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AEY-YEC-JM-001

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

**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

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Topic: Application

Reference: Page 3 (PDF 5/115) No. 7: "... significant load increases, like those from Electric Vehicles (EVs)."

Request:

- (a) Are the Companies referring to the monthly energy consumption of EVs or the demand of a certain type or 'level' of charger?
- (b) If the reference is to the monthly energy consumption, please provide the Yukon based data on which the utilities relied to determine that an EV would require a significant increase in monthly energy.
- (c) If the reference is to the demand of a certain level(s) of EV charger please provide the details for each of level 1, level 2, and level 3 chargers.

Response:

- (a-c) The proposed change in the T&Cs is intended to address changes in customer behaviour driven by both federal and provincial policy around decarbonization and electric vehicle (EV) sales.¹ The Utilities consider both energy consumption and demand for EV chargers a significant change in load in communities, as EVs may impact operations in communities at all levels of EV charging. Working with customers and the Yukon and local governments to determine changes in

¹ **Emissions Reduction Plan issued March 29, 2022** - mandates so that 100 percent of new passenger vehicles sold in Canada will be zero emission by 2035, with interim targets of at least 20 percent by 2026 and at least 60 percent by 2030; as well as , **2023 Canada's Electric Vehicle Availability Standard Targets** - 2026 manufacturers and importers are required to offer at least 20 percent of new light-duty ZEVs for sale, and the requirement increases to 60 percent by 2030 and 100 percent by 2035.

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electricity usage, whether EV charging or electric heat, is imperative to ensure proper planning, in both the short and long term, of generation and infrastructure in communities across the Yukon. The Utilities are not proposing a set range or level in the T&Cs for energy consumption or demand in order to allow flexibility to address different circumstances that can appear in the different communities. Rather, the Utilities intend to use outreach programs that are community specific to align requirements to system conditions and needs.

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

**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-002

Topic: Application

Reference: Page 4 (PDF 6/115) No. 15: Appropriate MIL balance:

Request:

- (a) Please explain in more detail the meaning of the following terms with respect to the cost to connect a customer to the Utilities' distribution infrastructure:
 - a. Uneconomic bypass
 - b. Intergenerational inequity
 - c. Depriving the utility of a fair return on assets it owns and operates, and what specifically are the assets being referred to here
- (b) Please explain what is meant by the last sentence in this paragraph – is it saying that if the Companies' allowable investment is too low (and the customer portion too high) this will deter new connections and hurt the Yukon economy? Please explain in light of the present MIL rates being too low and the rapidly increasing utility loads for the past several years.
- (c) Please provide a table of typical MIL rates for both northern and southern Canadian electric utilities – please include the present and proposed Yukon MIL rates in the table for comparison.

Response:

- (a) a. Uneconomic bypass: In general, uneconomic bypass is the inefficient allocation of resources from society's perspective, when individual customers make investments that lower their own costs of consuming electricity, but do not reduce the total cost of the grid or add billing

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determinants (increase usage) to allocate these costs across a larger customer base, such that costs are shifted to other customers.¹ From a societal perspective, uneconomic bypass should be avoided as it results in inefficient outcomes.

Setting an appropriate MIL is critical to prevent uneconomic bypass because the MIL sends a price signal to individual customers when evaluating options to meet their electricity needs. Ensuring an appropriate MIL is particularly important today, as customers have a number of options, such as Distribution Energy Resources (DERs), when looking to meet their electrical needs.

- b. **Intergenerational Inequity:** Intergenerational inequity, or an issue of intergenerational equity, arises when utility customers are not treated equitably across time, such that an inequitable cost burden is imposed on certain customers compared to past or future customers. In a MILs context, the Alberta Utilities Commission (AUC) has described intergenerational inequity as "a concern, in that material changes to MILs may result in new customers receiving a greater or a lesser amount of subsidization than prior generations."² For example, intergenerational inequity occurs when customers pay a share of new extension costs, either through a contribution or through rates, that is disproportionate with the treatment of another generation of customers.
- c. **Depriving the utility of a fair return on assets it owns and operates:** The utility earns a return on investments made in assets, net of contributions where

¹ AUC Distribution System Inquiry Final Report, Proceeding 24116, PDF p. 9.

² AUC Decision 27658-D02-2023, Residential Standards of Service and Maximum Investment Levels – Phase 2 (October 18, 2023), para. 60, PDF p. 20.

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costs exceed the MIL. Under the regulatory compact, a utility has an obligation to serve and, in exchange, has an opportunity to earn a reasonable return on prudent investments and to recover its prudently incurred costs. MILs are set to provide an economic signal to customers (i.e., if a customer wants to connect far away, then that customer should pay for the relatively higher cost of that connection). Setting the MIL too low will not appropriately compensate the utility for the risk of owning, operating and maintaining these assets, since the utility's investment in the system will be lower, as well as sending an inappropriate price signal to customers incenting uneconomic bypass and intergenerational inequity (as discussed above). An appropriate MIL will strike a balance between sending an appropriate price signal, maintaining intergenerational equity and ensuring the utility has a reasonable opportunity to earn a return on assets it owns, operates and maintains.

- (b) The sentence referred to in this request states: “An appropriate MIL also contributes to the strength of the Yukon economy by providing a proper signal for upfront costs which may defer new connection if set to low.” In this context, if the MIL is set too low, requiring a higher customer contribution, then customers may be deterred from developing in the Yukon or look for alternative sources which can result in uneconomic bypass as defined above in response to part (a). A MIL should not be set based on economic cycles of boom and bust. Rather, it should be set to ensure that attraction remains steady through the cycles, based on principles of providing an appropriate economic signal while ensuring a fair return for utilities.
- (c) Table 1, below, sets out typical MIL rates in other jurisdictions alongside present and proposed MIL rates in the Yukon. These should be used as references only, as every jurisdiction has different costs and factor-specific considerations

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(e.g., urban versus rural, density consideration and supply constraints). Within the Application, AEY has provided a detailed MIL Study which considers the level of MIL specific to the Yukon, supported by a cost per lot study and Desktop Study.

Table 1: MILs of Northern and Southern Canadian Electric Utilities

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

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

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

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

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

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-003

Topic: Appendix 2 (For ease of reference regarding changes, Appendix 1 was not used for these IRs)

Reference: Page 4 (PDF 59/115) "Multiple Dwelling" compared to "Single Family Dwelling" [Page 5 (PDF 60/115)]:

Request:

- (a) Is a Single Family Dwelling that develops a separately metered suite (containing a bedroom, living room, and kitchen) in the basement now considered a Multiple Dwelling to be billed at General Service rates?
- (b) Is a Single Family Dwelling that builds a separate building, containing a bedroom, living room, and kitchen that is separately metered, on the same lot, considered a Multiple Dwelling?
- (c) Please explain how the Companies treat each of these two situations.
- (d) Please explain how the Companies accommodate the arrangements for additional dwelling units on existing Single Family Dwelling lots that are being encouraged by the City of Whitehorse.

Response:

- (a) No. The Utilities note that no changes to the definitions of "Multiple Dwelling" or "Single Family Dwelling" are being proposed in this Application. The changes proposed to Section 4.13 of the T&Cs do not impact how billing would occur in this scenario. Pursuant to Section 4.13, absent specific agreement between the Company and Customer as described in that section, each individual separately

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metered unit in a Multiple Dwelling is billed individually on the applicable residential rate.

- (b) No, a separate building, containing a bedroom, living room, and kitchen that is separately metered, on the same lot, is not considered a Multiple Dwelling and would be billed on the residential rate.
- (c) Please refer to the responses (a) and (b) above.
- (d) Pursuant to Section 4.13, and as described with respect to the examples in (a) and (b) above, each individual unit within a Multiple Dwelling is served as a separate Point of Service and billed individually on the applicable residential rate, unless the Company and Customer agree to a different arrangement as described in Section 4.13.

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Received: February 28, 2025**

AEY-YEC-JM-004

Topic: Appendix 2 (For ease of reference regarding changes, Appendix 1 was not used for these IRs)

Reference: Page 5 (PDF 60/115) "Seasonal Service":

Request:

- (a) Why was "Seasonal Service" added to these Terms and Conditions of Service?
- (b) What is the purpose of the clause "...when the overnight temperature is forecast to drop below zero (0) degree Celsius." which follows the two specified time periods which cover the entire year?
- (c) Was this clause intended to apply only to the winter season period of October 15 to April 15 when the temperature could be 0°C or lower on any given day?
- (d) What customer class or classes are eligible for Seasonal Service?
- (e) What rate schedule or schedules apply to Seasonal Service?
- (f) What is the seasonal connection and disconnection process by the Companies?

Response:

- (a) The Seasonal Service definition being proposed is to better define and to provide clarity on when a utility will not proceed with a disconnection because it is too cold. Currently it is at the discretion of the utility which has created ambiguity in the past. Adding the definition will remove ambiguity that exists in the currently approved T&Cs, which do not have a definition.

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- (b) The purpose of the temperature clause is to address abnormal seasonality between April 16 and October 14.
- (c) No. Please refer to response (b) above.
- (d-e) All customer classes are eligible as it relates to the disconnection process.
- (f) Please refer to response (a) above.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
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Received: February 28, 2025**

AEY-YEC-JM-005

Topic: Appendix 2 (For ease of reference regarding changes, Appendix 1 was not used for these IRs)

Reference: Page 5 (PDF 60/115) “Standard Meter”:

Request:

- (a) What is the practical meaning of “means a meter that has the capability of remotely communicating with the Company’s metering network ...”?
- (b) Does this meaning include the capability of remote reads, remote connects, remote disconnects?
- (c) Any other practical functions?

Response:

- (a) Under the grid modernization initiatives being pursued by the Utilities, the Utilities are transitioning from mechanical meters to meters that can be remotely accessed to carry out functions such as remote meter reading, load limiting, reconnect and disconnect functionality. These meters will be connected to an Advanced Metering Infrastructure (AMI) network. For further clarity, the Federal Energy Regulatory Commission (FERC) provides the following practical definition of AMI:

AMI is defined as the communications hardware and software and associated system software that creates a network between advanced meters and utility business systems and which allows collection and distribution of information to customers and other parties, such as

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competitive retail providers, in addition to providing information to the utility itself.¹

- (b) Yes. The Standard Meter will include remote reads, disconnect, and connects.
- (c) No other particular functions at this time. However, the AMIs will play an important role in the future around enabling Time of Use Rates and during the development and implementation of demand side management programs as they provide more of the required interval data.

¹ [Federal Energy Regulatory Commission Survey on Demand Response, Time-Based Rate Programs/Tariffs and Advanced Metering Infrastructure Glossary](#)

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Received: February 28, 2025**

AEY-YEC-JM-006

Topic: Appendix 2 (For ease of reference regarding changes, Appendix 1 was not used for these IRs)

Reference: Page 6 (PDF 61/115) Clause 3.4:

Request:

- (a) Is the clause "... or unless otherwise permitted by legislation." added to enable third party electricity sales only through EV charging stations or are there other applications? If so, please specify all.

Response:

- (a) The proposed addition is not limited to third party electricity sales through EV charging stations. The addition "or unless otherwise permitted by legislation" is intended to allow flexibility for both the utility and customers and promote efficiencies for any future changes in legislation and the energy transition, including EV charging stations. The proposed inclusion does not contemplate any specific legislative change.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-007

Topic: Appendix 2 (For ease of reference regarding changes, Appendix 1 was not used for these IRs)

Reference: Page 7 (PDF 62/115) Clause 3.5

Request:

- (a) This clause would appear to prevent any Customer from signing an easement with the Company (serving this Customer) that would allow the Company to cross any portion of their lot in order to provide service to a new customer. Please clarify the meaning of this clause.
- (b) Is this clause intended to say: A Customer shall not extend or permit the extension *of the Customer's facilities* connected to the Company's Facilities ..."; in other words no new customer may be connected to a Company's Facilities through an existing Customer?

Response:

- (a) Please refer to AEY-YEC-YUB-023(a).
- (b) Correct. The Utilities consider that this would add further clarity. Accordingly, they propose to update Provision 3.5 to add the word "Customer" before "Facilities connected to the Company's facilities" as part of the final T&Cs.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-008

Topic: Appendix 2 (For ease of reference regarding changes, Appendix 1 was not used for these IRs)

Reference: Page 10 (PDF 65/115) Clause 4.4(b)

Request:

- (a) To be grammatically consistent, should not the last word in this subclause be “Customer” singular rather than plural?

Response:

- (a) The Utilities consider that this would add further clarity. Accordingly, they propose to update Clause 4.4(b) to change “Customers” to “Customer” in the final sentence of the clause as part of the final T&Cs.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-009

Topic: Application

Reference: Page 10 (PDF 65/115) Clause 4.5

Request:

- (a) With respect to subclause (a) please also refer to relevant questions on Clause 8.1.
- (b) Subclause (b) is too vague, more specificity is required. For example:
 - i. If a Residential Customer who has a 200 Amp Company connection to their meter upgrades their home electrical panel from 100 Amps to 200 Amps, will they require the Company's written permission?
 - ii. If a Residential Customer who has a 200 Amp Company connection to their meter and a 200 Amp electrical panel but has only been using the equivalent of 100 Amp Connected Load usage, will they require the Company's written permission to add a 50 Amp load to their existing electrical panel?
- (c) Subclause (c) requires more specificity with respect to EV chargers, for example:
 - i. Does a level 1 charger (120 volts, 15 amps – same as an electric kettle) require written permission from the Company?
 - ii. Does a level 2 charger (240 volts, 30 Amps – same as a clothes dryer) require written permission from the Company?

Response:

- (a) The request is unclear; however, to be of assistance please refer to response AEY-YEC-YUB-026.

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- (b) Please refer to response AEY-YEC-YUB-026.
- (c) Similarly, the Utilities would not propose specific parameters, as flexibility is key to ensuring safe and reliable service to customers. For example, balancing customer needs and system capability as more EV charging is being seen on the system.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-010

Topic: Application

Reference: Page 12 (PDF 67/115) Clause 4.8

Request:

- (a) With respect to subclause (b) of the existing Terms and Conditions of Service, the table provided for cost sharing for very expensive Extensions of Service of 10 years because the original Customer would be paying for this extension of service for 10 years through local improvement charges while free loaders could, in prior Electric Service Regulations connect after 5 years without paying any contribution.
- i. Why have the Companies now proposed to eliminate the 10-year cost sharing period rather than just change the threshold cost for the cost sharing?
 - ii. Since the existing Terms and Conditions of Service came into effect in 2011, how many projects have each of (1) YEC and (2) AEY had that were eligible to be cost shared over a 10 year period and how many actually did result in cost sharing?

Response:

- (a) (i) Please refer to the response to AEY-YEC-YUB-028(d).
- (ii) The Utilities do not specifically track the number of projects that would be eligible for cost sharing. Based on a high-level historical review, the number of projects from 2011-2024 that resulted in cost sharing are 48 for AEY and 5 for YEC.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-011

Topic: Application

Reference: Page 12 & 13 (PDF 67 & 68/115) Clause 4.10

Request:

- (a) Please clarify if this clause applies to an existing **Customer** or only to a prospective new **customer**. If (existing) Customers are charged differently from prospective (new) customers, please clarify what charges and credits apply in each case.
- (b) In subclause (a) please list:
 - i. The typical Facilities components that are reused by the Company and describe how the reuse values are determined, and
 - ii. The typical Facilities components that are not reused by the Company and describe how the scrap values are determined.
- (c) In subclause (b) **assuming that this Clause 4.10 is approved by the Yukon Utilities Board as written**, would an existing **Customer** converting to underground service from overhead service pay for the actual cost less the new approved Maximum Company Investment as specified in Schedule B regardless of the then MIL amount invested by the Company at the time this Customer's present location was first provided with electrical service, or the difference between them?

Response:

- (a) This would apply to both existing and new customers when requesting that existing Company Facilities be converted from overhead to underground.
- (b) (i-ii) The facilities components to be reused in overhead-to-underground conversion projects are determined on a case-to-case basis. Typically, very

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few overhead assets can be used when facilities are converted from overhead to underground. Transformers have salvage value in an overhead-to-underground conversion. Typically, the salvage value of a transformer is 50 percent of the cost of a new unit.

- (c) The customer converting to underground service from overhead service pays the actual cost.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-012

Topic: Application

Reference: Page 13 (PDF 68/115) Clause 4.13

Request:

- (a) Both YEC and AEY are expending efforts to “modernize” the grid. Electric heat and the attendant increase in peak YIS loads has been a concern for the Companies and an expense to all Customers as YEC has had to increase diesel rentals. The Companies have instituted a Peak Smart program and participated in or supported others like the Electric Thermal Storage and heat pump programs in an effort to minimize present and future peak loads and winter energy demands. It would stand to reason that with the increase in the number of condominium buildings being built that the Companies would also direct efforts at improving electrical efficiency in these. However, the effect of subclause (a) is to encourage electric baseboard heat in Multiple Dwelling units and to discourage larger building-wide and more electrically efficient shared heating systems by metering them at the General Service rate rather than at the residential rate.
- i. Why have the Companies not modernized the ways in which such shared and more electrically efficient systems are treated so that the common use portions of such systems are billed at the General Service rate, but the portions used by the individual Single Family Dwelling units are billed at the Residential rates?

Response:

- (a) (i) The Utilities note that Clause 4.13 applies regardless of the type of electrical system used in multiple dwellings. Rather, the provision provides guidance on the usage of electricity and the applicable rates. The proposed wording change in Section 4.13 is intended to clarify that “common use areas such

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as hallways, lobbies, and laundry rooms, elevators, and parkades will be billed under the applicable general service price schedule” which would be under the General Service rate. In addition, the Section provides guidance on the Application of individual units, specifically, “each individual unit within a Multiple Dwelling will be served as a separate Point of Service and billed individually on the applicable residential rate”.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-013

Topic: Application

Reference: Page 16 (PDF 71/115) Clause 5.5

Request:

- (a) When a prospective new customer requests an electrical Service that requires brushing on the new customer's property, does the Company provide the surveying for and the flagging of the area to be brushed, including marking any adjacent danger trees identified, and a written copy of the standard of brushing that must be met?
- (b) Where an existing Service on a Customer's property is in need of brushing, does the Company alert the affected Customer to this need, provide a hard copy of the standard to that Customer, and a reasonable time frame within which that brushing must be completed? If not, by what process is the brushing completed?

Response:

- (a) Yes.
- (b) Pursuant to Section 5.3 of the T&Cs, in the case of vegetation management needed in the vicinity of the low voltage (service drops or secondary) distribution on the Customer's property, which is the responsibility of the Customer, in circumstances where the Utilities identify a concern at a customer premise, the Utilities provide information to the customers about the brushing requirements. No specific timeline is given for the completion of brushing.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-014

Topic: Application

Reference: Page 17 (PDF 72/115) Clause 6.1

Request:

- (a) With respect to sub clause (c), please describe the features of a “Standard Meter” as of the date of the response to this IR. Subject to the Company having the appropriate supporting infrastructure is this meter capable of:
- i. Remote meter reads?
 - ii. Remote disconnects and connects?
 - iii. Any other AMI functions? If so please list them.
- (b) Once these AMI functions are operational for any Customers, how will the cost based fees outlined in Schedule D change?

Response:

- (a) Implementation of AMI meters – regarding standard meter - are ongoing for the Utilities. Below are the intended purposes of the AMI meters:
- i. Please refer to AEY-YEC-JM-005(b).
 - ii. Please refer to AEY-YEC-JM-005(b).
 - iii. Please refer to AEY-YEC-JM-005(c).

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- (b) Given the early stages of transition to remote capable meters infrastructure connects and reconnects are currently still occurring manually, which is reflected in the cost of a typical connect/reconnect being proposed in Schedule D. As more remote capable meters are installed, the Utilities anticipate that the cost of connection and reconnection fees will be reduced overtime.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-015

Topic: Application

Reference: Page 20 (PDF 75/115) Clause 7.2

Request:

- (a) With respect to subclause (f) the actual time periods between meter readings can presently vary from 28 days to 34 days without proration of rate blocks based on the number of days in the billing period. With the implementation of AMI and remote reads will the reading periods be automated to always be 30 or 31 days, or will the reads always take place on the same calendar day of the month?

Response:

- (a) The Utilities do not intend at this time to change the way billing cycles / periods will operate in the transition to remote meter reading.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-016

Topic: Application

Reference: Page 23 (PDF 78/115) Clause 8.1

Request:

- (a) For Residential Customers please define in absolute and percentage terms what is meant by “any material change in Connected Load”.
- (b) What are the metrics that define a “any material change in Connected Load” for General Service customers of different sizes?
- (c) Does this include any increase in Connected Load that is still within a Company’s Facilities capacity at the Customer’s meter? For example if a Customer with a Connected Load of 60 Amps on a 100 Amp electrical panel, but with Company Facilities capable of delivering 100 Amps to the meter, installs a new 30 Amp load (for example a 30-Amp clothes dryer or level 2 EV charger) must they give the Company prior written notice?
- (d) Does this clause only apply when a Residential or General Service Customer wishes for the Company to increase the Company’s Facilities amperage capability to the meter beyond the existing capability of the service, for example increasing a service capacity from 100 Amps to 200 Amps to the meter to accommodate the installation of electric heat?
- (e) Is this clause intended to include any change in the time and energy usage of the existing Customer Connected Load?

Response:

- (a) The Utilities emphasize the importance of working with customers to determine changes in electricity usage to ensure proper planning of generation and

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infrastructure. The Utilities are not proposing pre-established parameters to define a "material change in Connected Load". Rather, this provision would enable flexibility for the utility and customers to work together as energy transition unfolds and customer behaviors change over time.

- (b) Please refer to the response to (a) above.
- (c) Yes, the intent of this clause is to enable the Utilities and customers to collaborate to assess changes in electricity usage that might impact the capacity of the system (peak demand) to facilitate optimal planning of generation and infrastructure. In most cases there is not an issue with adding load such as dryer or hot tub; however, in some situations the load addition does not meet present day standards for capacity or voltage drop. It is in the best interest of both the utility and customers to collaborate to optimize system planning and ensure safe and reliable service.
- (d) The proposed changes are not specific to or limited to amperage changes. The intent of this clause is to enable the Utilities and customers to collaborate to assess changes in electricity usage that might impact the capacity of the system (peak demand) to facilitate optimal planning of generation and infrastructure.
- (e) No. The intent of this clause is not to capture any change in the usage of the existing Customer Connected Load. The intent is to enable the Utilities and customers to collaborate to assess changes in electricity usage that might impact the capacity of the system (peak demand) to facilitate optimal planning of generation and infrastructure.

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AEY-YEC-JM-017

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

**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-017

Topic: Application

Reference: Page 23 (PDF 78/115) Clause 8.3

Request:

- (a) If an existing Residential Customer with a Company overhead service capable of 100 Amps wishes to upgrade their service to 200 Amps, requiring new Company Facilities will the Customer have to pay:
 - (i) All costs less the estimated salvage values, OR
 - (ii) All costs less the estimated salvage values and less the new MIL level of \$10,337, OR
 - (iii) All costs less the estimated salvage value less the difference between the new MIL level and the MIL level applied when that residence first received service from the Company?
 - (iv) Would the Company automatically use a salvaged (used) but serviceable transformer if available in preference over a higher cost new transformer?
- (b) Should, in (a) above, the Customer be the only Customer being serviced from a transformer, would the Company replace the transformer with one capable of meeting only the higher load requested by this single Customer and no larger? Or the next standard larger size?
- (c) Should, in (a) above, the Customer be served by a shared transformer serving all the connected Customers with 100 Amp service, would the Company replace the transformer with:
 - (i) one able to meet only that one requesting Customer's additional load? Or

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- (ii) Given the increased electrification trends would the Company take the opportunity to replace the transformer with one having the capacity to serve all connected Customers with 200 Amp service?
- (d) If the answer in (c) above is ii, would the originating Customer in (a) above be charged with the entire cost of the larger transformer or would the Company split the increased cost among all the connected Customers up to the new MIL levels (or the difference between the original MILs and the one in effect at the time of replacement)?
- (e) Further to (d) above, should a transformer serving 3 or more connected Customers have the capacity to serve one Customer with an upgraded 200 Amp service but not two, how would cost of a larger transformer be split between each of: the first Customer who received 200 Amp service, the second Customer who requested 200 Amp service, and the remaining customers receiving 100 Amp service?
- (f) Are Commercial Customers (receiving service under the General Rate class) treated in a manner similar to the Residential Customers above, with respect to Company investments up to the new MIL level and with respect to shared Facilities?

Response:

- (a) (i-iv) Existing customers are responsible for the cost as identified in the request i-iv of their service upgrades. MILs would not be applicable in this example since there are no new extensions as described in Clause 4.8.
- (b) Transformers are sized according to current and future load requirements.
- (c) Please refer to the response (b) above. Transformers are sized based on load requirements including forecast load growth and number of customers served.
- (d) Please refer to responses to (a) and (b). For existing customers, MILs will not be applicable. Where multiple residential customers are fed from shared utility infrastructure, upgrades to the shared facilities are considered system costs when the facilities cannot serve the expected typical loading for the area.

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- (e) Please refer to the response to (d) above. Customers would be responsible for their service upgrades from 100 Amps to 200 Amps. Customers remaining on 100 Amp service will not have any cost impact.

- (f) Similar to existing residential customers, MILs would not apply for upgrades related to service to existing commercial customers, since MILs apply only in the case of new extension services. Upgrades to shared infrastructure may be considered system costs if there is a benefit to the system.

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

**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-018

Topic: Application

Reference: Page 24 (PDF 79/115) Clause 9.1, last sentence below subclause (c):

Request:

- (a) Please elaborate on who "... [C]ustomers with their own generation." are. Do these Customers include Residential Customers with microgeneration systems, or a generator that can be connected to a meter base (as are advertised locally), or any other Residential Customer's generation systems?

Response:

- (a) The Utilities understand this request to be referring to the last sentence of Clause 9.2. "Customers with their own generation" include residential customers with micro-generation and any other generation system.

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

**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-019

Topic: Application

Reference: Page 36 (PDF 90/115) Schedule D

Request:

- (a) Which of these charges will change when AMI is operational and actual costs for labour (e.g. for meter reads) decrease?

Response:

- (a) It is anticipated that once AMI is operational, the connection and reconnection fees should decrease with AMI's capability for remote connect/reconnect. These charges will be reviewed once the AMI capabilities are available and commonly used throughout the Yukon.

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AEY-YEC-JM-020

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

**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-020

Topic: Appendix 3 MIL Study

Reference: Page 4 (PDF 96/115) Table 3 Handy-Whitman Index

Request:

- (a) Is it fair to assume that since the MIL study was dated December 2024 and that actual data for the Handy-Whitman Index was available for 2023, that this data will continue to be about 1 year behind Consumer Price Index (CPI) data?
- (b) Is the Consumer Price Index referenced here the Statistics Canada CPI for Whitehorse? If not why not?
- (c) Would it be fair to conclude that in the most recent 5 years of actual Handy-Whitman Index data there have been some substantial variations from the CPI?

Response:

- (a) No, this would not be the case. AEY is requesting to set the MIL rate as of 2025 as final. Further, the Utilities are seeking CPI to be applied annually to the MILs and Fees and Service Charges when a rate case is not in front of the Board. This approach is suggested for its simplicity and because the Handy-Whitman index is typically one year behind. In the subsequent years it proposes to apply a 12-month average of CPI for Whitehorse is being proposed to be applied annually to the MILs and Fees and Service Charges when a rate case is not in front of the Board.
- (b) Yes, the CPI referenced in the Application is the Statistics Canada CPI for Whitehorse.

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- (c) The Handy-Whitman Index data has varied from the CPI in recent years. However, Handy-Whitman Electric Utility Construction Cost Indexes (HWIs) is a better representation of the electric utility business, including, for example, impacts of supply costs specific to the utility industry. Please refer to response to (a) above.

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AEY-YEC-JM-021

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

**Information Responses Round 1 to:
John Maissan (JM)
Received: February 28, 2025**

AEY-YEC-JM-021

Topic: Appendix 3 MIL Study

Reference: Page 21 (PDF 113/115) Paragraph 58

Request:

- (a) In Paragraph 58 the Companies say that it is appropriate that MIL levels should reflect or approximately reflect actual changes in costs. Is it appropriate to conclude this means that the MIL levels should reflect changes in the Handy-Whitman Index?
- (b) The Companies asked the Board to direct them to provide annual updates in December of each year using the appropriate CPI index to annually inflate the following year's MILs until the next MIL study (Application Page 6, PDF 8/115). What is to prevent the Companies from including in that annual update a correction for the MIL inflation factor for the year of the December filing in addition to a correction to the prior year adjustment for the difference between the Handy-Whitman Index and the CPI? This would then consist of the following for the December 2025 update filing to take effect in 2026:
 - 1. To reflect the difference between the Handy-Whitman Index and CPI for the year 2024: the actual Handy-Whitman Index for 2024 less the actual CPI for 2024 (whether positive or negative); plus
 - 2. The actual CPI for 2025.

Such an approach would more accurately reflect the appropriate inflation for MILs on a year to year basis. This approach would have the advantage of having the MILs reflect a potential downward adjustment that may result from a downward movement of the Handy-Whitman Index following several years of very high inflation in this Index. Please respond.

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Response:

- (a) Please refer to AEY-YEC-JM-020(a). AEY has used the latest available information for Handy-Whitman which was 2023, and projected the 2024 and 2025 periods based on the historical 10-year average. Balancing regulatory efficiency and fairness must be considered. AEY believes that the approach taken in the Application strikes that balance.

- (b) The Utilities have requested to set as final the 2025 MIL within this proceeding at the values proposed in the Application (with the assumed Handy-Whitman as presented in Table 3). On a go-forward basis, the Utilities are proposing to apply CPI for Whitehorse annually to the MILs and Fees and Service Charges when a rate case is not in front of the Board. In consideration of Driven by striking the balance between regulatory efficiency, fairness and administrative ease, AEY does not consider that revising the 2026 MIL with actual Handy-Whitman figures for 2024 and 2025 should be required, as it would be inefficient.