

April 16, 2025

AEY-YEC-JM-001

**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)  
2025 Terms & Conditions of Service**

**Information Responses Round 2 to:  
John Maissan (JM)  
Received: April 2, 2025**

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**AEY-YEC-JM-001**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-001

**Request:**

- (a) Is the reference to "communities" a reference to AEY diesel generation served communities?
- (b) Please the answer the original question if confined to Whitehorse.
- (c) Please describe the electrical load monitoring frequency (continuous? periodic?) and data recording that AEY and YEC do on each of their substation transformers.
- (d) Please describe the electrical load monitoring frequency (continuous? periodic?) and data recording that AEY and YEC do on each of their distribution feeders and indicate at how many points along the feeders the monitoring is done.
- (e) Do the references provided in Footnote 1 not provide the Companies with the key planning criteria required for generation and infrastructure planning?

**Response:**

- (a) No. The term "communities" encompasses any community within the Yukon that is either served by diesel generation or connected to the interconnected electrical grid.
- (b) N/A.

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- (c) YEC has load monitoring on almost all SCADA monitored transformers and transmission transformers without direct load monitoring are monitored by at least one adjacent load measurement. AEY transformer loading is calculated based on the feeder load and not currently at the transformer. AEY-owned substation transformers mostly have load measured continuously at the adjacent breakers. Load data is typically recorded every fifteen minutes, with some locations recorded every five minutes. Smaller rural substation transformers have load checked manually when required.
- (d) AEY continuously monitors load at all feeders. If a feeder has downstream reclosing devices, load is continuously monitored at those points as well. This feeder and recloser load data are key inputs for system evaluations and load forecasting. The load data is recorded every fifteen minutes. YEC continuously monitors feeder loading at the feeder breaker and some feeders have continuous phase current monitoring. YEC currently does not have continuous monitoring past the feeder. Communities that are tapped off transmission lines are not continuously monitored. Most feeder information is stored at two to five second intervals for 7-10 days. Feeder information records are stored at five-minute intervals for long term.
- (e) The references provided in Footnote 1 outline policies which are driving different customer behaviors. However, the adoption rate of these policies will be different by jurisdiction, communities and localized subdivisions. Driven by the energy transition, it is imperative that the utilities, customers and local governments work together and are enabled through the proposed clause in the T&Cs to ensure continued safe and reliable service today and into the future, particularly as significant loads, such as Electric Vehicle charging, are added to the electrical system and impact the planning and operation of the system.

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AEY-YEC-JM-002

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**AEY-YEC-JM-002**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-002

**Request:**

- (a) The response to (b) in the original question did not explain, in light of the present MIL rates being way too low, the rapidly increasing utility loads in Yukon over the past several years. Is it the companies' view that the load growth would have been higher with appropriate MIL levels? What additional load growth are the Companies forecasting if the proposed new MIL rates are accepted?
- (b) The table provided in response to (c) did not include the present and proposed Yukon MIL rates as requested, please provide a table including these rates.

**Response:**

- (a) The response to AEY-YEC-JM-002(b) provides context from an investment perspective. When making an investment decision, investors are considering the cost to connect to the system. Setting a Maximum Investment Level (MIL) too low will have an impact on the financials of investors in the Yukon as it will result in an unduly strong economic signal, which will result in a high upfront cash outlay for customers. AEY cannot speak to the overall effect around growth, rather AEY refers to the investment decisions/impacts when setting a MIL that is too low, related to the money required upfront from the customer. This is an important consideration, as economic discipline and ensuring a proper price signal are key principles in setting an appropriate MIL from a customer / investor perspective.

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(b) Please refer to the table below, as requested.

**Table 1: MILs of Northern and Southern Canadian Electric Utilities**

	AEY/YEC Present MILs	AEY/YEC Proposed MILs	Naka-YK <sup>1</sup>	Naka-NWT <sup>2</sup>	NTPC	BC Hydro <sup>3</sup>	ATCO Electric Distribution	Fortis Alberta	Ontario and Quebec <sup>4</sup>
Year	2011	2025	2013	2016	2019	2025	2024	2024	2024
Residential Single Dwelling	\$1,500/site	\$10,337/site	\$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	\$725/site	\$2,645/site	\$780/site	\$890/site	\$750/unit	N/A	N/A	N/A	
General Service	\$690/kW	\$1,801/kW	\$340/kW	\$340/kW	\$250/kW	\$501/kW	\$3,231/kW	\$6,461 fixed plus \$1,028/kW	
Street Lighting	\$1,240/light	\$6,649/light	Cost of installation	\$1,430/light	Cost of installation	\$174/Light	\$2,865/Light	\$3,325/light	

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

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

<sup>3</sup> BC Hydro adopts a present value methodology, equivalent to a Desktop Study plus economic modeling.

<sup>4</sup> 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.

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**AEY-YEC-JM-003**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-004

**Request:**

- (a) Is it a correct interpretation of the response in its entirety that the term "Seasonal Service" only applies to disconnection and not to the provision of power on a seasonal basis to certain approved Customers?
- (b) Is the response to (b) in the original question saying that there will be no disconnection:
  - i. between October 15 and April 15, and
  - ii. between April 16 and October 14 when there is a forecast of temperatures below 0°C?

**Response:**

- (a) Correct. The definition of Seasonal Service definition is being proposed to provide clarity around the Utilities' existing policy for disconnections.
- (b) (i-ii) Yes. The definition generally applies to disconnection for non-payment, but the Utilities still reserve the right to disconnect in those periods for other reasons outlined in the T&Cs. For example, per Article 9.2 of the T&Cs, "the Company shall have the right to disconnect or otherwise curtail, interrupt or reduce service to Customers" to maintain the safety and reliability, due to

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any other reason related to dangerous or hazardous circumstances including emergencies, forced outages, potential overloading of the Company's Facilities, insufficient supply or Force Majeure.

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**AEY-YEC-JM-004**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-009 and AEY-YEC-YUB-026:

**Request:**

- (a) Please clarify the meaning of the title of Clause 4.5 "Change in Service Connection". Does "change in Service Connection" mean a change in a Customer's load that requires the Company to make physical changes to any of its Facilities such as larger conductors to the customer, larger transformer etc. or something different? Please explain in detail.
- (b) Do subsections (a), (b), and (c) all apply only to situations in which a customer load increase drives a need for physical changes in the Company's facilities as described in (a) above?
- (c) The response to AEY-YEC-JM-009 implied to me that any increase in customer load, even when it does not require the Company to change its physical facilities, is intended to be captured under Clause 4.5, was this an incorrect interpretation? Please explain in detail.
- (d) If the answer to (c) above is that this was a correct interpretation, and if the Companies refuse to propose clear and specific requirements as to what changes in customer load require written permission from the companies how can they realistically expect to get any cooperation from customers making changes within a home that are made by professional electricians with permits to ensure that they meet the Canadian Electrical Code requirements?
- (e) With respect to the response to AEY-YEC-YUB-026 (c) is it not YEC's and AEY's responsibility as regulated utilities to ensure adequate generation to meet the electrical load that they, as regulated utilities with monopolies, have an obligation to serve?

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**Response:**

- (a) The title “Change in Service Connection” is meant to cover any situation where the customer is making a significant alteration or change in load that could affect (1) the current service requirement; and (2) future system planning. It is imperative that the customer and utility work together to maintain safe and reliable service today and in the future as the utility plans the grid amidst the energy transition. The customer does not have all the relevant knowledge of the utility’s system and, therefore, cannot know beforehand whether a significant load (or any other alteration) will require physical changes today or expediate a system upgrade. For example, if one customer adds an EV charger in a subdivision, this may not trigger any changes in the short term (all things equal). However, if three or four customers add EV chargers, this may expedite system upgrades to ensure safe and reliable service.
- (b) Not specifically. The section is intended to address short-term physical system requirements; however, it will also enable the utility and customers to work together with respect to future upgrades as discussed in response to part (a) above. This balance will ensure that the system is safe and reliable today (short term impact of increasing load through physical requirements) and the future (long term system planning for upgrades).
- (c) The understanding is correct. Section 4.5(a) is intended for any **significant** increase in load. As outlined in the response to parts (a) and (b), this will enable the utility and customers to collaborate on system need and ensure proper planning of the system into the future.
- (d) Please refer to AEY-YEC-YUB-010 (Round 2) for a response to this question. The purpose of the proposed addition is to provide flexibility to the customer and utility to set specific requirements as concerns or system issues arise. Setting a specific

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requirement, where no system issues or concerns exist, may impose an added burden on customers and would likely be out of date as the energy transition unfolds. Furthermore, generally, the utility is already typically contacted in cases where changes are made within a home that are made by professional electricians with permits to ensure that they meet the Canadian Electrical Code requirements.

- (e) The Utilities model and forecast load increases to ensure adequate capacity and generation are available. However, increases to end-user loads and demands can happen quickly with the purchase of an EV or construction/switch to electric heat, while planning, permitting and building of new sources of generation supply can take several years. Without the Utilities being aware of these changes in advance, the system runs the risk of not having enough electricity supply to meet all customer needs. This is especially important in isolated grids like the Yukon Integrated System and isolated diesel communities, where the electrical grid is not connected to another grid to import power when needed. The changes to customers' service can push increases in load to the point that more generation resources will be required or cause system issues. The proposed changes to the T&Cs will assist both the Utilities and customers by allowing the Utilities to better model, forecast, and respond to load increases.

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**AEY-YEC-JM-005**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-011

**Request:**

- (a) The responses to part (a) and (c) appear to be contradictory. The response to (a) implies that an existing single family residential unit Customer converting from overhead to underground service under the proposed new Terms and Conditions of Service would receive the salvage value of the existing overhead service plus the MIL of \$10,337 for the conversion to underground. The response to part (c), however, says that an existing Customer would pay the full cost. Please clarify, and please also ensure that the wording of clause 4.10 is unambiguous with respect to existing Customers and to new single family residential units (new homes).
- (b) Please clarify the response to (b): is it only the components of the existing overhead service that can be reused that provide a "salvage value" to the converting Customer, or are the scrap values (e.g. of the salvaged and recycled conductor) also credited to the Customer? If no scrap values accrue to the Customer, where do the recycled material payments show on the Companies' books?

**Response:**

- (a) The Utilities notes that Clause 4.10 applies to both existing and new customers. Where Clause 4.10(b) is for new customers with no infrastructure in place and Clause 4.10(a) is for existing customers. For clarity, below is the treatment under each scenario:

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New Customer (no infrastructure in place) – If a new customer requests underground upon a connection request, in accordance with Clause 4.10 (b) the customer would be charged for the actual cost of the service less the available Company Investment.

Existing Customer (infrastructure existing in place) – If an existing customer requests an existing service be converted from overhead to underground, in accordance with Clause 4.10 (a) the customer would be charged the actual costs of the new underground service plus the actual cost of removing the existing Facilities, less the estimated value of salvaged or scrap value of material no longer used as part of the conversion to underground. As the customer exists the available Company Investment would not apply.

- (b) In accordance with Clause 4.10 (a) the estimated “salvage value”, or in other words “scrap value”, of the components that are not being reused are credited to the Customer. Assets that are being reused would not have a “salvage” or “scrap” value as they continue to be in use and not removed.

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**AEY-YEC-JM-006**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-012

**Request:**

- (a) The Companies have avoided answering the question asked. The Companies have said that they are modernizing the Terms and Conditions of Service, but this clause does the opposite. It discourages the utilization of more electrically efficient shared heating systems in Multiple Dwelling units. Please answer the question asked: Why have the Companies not modernized the ways in which such shared and more electrically efficient heating systems are treated so that the common use portions of such systems are billed at the General Service rate, but the portions used by the individual Single Family Dwelling units are billed at the Residential rates?

**Response:**

- (a) The Utilities note that an inability to measure actual consumption for each individual customer (or unit) prevents the Utilities from allowing a common heating system where a portion of the common areas' energy is billed at the General Service rate, with individual Single Family Dwelling units (with no meter at the unit to measure energy consumption) billed for energy at the Residential rate. In a typical situation, to bill a residential customer, a meter or a single Point of Service will be required at the unit. Otherwise, the utility would not have a way to accurately measure the electricity consumed by the specific customer or tenant at that unit. In the case where a complex would like to install a common heating system, they are permitted to do so under the proposed wording in Section 4.13(b) of the T&Cs.

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**AEY-YEC-JM-007**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-013

**Request:**

- (a) The response to part (b) of the question addresses service drops (secondary) but not distribution line voltage lines (primary?) including for longer distances such as on rural properties or where such lines are located on easements on Customers' properties. Please explain the responsibility (including costs) in these situations?

**Response:**

- (a) To clarify, the Utilities are responsible and pay for brushing trees on rights-of-way adjacent to existing high voltage powerlines.

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**AEY-YEC-JM-008**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-014

**Request:**

- (a) Further to the response in part (b) of the question, Schedule D provides lower supplementary meter read costs for Standard Meters (AMI meters) as further explained in IR response AEY-YEC-YUB- 013 (a). It seems inconsistent that disconnects and reconnects on Standard Meters are not also specified at proportionally lower costs. Please explain.

**Response:**

- (a) For clarity, the Utilities are seeking a Standard and Non-Standard charge for supplementary meter reads versus a single disconnect and reconnect fee. The difference between supplementary meter readings and disconnect/reconnect is the frequency of the charge. A Non-Standard meter read charge would be frequent in nature as manual meter readings are required to bill actual consumption. In comparison, disconnect/reconnects are infrequent and would reflect the average cost to perform the service, not requiring a separate charge between Standard and Non-Standard. As outlined in the response to AEY-YEC-JM-014 (Round 1), the Utilities are in the early stages of transitioning to remote capable meters infrastructure and, as more remote capable meters are installed, the Utilities anticipate that the cost of connection and reconnection fees will be reduced over time.

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**AEY-YEC-JM-009**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-015

**Request:**

- (a) Further to this response, at what stage in the conversion process to Standard Meters (AMI meters) will the Companies be reconsidering the timing of billing cycles?

**Response:**

- (a) The Utilities will reconsider the timing of billing cycles if there are any technology / software constraints that challenge or make it impractical to use the current billing cycles. As mentioned in AEY-YEC-JM-015 (Round 1), the Utilities do not foresee a change being required.

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**AEY-YEC-JM-010**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-017

**Request:**

- (a) The responses to various parts of this question appear to deliberately avoid clear concise answers specific to the questions asked. The question is asked because I personally know of an ATCO Customer in Whitehorse who wanted to install and EV charger. The Customer was prepared to pay for their secondary upgrade (in addition to the in-home upgrades). The Customer was told that a shared transformer upgrade would be required and the Customer would need to pay for the entire cost of the shared transformer upgrade. IR AEY-YEC-JM-017 parts (c), (d), and (e) refer to a residential Customer served by overhead infrastructure and seeks to clarify if there is a difference in transformer cost allocation to a Customer served from a dedicated transformer instead of being one of multiple residential customers on a shared transformer. The questions asked what the Companies would require in such situations. The response to (d) reads "... upgrades to the shared facilities are considered system costs..." which implies to me that the Customer on a shared transformer was, perhaps, mistakenly asked to pay for the shared transformer upgrade whereas a Customer served by a dedicated transformer may have to pay for the transformer upgrade. Please answer the original questions in parts (b), (c), and (d) with respect to transformers clearly and concisely as asked.

**Response:**

- (a) Please find below further clarity regarding the original questions in parts (b), (c) and (d) from AEY-YEC-JM-017 (Round 1):

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AEY-YEC-JM-017(b) (Round 1) – Under the scenario where the customer is the only one serviced by the transformer, the customer will be responsible for the cost of the upgrade to the transformer. In sizing the transformer, considerations such as future load growth are factored in. In cases where there is a future load growth forecast, a larger transformer is installed in the present day to address future system needs. As this is an existing service, no MILs would be applicable. The customer will receive “salvage” or in other words “scrap” value of the assets removed and recycled.

AEY-YEC-JM-017(c) (Round 1) – Under the scenario where the customer is served by a shared transformer, all else equal, necessary upgrades to the shared transformer would be considered system costs if the existing transformer cannot serve the expected typical loading for the area. An area study would be conducted to determine the appropriate sizing of the transformer. In most cases, the sizing of the transformer is not as linear or staged as the scenario presented in the request suggests. However, growth in electricity demand in the area is considered when sizing the transformer.

AEY-YEC-JM-017(d) (Round 1) – As outlined above, cost split among customers served by the shared transformer would not be applicable where the transformer upgrade is being considered a system cost. MILs would also not be applicable since the transformer upgrade in this circumstance is for existing customers, rather than a new connection.

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**AEY-YEC-JM-011**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-018

**Request:**

- (a) It is understandable that Industrial Customers who are required to have their own emergency stand-by generation (and are not included in the Companies' N-1 criterion) and that some larger General Service Customers who have their own back-up generation (for example, extended care homes) may be interrupted first. However, very few (if any) residential micro-generation systems provide any back-up power supply to the residential units in which they are installed because a back-up power supply is a totally different system requiring much more equipment. Please explain the rationale for first interrupting residential customers with micro-generation but who have no back-up power supply system available.

**Response:**

- (a) The Utilities note that additional wording is only being requested in this Application to provide clarity and transparency with respect to utility decision making. As stated in Section 9.2 (c), "the Company **may** first interrupt industrial customers, and customers with their own generation". The key word is "may", as every emergency is different, but the Utilities believe that the additional wording provides transparency to customers on the options available. The Utilities understand that at present time most of the micro-generation customers do not have in-home batteries that store electricity and could be used to supply power to the home during an outage/emergency. These decisions will be made in real time and in

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accordance with Section 9.1, which states that the Utilities will make reasonable efforts to maintain continuous supply to customers.

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**AEY-YEC-JM-012**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-020

**Request:**

- (a) It appears that the question may have been misinterpreted by the Companies. If the answer is indeed that the Handy-Whitman Index will not continue to lag one year behind the Consumer Price Index, do the companies expect this lag to increase or decrease?

**Response:**

- (a) The Handy-Whitman index has historically lagged one year behind the Consumer Price Index. This one-year lag is expected to continue into the future, given there are no signs from either index that their respective update frequencies will change.

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**AEY-YEC-JM-013**

**Topic:** Follow-up questions on AEY-YEC responses to John Maissan's round 1 IR responses

**Reference:** Response AEY-YEC-JM-021

**Request:**

- (a) Considering that the Companies would be required to provide the CPI calculations to the Board on an annual basis in any case surely a two-line calculation by also including a Handy-Whitman Index is virtually no more work than a one-line calculation? This would surely protect the Companies if the handy-Whitman Index exceeds the CPI and keeps the customers whole if it is less than the CPI, would it not?

**Response:**

- (a) The Utilities are recommending, for regulatory efficiency, fairness and administrative ease, that the approved 2025 MIL simply be indexed by CPI on a go-forward basis and set as final when a rate case is not in front of the Board. Applying CPI ensures that MILs will track in line with inflation when a rate case is not in front of the Board. Given the foregoing, the Utilities do not consider the additional application of the Handy-Whitman Index to correct or revise the previous year's CPI in the annual MIL update to be efficient or necessary. Setting the MIL as final after applying the CPI for the following year when a rate case is not in front of the Board also creates certainty for customers as MILs are set as final prior to the year applied.

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**AEY-YEC-JM-014**

**Topic:** Follow-up questions on other Intervenors and YUB IRs

**Reference:** Schedule B Maximum Company Investment and responses AEY-YEC- UCG-013, AEY-YEC-YUB-037, as well as response AEY-YEC-JM-003

**Request:**

- (a) If the Company receives a request for service from the owner of a newly developed lot who wishes to build a new single family residence with a basement the Company would invest \$10,337 towards the cost of providing electrical service to that home; confirmed? If not confirmed please provide the correct answer.
- (b) If, in future, the new owner in (a) above were to develop a separately metered rental suite in the basement containing a kitchen, a living room, a bedroom and a bathroom would the owner receive any further MIL investment from the Company?
- (c) If the new owner in (a) above builds a new single family residence incorporating from the outset a separately metered rental suite in the basement containing a kitchen, a living room, a bedroom and a bathroom, would the owner receive the benefit of a Company MIL of:
  - i. \$10,337 (single family residence), or
  - ii. \$5,290 (2 X \$2,645 – multiple dwelling units), or
  - iii. Something different; please explain.
- (d) If the new owner in (a) above instead builds a new single family residence and a separately metered “garden suite” in a separate building on the lot containing a living room, a kitchen, a bedroom and a bathroom, would the owner receive the benefit of a Company MIL of:

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- i. \$10,337 (single family residence), or
- ii. \$20,674 (2 X 10,337) (single family residences) or,
- iii. \$5,290 (2 X \$2,645 – multiple dwelling units), or
- iv. Something different; please explain.

**Response:**

- (a) Confirmed. Under this scenario, assuming the proposed MILs are approved by the Board, the Utility would invest \$10,337 in instances where there is a single residential service with or without a basement built.
- (b) Under this scenario, assuming the proposed MILs are approved by the Board, the Utilities would invest up to an additional \$2,645 (the multi-dwelling MIL rate) in instances where a metered suite is added in the basement of a single-family residence.
- (c) Under this scenario, assuming the proposed MILs are approved by the Board, the Utilities would invest 2 x \$2,645 (the multi-dwelling MIL rate) in instances where there are two residential services within one building.
- (d) Under this scenario, assuming the proposed MILs are approved by the Board, the Utilities would invest 2 x \$10,337 in instances where there are two residential services in separate buildings.

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**AEY-YEC-JM-015**

**Topic:** Follow-up questions on other Intervenors and YUB IRs

**Reference:** Response AEY-YEC-YUB-011(c)

**Request:**

- (a) The question asked was about customer usage information (which is also provided graphically on bills). What does the actual past 12 months usage have to do with transformer or conductor sizes or clearances? Why are Engineering or IT involved at all? This should be answerable by a customer service representative on a computer.

**Response:**

- (a) Please refer to the response to AEY-YEC-YUB-005(e).