

ATCO ELECTRIC YUKON AND YUKON ENERGY CORPORATION
APPLICATION FOR CHANGES TO TERMS AND CONDITIONS (T&Cs)
Yukon Utilities Consumers' Group
Information Request

UCG-AEY/YEC-1-1

Reference: Application dated December 20, 2024

Request:

- (a) Please provide details of all customer and stakeholder consultations conducted by ATCO Electric Yukon and Energy Corporation during development of this application prior to submitting it to the YUB.
- (b) Please provide specific details on how customers were informed of proposals being considered for inclusion in the application and how input from customers was used to develop details of the application.
- (c) Please provide all documentation related to issues discussed during these consultations and a list of all parties involved in the consultations.
- (d) Please confirm how and when the leadership / owners of AEY and YEC approved the Application as provided to the YUB. Please identify the dates on which these approvals were provided.

UCG-AEY/YEC-1-2

Reference: Application dated December 20, 2024

Request:

- (a) Provide the details of how any changes (i.e. increased fees and charges) in the T&Cs will be accommodated in the revenue requirement for the 2025 year to account for any new increased revenues resulting from this process.
- (b) Provide details of how these increased T&C charges will be accommodated in the revenue requirement for each of the following non-test years (after 2025) preceeding any new GRA filing to account for increased revenues.
- (c) Will these changes in T& C charges result in a rider to reimburse ratepayers until a GRA sets these revenues into the requirement?

UCG-AEY/YEC-1-3

Reference: Application dated December 20, 2024

• **Revised Terms and Conditions of Service** – Prepared by the Utilities. Changes focused on modernizing the T&Cs to address elements such as grid modernization efforts and different loads in Isolated Communities.

Request:

- (a) Provide details of each grid moderization and how each of these affects T&Cs.
- (b) Provide details of different loads in isolated communities affect on T&Cs.

UCG-AEY/YEC-1-4

Reference: Application dated December 20, 2024

5. While the current T&Cs continue to provide the guidance needed between the customer and the utility, upon a detailed review of the T&Cs, the need to modernize the

T&Cs to address different circumstances which were not present in 2011, when the T&Cs were last approved, was identified.

Request:

(a) Provide details of all circumstances not present in 2011.

(b) Explain why each utility has not applied for T&C updates each time they have filed a GRA.

UCG-AEY/YEC-1-5

Reference: Application dated December 20, 2024

Page 3

Customer Generation

6. The Utilities have expanded Section 3.6 Customer Generation to ensure safety, compliance, and clear communication between the Utilities and generating customers.

By requiring all necessary permits, licenses, and authorizations before starting or changing service, the Utilities can ensure that all interconnections meet regulatory and technical standards.

Request:

(a) Explain how the utilities ensured safety, compliance and clear communications before this newer more expensive policy now being requested.

(b) Discuss the similarities and differences of new and old policy.

(c) Explain how the utilities met the conditions requiring all the necessary permits, licenses and authorizations prior to this new policy change.

UCG-AEY/YEC-1-6

Reference: Application dated December 20, 2024

SECTION 3: MAXIMUM INVESTMENT LEVELS (MILs)

15. Appropriate MILs balance intergenerational equity, the utility's obligation to serve,

and the opportunity to earn a return. An imbalanced MIL can lead to issues such as

uneconomic bypass, intergenerational inequity (e.g., new customers subsidizing existing

ones), and depriving the utility of a fair return on assets it owns and operates.

Request:

- (a) Provide each of the MILs (new extensions of service for each year 2012 to 2024, separating costs (customer/utility).
- (b) Explain if a MIL would stand for all new additions and extensions to the distribution grid or the Integrated Grid.
- (c) Were all the new connections to Whistle Bend under this policy?
- (d) Explain how an asset that is partially paid for by a new customer is completely owned by a utility and therefore required a fair return on the total cost of such asset.

UCG-AEY/YEC-1-7

Reference: Application dated December 20, 2024

SECTION 3: MAXIMUM INVESTMENT LEVELS (MILs)

An appropriate MIL also contributes to the strength of the Yukon economy by providing a proper signal for upfront costs which may deter new connections if set too low.

Request:

- (a) Indicate why a private or a public utility should set policy to advocate government economic strategy.

UCG-AEY/YEC-1-8

Reference: Application dated December 20, 2024

SECTION 3: MAXIMUM INVESTMENT LEVELS (MILs)

17. Given the established principles and cost per lot methodology, AEY has conducted a detailed MILs study focused on the cost per lot methodology, including alternative analysis – i.e., desktop study – which supports the proposed MILs.

Request:

- (a) Explain who performed the detailed study focused on cost per lot methodology?
- (b) At what cost?
- (c) Is this the same methodology as used for the last MIL? Explain.
- (d) Was the last MIL study done by the same consultant firm?
- (e) Explain who performed the desk top study.
- (f) Explain if this desktop study was independent of the utilities.
- (g) If not, why not?

UCG-AEY/YEC-1-9

Reference: Application dated December 20, 2024

7.1 Meter reading

30. Finally, for meter disputes, the meter accuracy test handling fee applies to self contained meters and instrument meters are handled by Measurement Canada to ensure standardization and accuracy. The new fees are proposed at \$250 and \$500 compared to the previous fees of \$100 and \$200, respectively. These charges reflect the actual time and resources required for each meter dispute.

Request:

- (a) Explain why there is not a dispute resolution mechanism with set parameters giving a balance of customer and utility interest regarding disputes on possible faulty meters.
- (b) Explain why is there an automatic charge to the customer to get a meter under dispute tested?
- (c) Is this refundable? If so, why is this not in the policy program?
- (d) Explain why such meter dispute costs are necessary to be up-front payed by the customer and not after the meter has been tested to demonstrate cause. For example: a customer be notified that meter being disputed, which after being tested is shown to be in compliance, then the customer will be charged on the next billing for that testing. If the meter is non-compliant then this will be paid for by the utility revenues and not added into the rate base.

UCG-AEY/YEC-1-10

Reference: Application dated December 20, 2024

Updates to Fees and Service Charges

31. Similar to the proposal for MILs, approval is also sought to use the CPI for Whitehorse, Yukon, which will be applied annually (prior to January 1st of the following year) in years when the Fees and Service Charges are not being updated via a regulatory filing, to keep up with inflation on an ongoing basis. Updates to the Fees and Service Charges can be filed with the Board through a no-notice application in December to be effective the following year.

Request:

- (a) Provide inflation index for each year 2012 to 2024.
- (b) If the increase requested in the new MIL is greater than the accumulated inflation since the last changes to T&Cs, provide reasons.
- (c) Is the ratio between customer investment and MIL investment the same as 2011?
- (d) If not, explain reason why?

- (e) Does this policy update request suggest that the utilities are applying that the CPI index be added to the MIL and the Fees and Services for each new year following this process rather than going through a T&C review?
- (f) If so, is this not a new regulatory method being requested?
- (g) Is this new method standard regulatory principles used in other jurisdictions? Give examples from other jurisdictions.

UCG-AEY/YEC-1-11

*Reference: Application dated December 20, 2024
Connection/Disconnection Fees*

Request:

- (a) In many cases, can not a connection or disconnection be accomplished by flipping a switch at the warehouse?
- (b) If yes, why is there a charge for this?
- (c) In many cases disconnection is often to families most vulnerable to the economic conditions of the day, causing more financial drama and greater trauma added to the daily needs of having electricity for heat as well as food preparation and safety in their homes. How is this taken into consideration by each utility? Please give actual details of how this is handled, not a generic response.

UCG-AEY/YEC-1-12

*Reference: Application dated December 20, 2024
Schedule A: Standard Supply Specs*

Request:

- (a) Explain the difference in 240/120V and 208Y/120V.
- (b) Explain what each is used for and difference in costs.

UCG-AEY/YEC-1-13

*Reference: Application dated December 20, 2024
SCHEDULE B: MAXIMUM COMPANY INVESTMENT*

The Maximum Company Investment Levels set out in this Schedule are effective

January xxx 1xx, 2011xx.

1. Subject to the provisions of paragraph 2 of this Schedule B, the maximum Capital

Cost which the Company will incur to extend Service to a Point of Service (herein referred to as the "Maximum Company Investment") shall be determined as follows.

Under no circumstances would the Maximum Company Investment exceed the Customer extension cost:

(a) Residential Service:

\$1,500 10,337 per single family dwelling; and
\$ 725 2,645 per Multiple Dwelling unit

(b) General Service:

\$690 1,801 per kW, which shall not be less than five kilowatts, provided that if the estimated service life is less than 25 years or seasonal, then the Maximum Company Investment shall be determined in the manner described in paragraph 2;

At the end of one year of Service the Company will re-assess whether the Customer's estimates of their Demand were accurate and, if the loads are significantly different than originally estimated, will collect from the Customer (or refund) any contributions, that are required based on the Maximum Company Investment rules in place when the contribution was originally paid.

(c) Municipal Street Lighting:

\$1,240 6,649 per light.

Request:

- (a) Explain why residential single family increased 590% while multiple dwellings only went up 265% and general service only 161% since last filing.
- (b) Explain why single family residential MIL was only twice the amount of multiple last filing but 4 times this filing.
- (c) Explain why street lighting went up 440% since last filing.
- (d) Where and how much of the MIL company costs were administered in the last GRA. Demonstrate directly from the application or the compliance filing?
- (e) Does each utility add the difference in actual costs and the MIL to extend a project into capital costs or some other area of the books? Explain.
- (f) If the answer to e) is yes, demonstrate where and how much from the last GRA.

UCG-AEY/YEC-1-14

Reference: Application dated December 20, 2024

Schedule D: Fees and Service Charge

CUSTOMER USAGE INFORMATION REQUESTS

Applies to historical usage information requests with written authorization of the Customer (3.8) Company's actual cost (min \$75.00)

SUPPLEMENTARY METER READS

Standard Meter reads (3.8) \$11.00 (per read per meter)

Non-Standard Meter reads (in person) (3.8) \$87.00 (per read per meter)

LATE PAYMENT AND DISCONNECTION

Collection Fee (4.15, 7.4)

\$30.00 45.00

(personal visit) Late Payment Charge (7.4): 1.5% per month (19.56% per annum)

Dishonoured Payments Fee (7.5):

\$25.00 45.00

METER DISPUTES

Meter Accuracy Test Handling Fee (6.3)

Self Contained Meter

Request:

- (a) Explain when the utility started to charge for a customer usage report.
- (b) Explain why you wish to charge to have a customer usage information request when this is a simple print out.
- (c) Do you offer any complimentary services to your firm customers or do you just take us for granted? Explain.
- (d) Explain what a standard meter read is.
- (e) If a person or family has a problem making a payment, how can a collection fee and a late payment charge added to the next bill payment accommodate this rather than accerbate the financial frustration to the cusomers.
- (f) Is this policy absolutely followed which most often punishes the customer further by adding financial stress or is there some discretion used by the utility? Explain using concrete examples.

UCG-AEY/YEC-1-15

Reference: Application dated December 20, 2024

Reference: Application dated December 20, 2024

MIL Study

Request:

- (a) On table 4 for the Historical Expansion Costs, does not the company know exactly what the costs were for each service extension each year, including 2024 and 2025 so far this year?
- (b) Explain why you need inflated and non inflated costs and an expensive study to develop a new MIL?
- (c) If you consider that a balanced single residential MIL is to be 61percent of total cost then cannot this be easily determined using the real total cost average for the last year or even last 6 months?
- (d) If you consider a balanced multi-dwelling MIL to be 53 percent of total cost then this can easily be determined with real cost average for the last year?
- (e) Give concrete definition of residential-multi dwelling (i.e how many uits, ect.)?
- (f) Explain why residential multi-dwelling costs are only one quarter the cost of a single residential? Are there four or more extensions that pay this amount for a multi?
- (g) Explain using the same above rationale for General Service MIL.
- (h) Explain why general service MIL is to come it at 49 percent compared to single residential at 61 and multi-residential at 53 and street lights at 82 percent.
- (i) Is street lighting for MIL only on private properties, not city or communy or government?
- (j) If the city, communities or government street lighting is different, how is this evaluated and charged?

UCG-AEY/YEC-1-16

*Reference: Application dated December 20, 2024
Appendix A-Guiding Principles*

Request:

- (a) Who developed these guiding principles?
- (b) Were any ratepayer group involved in this decision making? If not, why not?

UCG-AEY/YEC-1-17

Reference: Application dated December 20, 2024

Preamble:

UCG would like to better understand the methodology of defining and determining Multiple Dwellings MIL. In our understanding, there are many different types of multiple dwellings, like duplex, triplex, fourplex..., multi plex, condominiums, townhouses, apartments, etc.

Request:

- (a) In this proposal all these appear to be grouped under one umbrella. This appears to be discriminatory (i.e. a multiplex with several units vs. a one single unit) where the charges for a single residential dwelling is costed at 4 times the amount of a multiple. Explain and discuss.
- (b) Explain how you consider this as fair?

UCG-AEY/YEC-1-18

Reference: Application dated December 20, 2024

Preamble:

In the Application for and Conditions of Service page 13 of changes requested:

4.13 Multiple Dwellings

- a) Each individual unit within a Multiple Dwelling will be served as a separate Point of Service and billed individually on the applicable residential rate. The Company and a Customer may agree that one bill will be issued covering all individual units in a Multiple Dwelling and, in such case, the applicable general service (non- residential) rate will apply to theService. Common use areas such as hallways, lobbies, and laundry rooms, elevators, and parkades will be billed under the applicable general service price schedule.
- b) Where the Company and a Customer have agreed that service to a Multiple Dwelling shall be delivered through a single Point of Service, the applicable general service (non-residential) price schedule will apply to the service.

Request:

- (a) Why is the utility treating this differently than the MIL methodology (i.e. why is not each separate point of service charged as an individual residential service in the MIL like they are assessed in billing)?

- (b) Give a concrete example of when one bill would be issued covering all individual units in a Multiple Dwelling?
- (c) In the request (b) above why is general service now applied to this charge?
- (d) Why are not common areas with one point of service not charged using single residential, not general service?
- (e) Are these areas not considered for the residential customers, but business oriented? Explain.
- (f) Give rationale for 4.13b) above when a Multiple Dwelling is delivered through a single point of service, a general service price schedule is applied.