

**ATCO Electric Yukon and Yukon Energy Corporation
2025 Terms and Conditions of Service (T&Cs) Application**

**Yukon Utilities Board (Board)
Information Requests (IRs) Round 2 to
ATCO Electric Yukon (AEY) and Yukon Energy Corporation (YEC) (the Utilities)**

YUB-AEY/YEC-2-001

Reference: YUB-AEY/YEC-1-003(b)¹

Issue: Customer rights and obligations

Preamble: The utilities have stated that the utilities are in constant communication with customers, have updated the T&Cs based on past customer interactions and past experiences, and aim to address challenges the Utilities have experienced in providing service and maintaining grid stability.

Request:

- (a) Do the Utilities have a written or recorded log of such interactions?
- (b) Is it fair to say that the summary of the response to parts (a) and (b) of the referenced IR, as set out in the preamble, indicate experiences from a utility perspective and, without stakeholder engagement, do not fully represent customer views? Please explain.
- (c) The last part of the response to the IR notes the Board's direction to the Utilities to notify customers regarding the T&Cs application. Please explain why the Utilities referred to the direction from the Board regarding the giving of notice of the application and the testing of the application in IR response AEY-YEC-YUB-003(b) when the question was about consulting with customers.

YUB-AEY/YEC-2-002

Reference: YUB-AEY/YEC-1-005(c)

Issue: Multiple dwellings/common areas – General Service

Quote: Please refer to response (a) above. There is not one specific customer that can be billed for electricity for these services. Rather, it is typically the condominium association, property manager, landlord or the building owner that passes on the costs to residents.

Preamble: YUB-AEY/YEC-1-005(c) was not directly responded to.

Request:

- (a) The response to YUB-AEY/YEC-1-005(c) repeated the definition of what constitutes a common area. Please explain what qualifies a common area as a general service rate

¹ Please note that the IRs referenced in this document have followed the format used by the YUB in the original IR request submitted on February 25, 2025.

versus a residential rate.

- (b) In some instances, does a common area in a multiple dwelling account for the load for all the dwellings that would otherwise be accounted for in the sum of a single residential dwelling equal to the number of dwellings in the multiple dwelling complex (for example a boiler system for providing heat)? Please explain.
- (c) Please explain the significance of who is responsible for passing on certain costs to residents in determining whether a service should be classified as general service versus residential.
- (d) The above quoted IR response is that since one specific customer cannot be billed for electricity for the common area services, then a General Service Rate should apply. It also refers to the YUB-AEY/YEC-1-005(a) response that “common areas are collectively funded and maintained by all residents of the property which distinguishes them from residential properties.” Please explain, from a cost causation perspective, how hallways, laundry rooms, lobbies, elevators, and parkades are more applicable to a General Service rate than a Residential rate.
- (e) In reference to the YUB-AEY/YEC-1-005(c) response, past the meter, what jurisdiction do the Utilities have in regard to how the condominium association, property manager, landlord, or the building owner passes on costs to residents?
- (f) In regard to the YUB-AEY/YEC-1-005(e) response, how does a customer as described above (i.e. condominium association, property manager, etc,) cause the utility to incur costs differently than from a residential rate?

YUB-AEY/YEC-2-003

Reference: YUB-AEY/YEC-1-005(b)

Issue: General Service billing rate for common areas

Quote: There are currently no exceptions for Multiple Dwellings where common use areas would not be billed under the general service price schedule. At this point, the Utilities are not proposing any such exceptions in the updates to the T&Cs.

Request:

Please confirm the Board’s understanding that the Whitehorse Condominium Corporation 275 is a Multiple Dwelling that is paying residential rates for its common areas under a settlement agreement approved by the Board. Please explain why this is not considered an exception in IR response YUB-AEY/YEC-1-005(b).

YUB-AEY/YEC-2-004

Reference: YUB-AEY/YEC-1-006

Issue: Definition of residential customer

Quote: The review entailed the use of residential premises between residential usage and commercial usage. As such, the Utilities can consider how premises classified as residential under the current T&Cs are actually used, and particularly cases where commercial activities are taking place in residential premises. The Utilities discussed the process of identifying the multi-use and whether potential changes to Section 7.8 would be required.

Preamble: It is not clear what the review entailed.

Request:

- (a) Please explain how the Utilities can consider how a premise classified as residential is actually used.
- (b) How do the Utilities determine if commercial activities are taking place at residential premises?
- (c) The Utilities responded to YUB-AEY/YEC-1-006(c) of the question by stating that, “The Utilities consider that a home is used for commercial purposes if activities are carried out on the premises which relate to operating a business.” If a person is a writer and works at home writing freelance articles, is that considered a commercial purpose to the utilities? How do the Utilities distinguish this from other activities carried out at the residential premise?

YUB-AEY/YEC-2-005

Reference: YUB-AEY/YEC-1-011(a) and (c)

Issue: Schedule D: Fees and Service Charge

Preamble: The Utilities did not respond to the question as asked.

Request:

- (a) YUB-AEY/YEC-1-011(a) asked for CPI from 2012 to 2024. The Utilities provided a response for CPI from 2011 to 2025. Please respond to the question by providing the table as asked.
- (b) In response to YUB-AEY/YEC-1-011(c), the Utilities responded that Engineering resources and IT costs are included to verify site specific information. Is information such as transformers and conductor size included in the site profile as part of the customer information system, and included in the billing parameters for the customer? Please explain.
- (c) If such information as suggested in YUB-AEY/YEC-2-005(b) is included, why are Engineering resources required to verify that information?
- (d) Does every customer usage request require Engineering resources? Please explain.

- (e) Why are Engineering resources required for customer usage information requests when, in response to YUB-AEY/YEC-1-12(d), the Utilities claim customers can access such information through MyAccount, presumably without Engineering resources?

YUB-AEY/YEC-2-006

Reference: YUB-AEY/YEC-1-012

Issue: Customer Usage Information Requests

Quote: The fee would apply to all requests for historical usage information.

Request:

- (a) How many months of customer usage data exist on the billing system without having to pull historical information from archives?
- (b) If a customer makes a customer usage information request, are they billed on the billing parameters associated with that account?
- (c) If the answer to YUB-AEY/YEC-1-012(b) is affirmative, why do the Utilities need site specific details?
- (d) For the average customer usage request, what is the average number of historical months for which customers request usage information?
- (e) In response to YUB-AEY/YEC-1-012(d), how was the average number of historical months determined?
- (f) Please explain the need for overhead costs identified in response to YUB-AEY/YEC-1-012 (a).
- (g) Is all overhead covered through the GRA applications and resultant approved revenue requirements for the Utilities? Please explain.
- (h) Similarly to the question in YUB-AEY/YEC-2-006(g), are the cost of Customer Service agents and IT and Engineering resources already included in the approved revenue requirement for the Utilities? Please explain.
- (i) In response to YUB-AEY/YEC-1-012(d) of the referenced IR, the Utilities stated “Charging a fee will encourage use of MyAccount and reduce utility hours spent providing this information.” Is charging customers such a relatively high fee the best way to encourage customers to use MyAccount? Please explain.

YUB-AEY/YEC-2-007

Reference: YUB-AEY/YEC-1-014, and AEY-YEC 2025 T&Cs Application, Appendix 2 Schedule D, PDF page 90.

Issue: Late Payment and Disconnection, Connection and Reconnection fees

Preamble: In the response to YUB-AEY/YEC-1-014(b), personnel review the account history, travel to the site, and leave a door hanger to notify the customer on an overdue amount owing (if the customer is not on site).

Request:

- (a) What attempts are made to contact customers who have an overdue amount owing to avoid travelling to the site when customers are not there? Please explain.
- (b) Are such customers contacted by telephone, email, or written notice before personnel travel to the customer site?
- (c) Please clarify: Are Connection and Reconnection fees from Schedule D a fixed amount, or are they shown as a minimum amount that can be higher if more time is required?

YUB-AEY/YEC-2-008

Reference: YUB-AEY/YEC-1-022(c)

Issue: Section 3.2 Terms and Conditions Prevail, subsection (c).

Quote: No. Waiver agreements and subsequent negotiations which are approved by the Board should not be posted on the Utilities' websites as these waivers would only be to address unique circumstances.

Request:

- (a) YUB-AEY/YEC-1-022(c) asked: "If such agreements were to take effect, should such agreements be posted on the websites of the Utilities in conjunction with the T&Cs? Please explain." Setting the negotiations aside, why shouldn't the waiver agreements be posted on the Utilities' websites in conjunction with the T&Cs?
- (b) Should the waiver agreements be posted on the Board's website? Please explain.
- (c) If the answer to YUB-AEY/YEC-2-008(b) is negative, please explain why all customers should not have access to information about the application of the T&Cs in a transparent manner.

YUB-AEY/YEC-2-009

Reference: YUB-AEY/YEC-1-024(c)

Issue: Fees and Charges

Quote: While the costs are not specified in Schedule D specifically, the costs are flowed through to customers in providing services that support our customer

Request:

- (a) YUB-AEY/YEC-1-024(c) asked: "If the utilities charge a customer for a service and [the]

charge [is] not listed in Schedule D, is it an approved regulated charge? Please explain.” It was not directly answered. If the charge is not listed in Schedule D, is it a valid regulated charge? Please explain.

- (b) Could Schedule D be amended to provide a general description of other charges and how those charges will apply? If so, provide such a general description and narrative as to how those charges will apply.

YUB-AEY/YEC-2-010

Reference: YUB-AEY/YEC-1-026(a)

Issue: Change in service connections

Quote: The Utilities would not propose specific parameters on what constitutes a significant change in load since each case is unique and most likely will require specific consideration to plan and execute electrical upgrades.

Request:

The response to YUB-AEY/YEC-1-026(a) does not respond to “reasonable prior notice”. Please provide examples of what the Utilities would and would not accept as reasonable prior notice or consider as significant change. Alternatively, explain the considerations the Utilities take into account in determining whether notice was reasonable, or a change was significant.

YUB-AEY/YEC-2-011

Reference: YUB-AEY/YEC-1-028(e)

Issue: Extension of Service – Cost sharing

Quote: Please refer to response YUB-AEY/YEC-1-004(a). While no formal consultations with customers were undertaken, the Utilities note that the values have not been updated for over a decade and do not reflect today’s costs.

Request:

Please explain why there were no consultations on changes to cost sharing.

YUB-AEY/YEC-2-012

Reference: YUB-AEY/YEC-1-032(c)

Issue: Reading and Estimates

Quote: In the case of missed meter readings, the meter read would be estimated and not included or identified in the spare meter reading cycle

Request:

- (a) How do the Utilities test the accuracy of its meter read estimates?
- (b) The Board has had several complaints regarding meter read estimates. Can the Utilities provide information as to how often estimates are off by more than 15 percent in terms of frequency (# of occurrences) and as a percentage of all estimated meter reads.

(c) Additionally, can the Utilities provide an error range for meter read estimates in dollar terms and percentages of customers' bills?

YUB-AEY/YEC-2-013

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 75 and Response to YUB-AEY/YEC-1-032(c), (e) and (f), PDF pages 62-63

Issue: Response to YUB-AEY/YEC-1-032(c), (e) and (f)

Quote: Request:

(c) If a customer uses any of the payment forms acceptable to the Utilities, and renders payment on or before the due date but the transaction is not deposited in the bank account of the Utilities before the due date, does a late payment charge apply? Please explain.

(e) When there are Board-approved rate schedule changes, what steps do the Utilities take to ensure that the rates apply to consumption effective the date of the approved rate schedule change and not some estimation errors from prior periods.

(f) In response to part (e), what better steps could be taken to address that issue?

Response:

(c) The Utilities post payments daily. Customers providing payment on or before the due date would not be subject to late fees.

(e) The rates apply to the date for the billing period performed through the billing system. If there is a high estimate, charges are recalculated when actual meter reads are received.

(f) The steps described in (e) are consistently followed to ensure that customers are receiving the proper rate charges and interim rebate.

Request:

(a) The response to YUB-AEY/YEC-1-032(c) does not fully address the question. If the payment form used is acceptable by the Utilities and clears the customer's account on or before the due date, but is not deposited into the Utilities' accounts until after the due date, does a late payment charge apply? Please explain.

(b) Referring to YUB-AEY/YEC-1-032(e) which addresses Board-approved rate schedule changes, is the Utilities' response intended to indicate that the "high estimate" has already occurred on the bill that was sent to the customer, and that the Board-approved rate schedule charges will be recalculated on a subsequent bill based on actual meter reads and consumption that can be assigned to the dates on which the consumption occurred and to which specific Board-approved rates apply? If not, please explain fully.

(c) What is the “interim rebate” referred to in the response to YUB-AEY/YEC-1-032(f)?

YUB-AEY/YEC-2-014

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 76 and Response to YUB-AEY/YEC-1-034(d), PDF pages 65-66

Issue: Response to YUB-AEY/YEC-1-034(d)

Quote: Request:

(d) Can you please explain what additional charges this paragraph is referring to when it states: “The customer is responsible for the additional charges that may result due to payment methods other than those noted in the bills...”?

Response:

(d) The Utilities do not charge for other forms of payment.

Request:

Notwithstanding the response which indicates that the Utilities “do not charge for other forms of payment,” the quoted clause appears to indicate otherwise, stating that the customer may be responsible for “additional charges” under a certain scenario. Accordingly, please identify all circumstances and scenarios where “The customer is responsible for the additional charges that may result due to payment methods other than those noted in the bills.”

YUB-AEY/YEC-2-015

Reference: MF-AEY/YEC-1-2(a)

Issue: General service charges for single point delivery for a multiple dwelling

Preamble: The Board would like to see a larger selection of other Canadian jurisdictions included in the response.

Request:

Please restate the response to the part (a) question referenced above by including BC Hydro, Fortis Electric (BC), SaskPower, Manitoba Hydro, Hydro Quebec, Nova Scotia Power, Maritime Electric, and Newfoundland Power in your response.

YUB-AEY/YEC-2-016

Reference: AEY-YEC 2025 T&Cs Application, PDF page 83; YUB letter on complaint regarding AEY service disconnection of March 3, 2025; AEY response letter regarding the complaint (March 7, 2025) (AEY Response).

Issue: 11.3 Company Termination Other Than for Safety

Quote: “The Company, or anyone acting under its authority, may, upon giving at least 48 hours' notice to the Customer, terminate the Customer's Service or use available Current-Limiting functionalities to restrict the Service to such Customer if the Customer:” (Application, PDF page 83)

Your complaint and reply indicate that you did not receive any notices or letters regarding disconnection of your power service. The Board has asked AEY for copies these documents and that you be provided with a copy. Also, the Board will ask questions in the Terms and Conditions of Service Proceeding currently before the Board as to the manner in which notices or letters of disconnection of service should be given to ensure that customers are adequately notified. (Board letter to complainant)

January 24, 2025: A reminder letter on payment was issued. Since the full payment was not received, and no contact was made with AEY's billing staff, a Pending Disconnect Notice was issued with a due date of February 12, 2025.

February 25, 2025: A cut off for nonpayment was issued to the Customer after not receiving acknowledgment or payment of the Pending Disconnect Notice. (AEY Response)

Request:

- (a) Please explain how the reminder letter, the Pending Disconnect Notice, and the cut off for non-payment (collectively referred to as “notices”) were issued/provided, and on what dates they were delivered to the customer.
- (b) How do the Utilities ensure customers actually receive such notices 48 hours before termination of service?
- (c) Are any of the notices delivered through postal services, by email, or other means?
- (d) If any notices are delivered via postal services, how do the Utilities know that delivery has occurred at least 48 hours before termination of service?
- (e) What steps do the Utilities take in the event of a disruption of postal services regarding the delivery of notices?
- (f) For the above referenced complaint, the complainant's position is that notices were not received. What steps can the Utilities take to ensure that customers are adequately notified?

YUB-AEY/YEC-2-017

Reference: AEY-YEC 2025 T&Cs Application, PDF page 76; YUB letter on complaint regarding AEY service disconnection on March 3, 2025.

Issue: Customer Arrears – payment arrangement documentation

Quote: 7.6 Outstanding Charges

The Company may add to the Customer's bill any outstanding charges due and owing to the Company (e.g., construction contribution, account receivable charges, former overdue accounts etc.). (Application PDF page 76.)

A written statement of all the details of the payment arrangements and consequences of non-payment in accordance with the arrangement, including disconnection of power service, may have avoided your disconnection situation. Given the situation outlined in your complaint, the Board will ask questions in the Terms and Conditions of Service Proceeding currently before the Board on including in the terms and Conditions of Service the documentation needed for recording payment arrangements.

Request:

- (a) Have the Utilities considered including a section in the T&Cs regarding customer arrears and the collection thereof? Please explain.
- (b) Respecting payment arrangements, would the Utilities consider including in the T&Cs documentation necessary for recording payment arrangement including the provision of a written copy (or electronic) of those arrangements to the customer, as well as outlining the consequences if the payments agreed to under the arrangements are not made as agreed to i.e. disconnection? Please explain.

YUB-AEY/YEC-2-018

Reference: AEY-YEC 2025 T&Cs Application, PDF pages 83-84; YUB letter on complaint regarding AEY service disconnection of March 3, 2025.

Issue: Timing of Disconnections

Quote: There are no provisions on disconnection in the late Fall or Winter months. The Board will ask questions in the Terms and Conditions of Service Proceeding currently before the Board on including in the terms and Conditions of Service about disconnections of power service in the late Fall and Winter months and the use of a Current-Limiting Device during such months instead of disconnection. Such provisions may address your concerns. The Board will also ask the utilities whether they keep annual statistics on winter residential disconnections, and if yes, to file those statistics in the proceeding.

Preamble: The T&Cs list six categories for termination of service by the company for reasons other than safety.

Request:

- (a) As noted in the March 21, 2025 letter from the Board, there are no provisions in the T&Cs regarding disconnection of power (or the use of current limiting devices) during what is considered heating season, or for those periods outside of the formal heating season, when outside temperatures are expected to be low enough that residential heating will likely be required. Could such provisions be included in the T&Cs? Please explain.
- (b) Do the Utilities use current limiting devices instead of disconnection of service? Please explain in what situations these are used. If not used, please explain why these devices are not used? How can a provision of the T&Cs address the circumstances in which such devices are to be used?
- (c) What steps/analysis/reviews have the Utilities previously taken to consider such a provision? Please explain. What other factors should be considered?
- (d) Do the Utilities keep annual statistics on winter residential disconnections? If so, please file those statistics for the years 2014-2024.

YUB-AEY/YEC-2-019

Reference: AEY-YEC 2025 T&Cs Application, PDF page 75.

Issue: Section 7.1 Reading and Estimates

Quote: 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.

Preamble: The Board has received complaints about significant amounts owed to the Utilities due to the difference between estimates and actual amounts from corrected bills.

Request:

- (a) If a customer bill based on a meter read is higher than 20 percent in a month due to the previous bill having been based on an estimate, should the T&Cs provide that the Utilities require the payment of the additional amount be paid over three months?
- (b) What would be the impact on the Utilities of such a provision?

YUB-AEY/YEC-2-020

Reference: AEY-YEC 2025 T&Cs Application, Appendix 3 – MILs Study, PDF page 96 and Response to YUB-AEY/YEC-1-038(l) and (m), PDF pages 75-83

Issue: Response to YUB-AEY/YEC-1-038(l) and (m)

Quote: Request:

(l) Has AEY’s 2024 desktop study of current minimum costs of an extension to supply a new customer, being \$11,014 per Residential Single Family, examined costs for a onetime Residential Single Family stand-alone service installation or are the estimates based on “simultaneous” multiple installations of Residential Single Family extensions, such as those installations during the development of a subdivision.

(m) Please provide references to Project IDs from Appendix B – MILs Study on the tab “Dataset” for costs for the following construction types:

- (i) Townhouse with a shared wall
- (ii) Townhouse with a shared wall and common area such as a laundry or utility room
- (iii) Townhouses on one lot either with or without a common area
- (iv) Duplex with a shared wall
- (v) Duplex with a shared wall and common area such as a laundry or utility room
- (vi) Duplex on one lot either with or without a common area
- (vii) Condominium with a shared wall
- (viii) Condominium with a shared wall and common area such as a laundry or utility Room
- (ix) Any other circumstance not identified in (m)(i) to (m)(ix) For each of the subparts, please explain why the construction type examples are, or alternatively, why the construction type examples are not, considered under the Residential Multi Dwelling MIL; and ensure it is clear how many units are represented by each of the Project ID costs.

Response:

(l) The Desktop Study examined the costs for a one-time Residential Single Family stand-alone service installation. Please refer to the response to (k) above.

(m) The extension projects do not differentiate based on the construction types specified in the request. Consequently, the extension costs and the proposed MIL for Residential Multiple Dwelling customers are unaffected by the construction type.

Request:

- (a) At PDF page 96 of Appendix 3, AEY states that it “conducted a desktop study using 2025 dollars based on the minimum costs of an extension to supply a new customer...”
Please explain the method that AEY used to restate the minimum costs of an extension to 2025 dollars. Provide a mathematical example that shows the initial minimum costs (and applicable year) and the inflation percent(s) applied to that amount in order to reflect that amount in 2025 dollars. If the response indicates that AEY used inflation percents based on HWI, please repeat the exercise using Whitehorse CPI.
- (b) Based on the response to YUB-AEY/YEC-1-038(l), please confirm that the Desktop Study does not consider economies of scale inherent with “simultaneous” multiple installations of Residential Single Family extensions.
- (c) Please confirm that AEY’s response to YUB-AEY/YEC-1-038(l) also applies to Desktop studies prepared for Residential Multi Dwellings, General Service and Street Lighting.
- (d) How relevant are the results of the Desktop Study in the Board’s evaluation of proposed MILs assuming that economies of scale have not been factored into the results of the Desktop Study?
- (e) Referring to the response to YUB-AEY/YEC-1-038(m), at what point does AEY make the determination of whether an extension will be considered a residential single family or residential multi-family dwelling.
- (f) Referring to the request to YUB-AEY/YEC-1-038(m)(i)-(ix), please identify any potential for ambiguity as to whether an extension could be considered a Residential Single Family or Residential Multi Dwelling given the multitude of construction types listed.

YUB-AEY/YEC-2-021

Reference: AEY-YEC 2025 T&Cs Application, Appendix 3 – MILs Study and Response to YUB-AEY/YEC-1-040(a), (c) and (g), PDF pages 90-92

Issue: Response to YUB-AEY/YEC-1-040(a), (c) and (g)

Quote: Request:

(a) AEY-YEC-YUB-040 PDF page 113: The Board requires further information respecting AEY's use of the Handy Whitman Index (HWI) in its MILs Study. For the purposes of AEY's MILs Study, please explain why AEY chose to inflate its historical costs using the HWI as opposed to the use of Consumer Price Index (CPI) for Whitehorse?

(c) Please explain why the HWI plateau region is applicable to the AEY service territory.

(g) In AEY's 2023-2024 GRA Application, which was submitted after the COVID pandemic, please identify and explain how any similar outlier information, inflation related or otherwise, was treated.

Response:

(a) The Handy-Whitman Index was adopted due to its better representation of the electric utility business, including, for example, impacts of supply costs specific to the utility industry. The CPI is more general as it represents the cost of a fixed basket of goods and services purchased by consumers.

(c) The HWI has data for the regions North and South Atlantic, North and South Central, Plateau, and Pacific. AEY utilized the Plateau region as the best reflection of Yukon cost inflation.

(e-g) Using data from the COVID years in the MILs Study was deemed reasonable by AEY as disruptions in supply chain, for example materials used for new extensions, continue to persist today. This is driven by the energy transition and electrification around the world. For example, federal and municipal policies continue driving electric heating, electric vehicles, and grid modernization.

Request:

- (a) Referring to the response to YUB-AEY/YEC-1-040(a), if the HWI is a better representation of the electric utility business than CPI, please explain why AEY has based its proposed annual increase of MILs on CPI rather than HWI Plateau region.
- (b) In its response to YUB-AEY/YEC-1-040(c), AEY states that the HWI Plateau region was used as "the best reflection of Yukon cost inflation" but did not explain why it was more applicable to the AEY service territory rather than any of the other regions identified such as the North and South Atlantic, North and South Central, Plateau, and Pacific

regions. Accordingly, please provide reasons for why the Plateau region best represents AEY service territory compared to the other regions identified.

(c) In its response to YUB-AEY/YEC-1-040(g) AEY did not identify nor explain how any similar outlier information related to the COVID pandemic was treated in AEY’s 2023-2024 GRA Application. Please provide the requested information.

YUB-AEY/YEC-2-022

Reference: AEY-YEC 2025 T&Cs Application, Appendix 3 – MILs Study and Response to YUB-AEY/YEC-1-040 (d), PDF pages 90-92

Issue: Response to YUB-AEY/YEC-1-040 (d)

Quote: Response:

Table 1: HWI and Whitehorse CPI

Year	Handy-Whitman		Whitehorse CPI	
	Index	% Change	Index	% Change
2011	585.5	-	118.1	-
2012	608.8	4.0%	120.8	2.3%
2013	630.4	3.6%	122.8	1.7%
2014	649.5	3.0%	124.4	1.3%
2015	668.1	2.9%	124.1	-0.2%
2016	674.3	0.9%	125.4	1.0%
2017	696.3	3.3%	127.5	1.7%
2018	726.3	4.3%	130.6	2.4%
2019	756.0	4.1%	133.2	2.0%
2020	793.8	5.0%	134.5	1.0%
2021	832.3	4.9%	138.9	3.3%
2022	974.8	17.1%	148.3	6.8%
2023	1,215.0	24.6%	155.5	4.9%
2024	1,297.4	6.8%	158.6	2.0%
2025	1,385.4	6.8%	162.5	2.5%

* Grey values were estimated by the 10-year average.

Request:

(a) Referring to the chart below, please complete columns (2) through (5) based on the bounds identified in Column (1)

	Table 8: Residential Single Family MIL ²	Table 13: Residential Multi-Dwelling MIL ³	Table 18: General Service MIL ⁴	Table 23: Street Lighting MIL ⁵
	MIL (2025\$/site)	MIL (2025\$/site)	MIL (2025\$/kW)	MIL (2025\$/light)

² AEY-YEC 2025 T&Cs Application, Table 8: Residential Single Family MIL Recommendation, PDF page 101.

³ AEY-YEC 2025 T&Cs Application, Table 13: Residential Multi-Family MIL Recommendation, PDF page 104.

⁴ AEY-YEC 2025 T&Cs Application, Table 18: General Service MIL Recommendation, PDF page 109.

⁵ AEY-YEC 2025 T&Cs Application, Table 23: Street Lighting MIL Recommendation, PDF page 113.

Column (1)	Column (2)	Column (3)	Column (4)	Column (5)
10-Year Median (Recommended)	10,337	2,645	1,801	6,649
10-Year Average using HWI	14,075 (Table 4)	4,023 (Table 9)	2,789 (Table 14)	6.933 (Table 19)
10-Year Median using HWI 2011-2025, replacing the years 2022 and 2023 with a % change of 6.8% and 4.9%, respectively				
10-Year Median using CPI Whitehorse 2011-2025				
10-Year Average using CPI Whitehorse 2011-2025				
Inflating 2009 Study	10,347	5,175	3,298	6,559
2009 Study inflated using HWI 2011-2025, replacing the years 2022 and 2023 with a % change of 6.8% and 4.9%, respectively				
2009 Study inflated using CPI Whitehorse 2011-2025				
3-Year Median (2021-2023)	6,347	4,046	1,617	3,834
3-Year Average using HWI	11,347 (Table 6)	3,994 (Table 11)	2,595 (Table 16)	5,083 (Table 21)
3-Year Median using HWI, replacing the years 2022 and 2023 with a % change of 6.8% and 4.9%, respectively				
3-Year Average using HWI, replacing the years 2022 and 2023 with a % change of 6.8% and 4.9%, respectively				
3-Year Median using CPI Whitehorse 2021-2023				
3-Year Average using CPI Whitehorse 2021-2023				
5-Year Median (2019-2023)	9,943	4,046	2,039	6,649
5-Year Average using HWI	14,102 (Table 6)	4,271 (Table 11)	3,102 (Table 16)	6,925 (Table 21)
5-Year Median using HWI, replacing the years 2022				

and 2023 with a % change of 6.8% and 4.9%, respectively				
5-Year Average using HWI, replacing the years 2022 and 2023 with a % change of 6.8% and 4.9%, respectively				
5-Year Median using CPI Whitehorse 2021-2023				
5-Year Average using CPI Whitehorse 2021-2023				
Desktop Study	11,014	2,754	4,533	4,571
Desktop Study – using CPI Whitehorse				
Approved MIL: Board Order 2020-10-13 Appendix A, PDF Page 55	1,500	725	690	1,240

YUB-AEY/YEC-2-023

Reference: AEY-YEC 2025 T&Cs Application, Appendix 3 – MILs Study and Response to YUB-AEY/YEC-1-041(b) and (c), PDF pages 94-97

Issue: Response to YUB-AEY/YEC-1-041(b) and (c)

Quote: Request:

(b) Does paragraph 19 on PDF page 98 as quoted above provide for a comparison of equivalent-type costs? For example, is there a difference between recovering “61 per cent of the **total costs being invested by the utility**” and “only 11 percent of **the average connection’s total costs**?” [emphasis added]

(c) Please provide the approved company investment percentages approve

Response:

(b) AEY acknowledges that the comparison of MILs percentage coverage by the utility might be confusing, as it contrasts the “total cost percentage” (61 percent, if the proposed MIL was in place) with the “average cost percentage” (11 percent, based on the current approved MIL). However, it is important to note that since the comparison adopts percentage values, the actual amounts remain unchanged, and that using the “total cost” versus “the average cost” in terms of percentage lead to the same values so the comparison remains valid.

(c) The previous MIL Application did not have the extensive dataset available in the current Application, which prevented the calculation of the percentages as described in part (a). Additionally, the previous study based the proposed MIL values on average costs (instead of median) and combined fixed and variable amount for General Service. Therefore, comparing the percentages is not only impossible but also unfair due to the different assumptions. ...

Preamble: Referring to the responses above, it appears that AEY agrees that the information in the graphs does not illustrate an equal comparison of data. However, AEY explains that, because the comparison adopts percentage values, the interpretation of the results remains valid. While this may be the rationale provided by AEY, the issue remains that when combining the two sets of data (approved 2011 MIL using average and proposed 2025 MIL using median) it is unclear whether or not the graphs provide useful or comparable information.

Request:

(a) Please complete the following table:

	Residential Single Family MIL	Residential Multi-Dwelling MIL	General Service MIL	Street Lighting MIL
2025 MIL Study:				
Total cost in 2025 dollars				
Company investment in 2025 dollars based on proposed MIL				
Percentage of costs recovered				
2009 MIL Study:				
Total cost in 2011 dollars				
Company investment in 2011 dollars based on proposed MIL				
Percentage of costs recovered through proposed MIL				

Company investment in 2011 dollars based on approved MIL				
Percentage of costs recovered through approved MIL				

YUB-AEY/YEC-2-024

Reference: AEY-YEC 2025 T&Cs Application, Appendix 3 – MILs Study and Response to YUB-AEY/YEC-1-042(c), PDF pages 98-101

Issue: Response to YUB-AEY/YEC-1-042(c)

Quote: Request:

(c) Please calculate the forecast impact on each of AEY’s and YEC’s rates, associated with the proposed changes to AEY’s MILs.

Response:

(c) For illustration purposes, Table 1 presents the average required and collected revenues resulting from the proposed MILs, calculated as 20-year cumulative present values (CPV) per new customer. Based on the general principles outlined in the MIL Study, AEY notes that the findings indicate that intergenerational equity is properly balanced despite the revenue collected from a new service outweighing the revenue requirement of the MIL.

Table 1: Revenues per New Customer Due to Proposed MILs

Service Type	Revenue Collected from New Service ¹ (CPV 20 yr, exc. wholesale)	Increase in Revenue Requirement ² (CPV 20 yr.)
Residential	\$9,873/site	\$6,447/site
General Service	\$2,371/kW	\$1,164/kW

¹ Revenue collected from typical residential and general service new services at the approved rates today.

² Revenue requirement increase as a result of the MIL being included in rate base.

Request:

(a) Please explain why was it necessary to provide a CPV analysis in order to respond to YUB-AEY/YEC-1-042(c)? Please list each of the assumptions relied on in order to prepare the response.

(b) Is AEY able to provide a table of the impact on 2025 rates similar to the information it provided in response to Yukon Energy and Yukon Electrical, 2009 Phase II Rate Application, Responses to City of Whitehorse Information Requests, CW-YEC/YECL-1-26(e), PDF page 161? If so, please provide the information for 2025 in the format indicated in the following table.

Rate Class	2011	2012	2013	2014	2015
Residential	0.02%	0.06%	0.12%	0.19%	0.28%
General Service	0.03%	0.08%	0.13%	0.17%	0.22%
Street Lighting	0.07%	0.22%	0.41%	0.65%	0.95%

Note that the Board has provided only AEY’s table for illustrative purposes.

YUB-AEY/YEC-2-025

Reference: AEY-YEC 2025 T&Cs Application, Appendix 3 – MILs Study and Response to JM-AEY/YEC-1-002(c), PDF page 6

Issue: Response to JM-AEY/YEC-1-002(c)

Quote: Table 1 included in response to part (c):

Table 1: MILs of Northern and Southern Canadian Electric Utilities

	Naka-YK ¹	Naka-NWT ²	NTPC	BC Hydro ³	ATCO Electric Distribution	Fortis Alberta	Ontario and Quebec ⁴
Year	2013	2016	2019	2025	2024	2024	2024
Residential Single Dwelling	\$2,340/site	\$1,750/site	\$1,500/site	\$2,690/site	\$3,016/site	\$3,016/site	Based on a basic service defined by the distributor.
Residential Multi Dwelling	\$780/site	\$890/Site	\$750/unit	N/A	N/A	N/A	
General Service	\$340/kW	\$340/kW	\$250/kW	\$501/kW	\$3,231/kW	\$6,461 Fixed plus \$1,028/kW	
Street Lighting	Cost of installation	\$1,430/light	Cost of installation	\$174/Light	\$2,865/Light	\$3,325/Light	

¹ Northland Utilities (Yellowknife) Limited o/a Naka Power Utilities (Yellowknife) (Naka-YK).

² Northland Utilities (NWT) Limited o/a Naka Power Utilities (NWT) (Naka-NWT).

³ BC Hydro adopts a present value methodology, equivalent to a desktop study plus economic modeling.

⁴ As per Ontario’s Distribution System Code (DSC) and Hydro Quebec’s Conditions of Service, the cost recovery is based on a basic connection service defined by the distributor. Customers shall be subject to charges above and beyond the basic service.

Request:

- (a) Please provide the most recent cost of Street Lighting installation for the Naka-YK and NTPC jurisdictions.
- (b) Please explain why ATCO Electric Distribution does not appear to have a MIL for any Residential Multi Dwelling. Would the Residential Multi Dwelling MIL be included with another MIL category?