

Nathaniel Yee  
travelslowly@gmail.com

19-June 2025

To: Yukon Utilities Board  
Attn: Lesley McCullough, Chair

RE: Request for Review and Variance of Board Order 2025-11

Pursuant to Rule 31 of the Yukon Utilities Board's Rules of Practice and section 62 of the Public Utilities Act, I hereby apply for a review and variance of Board Order 2025-11, on the grounds that:

- (a) The Board has made an error in fact and law (Rule 31(1)(b));
- (b) The Board has acted on a false document despite clear evidence to the contrary. Disregarding evidence of a false document is an error in law. (Rule 31(1)(f));
- (c) A basic principle of fairness and due process was not applied in the original determination (Rule 31(1)(d)).

#### **I. Grounds for Review**

(a) The Board erred in fact by stating that the unredacted invoice content was not part of YEC's submission.

In paragraph 53 of Board Order 2025-11, the Board refused to consider the unredacted version of YEC's legal invoice on the basis that YEC had not filed this content. This is incorrect. As the Board is aware, the redacted and unredacted content are part of the same electronic document filed by YEC on August 12, 2024, and available on the Board's website. The redacted portions are simply covered by white rectangles and remain accessible by copying the text or adjusting layer transparency using standard software. The Board was made aware that YEC was the source of the unredacted content in a letter I provided on March 18, 2025 in reply to a note from the Board questioning the validity of the unredacted information.<sup>1</sup>

(b) The Board erred in law by acting on a false document. The version of the invoice that YEC asked the Board to act on is materially altered. Under section 366(2)(c) of the *Criminal Code*<sup>2</sup>, this constitutes the making of a false document. Altering an invoice to change the nature of work performed, such as hiding that the work was for the "AEY" GRA rather than the "YEC" GRA affects cost eligibility and thereby the outcome of the Board's decision. I provided a few other examples in my cost claim comment submitted on August 29, 2024, some as obvious as changing "irrelevant" to "relevant" by covering the first two letters.

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<sup>1</sup> My Letter to Yukon Utilities Board March 18, 2025, Steps 1–5, detailing how the original redacted document includes retrievable unredacted content. (letter included at the end of this request)

<sup>2</sup> *Criminal Code*, RSC 1985, c. C-46, s. 366(2)(c): "Making a false document includes... making a material alteration in a genuine document by erasure, obliteration, removal or in any other way." (included in my letter attached after this document)

Acting on a known false document, as the Board has done, violates section 368(1) of the Criminal Code<sup>3</sup>, which prohibits using or dealing with a false document as if it were genuine.

(c) The Board failed to uphold procedural fairness.

The Board's refusal to examine the unredacted content of YEC's own filing, despite being alerted to it and made aware of its source and authenticity undermines the basic principle of fairness in regulatory proceedings. It is the duty of the Board to ensure that cost claims are not based on misleading or altered documents. Declining to examine a falsified cost claim, even after notice and supporting evidence, calls into question the integrity of the cost review process.

It is concerning that the Board would also claim that "disallowance is unreasonable" in response to my request that YEC's false document be disallowed. This raises the question of whether the Board considers the use of materially altered documents to be reasonable, and whether it views sections 366(2) and 368(1) of the Criminal Code as irrelevant or unreasonable in its proceedings.

The Board's refusal to consider both versions of the document in its possession is not in the public interest. The Board's assertion that these concerns are "unsubstantiated" is incorrect. The redacted and unredacted versions are visually and textually verifiable, and were submitted simultaneously by YEC.

## II. Statement of Supporting Facts

- On March 18, 2025, I submitted a letter explaining how the redacted content in YEC's invoice was not properly removed and could be viewed by opening the same PDF filed by YEC on August 12, 2024 and adjusting graphic properties or copy / paste.
- I demonstrated that text such as "preliminary review of cover letter for AEY GRA, and draft" was visible under the redaction boxes. This task is not chargeable to YEC's GRA and materially alters the invoice. I also identified several additional examples, though even a single material change would render this a false document.
- The Board disregarded this evidence and awarded YEC over \$450,000 in costs, based on a false document submitted by YEC.

From Supreme Court of Canada Guidelines for Preparing Documents<sup>4</sup>:

*"An attempt to redact text will be unsuccessful if sensitive content is blocked using a method that merely covers up the text so that it is no longer visible on the screen, but that allows readers to access the content by copying and pasting."*

No new evidence is introduced. This application rests entirely on YEC's August 12, 2024 cost claim filing, which contains both the redacted and unredacted content.

## III. For further assistance to the Board, I invite the Board to follow these steps:

- (1) Open the PDF cost claim submission from YEC dated August 12, 2024.

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<sup>3</sup> *Criminal Code*, RSC 1985, c. C-46, s. 368(1): "Everyone commits an offence who, knowing or believing that a document is forged, uses, deals with or acts on it as if it were genuine."

<sup>4</sup> Guidelines for Preparing Documents to be Filed with the Supreme Court of Canada (Print and Electronic) <https://www.scc-csc.ca/filing-depot/guide/>

- (2) On page 20, locate the redacted line that starts with the text “preliminary review of cover letter” and then has a white box.
- (3) Select and copy the entire line and paste into a blank document, or use a graphics or PDF editor to reveal the text beneath the white overlay.
- (4) Compare this with the identical unredacted content provided in my cost claim comment submitted on August 29, 2024 and available on the Board’s website.

This exercise will demonstrate that YEC filed a materially altered invoice, and that the cost award in Board Order 2025-11 was based on a false document. This exercise was also explained to the Board in my March 18, 2025 letter.

#### **IV. Relief Sought**

I respectfully request that the Board:

- Reopen the cost award to YEC under Order 2025-11;
- Disallow the entire cost award to YEC in light of the evidence and applicable law;
- Confirm that the Board’s process will not tolerate the use of falsified records in public proceedings.

#### **V. Request for Review**

The Board’s refusal to examine evidence in its possession and submitted by YEC undermines public trust in the fairness and integrity of the Board’s processes and conveys the appearance that the Board is protecting the utility rather than the public.

I submit that there is a *prima facie* case for Board Order 2025-11 to be reviewed by the Board based on error of fact and of law, and that this error has significant material implications in charging customers based on a false document submitted by YEC, and I therefore request a review by the Board.

ALL OF WHICH is respectfully submitted this 19th day of June, 2025.

Nathaniel Yee

Attachments on following pages:

- 1) My letter to the Board, March 18, 2025.
- 2) A few pages of the unredacted version of YEC’s cost claim, from YEC’s cost claim available on the YUB website.

Nathaniel Yee  
[travelslowly@gmail.com](mailto:travelslowly@gmail.com)

18-Mar, 2025

Yukon Utilities Board, and  
Lesley McCullough, Chair

Thank you for your letter of March 17, 2025 concerning my cost claim comment and the associated unredacted document.

There appear to be a few misconceptions in the letter about the source and validity of the unredacted document view, which I will correct below.

From your letter:

*Fairness requires that a cost claim be assessed as filed by a party because the party filing the costs claim is relying on the information as filed. The Board cannot rely on information filed by another party that is claiming it has unredacted information in relation the costs claim of a party.*

It should first be noted first that YEC has filed both the redacted and unredacted documents with the Board, and asked the Board to act on the altered/redacted version. In providing the unredacted view with my cost claim comment, I am not providing anything that the Board does not already have or that was not already filed by YEC, as shown below:

- 1) Please open YEC's original cost claim application as filed on August 12, 2024 and available on the YUB website.
- 2) Search on "for AEY" (both words) and this will bring you to the following entry on p. 20:

07/25/23	JKH	Telephone call with Mr. Landry regarding GRA planning; preliminary review of cover letter [redacted] and draft of YEC's interim rate filing;	0.60
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The search is finding and highlighting text which YEC has covered up with a white box.

- 3) Select and copy the entire line of text including the white box, and paste into an empty file, and you will see the following:

preliminary review of cover letter for AEY GRA, and draft

- 4) And now comparing this with what is in my cost claim comment and in the unredacted document:

07/25/23	JKH	Telephone call with Mr. Landry regarding GRA planning; preliminary review of cover letter for AEY GRA and draft of YEC's interim rate filing;	0.60
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- 5) Copy/paste is slow, but the entire unredacted document can be viewed easily by opening YEC's cost claim in a graphics program or PDF editor, clicking on the white boxes and changing transparency to 100%, as I did and you have unredacted document or unredacted view.

- 6) In following the exercise above, the Board is now aware of the original and genuine unredacted document (both text and graphic layers) behind the white boxes that YEC used to redact and materially alter the document. Canadian Criminal Code describes this: 366(2)(c) making a material alteration in a genuine document by erasure, obliteration, removal or in any other way.
- 7) In reviewing the underlying text, the Board knows that the redacted/altered document as submitted by YEC is a false document, and the Board cannot use, deal with or act on it as if it were genuine, as noted in my cost claim comment and in Canadian Criminal Code 368(1).

In the letter, the Board has questioned the source and the authenticity of the unredacted information, and both have been verified above. The source is YEC's cost claim submission, and in that YEC document, the genuine underlying text of every redacted item can easily be verified.

The unredacted view was submitted as part of my cost claim comment to facilitate the Board's review of the original and altered documents, and it should to be accepted and reviewed as such. There is no provision that I can see for the Board to reject and not review some part of a comment submission, particularly now that its validity has been confirmed.

From your letter:

*I also want to clarify what we will and will not consider in respect of documents submitted by a party other than the originator of those documents.*

As shown above, YEC submitted the document and is the originator of the document. I examined YEC's document closely, and noticed details that I have brought to the Board's attention by providing my comments and the unredacted view of the document. Reviewing the documents and noticing details that others might have missed is the purpose of having interveners. Having been alerted to these details, I expect that the Board will look at them closely. The Board can extract its own unredacted view from YEC's submission confirming that YEC is the originator of the documents, if this is preferable to using the identical unredacted view that I have provided.

The original reason for rejecting the unredacted documents was that *the Board "reviews cost claims provided by the parties as filed"*.

And I agree, noting that YEC provided and filed the unredacted view, along with the altered/redacted view. The altered document should be reviewed in relation to the unredacted view which I filed with my cost claim. YEC provided and filed both, and accordingly both should be reviewed in context.

In your letter you list the criteria for cost awards, and certainly "making a false document" and "forgery" are not listed as issues. However, as I point out in my cost claim comment, these are addressed in Canadian Criminal Code, which we can safely say takes precedence over the Yukon Utilities Board's Scale of Costs.

As pointed out in my cost claim comment, making a false document is a serious issue, as is acting on one. As noted, Canadian Criminal Code 366(1&2) and 368(1) apply here. YEC may not have meant to provide the unredacted view and exposed the false document, but since it was filed and noticed, it needs to be thoroughly examined.

The Board's repeatedly refusing to review documents that confirm that YEC has submitted a false document is not acting in the public interest and gives the impression that the Board is trying to protect YEC rather than protecting the public. Is it in the best interest of the Board or the public to allow YEC to submit false documents in these proceedings? Is protecting YEC worth the risk to the Board outlined in 368(1)? As I wrote in my cost claim comment, YEC's cost claim should be rejected and no costs whatsoever should be awarded to YEC.

Or will the Board instead act on a false document and claim not to have known?

Thanks,  
-Nathaniel

Applicable references also provided in my cost comment:

Use, trafficking or possession of forged document

368 (1) Everyone commits an offence who, knowing or believing that a document is forged,

(a) uses, deals with or acts on it as if it were genuine;

Punishment

(1.1) Everyone who commits an offence under subsection (1)

(a) is guilty of an indictable offence and liable to imprisonment for a term of not more than 10 years; or

(b) is guilty of an offence punishable on summary conviction.

Forgery and Offences Resembling Forgery

Forgery

366 (1) Every one commits forgery who makes a false document, knowing it to be false, with intent

(a) that it should in any way be used or acted on as genuine, to the prejudice of any one whether within

Canada or not; or

(b) that a person should be induced, by the belief that it is genuine, to do or to refrain from doing anything, whether within Canada or not.

Making false document

(2) Making a false document includes

(a) altering a genuine document in any material part;

(c) making a material alteration in a genuine document by erasure, obliteration, removal or in any other way.

**YEC's 2023-24 GRA Cost Claim  
Unredacted pages:**

I submitted 25 pages containing unredacted material with my cost claim comment on August 29, 2024. For this review and variance request, I am including only 8 pages as examples. The Board already has the full 25 pages, which were submitted as a supporting document with my cost claim comment. As explained in my letter of March 18, the complete document including both redacted and unredacted content is publicly available on the YUB website, and anyone can easily view all of the unredacted information with a simple copy / paste so it is not necessary to resubmit all pages here.

Further, 366(2) reads "*Making a false document includes (a) altering a genuine document in any material part;*" so really any one material alteration is sufficient.

As noted again, all of this information is public. The boxed items on the following pages were redacted using white overlay boxes in the original document submitted by YEC, which contains both redacted and unredacted versions and can be accessed here:

[https://yukonutilitiesboard.yk.ca/pdf/YEC\\_2023\\_GRA/YEC\\_2023-24\\_GRA\\_Cost\\_Claims\\_Application\\_Aug.12\\_2024.pdf](https://yukonutilitiesboard.yk.ca/pdf/YEC_2023_GRA/YEC_2023-24_GRA_Cost_Claims_Application_Aug.12_2024.pdf)

My cost claim comment noting YEC's material alterations and false document are here:

[https://yukonutilitiesboard.yk.ca/pdf/YEC\\_2023\\_GRA/NY\\_YEC\\_Cost\\_Claim-Reply\\_Aug.29\\_2024.pdf](https://yukonutilitiesboard.yk.ca/pdf/YEC_2023_GRA/NY_YEC_Cost_Claim-Reply_Aug.29_2024.pdf)

I had discovered the unredacted text entirely by accident, as something I had searched on brought me to a white box. I soon realized that all of the original text was available under the white boxes in the badly redacted document.

If the YUB website happens to be down or these documents are not accessible, these original documents are also available on archive.org, and were of course originally emailed to all participants. As YEC emailed this document to everyone and it is on the YUB website, it is all publicly available information.



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Yukon Energy Corporation  
P.O. Box 5920  
Whitehorse, YT Y1A 5L6 Canada

Attention: Jason Epp

Our File No: 084813-00287

Yukon Energy Corporation  
Re: 2023 GRA

Date: August 18, 2023  
Invoice Number: 2216336

### PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through July 31, 2023.

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>
06/20/23	PJL	Review of YUB decision regarding LWR and DCF.	0.50
07/24/23	PJL	Call with J. Epps; call with C. Osler regarding status of items in GRA.	2.00
07/25/23	JKH	Telephone call with Mr. Landry regarding GRA planning; preliminary review of cover letter <span style="border: 1px solid black; padding: 0 2px;">for AEY GRA</span> and draft of YEC's interim rate filing;	0.60
07/25/23	PJL	Review issues regarding interim application; call with C. Osler regarding redraft.	1.50
07/26/23	PJL	Review legal issues regarding interim application; prepare for and attend meeting with GRA team; call with YUB counsel and follow up.	2.50
07/26/23	JKH	Teams meeting with YEC team regarding GRA planning;	1.00
07/27/23	PJL	Calls and review regarding interim rate issues.	1.00
07/28/23	PJL	Dealing with YEC and YUB counsel regarding interim rates.	1.00
07/31/23	PJL	Review of issues regarding AEY application and YEC upcoming application.	1.00
<b>Total Hours</b>			<b>11.10</b>

### BILL SUMMARY

REG # 110 152 824	Total Fees:	\$	6,829.90
	Total GST:	\$	341.50



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Yukon Energy Corporation  
P.O. Box 5920  
Whitehorse, YT Y1A 5L6 Canada

Attention: Jason Epp

Our File No: 084813-00287

Yukon Energy Corporation  
Re: 2023 GRA

Date: September 26, 2023  
Invoice Number: 2224467

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through August 31, 2023.

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>
08/01/23	PJL	Review issues regarding <u>bad</u> debts and capital <u>accruals</u> .	1.00
08/02/23	PJL	Review issues regarding AEY GRA.	0.50
08/03/23	PJL	Review issues in AEY GRA regarding YEC GRA.	0.50
08/04/23	PJL	Call with IG regarding capital issues.	0.50
08/08/23	JKH	Review Ms. Pollitt-Smith's correspondence regarding drafts of GRA materials;	0.10
08/08/23	PJL	Review of memos and follow up review of issues with C. Osler.	2.50
08/09/23	JKH	Preliminary review of draft GRA materials (Tab 1 outline and Tab 6);	0.50
08/09/23	PJL	Calls regarding draft Tabs 1 and 6; meeting with J. Herbert; discussion with IG.	1.50
08/10/23	JKH	Conference with Mr. Landry, and Teams meeting with GRA team, regarding preparation of GRA materials;	1.50
08/10/23	PJL	Calls with YEC; meeting with GRA team; review of draft materials.	3.50
08/11/23	PJL	Prepare for and attend call with J. Herbert, C. Osler and M.Pollitt-Smith; review of J. Herbert material sent to J. Epp.	2.50
08/11/23	JKH	Preliminary review of draft outline for draft of GRA introductory content, conference with Mr. Landry regarding same; Zoom	2.80



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Yukon Energy Corporation  
P.O. Box 5920  
Whitehorse, YT Y1A 5L6 Canada

Attention: Jason Epp

Our File No: 084813-00287

Yukon Energy Corporation  
Re: 2023 GRA

Date: November 09, 2023  
Invoice Number: 2237516

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through October 31, 2023.

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>
10/03/23	PJL	Summarize issues regarding AEY IRs.	0.50
10/06/23	JKH	Telephone call with Mr. Epp regarding legal review of draft response to YUB advisor's inquiry about YEC's issuance of public notice of technical workshop; review Mr. Epp's draft response to Mr. Ward, and correspondence to Mr. Epp regarding suggested revisions/additions; review Mr. Epp's revised correspondence responding to Mr. Ward;	0.50
10/06/23	PJL	Review schedule and call to YEC.	0.50
10/10/23	JKH	Review YUB decision on interim rates; telephone call with Mr. Landry regarding same;	0.30
10/10/23	PJL	Review decision on interim rates and impact with AEY rate.	1.00
10/11/23	PJL	Review of issues identified in filings.	0.50
10/12/23	PJL	Discussions with J. Epp regarding workshop; review slides and related material.	0.50
10/13/23	PJL	Review issues regarding witness training.	0.50
10/16/23	PJL	Review material regarding [irrelevant to GRA].	0.50
10/18/23	JKH	Review YUB letter <u>declining to take further action</u> on Mr. Yee's request for clarification of his previous submission on interim rates;	0.10
10/18/23	PJL	Calls regarding material in interim rates.	0.50



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Yukon Energy Corporation  
P.O. Box 5920  
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Attention: Jason Epp

Our File No: 084813-00287

Yukon Energy Corporation  
Re: 2023 GRA

Date: December 05, 2023  
Invoice Number: 2244566

## PROFESSIONAL SERVICES

For Professional Services rendered and/or disbursements advanced through November 30, 2023.

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>
11/02/23	JKH	Preliminary review of IRs.	0.50
11/02/23	PJL	Review issues of IRs.	0.50
11/03/23	PJL	Review YUB IRs.	1.00
11/05/23	JKH	Preliminary review of Mr. Osler's correspondence regarding IRs.	0.20
11/06/23	JKH	Conference with Mr. Landry regarding review of YUB IRs.	0.10
11/06/23	PJL	Calls with C. Osler regarding IR meeting.	1.00
11/07/23	JKH	Further review and consider YUB IRs; Teams meeting with Ms. Pollitt-Smith, Mr. Osler and Mr. Landry to discuss YUB IRs; follow-up correspondence to Mr. Osler, Ms. Pollitt-Smith and Mr. Landry regarding YEC's <u>position on YUB's inquiries about</u> rental diesel units.	3.50
11/07/23	PJL	Prepare for and attend call with IG regarding legal related issues.	1.50
11/08/23	PJL	Review specific legal related IRs.	0.50
11/08/23	JKH	Consider and respond to Ms. Pollitt-Smith's follow-up correspondence regarding <u>YUB</u> IRs concerning diesel rentals.	0.10
11/10/23	JKH	Consider Mr. Osler's response to correspondence about diesel rentals, and correspondence to Mr. Osler regarding further follow-up questions; preliminary review of draft responses to selected YUB IRs, and correspondence to Mr. Osler regarding potential	1.00



<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>
		additional line of argument in opposition to proposal to apply LWRF as an offset to rate base; review Mr. Osler's comments in response.	
11/14/23	JKH	Prepare revised drafts of IR responses, and correspondence with Mr. Osler regarding same; conference with Mr. Landry regarding draft IR responses; further prepare revised drafts of IR responses, and further correspondence with Mr. Osler regarding same.	4.20
11/14/23	PJL	Review of IRs and comments.	1.50
11/15/23	JKH	Review Mr. Osler's further revisions to draft IR responses, prepare further revised drafts, and correspondence with Mr. Osler regarding same; conference with Mr. Landry regarding review of draft IR responses; further prepare revised drafts of IR responses, and further correspondence with Mr. Osler regarding same.	3.00
11/15/23	PJL	Review and comment on IRs.	2.00
11/16/23	JKH	Review further drafts of IR responses, prepare revised draft of IR response, and correspondence to Mr. Osler regarding same and to seek further clarification regarding draft responses.	1.50
11/16/23	PJL	Calls and comments on IRs.	1.50
11/17/23	PJL	Work on IRs.	2.00
11/17/23	JKH	Review revised draft of IR response, prepare further revised draft, and correspondence to Mr. Osler regarding same; review further draft IR responses, further prepare revised drafts, and further correspondence with Mr. Osler regarding same; Zoom meeting with Mr. Osler regarding draft IR responses, further correspondence with Mr. Osler regarding draft IR responses, and Zoom meeting with Mr. Osler and Mr. Landry regarding same.	4.50
11/18/23	JKH	Review Mr. Osler's further correspondence regarding revisions to draft IR responses; prepare further draft revisions, and further correspondence with Mr. Osler regarding same. <span style="border: 1px solid black; padding: 2px;">review and consider Ms. Pollitt-Smith's inquiry about draft IR response referencing request for YUB to receive copies of rental agreement on confidential basis, and correspondence to Ms. Pollitt-Smith regarding same.</span>	1.50
11/19/23	JKH	Consider and respond to Ms. Pollitt-Smith's further correspondence <span style="border: 1px solid black; padding: 2px;">regarding confidentiality objection to</span>	0.30



<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>
		producing copies of rental agreements requested by YUB; review further correspondence of Mr. Landry regarding same;	
11/20/23	PJL	Review YUB IR.	0.50
11/21/23	PJL	Review IRs.	0.50
11/22/23	PJL	Calls with YEC and IG; review of IRs for legal review.	2.00
11/22/23	JKH	Correspondence with Ms. Pollitt-Smith regarding review of further draft IR responses; Teams meeting with Mr. Osler and Ms. Pollitt-Smith, with Mr. Landry, to discuss status of preparation and review of draft IR responses; follow-up telephone call with Mr. Landry; review further drafts of IR responses, and follow-up correspondence with Mr. Osler regarding same; correspondence with Mr. Ritchie regarding questions arising from review of draft IR responses concerning diesel permitting, and correspondence with Mr. Osler and Mr. Landry regarding same; prepare further revised draft IR response concerning EAM and PAMMS projects, and further correspondence with Mr. Osler regarding same.	5.20
11/23/23	JKH	Further correspondence with Mr. Landry and Mr. Osler regarding revised draft IR response.	0.20
11/23/23	PJL	Meeting of GRA team and follow up.	1.50
11/24/23	JKH	Further correspondence with Ms. Pollitt-Smith regarding draft IR responses regarding diesel permitting.	0.10
11/24/23	PJL	Review issues regarding AEY hearing.	1.00
11/27/23	JKH	Review Mr. Epp's correspondence forwarding comments of Ms. Cunha and Mr. Ritchie on draft IR response regarding diesel permits, and correspondence to Mr. Osler regarding same; consider further comments of Mr. Osler, and further correspondence to Mr. Epp and Mr. Osler regarding same.	0.40
11/27/23	PJL	Review Day 1 AEY.	0.50
11/28/23	PJL	Review related issues re AEY hearing.	0.50
11/29/23	JKH	Review correspondence of Mr. Osler and Ms. Cunha regarding draft IR response on diesel permitting, and review revised draft IR response; review Mr. Epp's correspondence providing updated on AEY GRA hearing, and Mr. Osler and Mr. Najmidinov's correspondence in response.	0.30



<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>
01/12/24	PJL	Review and attend calls and meetings regarding NY evidence.	5.00
01/13/24	JKH	Consider Mr. Osler's further comments on draft response to follow-up question about emergency operation of rented diesel units, prepare further revised draft, and further correspondence with Mr. Osler regarding same, and regarding preparation of attachments to IR responses; correspondence to Mr. Ritchie regarding revised draft of response to follow-up question; consider further comments of Mr. Osler, prepare further revised draft of response to follow-up question, and further correspondence to Mr. Osler regarding same;	1.50
01/14/24	JKH	Review further comments of Mr. Landry and Mr. Osler regarding revised draft response to follow-up question about emergency operation of diesel units, and further correspondence with Mr. Osler regarding same; review further comments of Mr. Najmidinov and Mr. Osler regarding revised draft response to YUB-YEC-1-35, prepare further revised draft, and correspondence to team regarding same;	0.50
01/15/24	JKH	Consider and respond to Mr. Najmidinov's correspondence regarding revised draft of response to YUB follow-up question regarding emergency operation of rented diesel units; follow-up correspondence with Mr. Osler and Ms. Pollitt-Smith regarding attachments to revised IR responses; review and consider Mr. Ritchie's further comments on draft response to follow-up question; <u>review letter from YESAB regarding Designated Office authority over assessment of Whitehorse diesel permit renewal.</u> review Mr. Najmidinov's further comments on draft response to follow-up question, and correspondence to team regarding potential further revision; review Ms. Cunha's revisions to draft response to follow-up question on public engagement, prepare further revised draft, and correspondence to team regarding same; Teams meeting with Mr. Epp, Mr. Najmidinov, Mr. Osler, Ms. Pollitt-Smith and Mr. Landry regarding status of revised IR responses; prepare draft of cover letter to YUB regarding filing of revised IR responses, and correspondence to Mr. Osler and Ms. Pollitt-Smith regarding same; commence further review and consideration of Mr. Yee's evidence, <u>and potential approach to responding to it.</u> review Mr. Osler's revisions to draft cover letter to YUB, prepare further revised draft,	4.50



<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>
		IPP EPAs; further consider relationship between YG IPP policy and standard EPA template for IPPs, and follow-up correspondence to Ms. Cunha and Mr. Osler regarding same.	
02/23/24	PJL	Calls regarding issues for preparation meetings.	1.00
02/24/24	JKH	Consider and respond to Mr. Osler's correspondence regarding IPP Standard Offer Program.	0.20
02/25/24	JKH	Review and respond to Ms. Cunha's correspondence regarding discussion with Mr. Milner about history of YEC communication with CTFN about SLESP; consider further correspondence of Mr. Osler and Ms. Cunha regarding IPP Standing Offer Program, and further correspondence to Ms. Cunha and Mr. Osler regarding same; review and respond to further correspondence of Ms. Cunha regarding IPP issue; review prior correspondence with CTFN about SLESP forwarded by Mr. Miner regarding SLESP, and further correspondence to Mr. Milner regarding same; correspondence with Mr. Landry regarding IPP issue; review YUB exhibit list and record of proceedings, and correspondence to Mr. Landry regarding same; preliminary review of GRA team correspondence regarding revised draft of opening statement.	2.50
02/26/24	JKH	Attend check-in meeting with GRA team; correspondence to, and telephone call with, Ms. Bentivegna regarding omissions from YUB Exhibit List, and correspondence to GRA team regarding same; review revised draft of opening statement, prepare further revised draft, and correspondence to GRA team regarding same; attend hearing preparation meeting with GRA team and panel members; further hearing preparation meeting with Mr. Murchison and Mr. Osler.	7.50
02/26/24	PJL	Prepare for and attend meeting with GRA team.	3.50
02/27/24	JKH	Prepare draft letter to YUB regarding omissions from Exhibit List, correspondence with Mr. Landry regarding same, and finalize letter; further review and consider materials in preparation for meeting with Mr. Epp; hearing preparation meeting with Mr. Epp and Mr. Osler; <u>consider</u> copies of further letters between YEC and CTFN relevant to SLESP issue forwarded by Mr. Milner, and further correspondence with Mr. Milner regarding same.	3.50
02/27/24	PJL	Calls regarding opening statements and exhibit list.	1.00