

April 16, 2025

AEY-YEC-YUB-001

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-001**

**Reference:** YUB-AEY/YEC-1-003(b)<sup>1</sup>

**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.

**Response:**

- (a) No. There are no formal written or recorded logs of the referenced customer interactions. To clarify, the Utilities are in daily contact with customers through

---

<sup>1</sup> 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.

April 16, 2025

AEY-YEC-YUB-001

various avenues such as connection requests, billing inquiries, and municipal inquires. From these interactions, ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC) (the Utilities) have developed a thorough understanding of the various aspects of the Terms & Conditions of Service (T&Cs) that, in the Utilities' view, require additional guidance or clarity. For example, adding the process to enhance clarity and transparency around the proposed generating customer definition and requirements related to customer generation is based on the experience of utility staff working directly with customers. As outlined in the Application, while the Utilities believe that the existing T&Cs serve customers and the Utilities well, the proposed changes will improve the T&Cs by modernizing them and providing additional clarity and transparency.

- (b) No. As outlined in the response to part (a) above, the Utility perspective reflects the numerous interactions with customers regarding all sections of the T&Cs. These conversations help customers understand the requirements in the T&Cs and draw attention to areas that may benefit from further clarification. Although there was no formal process for customer engagement on the proposed changes to the T&Cs, aside from the option to participate in the current proceeding before the Board, these interactions allowed customers to provide their views on the current T&Cs.
- (c) Given the detailed communication required by the Board, the Utilities included this as part of the discussion to confirm that customers were notified of the Application filed by the Utilities, which provided them with an opportunity to participate in the subject proceeding.

April 16, 2025

AEY-YEC-YUB-002

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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 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.

April 16, 2025

AEY-YEC-YUB-002

- (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?

**Response:**

- (a) In general, common areas are viewed as areas that are not specific to an individual unit in the complex. More specifically, for tenants, there is a Point of Service (meter) that is associated with each individual housing unit (thus the tenant is charged the Residential rate like other residents of single dwelling homes), whereas for common areas there is one meter that measures the usage for all general areas of a complex/facility. The demand for power required by these common services (e.g., parkades, elevators, lobbies, laundry areas and hallways) are also typically higher than the demand of any single resident which is aligned with the General Service rate, which includes a demand charge to offset costs incurred to the utility to ensure an adequate and dependable supply of electricity is available to power the building. The bill produced for the consumption in the general areas is issued to the condominium association, property manager, landlord or the building owner of the building, who in turn charges tenants for the services, like a commercial service.
- (b) No. Under a scenario where each unit has a Point of Delivery, the common areas are metered at a single Point of Service; therefore, they are considered in totality and charged the General Service rate. Individual units will be metered separately and sent a separate bill based on the unit's specific consumption under the Residential rate. Under a scenario where the developer chooses to have one Point of Service for the entire complex (e.g., common areas and individual housing units), all energy consumption is billed at the General Service rate.

April 16, 2025

AEY-YEC-YUB-002

- (c) The significance of who is responsible for passing on certain costs to residents revolves around the fact that the Point of Service or meters for common areas are not assigned to a unit or individual residence. Rather, the bill is typically sent to the condominium association, property manager, landlord, or the building owner as the customer to the Utility. The Utility cannot be held responsible for “allocating” common area costs to residents where the utility cannot directly attribute the specific usage through a meter.
- (d) From a cost causation perspective, like a commercial property or customer, the property manager or condominium association of the building provides services to all residents to maintain common areas. Typically, these costs are included in the residence’s monthly condominium fees or operating fees. This approach is also common in other jurisdictions as referenced in response to AEY-YEC-YUB-015 (Round 2).
- (e) The Utilities do not have any jurisdiction on how the condominium association, property manager, landlord, or the building owner passes on costs to residents. Nor do the Utilities have the ability to “allocate” or “pass costs to residents” that cannot be directly measured at the individual unit level.
- (f) As referenced in response to parts (a) and (d) above, the customer (i.e., condominium association, property manager, etc.), provides common services for all residents in the building that demand a higher level of electrical capacity than what is required from a home (e.g., unit) on its own.

April 16, 2025

AEY-YEC-YUB-003

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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).

**Response:**

The Whitehorse Condominium Corporation 275 is unique and is not intended to serve as a precedent for any other similar customer situation, as a result this case was not considered as an exception in the response to AEY-YEC-YUB-005(b) (Round 1).

In general, this is a unique circumstance based mostly on infrastructure decisions and application of rates, as the original condominium development chose to serve the entire complex using a single Point of Service (billed using the General Service rate for all consumption by the complex) versus a Point of Service at each individual unit (billed using

April 16, 2025

AEY-YEC-YUB-003

Residential rate for individual units and General Service rate for common areas, as seen in most, if not all, other condominium complexes).

The Utilities note that the Settlement Agreement approved by the Board mitigates harm to customers, while not setting a precedent for future decision making due to the unique nature of the agreement. This case has also resulted in the clarifying wording proposed in Section 4.13 of the T&Cs.

April 16, 2025

AEY-YEC-YUB-004

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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?

April 16, 2025

AEY-YEC-YUB-004

**Response:**

- (a) The Utilities apply the definition provided in the Residential Service Rate Schedule which provides the following guidance: “To single-phase electric service at secondary voltage through a single meter, for normal use by a single and separate household. Not applicable to any commercial, industrial or government use.”

The Utilities rely on the customer to disclose the intended use of the service we provided to them, including cases where the intended use has significantly changed.

- (b) Typically, the utility is aware based on discussions with a customer, either at the time of a new connection or through customer requests to upgrade (e.g., electrical permits notify the utility). Additional indicators include:
- a. The primary name assigned to the account.
  - b. The customer’s described use of the service when requesting service.
  - c. Whether the customer resides at the address.
  - d. The type and level of investment in the customer’s original project. For example, if the premises were previously a business location, the Utilities ask more specific questions of the customer to inquire if the past business uses would continue, or if new business activities are anticipated to take place. The Utilities could deploy a site visit to check the area. For new connections, the Utilities also review the area and civic zoning of the new construction.
  - e. The definition in the T&Cs of a residence.
  - f. Abnormal usage such as high energy consumption.
- (c) No, the Utilities would not consider this to be a commercial property. The Utilities make best efforts to determine the primary function of the location.

April 16, 2025

AEY-YEC-YUB-005

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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?

**Response:**

- (a) Please refer to the table below for approved Schedule D fees and service charges escalated from 2012 to 2024:

April 16, 2025

AEY-YEC-YUB-005

**Table 1: Fees and Service Charges Comparison**

Schedule D Fee Or Service Charge (a)	Currently Approved Fee Or Service Charge (b)	Currently Approved Fee Or Service Charge Inflated At Whitehorse CPI From 2012 To 2024 (c)	Proposed Fee Or Service Charge (d)
Connection Fee - Business Hours	50.00	65.65	87.00
Connection Fee - Outside Business Hours	50.00	65.65	87.00
Reconnection Fee - Business Hours	60.00	78.77	87.00
Reconnection Fee - Outside Business Hours	60.00	78.77	87.00
Collection Fee	30.00	39.39	45.00
Dishonoured Payment Fee	25.00	32.82	45.00
Meter Accuracy Test Handling Fee, Self Contained Meter	100.00	131.29	250.00
Meter Accuracy Test Handling Fee, Instrument Meter	200.00	262.58	500.00

The annual inflation is based on the Whitehorse Consumer Price Index, Table 18-10-0005-01, all items, reference 2002=100, shown in the table below.

**Table 2: Whitehorse Consumer Price Index  
Table 18-10-0005-01**

Annual inflation		
Year	CPI Index	% Change
2012	120.8	-
2013	122.8	1.7%
2014	124.4	1.3%
2015	124.1	-0.2%
2016	125.4	1.0%
2017	127.5	1.7%
2018	130.6	2.4%
2019	133.2	2.0%
2020	134.5	1.0%
2021	138.9	3.3%
2022	148.3	6.8%
2023	155.5	4.9%
2024	158.6	2.0%
<b>Period total</b>		<b>31.3%</b>

April 16, 2025

AEY-YEC-YUB-005

- (b) No, electrical infrastructure information, such as transformers or conductor sizes, are not included in the customer information system. This information is included in the Utilities' mapping system and in project files. Furthermore, transformer specifications are not included in the information available to customers through the My Account service. My Account is simply a service where customers can view their electricity consumption, pay bills, print or display current and past electricity bills and make requests for disconnection of services and make general inquiries to the utility.
- (c) N/A.
- (d) No. As part of a long-standing practice, the rate being proposed takes the average time used for customer usage requests. The charge being proposed includes an average time for engineering (load information, sizing, etc.) and IT services (mapping/assets). The average rate creates regulatory and administrative efficiencies, as the alternative of charging based on time and materials would be inefficient and cause additional administrative costs.
- (e) Please refer to the response to (d) above.

April 16, 2025

AEY-YEC-YUB-006

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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.

April 16, 2025

AEY-YEC-YUB-006

- (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.

**Response:**

- (a) There are five years of historical data available on the current billing system, as well as in the My Account portal, that can be retrieved without having to refer to a previous system.
- (b) No. The information requests are billed based on the fees and service charges from Schedule D of the T&Cs, regardless of the billing parameters.
- (c) The Utilities assume that this request pertains to item (b) above and not to AEY-YEC-YUB-012(b) (Round 1). Site specific details are necessary to: (i) ensure the provision of data applicable to the specific customer making the request; and (ii) provide only their private billing information for that meter, while they are the primary account holder.
- (d) Routine customer requests for usage data are usually between 12-24 months of history for residential accounts. Commercial accounts may require a longer history of usage data to analyze demand requirements and load/usage details.
- (e) The Utilities assume that this request pertains to item (d) above and not to AEY-YEC-YUB-012(d) (Round 1). The range of historical months presented is based on the experience of AEY employees.
- (f) The proposed charges, including some provision for overhead costs such as administration costs, align with cost causation principles. The proposed charges ensure that the expenses are properly charged to the customer causing them. Any

April 16, 2025

AEY-YEC-YUB-006

revenues from these charges are then included as an offset to the revenue requirements in the rate Applications.

- (g) Overhead costs are accounted for in the General Rate Applications (GRA) as part of the Utility's operations and maintenance (O&M) costs. However, applying the overhead rate to the Fee Schedule ensures alignment with cost causation principles, as the amount collected from the fees will be used to offset the costs in the rate Application.
- (h) Please refer to the response to part (g) above. The costs of Customer Service agents and IT and Engineering resources are accounted for as an offset to the costs in the rate Application.
- (i) The Utilities believe that such a charge is appropriate given that historical usage information requests are customer specific and do not benefit all customers. It would not be fair to include these services as part of the general utility services, generally the information is readily accessible through other means such as the monthly prepared statement and MyAccount portal.

April 16, 2025

AEY-YEC-YUB-007

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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?

**Response:**

- (a) Customers are provided with full accounting of their electric account on their monthly statements, which reflect unpaid balances from the previous statement, and payments and/or debits/credits in the past month to reflect the “balance forward”.

April 16, 2025

AEY-YEC-YUB-007

The billing system issues a "pink notice" or Pending Disconnect Notice - mailed to a customer with an overdue amount to alert them to the arrears on their account that could result in additional action being taken on their account if left unpaid. For further information please refer to AEY-YEC-YUB-018.

- (b) Customers receive their monthly statement as an overall account activity, and they also receive a mailed notice alerting them to an overdue amount on their account. Additional action such as an email or phone call to the customer may also be taken by billing staff, for example, to avoid an unnecessary trip to communities (e.g., the customer makes a payment or payment arrangement).
- (c) The connection and reconnection fees set out in Schedule D apply, as fixed amounts, during normal business hours. Outside of normal business hours, the total charge is based on actual costs, with a minimum charge as set in Schedule D.

April 16, 2025

AEY-YEC-YUB-008

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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.

**Response:**

- (a) Waiver agreements are unique by nature, are case specific, are not repeatable or intended to set precedent, and typically contain confidential customer information. Such agreements should continue to uphold the spirit and intent of the T&Cs while accommodating for the unique situation the negotiated agreement is trying to address. For these reasons, the Utilities do not believe that there is any reason the waiver agreements should be posted on the Utilities' website.

April 16, 2025

AEY-YEC-YUB-008

- (b) For the same reasons outlined in response to part (a), the Utilities do not believe that there is any reason the waiver agreements should be posted on the Board's website.
  
- (c) Please refer to the response to part (a).

April 16, 2025

AEY-YEC-YUB-009

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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.

**Response:**

- (a-b) The Utilities submit that flow-through charges to customers (e.g., after-hour overtime charges for special request reconnect and non-sufficient funds charge from the bank) are valid charges. These charges are based on the principle of cost causation and avoiding cross-subsidization, utilizing actual costs incurred due to unique customer requests or circumstances.

The Utilities believe that the term "regulated charge" may be leading to confusion, as these charges are flow through charges incurred due to a specific customer request (e.g., after-hour charges) for utility service and not a specific charge out

April 16, 2025

AEY-YEC-YUB-009

rate like a reconnect/disconnect. There should be flexibility for the Utilities and customers in unique cases such as after-hours requests for reconnects to balance customer needs, avoid cross subsidization and enable the Utilities to recover the associated costs (e.g., overtime incurred). Limiting the Utilities' and customer's ability to address or request services like after-hours reconnects to only those services outlined in Schedule D would lead to inefficiencies and a reduced customer experience.

April 16, 2025

AEY-YEC-YUB-010

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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.

**Response:**

The Utilities are not proposing specific parameters for “reasonable prior notice” or for what constitutes a significant change in load. This language is intended to be future looking by enabling better communication and interactions with customers as the energy transition occurs. For example, if the utility is experiencing system issues in a certain area, the clause would enable the Utilities to work with customers in that area to set parameters and notice timeframes to ensure safe and reliable service. In many current cases, a significant load change already requires utility and customer discussions to assess system requirements prior to installation. The proposed clause is not intended to restrict customers, rather it is intended to ensure that interaction between customers and the

April 16, 2025

AEY-YEC-YUB-010

utility is encouraged as the use of the grid changes due to the energy transition. Significant load upgrades such as Electric Vehicle (EV) charging stations would, over time, result in system issues if not properly planned and implemented. This is particularly important as more sources of significant electrical load, such as electric heat and EVs, are added by customers. The Utilities are trying to proactively address this with the proposed addition to the T&Cs.

April 16, 2025

AEY-YEC-YUB-011

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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.

**Response:**

The Utilities do not believe that stakeholder consultations would have significantly contributed to this work. The changes are proposed based on several factors, including the Utilities' experiences when frequently working with customers on cost sharing, the administrative burden of administering the cost-sharing program with the relatively long timeframe for eligibility and low dollar value that are currently approved, and the fact that these figures have not been updated for inflation since 2011. While no direct consultation was carried out, past experience working with customers on these cost-sharing projects informed the proposed changes, which the Utilities considered to strike a balance between fairness and administrative burden.

April 16, 2025

AEY-YEC-YUB-012

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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?

**Response:**

- (a) In the absence of an actual meter read, the billing system calculates a meter read based on the simple average from the most recent 330 days of usage recorded on the account. Customer bills are not individually tested due to the volume of information processed. The Utilities note that they are in the early stages of implementing AMI, which will enable remote meter reading.

April 16, 2025

AEY-YEC-YUB-012

- (b) No. Due to billing volumes, the Utilities do not track variances between the estimates and actual meter reads related to the frequency of occurrences or percentage of all estimated meter reads.
  
- (c) No. Similar to the reasons for the response to part (b), the Utilities do not track the error range for meter read estimates in dollar terms and percentages of customers' bills. 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.

April 16, 2025

AEY-YEC-YUB-013

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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.

April 16, 2025

AEY-YEC-YUB-013

**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)?

**Response:**

- (a) No. If the payment is made in full and is posted to the customer's account, then no late fees will be charged regardless of the actual payments being deposited in the "Utilities" accounts (e.g., actual cash transfer) occurring shortly after.
- (b) Yes. If charges initially applied to a bill are based on an estimate, an adjustment to reflect actual Energy consumption and Demand (if applicable) used vs, the estimated amounts will be made when the meter is next read. Those adjustments will account for the Board-approved rate schedule charges at the time electricity was used (i.e., during the time period in which the estimate was made for).
- (c) It referred to the Yukon Government "Interim Electrical Rebate" in place until April 1, 2025. The same steps from the response to YUB-AEY/YEC-1-032(f) will be applied to the Yukon Government "Winter Electrical Affordability Rebate" starting in October 2025.

April 16, 2025

AEY-YEC-YUB-014

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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.”

**Response:**

On occasion, alternative payment methods might be used by customers which fall outside those noted on the Utilities bills. The extra transactional costs (if passed to the utility) of

April 16, 2025

AEY-YEC-YUB-014

these methods are flowed through to customers. Examples of this include (but are not limited to):

- a wire transfer payment directly to the Utility's account where the fee is charged to the utility;
- a non CAD cheque being cashed which may incur additional foreign exchange conversion fees;
- third party payment platforms such as PlastiQ, which may charge the utility a transaction fee; and
- any other payment method that may be available today or in the future where the transaction fees are passed to the utility.

The intention of this clause is to protect our rate payers from bearing the transaction costs of additional forms of payment that fall outside the many forms offered on the Utilities' bills/statements.

April 16, 2025

AEY-YEC-YUB-015

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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.

**Response:**

The Utilities have conducted a jurisdictional review of other utilities that permit a single Point of Delivery for multiple dwellings as outlined in the initial request AEY-YEC-MF-2(a) (Round 1).

**BC Hydro<sup>1</sup>**

**Summary**

BC Hydro allows a single point of delivery for multiple occupancy buildings. The relevant details of their Terms & Conditions are excerpted below.

---

<sup>1</sup> <https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/tariff-filings/electric-tariff/bchydro-electric-tariff.pdf>.

April 16, 2025

AEY-YEC-YUB-015

## **Electric Tariff**

### **6.1.3 General Service Election - Residential Customers**

General Service is available as an alternative to Residential Service only where (i) the Customer or applicant for Service (as applicable) is eligible for Residential Service but requests General Service, and (ii) the Service will be used:

1. In a Dwelling, a portion of which is used to carry on a business, where Billing Demand and Energy consumption at the Premises meet the availability requirements of Medium General Service or Large General Service; or
2. At a farm, where the Billing Demand and Energy consumption at the Premises meet the availability requirements of Medium General Service or Large General Service; or
3. In the common areas of multiple occupancy buildings if such common areas are used only for the common benefit of Dwellings in that building.

### **4.4.1 Multiple Occupancy Buildings - Residential Units**

If a building contains more than one unit, including one or more Dwelling, the Owner of the building may determine in respect of the unit(s) that are Dwellings that:

1. All Dwellings in the building will receive Service through a single meter; or
2. Each Dwelling will receive Service through separate metering.

## **Fortis BC<sup>2</sup>**

### **Summary**

FortisBC allows a single point of delivery for multiple occupancy buildings. The relevant details of their General Terms & Conditions are excerpted below.

### **General Terms and Conditions**

### **6.3 Residential Service**

Residential Service is normally single phase 120/240 volt. In FortisBC's discretion, three phase Residential Service or single phase Residential Service in excess of

---

<sup>2</sup> <https://fbc.comprod.blob.core.windows.net/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/electric-utility/fortisbcelectrictariff.pdf>.

April 16, 2025

AEY-YEC-YUB-015

200 amperes may be provided under special contract terms requiring the Customer to pay all additional costs of a larger Service.

At FortisBC's option, for billing purposes multiple family dwellings used exclusively for living quarters and served through one meter, may have the kilowatt-hour blocks and customer charge increased in proportion to the number of single family living quarters served.

### **SaskPower<sup>3</sup>**

#### **Summary**

SaskPower does not permit single point of delivery for multiple occupancy buildings. The relevant details of their Electric Service Requirements are excerpted below.

#### **Electric Service Requirements**

##### **2.1 Residential**

###### **2.1.1 General Requirements**

A single meter shall measure energy consumed by a single Customer in any individual premise, including individual self-contained apartment suites within an apartment building. An apartment suite is considered self-contained if it contains sleeping quarters, bathroom facilities, and permanently installed cooking facilities. Cord connected 120 V hot plates/cook tops and/or microwaves do not constitute permanent cooking facilities.

###### **2.1.2.4 Multiple Single Family Dwellings**

Multiple single family dwelling requirements apply to all single family row-housing units, townhouses, apartments, and duplexes. Note the requirement in Section 2.1.1 limiting the number of points of delivery to a building to a maximum of two. This requirement applies to all multiple single family services except individually titled condominium units. The only servicing option for duplexes and individually titled condominium units is an individual Customer supplied self-contained 200 A meter socket as per Figure 2-1. SaskPower may choose to deliver service to a multi-position meter trough, as per Figure 2-7, for individually titled multiple single family units where lot size or configuration limits servicing options.

---

<sup>3</sup> <https://www.saskpower.com/-/media/SaskPower/Accounts-and-Services/Service-Requests/Guide-ElectricalInspections-ServiceRequirements.pdf>.

April 16, 2025

AEY-YEC-YUB-015

## **Manitoba Hydro<sup>4</sup>**

### **Summary**

Manitoba Hydro allows single point of delivery for multiple occupancy buildings. The relevant details from their Rate Schedule are excerpted below.

### **Rate Schedule**

#### **RESIDENTIAL - TARIFF NO. 2023-01**

The Residential rate is applicable for all residential purposes as follows:

- a) individually metered single family dwellings including those in multiple residential projects and single or three phase farm operations served through the same meter if:
  - i. the connected business load does NOT exceed 3 kW; or
  - ii. the combined agricultural and residential load does NOT exceed a demand of 50 kW
  
- b) single metered multiple residential projects meeting all the following criteria:
  - i. monthly demand does not exceed 50 kVA;
  - ii. the meter serves four or less individual suites or dwelling units;
  - iii. none of the units are used for business purposes;
  - iv. individual dwelling units are:
    - self-contained rental apartments with common facilities; or
    - row housing with self-contained rental dwelling units and common facilities; or
    - buildings with condominium type dwellings incorporated under the Condominium Act; or individual residential services within a trailer park
    - established prior to May 1, 1969

---

<sup>4</sup> [https://www.hydro.mb.ca/docs/billing/electricity\\_rate\\_schedule.pdf](https://www.hydro.mb.ca/docs/billing/electricity_rate_schedule.pdf).

April 16, 2025

AEY-YEC-YUB-015

## **GENERAL SERVICE**

Applicability:

- a) single metered multiple residential projects meeting any of the following criteria:
  - i. demand exceeds 50 kVA to not exceeding 200 kVA ; or
  - ii. the meter serves five or more individual suites or dwelling units; or
  - iii. any of the units are used for business purposes.

## **Hydro Quebec<sup>5</sup>**

### **Summary**

Hydro Quebec allows single point of delivery for multiple occupancy buildings. The relevant details of their Electricity Rates are excerpted below.

### **Electricity Rates**

#### **2.8 - Apartment building, community residence or rooming house**

On condition that the electricity is exclusively for habitation purposes, including in the common areas and for collective services, Rate D also applies when the electricity is delivered to:

- a) a dwelling of an apartment building or a community residence consisting of dwellings, where there is separate metering;
- b) the common areas and collective services, if they are metered separately;
- c) a rooming house or community residence with rooms only. If it includes 10 rooms or more, its construction must have begun on or after April 1, 2008;
- d) an apartment building where there is bulk metering and whose construction began on or after April 1, 2008;
- e) a community residence consisting of dwellings, or both dwellings and rooms, where there is bulk metering and whose construction began on or after April 1, 2008. When the electricity is not exclusively for habitation purposes, Rate D applies in accordance with the provisions of Article 2.12.

---

<sup>5</sup> <https://www.hydroquebec.com/data/documents-donnees/pdf/electricity-rates.pdf?v=HT-2025-v1>

April 16, 2025

AEY-YEC-YUB-015

### **Nova Scotia Power<sup>6,7</sup>**

#### **Summary**

There is no conclusive documentation that outlines if Nova Scotia Power allows single point of delivery for multiple occupancy buildings.

### **Maritime Electric<sup>8</sup>**

#### **Summary**

Maritime Electric allows a single point of delivery for multiple occupancy buildings. The relevant details from their Regulatory: Rates, General Rules and Regulations are excerpted below.

#### **Regulatory: Rates, General Rules and Regulations**

##### **General Service Rate Application Guidelines**

##### **General Service**

General Service rate applications include the following:

- Dwellings providing lodging with more than nine (9) beds, including boarding and rooming houses, special care establishments, senior citizen homes, nursing homes, hostels and transition homes;
- Combined usage of a dwelling and a business operation measured by one meter, where the connected load of the business operation, excluding space heating and air conditioning, is greater than two (2) kilowatts;
- Bulk metered apartment buildings that combine the service to the dwelling units and/or the common use areas;
- Service to common areas in apartment buildings;

##### **Residential Service Rate Application Guidelines**

##### **Urban and Rural**

Customers who use electricity for living purposes in any of the following:

- Dwellings;

---

<sup>6</sup> <https://www.nspower.ca/docs/default-source/regulatory/tariff-book-jan-6-2025.pdf>.

<sup>7</sup> <https://www.nspower.ca/docs/default-source/default-document-library/nspowerregulations.pdf>.

<sup>8</sup> <https://www.maritimeelectric.com/about-us/regulatory/rates-and-general-rules-and-regulations/>

April 16, 2025

AEY-YEC-YUB-015

- Dwelling out buildings; and
- Individually metered, self-contained dwelling units within an apartment building.

### **Newfoundland Power<sup>9</sup>**

#### **Summary**

Newfoundland Power allows single point of delivery for multiple occupancy buildings. The relevant details from their Schedule of Rates, Rules and Regulations are excerpted below.

#### **Schedule of Rates, Rules and Regulations**

##### **7. METERING:**

- (a) Service to each building shall be metered separately except as provided in Regulation 7(b).
- (b) Service to buildings and facilities on the same Serviced Premises which are occupied by the same Customer may, subject to Regulation 7(c), be metered together provided the Customer supplies and maintains all distribution facilities beyond the point of supply.
- (c) Except as provided in Regulation 7(d), Service to each new Domestic Unit shall be metered separately.
- (d) Where an existing Domestic Unit is subdivided into two or more new Domestic Units, Service to the new Domestic Units may, in the discretion of the Company, be metered together.
- (e) Where four or more Domestic Units are metered together, the Basic Customer Charge shall be multiplied by the number of Domestic Units.
- (f) Where the Service to a Domestic Unit has a connected load for commercial or nondomestic purposes exceeding 3000 watts, exclusive of space heating, the Service shall not qualify for the Domestic Service Rate.
- (g) The Company shall not be required to provide more than one meter per Service, however submetering by the Customer for any purpose not inconsistent with these Regulations, is permitted.

---

<sup>9</sup> <https://www.newfoundlandpower.com/My-Account/Services/Moving/-/media/03337A8CF44D47FAB71E64890F7DE86A.ashx>

April 16, 2025

AEY-YEC-YUB-015

**RATE #1.1**

**DOMESTIC SERVICE**

**Availability:**

For Service to a Domestic Unit or to buildings or facilities which are on the same Serviced Premises as a Domestic Unit and used by the same Customer exclusively for domestic or household purposes, whether such buildings or facilities are included on the same meter as the Domestic Unit or metered separately.

April 16, 2025

AEY-YEC-YUB-016

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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)

April 16, 2025

AEY-YEC-YUB-016

**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?

**Response:**

- (a) The Pending Disconnect Notice was issued January 31, 2025, and mailed out using Canada Post. On March 3, 2025, four weeks after the issuance of the disconnection notice, AEY acted on the disconnect.
- (b) The Utilities allow adequate time between issuing a notice and actioning a disconnect to ensure that customers can address any outstanding amounts. While the T&Cs require a minimum notice period of 48 hours, the Utilities typically mail out, via Canada Post, the Pending Disconnect Notice weeks in advance prior to any action to disconnect. Due to the volume of arrears and in consideration of administrative costs, the Utilities rely on mail in providing notice. On the date of disconnect, the utility operator will conduct a door knock at the premise in an effort to speak to the customer to collect payment before a disconnection is made. If the customer is not onsite, the utility operator will leave a cut-off for non-payment

April 16, 2025

AEY-YEC-YUB-016

hanger on the door. If the payment is made that day, the operator will return and reconnect the site.

- (c) Official delivery is by Canada Post. Please refer to the response to part (b) above. In certain circumstances, the Utility may call or email the customer in an effort to collect payment or make a payment plan before disconnecting service.
- (d) Please refer to the response to part (b) above. Pending Disconnect Notices are mailed out weeks in advance before the disconnection takes place, allowing sufficient time for mail delivery.
- (e) Please refer to the response to part (c). No Pending Disconnection Notices are issued to customers during postal interruptions.
- (f) Customers receive regular billing statements on their account, which, if applicable, outline overdue amounts owing on the account. Pending Disconnect Notices are sent out with sufficient time for customers to receive and respond, as discussed in the responses to parts (b) and (d) above. Operator door-knockers and/or an onsite cut-off for non-payment hangers are left on the customer's premises are also used as resort of last attempt before service is disconnected. The Utilities' current collection practices ensure the customers are adequately notified.

April 16, 2025

AEY-YEC-YUB-017

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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.

April 16, 2025

AEY-YEC-YUB-017

**Response:**

(a-b) As part of the Utilities' best efforts to work with customers, payment plans are viewed as a "tool-in-the-toolbox" in certain unique circumstances seen by customers. Each scenario should be developed and discussed on a case-by-case or customer-by-customer basis. It is the Utilities' view that payment plans are not prescriptive in the T&Cs as they should be viewed as unique in nature and not part of a normal course of business. Rather, the option to assist customers should continue as it has in the past to be an offering or a "tool-in-the-tool box", where the Utilities have the flexibility to work with the customer in these unique circumstances. The Utilities; however, are open to adjusting their current practice to ensure that information such as the agreement and penalties are clearer to the customers.

April 16, 2025

AEY-YEC-YUB-018

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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?

April 16, 2025

AEY-YEC-YUB-018

- (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.

**Response:**

- (a) The Utilities submit that the proposed revisions to the T&Cs provide clarity regarding disconnections 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. Specifically, the Utilities are proposing the following definition in Section 2.1:

“Seasonal Service” – service between October 15 to April 15, or between April 16 to October 14 when the overnight temperature is forecast to drop below zero (0) degree Celsius.

In regard to limiting devices, the currently approved T&Cs do enable the Utilities to utilize this tool under Section 11.3. The Utilities are not proposing to change this provision. Please note that the Utilities do not disconnect residential customers during periods of Seasonal Service (e.g., winter) due to non-payment.

- (b) Utilities do not currently use load limiting devices because their thresholds are lower than what is typically required of a premise nowadays, as electricity is used more for heat, electricity and other common household devices. Additionally, risks around using load limiting devices today include damages to the customer infrastructure from wear and tear of equipment as the meter must be removed and reinstalled to add the load limiting device. Furthermore, the Utilities are seeing issues with the adoption of electric heat and the ability of the current limiting devices to function with the added load of electric heat. With the installation of AMI technology, load limiting will be enabled without the risks experienced today.

April 16, 2025

AEY-YEC-YUB-018

- (c) Please refer to the responses to parts (a) and (b). The current and proposed T&Cs allow for load limiting; however, operational restrictions limit the use.
  
- (d) No, the Utilities do not keep annual statistics on winter residential disconnections. Each disconnect is evaluated separately in accordance with long-standing utility practice. For clarity and transparency, the Utilities are proposing to add the definition from part (a) in Section 2 of the T&Cs.

April 16, 2025

AEY-YEC-YUB-019

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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?

**Response:**

- (a) The Utilities submit that it is not necessary to set a prescribed payment plan in the T&Cs in situations where a customer bill is higher in a month due to the previous bill having been based on an estimate. In these scenarios, the Utilities work with

April 16, 2025

AEY-YEC-YUB-019

the customer to provide solutions that work for them, such as a payment plan. This enables flexibility on a case-by-case basis and does not bind the customer into a prescribed payment plan set out in the T&Cs. Using the example from the request, a 20 percent variance in the winter months would be different than a 20 percent variance in the summer months. Enabling the Utilities and customers to work together on a one-on-one basis provides flexibility and better resolution of customer issues. In addition, the Utilities are in the early stages of implementing AMI meters with remote meter reading access, which will limit the need for the use of estimates in the future.

- (b) In addition to removing the flexibility of working with customers on a case-by-case basis, implementing the provision as suggested in question (a) above will most likely require some configuration changes in the metering and billing systems as well as administrative costs, increasing costs incurred by the Utilities and ultimately passed on to all ratepayers. From a systems standpoint, this would include testing and implementation efforts and additional administrative work. The specific financial impact at this point is difficult to assess and would require further analysis.

April 16, 2025

AEY-YEC-YUB-020

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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

April 16, 2025

AEY-YEC-YUB-020

(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.

April 16, 2025

AEY-YEC-YUB-020

- (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.

**Response:**

- (a) Due to the timing of the analysis being later in 2024, AEY conducted the Desktop Study using the latest 2024 unit costs, assuming these costs would remain constant over the next few months. Thus, to be conservative, no additional inflation rate was applied. If inflation was applied, the results of the Desktop Study would be higher.
- (b) Confirmed. The Desktop Study looked at a typical extension request. The Desktop Study did not consider economies of scale inherent with "simultaneous" multiple installations of Residential Single-Family extensions. Economies of scale would be gained mainly through contractor and labour charges; however, materials would have limited benefits for economies of scale. Further, to be conservative, the Desktop Study adopted a typical service in Whitehorse, which does not factor in other elements such as travel expenses that would typically occur for isolated communities, brushing requirements, and project contingencies. AEY submits that the Desktop Study is relevant when determining an appropriate MIL in conjunction with the detailed cost per lot/fixture study, both of which provide similar results.
- (c) Not confirmed. The Desktop Study considers the following for Residential Multi-Dwellings, General Service and Street Lighting:

April 16, 2025

AEY-YEC-YUB-020

- i. Residential Multi-Dwellings – shared connection by four customers in a single installation.
  - ii. General Service – one single customer without any cost sharing.
  - iii. Street Lighting – shared travel costs assuming other services in the area.
- (d) The Desktop Study values are relevant as they represent a typical scenario or extension for each rate class. For example:
  - i. Residential Single Family – 83 percent of the Single Family historical projects are single extensions without economies of scale.
  - ii. Residential Multi-Dwellings – 71 percent of the Multi-Dwellings historical projects are from single extensions with less than four customers. There were no extensions to multi-dwellings as part of the development of new subdivisions, which would have benefits of economies of scale.
  - iii. General Service – 81 percent of the General Service historical projects are from extensions to customers with less than 25kW. Due to the particular demand request of each General Service customer, the projects are typically developed individually and without economies of scale.
  - iv. Street Lighting – The desktop study already accounts for shared travel expenses. Other shareable expenses would be minimal and roughly represent 10 percent of the cost.
- (e) The determination of whether an extension will be considered a residential single family or residential multi-family dwelling is based upon the request of the customer for service and requirements provided. For example, a typical multi-dwelling request would include a request for multiple extensions and meters for each unit of the multi-dwelling whereas a residential request would only have one extension and meter.
- (f) Further to the response to part (e) above, AEY does not foresee any ambiguity since all of the situations outlined in i. to viii. are considered as Residential Multiple

April 16, 2025

AEY-YEC-YUB-020

Dwelling. For the case ix., additional details need to be provided and specific considerations need to be factored in on a case-by-case basis.

April 16, 2025

AEY-YEC-YUB-021

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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.

April 16, 2025

AEY-YEC-YUB-021

(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.

**Response:**

- (a) The CPI was recommended for the annual increase due to its more frequent publication and availability ahead of the Handy-Whitman index. The Handy-Whitman index typically lags behind the CPI by one year.
- (b) The Handy-Whitman (HW) Plateau region was suggested due to its geographical proximity to the Yukon. As such, the HW Plateau region is considered to best over CPI, and CPI Whitehorse when compared to historical extension costs in the Yukon.

April 16, 2025

AEY-YEC-YUB-021

- (c) In the 2023-2024 GRA filed July 7, 2023, adjustments to forecasts were made specifically to Residential and Commercial Usage Per Customer (UPC) due to an unprecedented shift during the pandemic of usage, which was anticipated to return to pre-pandemic levels for both Residential and Commercial customers. As outlined in YUB-AEY/YEC-1-040(g) (Round 1) and in Figure 1 of the MILs Study, the material costs continue to see an increase due to other factors such as supply chain, demand for the materials and inflation. Unlike the UPC forecast in the 2023-2024 GRA, the cost increases were not a direct result of pandemic policies (such as work from home) and are not anticipated to return to historic levels in the near future.

April 16, 2025

AEY-YEC-YUB-022

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

**AEY-YEC-YUB-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.

April 16, 2025

AEY-YEC-YUB-022

**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 <sup>2</sup>	Table 13: Residential Multi-Dwelling MIL <sup>3</sup>	Table 18: General Service MIL <sup>4</sup>	Table 23: Street Lighting MIL <sup>5</sup>
	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.

April 16, 2025

AEY-YEC-YUB-022

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				

April 16, 2025

AEY-YEC-YUB-022

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

**Response:**

(a) The calculations requested are presented in Table 1 below.

**Table 1: MILs Calculations for Different Inflation Scenarios**

	<b>Table 8: Residential Single Family MIL</b>	<b>Table 13: Residential Multi- Dwelling MIL</b>	<b>Table 18: General Service MIL</b>	<b>Table 23: Street Lighting MIL</b>
	MIL 2025\$/site	MIL 2025\$/site	MIL 2025\$/kW	MIL 2025\$/light
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	7,590	1,923	1,344	5,909
10-Year Average using HWI 2011-2025, replacing the years 2022 and	10,500	2,954	2,054	5,356

April 16, 2025

AEY-YEC-YUB-022

	<b>Table 8: Residential Single Family MIL</b>	<b>Table 13: Residential Multi- Dwelling MIL</b>	<b>Table 18: General Service MIL</b>	<b>Table 23: Street Lighting MIL</b>
2023 with a % change of 6.8% and 4.9%, respectively <sup>1</sup>				
10-Year Median using CPI Whitehorse 2011-2025	7,088	1,694	1,192	5,711
10-Year Average using CPI Whitehorse 2011-2025	9,632	2,695	1,870	5,030
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	7,524	3,763	2,399	4,770
2009 Study inflated using CPI Whitehorse 2011-2025	6,017	3,009	1,918	3,814
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	6,019	3,228	1,244	3,636
3-Year Average using HWI, replacing the years 2022 and 2023 with a % change of 6.8% and 4.9%, respectively	9,389	3,176	1,999	4,434
3-Year Median using CPI Whitehorse 2021-2023	5,817	3,119	1,202	3,514
3-Year Average using CPI Whitehorse 2021-2023	9,074	3,069	1,932	4,286
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	7,590	3,005	1,492	5,909
5-Year Average using HWI, replacing the years 2022 and 2023 with a % change of 6.8% and 4.9%, respectively	10,667	3,161	2,314	5,358
5-Year Median using CPI Whitehorse 2021-2023	7,335	2,860	1,388	5,711
5-Year Average using CPI Whitehorse 2021-2023	10,021	2,949	2,184	5,041

<sup>1</sup> The MILs calculation for the scenario "10-Year Average using HWI 2011-2025, replacing the years 2022 and 2023 with a percent change of 6.8 percent and 4.9 percent, respectively" was not part of the request. AEY has included this calculation.

April 16, 2025

AEY-YEC-YUB-022

	<b>Table 8: Residential Single Family MIL</b>	<b>Table 13: Residential Multi- Dwelling MIL</b>	<b>Table 18: General Service MIL</b>	<b>Table 23: Street Lighting MIL</b>
Desktop Study	11,014	2,754	4,533	4,571
Desktop Study — using CPI Whitehorse <sup>2</sup>	11,014	2,754	4,533	4,571
Approved MIL: Board Order 2020-10- 13 Appendix A, PDF Page 55	1,500	725	690	1,240

---

<sup>2</sup> The Desktop Study was conducted using current values, which are not influenced by the inflation index. Please refer to the response to AEY-YEC-YUB-020(a) (Round 2).

April 16, 2025

AEY-YEC-YUB-023

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

---

**AEY-YEC-YUB-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

April 16, 2025

AEY-YEC-YUB-023

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				

April 16, 2025

AEY-YEC-YUB-023

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

**Response:**

- (a) The requested table is provided below using the 2025 and 2009 MIL Studies, respectively.

**Table 1: Comparison of Company Investment Over the Historical Projects used in the MILs Studies**

	<b>Residential Single Family MIL</b>	<b>Residential Multi-Dwelling MIL</b>	<b>General Service MIL</b>	<b>Street Lighting MIL</b>
<b>2025 MILs Study:</b>				
Total cost in 2025 dollars	20,226,300	1,021,730	11,874,595	3,043,430
Company investment in 2025 dollars based on proposed MIL	12,259,246	544,507	5,822,773	2,556,668
Percentage of costs recovered	61%	53%	49%	84%
<b>2009 MILs Study:</b>				
Total cost in 2011 dollars	795,798	N/A <sup>1</sup>	822,283	155,207
Company investment in 2011 dollars based on proposed MIL	769,401	N/A <sup>1</sup>	664,615	153,216
Percentage of costs recovered through proposed MIL	97%	N/A <sup>1</sup>	81%	99%
Company investment in 2011 dollars based on approved MIL	273,000	N/A <sup>1</sup>	761,994	69,440
Percentage of costs recovered through approved MIL	34%	N/A <sup>1</sup>	93%	45%

<sup>1</sup> In 2009, the dataset did not include Multi-Dwelling units, so it is not possible to provide this information.

April 16, 2025

AEY-YEC-YUB-023

AEY also conducted a similar analysis using the same dataset used in the development of the MILs Study, adjusting the costs to both 2011 and 2025 values, for a better apples-to-apples comparison. AEY considers this second analysis presented in Table 2 to be a more accurate comparison.

**Table 2: Comparison of Company Investment Over the Historical Projects (2014-2023) used in the MILs Studies**

	<b>Residential Single Family MIL</b>	<b>Residential Multi-Dwelling MIL</b>	<b>General Service MIL</b>	<b>Street Lighting MIL</b>
<b>2025 MILs Study:</b>				
Total cost in 2025 dollars	20,226,300	1,021,730	11,874,595	3,043,430
Company investment in 2025 dollars based on proposed MIL	12,259,246	544,507	5,822,773	2,556,668
Percentage of costs recovered	61%	53%	49%	84%
<b>2009 MILs Study:</b>				
Total cost in 2011 dollars	8,548,140	431,809	5,018,500	1,286,229
Company investment in 2011 dollars based on proposed MIL	5,184,161	331,391	1,974,000	1,070,371
Percentage of costs recovered through proposed MIL	61%	77%	39%	83%
Company investment in 2011 dollars based on approved MIL	2,120,103	170,088	2,347,967	544,360
Percentage of costs recovered through approved MIL	25%	39%	47%	42%

April 16, 2025

AEY-YEC-YUB-024

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

**AEY-YEC-YUB-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**

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

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

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

April 16, 2025

AEY-YEC-YUB-024

**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.

**Response:**

- (a) The CPV is used to reflect that the assets being invested in and associated revenue collected are long-life assets which will be in service for decades into the future. AEY has used the standard revenue requirement economic model when determining the calculation. The assumptions relied upon to calculate the CPVs are described in the Table below.

**Table 1: Assumptions to Calculate Expected Revenue and Revenue Requirement CPVs**

	Load			Charges					Revenue Requirement			
	Energy	Demand	Growth	Customer	Demand	Energy	Annual Increase	Riders	Average Cost	Depreciation	CCA	WACC
	kWh/y	kW	%/y	\$/mo	\$/kW*mo	\$/kWh	%/y	%	\$	%/y	%	%
Residential	10,962	-	0.7%	14.65	-	0.1214	1.0%	13%	7,572	3.20%	8.0%	6.40%
General Service	52,094	21.72	0.0%	-	7.39	0.1300	1.0%	0%	1,367	3.20%	8.0%	6.40%
Wholesale	-	-	-	-	-	0.0846	1.0%	-	-	-	-	-

April 16, 2025

AEY-YEC-YUB-024

- (b) Consistent with 2009 Phase II Rate Application, Responses to City of Whitehorse Information Requests, CW-YEC/YECL-1-26(e), PDF page 161, below is the rate impact of the proposed MILs. The rate impact is calculated using the increased revenue requirement by the incremental investment (proposed MIL minus the currently approved MIL), by rate class. The Utilities note; however, that outside a Phase II Application, the Rate Policy directive provides guidance to the utility to apply the rate increase equally to the customer classes. AEY has provided the average rate impact for further clarity in Table 2 below.

For clarity, in the 2009 Phase II Rate Application, AEY proposed a phase-in approach to the MIL increase lasting five years, and therefore presented the rate impact for each year of the period. Currently, the Utilities are proposing a single-step adoption of the MIL amounts, which will have a first-year impact as shown in the table. The following years will have lower impacts as the asset depreciation reduces over time.

While the rate impact is a datapoint in considering the implementation methodology (e.g. single-step or gradually phased in), the development of the MIL should continue to be based on the fundamental principles by ensuring an appropriate economic signal while enabling a fair return for the utility which owns and operates the assets.

**Table 2: Rate Impact of Proposed MIL Increases**

<b>Rate Class</b>	<b>2025</b>
Residential	0.34%
General Service	0.06%
Street Lighting	0.98%
Average Rate Impact	0.20%

April 16, 2025

AEY-YEC-YUB-025

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

**Information Responses Round 2 to:  
Yukon Utilities Board (YUB)  
Received: April 2, 2025**

**AEY-YEC-YUB-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 <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	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	

<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.

**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?

**Response:**

- (a) Both Naka-YK and NTPC invest 100 percent of the actual cost for streetlights, compared AEY's proposal which limits the utility investment to a maximum of

April 16, 2025

AEY-YEC-YUB-025

\$6,649/light. AEY has not been able to find any document on the public record that details the installation costs for streetlights for Naka-YK or NTPC.

- (b) ATCO Electric Distribution has one MIL amount that combines Residential single family and multi-dwelling. Factors such as size of the MIL class would be elements that are considered in formulating one MIL amount.