-yukon/october-1-2024-rates/YECL%20YEC%20Rate%20Schedules%2011-2024.pdf>

Table 1: Residential Charges Comparison Summary

Billing Period Amounts				Adjusted Billing Detail	
Billing Period (Nov. 15, 2023- Mar. 13, 2024)	Billed Based on	Bill based on Actuals (\$)	Bill based on Estimates (\$) [A]	Bill based on Actual Reads for Originally Estimated Periods (\$) (B)	Adjusted Billing (\$) Estimate to Actual [B] – [A]
Nov. 15 – Dec. 13	Estimate		386.39	495.8	109.41
Dec. 13 – Jan. 15	Estimate		446.05	586.15	140.1
Jan. 15 – Feb. 13	Estimate		776.8	512.47	-264.33
Nov. 15 – Mar. 13⁽¹⁾	Actual True Up – Nov. 15 to Feb. 13	1,594.42		N/A	
	Actual Consumption– Feb. 13 – Mar. 13	468.33		N/A	
TOTAL		2,062.75	1,609.24	1,594.42	-14.82

(1) Bill presented to customer was \$2,062.75 - broken down between actual to estimate true up of \$1,594.42 for the periods of Nov 15 to Feb. 13 and an actual meter read for the energy used in the Feb. 13 – Mar. 13 billing period of \$468.33.

Business Bill Analysis

Regarding the Customer’s business meter reading, as the customer identifies in their complaint, the two (2) months that were estimated were the months of October 2023 and July 2024. AEY can clarify that the billing adjustment for the estimated October 2023 bill was recalculated to actual on the November 20, 2023 bill. As outlined in Table 2 below, the only estimated period included on the bill issued on August 28, 2024, was for the billing cycle between June 18, 2024 and July 18, 2024; however, as part of the billing course there are small billing adjustments from period to period due to demand estimation and proration. As shown in Table 2, the adjusted billed amounts occurred in conjunction to the normal July 18, 2024 – August 20, 2024 billing cycle, therefore the billing adjustment for the periods between January 24, 2024 to July 18, 2024, which included one estimated month, was \$207.46.

Table 2: Business Charges Comparison Summary

Billing Period Amounts				Adjusted Billing Detail	
Original Billing Period (2024)	Meter Read Status	Adjusted Bill based on Actuals (\$)	Original Bill (\$) [A]	Adjusted Billing due to Demand proration and Actuals (\$) [B]	True-up (\$) [B]-[A]
Jan. 24 – Feb. 16	Actual		1,460.29	1,393.72	-66.57
Feb. 16 – Mar. 18	Actual		1,571.58	1,578.85	7.27
Mar. 18 – Apr. 17	Actual		1,566.02	1,573.55	7.53
Apr. 17 – May. 16	Actual		1,521.25	1,503.13	-18.12
May. 16 – Jun. 18	Actual		1,862.37	1,893.92	31.55
Jun. 18 – Jul. 18	Estimated		1,810.63	2,056.43	245.80
Jan. 24 – Aug. 20 ⁽²⁾	Actual True Up – Jan. 24 to Jul 18	9,999.60			
	Actual Consumption– Jul. 18 – Aug. 20	2,334.00			
TOTAL		12,333.60	9,792.14	9,999.60	207.46

(2) Bill presented to customer was \$12,333.60 - broken down into true-up billings for the period of Jan. 24 to Jul. 18 for the amount of \$9,999.60 and actual meter read for energy and demand in the Jul. 18 – Aug. 20 period of \$2,334.00.

AEY takes all billing inquiries seriously. As shown in Tables 1 and 2, the adjustments from estimate to actual were \$14.82 for the residential property and \$207.46 for the commercial property. As mentioned above, AEY estimates and adjusts bills in accordance with Section 7.1 of the T&Cs and the General Service price schedule.

Given the foregoing, AEY acknowledges the Customer’s situation; however, AEY believes it has followed the necessary steps to uphold the T&Cs, the Board-approved rates, and has made a reasonable effort to communicate the same to the customer. Accordingly, AEY respectfully requests the complaint be dismissed.

Please contact the undersigned if you require any further information.

Sincerely,

Tony Badry
Manager, ATCO Electric Yukon