

March 14, 2025

AEY-YEC-UCG-001

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

**Information Responses Round 1 to:
Yukon Utilities Consumer's Group (UCG)
Received: February 28, 2025**

AEY-YEC-UCG-001

Reference: Application dated December 20, 2024

Request:

- (a) Please provide details of all customer and stakeholder consultations conducted by ATCO Electric Yukon and Energy Corporation during development of this application prior to submitting it to the YUB.
- (b) Please provide specific details on how customers were informed of proposals being considered for inclusion in the application and how input from customers was used to develop details of the application.
- (c) Please provide all documentation related to issues discussed during these consultations and a list of all parties involved in the consultations.
- (d) Please confirm how and when the leadership / owners of AEY and YEC approved the Application as provided to the YUB. Please identify the dates on which these approvals were provided.

Response:

- (a-c) Please refer to the responses AEY-YEC-YUB-001 and AEY-YEC-YUB-036(d).
- (d) Final approval from the Utilities' leadership was provided prior to the filing of the Application on December 19, 2024.

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AEY-YEC-UCG-002

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

**Information Responses Round 1 to:
Yukon Utilities Consumer's Group (UCG)
Received: February 28, 2025**

AEY-YEC-UCG-002

Reference: Application dated December 20, 2024

Request:

- (a) Provide the details of how any changes (i.e. increased fees and charges) in the T&Cs will be accommodated in the revenue requirement for the 2025 year to account for any new increased revenues resulting from this process.
- (b) Provide details of how these increased T&C charges will be accommodated in the revenue requirement for each of the following non-test years (after 2025) preceding any new GRA filing to account for increased revenues.
- (c) Will these changes in T&C charges result in a rider to reimburse ratepayers until a GRA sets these revenues into the requirement?

Response:

- (a-b) Neither of the Utilities will be seeking alterations to their revenue requirements for 2025 with respect to the changes in MILs and Schedule D (Fees and Service Charge Summary). For regulatory efficiency, the Utilities intend to utilize the figures approved for both MILs and Schedule D in their next respective rate applications filed after the approval date. The Utilities will forecast the charges using the approved rates and apply the amount to the revenue requirement for both the fees and charges and updated MILs in their next rate application.
- (c) No. The Utilities are not requesting a Rider with respect to changes to the T&Cs to reimburse ratepayers until the next GRA, nor will the Utilities be seeking a Rider for the changes in MIL amounts.

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AEY-YEC-UCG-003

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

**Information Responses Round 1 to:
Yukon Utilities Consumer's Group (UCG)
Received: February 28, 2025**

AEY-YEC-UCG-003

Reference: Application dated December 20, 2024

Revised Terms and Conditions of Service – Prepared by the Utilities. Changes focused on modernizing the T&Cs to address elements such as grid modernization efforts and different loads in Isolated Communities

Request:

- (a) Provide details of each grid modernization and how each of these affects T&Cs.
- (b) Provide details of different loads in isolated communities affect on T&Cs.

Response:

- (a) The Utilities note that it has been over a decade since the T&Cs were last reviewed. The main changes proposed to the T&Cs related to grid modernization include:
 - The Utilities' anticipated transition to the use of AMI meters has been incorporated into the T&Cs with the addition of a definition for "Standard Meter" and the incorporation of terms related to the installation of Standard Meters in section 6 and related fees in Schedule D of the T&Cs.
 - Defining and setting out requirements for Customer Generation, in order to provide clarity on existing processes and requirements when a Generating Customer requests service.
 - Additional clarification in clause 4.5 to address changes in electricity loads in communities (e.g., heating and EV charging) to assist in the management

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of significant load changes, as further described in response AEY-YEC-JM-001.

- (b) Different loads in isolated communities can relate to electric heating or EV charging. It is imperative that customers and utilities in isolated communities work together to ensure the utility can properly plan generation and infrastructure needs to ensure safe and reliable service.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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Received: February 28, 2025**

AEY-YEC-UCG-004

Reference: Application dated December 20, 2024

5. While the current T&Cs continue to provide the guidance needed between the customer and the utility, upon a detailed review of the T&Cs, the need to modernize the T&Cs to address different circumstances which were not present in 2011, when the T&Cs were last approved, was identified.

Request:

- (a) Provide details of all circumstances not present in 2011.
- (b) Explain why each utility has not applied for T&C updates each time they have filed a GRA

Response:

- (a) Please refer to AEY-YEC-UCG-003(a). Examples of new circumstances since 2011 include the initial implementation and deployment of AMI meters, micro-generators being connected to the electrical system and increased loads in communities due to EVs or electric heat.
- (b) The proposed changes to the T&Cs are focused on enhancing clarity, transparency and ease of understanding of the provisions under which electricity service is provided, and to address new circumstances as noted above. Generally, the T&Cs as approved in 2011, have provided sufficient guidance to both customers and the Utilities with respect to the provision of electrical service. Accordingly, it was not necessary to update the T&Cs on a frequent basis. As the energy transition unfolds, the T&Cs require updating to enable customers and the Utilities to continue to work together efficiently and effectively.

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

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Received: February 28, 2025**

AEY-YEC-UCG-005

Reference: Application dated December 20, 2024

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Customer Generation

6. The Utilities have expanded Section 3.6 Customer Generation to ensure safety, compliance, and clear communication between the Utilities and generating customers. By requiring all necessary permits, licenses, and authorizations before starting or changing service, the Utilities can ensure that all interconnections meet regulatory and technical standards.

Request:

- (a) Explain how the utilities ensured safety, compliance and clear communications before this newer more expensive policy now being requested.
- (b) Discuss the similarities and differences of new and old policy.
- (c) Explain how the utilities met the conditions requiring all the necessary permits, licenses and authorizations prior to this new policy change.

Response:

- (a-c) The Utilities work with Generating Customers to ensure safe and reliable service and proper connection to avoid any unintended consequences such as creating downstream system issues, safety issues or reliability concerns. The Utilities currently require all necessary permits, licenses and authorizations prior to connecting Generating Customers even though the requirement is not specifically codified in the current T&Cs. The proposed wording excerpted above provides clarification rather than substantive changes in the application process.

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

**Information Responses Round 1 to:
Yukon Utilities Consumer's Group (UCG)
Received: February 28, 2025**

AEY-YEC-UCG-006

Reference: Application dated December 20, 2024

SECTION 3: MAXIMUM INVESTMENT LEVELS (MILs)

15. Appropriate MILs balance intergenerational equity, the utility's obligation to serve, and the opportunity to earn a return. An imbalanced MIL can lead to issues such as uneconomic bypass, intergenerational inequity (e.g., new customers subsidizing existing ones), and depriving the utility of a fair return on assets it owns and operates.

Request:

- (a) Provide each of the MILs (new extensions of service for each year 2012 to 2024, separating costs (customer/utility).
- (b) Explain if a MIL would stand for all new additions and extensions to the distribution grid or the Integrated Grid.
- (c) Were all the new connections to Whistle Bend under this policy?
- (d) Explain how an asset that is partially paid for by a new customer is completely owned by a utility and therefore required a fair return on the total cost of such asset.

Response:

- (a) It is not clear whether this request is seeking past project cost information or MIL information. AEY provides the following in an effort to be helpful. Please refer to the Application, Appendix B, which provides project cost information.¹ The data in Appendix B is organized into tabs for each service type. The cost per site for each

¹ 2024-12-20 Appendix B - MILs Study - Excel.xlsx.

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project and for the whole period is provided in the service type dataset, under column “Cost, average (\$/site)” in each service type tab. The Company Investment is this value, limited by the MIL. If the value exceeds the MIL, the portion above the MIL is the Customer Contribution. This calculation is implemented, in present value, in the supporting data for “Figure - Company Investment: Proposed vs. Approved MIL”. Please also refer to the reply to AEY-YEC-YUB-041(a) for further explanation.

The approved MIL values from 2011 and applicable for the 2012 to 2024 period are as follows:

- Residential Single Family: \$1,500/site;
 - Residential Multiple Dwelling: \$725/site;
 - General Service: \$690/kW; and
 - Street Lighting: \$1,240/light.
- (b) The MIL is applied to new extensions to the distribution grid, regardless of whether or not they are connected to the Integrated Grid.
- (c) AEY assumes that the reference to a policy refers to the MILs Study filed in the Application. The historical project cost data used in the MILs Study included several connections in Whistle Bend, encompassing Residential, General Services, and Streetlights extensions. Projects that were not completed by December 2023 were not included in the study.
- (d) The quote “depriving the utility of a fair return on assets it owns and operates” refers to the fact that the contribution portion is an offset to rate base and a return is not earned on that portion. A MIL that is set too low may deprive the utility of the opportunity to earn a fair return because the contributed portion of a project cost is an offset to rate base, even though the utility is the owner of the project assets and is

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responsible for operating and maintaining them. Furthermore, setting the MIL too low results in a distorted price signal to customers as they are required to pay a large up-front payment to obtain service to the electrical grid. Thus, as cited in the Application, it is the Utilities' position that an appropriate MIL, as requested in the Application, balances the interest of both the customer and utility.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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AEY-YEC-UCG-007

Reference: Application dated December 20, 2024

SECTION 3: MAXIMUM INVESTMENT LEVELS (MILs)

An appropriate MIL also contributes to the strength of the Yukon economy by providing a proper signal for upfront costs which may deter new connections if set too low.

Request:

- (a) Indicate why a private or a public utility should set policy to advocate government economic strategy.

Response:

- (a) The Utilities are not proposing to set policy to advocate for any government economic strategy.

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AEY-YEC-UCG-008

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

**Information Responses Round 1 to:
Yukon Utilities Consumer's Group (UCG)
Received: February 28, 2025**

AEY-YEC-UCG-008

Reference: Application dated December 20, 2024

SECTION 3: MAXIMUM INVESTMENT LEVELS (MILs)

17. Given the established principles and cost per lot methodology, AEY has conducted a detailed MILs study focused on the cost per lot methodology, including alternative analysis – i.e., desktop study – which supports the proposed MILs.

Request:

- (a) Explain who performed the detailed study focused on cost per lot methodology?
- (b) At what cost?
- (c) Is this the same methodology as used for the last MIL? Explain.
- (d) Was the last MIL study done by the same consultant firm?
- (e) Explain who performed the desk top study.
- (f) Explain if this desktop study was independent of the utilities.
- (g) If not, why not?

Response:

- (a-b) The detailed MIL Study was conducted by AEY internal staff.
- (c) A similar methodology was adopted in the current study. Both studies looked at a relevant sample of historical costs and applied the cost per lot, cost per kW and cost per light) methodologies. The present study was based on a more extensive

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AEY-YEC-UCG-008

dataset that allowed the use of median values, instead of the average, and the specific calculation of Residential Multiple Dwellings projects.

- (d) AEY used internal resources to conduct both the current and previous MIL Study.
- (e-g) The Desktop Study was conducted by AEY internal staff. A consultant was not engaged. AEY personnel are best positioned to conduct the study due to their detailed knowledge of the various service types and the costs involved.

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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-UCG-009

Reference: Application dated December 20, 2024

7.1 Meter reading

30. Finally, for meter disputes, the meter accuracy test handling fee applies to self contained meters and instrument meters are handled by Measurement Canada to ensure standardization and accuracy. The new fees are proposed at \$250 and \$500 compared to the previous fees of \$100 and \$200, respectively. These charges reflect the actual time and resources required for each meter dispute

Request:

- (a) Explain why there is not a dispute resolution mechanism with set parameters giving a balance of customer and utility interest regarding disputes on possible faulty meters.
- (b) Explain why is there an automatic charge to the customer to get a meter under dispute tested?
- (c) Is this refundable? If so, why is this not in the policy program?
- (d) Explain why such meter dispute costs are necessary to be up-front payed by the customer and not after the meter has been tested to demonstrate cause. For example: a customer be notified that meter being disputed, which after being tested is shown to be in compliance, then the customer will be charged on the next billing for that testing. If the meter is non-compliant then this will be paid for by the utility revenues and not added into the rate base

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Response:

- (a) The Utilities follow a meter dispute process when a metering concern is identified. This is a step-by-step process up to and including submission of the meter in question to Measurement Canada for testing.
- (b) If a meter test is requested by the customer, the meter at issue is retrieved from the field and sent for testing. The costs of testing are collected from the customer.
- (c) If the meter is found to be defective the amount is refunded back to the customer.
- (d) These costs are borne by the customer as this is a customer request to provide a service up-front, rather than awaiting the results of the meter test.

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

**Information Responses Round 1 to:
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Received: February 28, 2025**

AEY-YEC-UCG-010

Reference: Application dated December 20, 2024

Updates to Fees and Service Charges

31. Similar to the proposal for MILs, approval is also sought to use the CPI for Whitehorse, Yukon, which will be applied annually (prior to January 1st of the following year) in years when the Fees and Service Charges are not being updated via a regulatory filing, to keep up with inflation on an ongoing basis. Updates to the Fees and Service Charges can be filed with the Board through a no-notice application in December to be effective the following year

Request:

- (a) Provide inflation index for each year 2012 to 2024.
- (b) If the increase requested in the new MIL is greater than the accumulated inflation since the last changes to T&Cs, provide reasons.
- (c) Is the ratio between customer investment and MIL investment the same as 2011?
- (d) If not, explain reason why?
- (e) Does this policy update request suggest that the utilities are applying that the CPI index be added to the MIL and the Fees and Services for each new year following this process rather than going through a T&C review?
- (f) If so, is this not a new regulatory method being requested?
- (g) Is this new method standard regulatory principles used in other jurisdictions? Give examples from other jurisdictions

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Response:

- (a) Please refer to response AEY-YEC-YUB-040(d).
- (b) The proposed MILs have been developed using a cost per lot/kW//fixture methodology, reflecting the specific costs associated with providing electricity service, including construction, equipment, and labour. Amounts determined using the applicable methodology were then compared with other methodologies, such as a Desktop Study and inflated 2009 cost per lot information. Simply utilizing the 2011 approved MILs and inflating based on CPI does not reflect the true cost of each service. CPI is a general inflation factor that measures the average changes to prices from a broad basket of customer goods and services, including food, clothing, and housing, among others. The CPI therefore does not accurately reflect the electricity sector and AEY is of the view that the methodology employed in the MIL Study is more reliable.
- (c) No, the ratios between Customer Contribution and Company Investment are not the same as in 2011.
- (d) In determining an appropriate MIL, as discussed in the MIL Study, AEY has conducted a comprehensive study which looks at the cost per lot, in addition to a Desktop Study for reasonability. The cost ratio is an outcome of the MIL Study; however, it should not drive the MIL amount. The variation of the ratio over time highlights the importance of periodically updating the MILs Study and adjusting MILs annually.
- (e) No. The Utilities are seeking approval to apply the Whitehorse CPI annually in years when the MILs and the Fees Schedule are not being updated to ensure ongoing alignment with inflation. Procedurally, updates to the MILs and the Fees

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Schedule will continue to be filed with the Board through a no-notice application every year.

This request strikes a balance between ensuring the MILs and the Fees Schedule remain aligned with cost escalations while recognizing that MILs and the Fees Schedule will not be reviewed in detail annually and promotes regulatory efficiency.

- (f) AEY is not proposing a new regulatory method. New MIL studies will still be conducted, and T&Cs reviews will continue to be conducted, as needed or as directed otherwise by the Board.
- (g) The proposal to update MILs, fees and charges annually based on inflation in years between larger proceedings is common. For instance, it is applied for Alberta distribution utilities during their annual rate filings in September.

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AEY-YEC-UCG-011

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

**Information Responses Round 1 to:
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Received: February 28, 2025**

AEY-YEC-UCG-011

Reference: Application dated December 20, 2024

Connection/Disconnection Fees

Request:

- (a) In many cases, can not a connection or disconnection be accomplished by flipping a switch at the warehouse?
- (b) If yes, why is there a charge for this?
- (c) In many cases disconnection is often to families most vulnerable to the economic conditions of the day, causing more financial drama and greater trauma added to the daily needs of having electricity for heat as well as food preparation and safety in their homes. How is this taken into consideration by each utility? Please give actual details of how this is handled, not a generic response

Response:

- (a) Currently there is no remote switch capability. Connection and disconnections need to be performed manually on site.
- (b) N/A.
- (c) Utility employees consider each situation on a case-by-case basis and work with customers on keeping their accounts in good standing to avoid disconnection. Payment plans are often worked out with customers to allow for gradual payback on arrears.

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

**Information Responses Round 1 to:
Yukon Utilities Consumer's Group (UCG)
Received: February 28, 2025**

AEY-YEC-UCG-012

Reference: Application dated December 20, 2024

Schedule A: Standard Supply Specs

Request:

- (a) Explain the difference in 240/120V and 208Y/120V.
- (b) Explain what each is used for and difference in costs

Response:

- (a) These are different types of single-phase supply for Residential and General Services:
 - a. 240/120V: Provided in locations where a single-phase transformer is the best solution. The Utilities often supply single-phase for single family homes and businesses not requiring significant loads. The 120V is for regular building circuits, and the 240V is for larger appliances such as ranges and hot water tanks.
 - b. 208Y/120V: Provided in locations where a three-phase transformer is the best solution. The Utilities often serve apartment buildings and in downtown areas with higher load density with three-phase transformers. The service to each meter uses two of the 120V phase conductors from the three-phase transformer: 120V for regular building circuits, and 208V for larger appliances such as ranges and hot water tanks.
- (b) Please refer to the response to part (a) regarding what each is used for. There is no differentiation in the rates charged between single phase 240/120V and single phase 208Y/120V. Costs of installation may differ depending on the specific design and customer requirements.

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AEY-YEC-UCG-013

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**Information Responses Round 1 to:
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Received: February 28, 2025**

AEY-YEC-UCG-013

Reference: Application dated December 20, 2024

The Maximum Company Investment Levels set out in this Schedule are effective **January xxx 1xx, 2011xx.**

1. Subject to the provisions of paragraph 2 of this Schedule B, the maximum Capital Cost which the Company will incur to extend Service to a Point of Service (herein referred to as the "Maximum Company Investment") shall be determined as follows. Under no circumstances would the Maximum Company Investment exceed the Customer extension cost:

(a) Residential Service:

\$1,500 **10,337** per single family dwelling; and \$ 725 **2,645** per Multiple Dwelling unit

(b) General Service:

\$690 **1,801** per kW, which shall not be less than five kilowatts, provided that if the estimated service life is less than 25 years or seasonal, then the Maximum Company Investment shall be determined in the manner described in paragraph 2; At the end of one year of Service the Company will re-assess whether the Customer's estimates of their Demand were accurate and, if the loads are significantly different than originally estimated, will collect from the Customer (or refund) any contributions, that are required based on the Maximum Company Investment rules in place when the contribution was originally paid.

(c) Municipal Street Lighting:

\$1,240 **6,649** per light.

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Request:

- (a) Explain why residential single family increased 590% while multiple dwellings only went up 265% and general service only 161% since last filing.
- (b) Explain why single family residential MIL was only twice the amount of multiple last filing but 4 times this filing.
- (c) Explain why street lighting went up 440% since last filing.
- (d) Where and how much of the MIL company costs were administered in the last GRA. Demonstrate directly from the application or the compliance filing?
- (e) Does each utility add the difference in actual costs and the MIL to extend a project into capital costs or some other area of the books? Explain.
- (f) If the answer to e) is yes, demonstrate where and how much from the last GRA

Response:

- (a) AEY has conducted a comprehensive MILs Study for each MIL class, utilizing 10 years of historical data with a relevant sample size of projects to establish appropriate MILs that reflect actual project costs. This was supplemented by a Desktop Study to assess reasonableness. The different percentage increases reflect the uniqueness of each service type, including development trends such as sizing, density, bylaw requirements, etc., captured in the individual MIL class assessments.
- (b) The currently approved value of \$725 per multiple dwelling was approved using a simple methodology of taking half of the Single-Family dwelling. As noted in the response to (a) , the MIL Study included in the Application considered each service type separately and was based on relevant historical project cost data. As stated in paragraph 32 of the MIL Study, AEY considers the difference between residential and multi-residential is mainly due to the change in the methodology, as the currently proposed value was derived from a cost-based approach rather

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than simply taking 50 percent of the Single-Family value as was done in the 2009 Study.

- (c) Please refer to the response to (a). The MIL Study employed a robust methodology and the proposed changes with respect to street lighting reflect current consideration of a broad range of project data, including data on various extension lengths and numbers of customers, for both underground and overhead services.
- (d) AEY is not sure what information this request is seeking but provides the following in an effort to be helpful. AEY's last GRA application did not include a review of the MILs. Instead, by letter¹ dated March 31, 2023, the Board directed the Utilities to update the MILs. In response to that letter, the Utilities are addressing updates to the MILs as part of this standalone limited scope filing. Please also refer to the responses to (e) and (f) below.
- (e) The cost of a new extension project is included in capital costs net of any contribution from customers, as applicable.
- (f) Schedule 8.5 included in the AEY 2023-2024 GRA Application – Omission and Updates filing² shows annual capital addition and contributions, further details are presented in Schedule 8.12 of the same filing. YEC's 2023/24 GRA, Tab 5, Tables 5.2-5.6 under distribution function include annual capital additions and contributions ["customer extensions" and "customer extensions contributions"].

¹ Letter referenced in 2023-2024 AEY GRA-Application.PDF pp. 2 and 3.

² https://yukonutilitiesboard.yk.ca/pdf/AEY_2023-24_GRA/AEYs_Omissions_Updates_-_Clean.pdf.

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**ATCO Electric Yukon (AEY) & Yukon Energy Company (YEC)
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Received: February 28, 2025**

AEY-YEC-UCG-014

Reference: Application dated December 20, 2024

Schedule D: Fees and Service Charge

CUSTOMER USAGE INFORMATION REQUESTS

Applies to historical usage information requests with written authorization of the Customer (3.8) Company's actual cost (min \$75.00)

SUPPLEMENTARY METER READS

Standard Meter reads (3.8) \$11.00 (per read per meter)

Non-Standard Meter reads (in person) (3.8) \$87.00 (per read per meter)

LATE PAYMENT AND DISCONNECTION

Collection Fee (4.15, 7.4) \$30.00 45.00 (personal visit) Late Payment Charge (7.4): 1.5% per month (19.56% per annum)

Dishonoured Payments Fee (7.5): \$25.00/45.00

METER DISPUTES

Meter Accuracy Test Handling Fee (6.3)

Self Contained Meter

Request:

- (a) Explain when the utility started to charge for a customer usage report.
- (b) Explain why you wish to charge to have a customer usage information request when this is a simple print out.
- (c) Do you offer any complimentary services to your firm customers or do you just take us for granted? Explain.
- (d) Explain what a standard meter read is.

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- (e) If a person or family has a problem making a payment, how can a collection fee and a late payment charge added to the next bill payment accommodate this rather than acerbate the financial frustration to the customers.
- (f) Is this policy absolutely followed which most often punishes the customer further by adding financial stress or is there some discretion used by the utility? Explain using concrete examples.

Response:

- (a) The proposed T&Cs include a charge for a customer usage report. If approved, the Utilities would begin to charge for customer usage reports effective the date of the Board's decision.
- (b) Responses to customer usage information requests are customer specific and include historical load data presented to the customer in a spreadsheet. Please refer to the response to AEY-YEC-YUB-012(a) for more details.
- (c) The Utilities value their customers and strive to provide safe and reliable service to all customers. However, when costs are incurred that are customer specific, such as usage requests as described in the response to (b) above, the Utilities are proposing that such costs be covered by the customer.

Some typical services that are provided to all customers without additional charges include, but are not limited to providing:

- Walking customers through questions regarding their accounting information;
- Explanation of rates;
- Explanation of billing statements;
- Energy-efficiency and energy-conservation tips;
- IT assistance with My account sign up;
- Accept variety of payments options at the billing office;
- Payment plans, if required; and
- Printed statements on request.

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- (d) As proposed in the T&Cs, in the context of Supplementary Meter Reads, a Standard Meter read is a customer-requested meter read for a Standard Meter, which would be conducted remotely, requested outside of the normal schedule of meter reads. In the event the meter has not been converted to AMI by the Utilities during the transition from conventional meter to AMI meters the customer would be charged the standard meter reading rate.

- (e-f) Late payments charges are managed by the billing system and are applied automatically to bills. However, the Utilities' billing staff will work with customers on a case-by-case basis and can accommodate payment arrangements in certain circumstances to assist customers who are in arrears.

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2025 Terms & Conditions of Service**

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Received: February 28, 2025**

AEY-YEC-UCG-015

Reference: Application dated December 20, 2024

MIL Study

Request:

- (a) On table 4 for the Historical Expansion Costs, does not the company know exactly what the costs were for each service extension each year, including 2024 and 2025 so far this year?
- (b) Explain why you need inflated and non inflated costs and an expensive study to develop a new MIL?
- (c) If you consider that a balanced single residential MIL is to be 61percent of total cost then cannot this be easily determined using the real total cost average for the last year or even last 6 months?
- (d) If you consider a balanced multi-dwelling MIL to be 53 percent of total cost then this can easily be determined with real cost average for the last year?
- (e) Give concrete definition of residential-multi dwelling (i.e how many units, ect.)?
- (f) Explain why residential multi-dwelling costs are only one quarter the cost of a single residential? Are there four or more extensions that pay this amount for a multi?
- (g) Explain using the same above rationale for General Service MIL.
- (h) Explain why general service MIL is to come it at 49 percent compared to single residential at 61 and multi-residential at 53 and street lights at 82 percent.
- (i) Is street lighting for MIL only on private properties, not city or community or government?

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- (j) If the city, communities or government street lighting is different, how is this evaluated and charged?

Response:

- (a) At the time of filing, data was available up to and including 2023. A relevant sample size with ten years' worth of known project data was used to determine a median to reflect the middle value for the data set. AEY considers that using a median from the 2014-2023 dataset provides a reliable representation of actual project costs. AEY has also provided supplemental analysis in the MIL Study, such as the Desktop Study, which used 2024 costing figures to support and act as a check on the reasonableness of costs determined based on the historical data.
- (b) AEY provided both inflated and non-inflated costs in order to be transparent on the methodology and approach taken to determine the requested MILs. Developing MILs is complex and it is important to conduct sufficient analysis in order to determine appropriate MIL amounts, in consideration of the principles discussed in the Introduction to the MIL Study. As stated in response AEY-YEC-UCG-008(a), AEY internal staff were used to develop the MILs Study.
- (c-d) Utilizing 10-years' worth of data in the MIL Study ensures that various project conditions are captured, for example, different sizes of developments. AEY does not consider that 6 months of data would provide an adequate range to determine appropriate representative costs. In conducting a comprehensive evaluation, AEY has also included a Desktop Study, which considered a typical service using 2024 costs, to provide a reasonability check and support the value determined based on historical data.

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- (e) As defined in Section 2.1, of the T&Cs and set out in paragraph 26 of the MIL Study, "Multiple Dwelling" is "a residential building containing more than one Single Family Dwelling unit". As such, any building that has more than one single family dwelling unit within one lot is considered a Multiple Dwelling. Please refer to AEY-YEC-YUB-037(a).
- (f) In Section 2.1 of the T&Cs, "Multiple Dwelling" is defined as "a residential building containing more than one Single Family Dwelling unit". The extension to a multiple Dwelling will be shared between the units, as well as its cost. As such, in conducting the MILs Study, AEY evaluated historical projects costs for each service type separately (i.e., Multiple Dwelling and Single-Family Dwelling) and identified that service extensions to multiple dwellings, on a per dwelling basis, are generally less expensive than those to single units. This fact is reflected in the MIL calculation, currently at a Multiple Dwelling to Single-Family Dwelling ratio of approximately four as mentioned in the question. Each dwelling from the same service point will have its corresponding MIL and investment.
- (g) AEY is not sure what information this request is seeking but provides the following to be helpful. As the General Service class is unique in nature, AEY incorporated the capacity of the service as a factor in the MIL calculation, so the study considers the cost per kW, rather than cost per lot as was done for the Residential MIL studies.
- (h) Each service type is unique by nature, which is reflected in the analyses in the MIL Study and results in different Customer Contributions and Company Investments. For General Service, the MIL Study considers the capacity (kW) of the service as a factor in the MIL calculation. As such, and as described in paragraphs 38-41 of the MIL Study, projects with higher capacities benefit from economy of scale and, although more expensive, typically have lower costs per unit of capacity. Similarly,

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the analysis for Street Lighting used a different methodology and costs are determined by light, neither by lot nor per kW like the other service types.

- (i) No, the proposed MIL is for Municipal Street Lighting.
- (j) N/A.

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

**Information Responses Round 1 to:
Yukon Utilities Consumer's Group (UCG)
Received: February 28, 2025**

AEY-YEC-UCG-016

Reference: Application dated December 20, 2024

Appendix A-Guiding Principles.

Request:

- (a) Who developed these guiding principles?
- (b) Were any ratepayer group involved in this decision making? If not, why not?

Response:

- (a) As footnoted on page 22 of the Application:

“these Guiding Principles were a result of the Alberta Utilities Commission (AUC) Decision 2008-011, that oriented Fortis Alberta (FAI) to discuss with other utilities and stakeholders a common approach to MILs. The resulting Guiding Principles were first included in FAI’s 2010/2011 Distribution Tariff Application, Section 9 – Appendix O: Common 12 Approach to Maximum Investment Levels.”

- (b) The generic guidelines principles with respect to establishing an appropriate MIL were developed following the direction of the Alberta Utilities Commission (AUC or Commission) under Decision 2008-011 that FAI discuss a common approach to MILs with other utilities and stakeholders. The Utilities note that Yukon ratepayers did not participate; however, these guiding principles are standard guidelines that can be used to develop appropriate MILs in any jurisdiction.

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

**Information Responses Round 1 to:
Yukon Utilities Consumer's Group (UCG)
Received: February 28, 2025**

AEY-YEC-UCG-017

Reference: Application dated December 20, 2024

Preamble: UCG would like to better understand the methodology of defining and determining Multiple Dwellings MIL. In our understanding, there are many different types of multiple dwellings, like duplex, triplex, fourplex..., multi plex, condominiums, townhouses, apartments, etc.

Request:

- (a) In this proposal all these appear to be grouped under one umbrella. This appears to be discriminatory (i.e. a multiplex with several units vs. a one single unit) where the charges for a single residential dwelling is costed at 4 times the amount of a multiple. Explain and discuss.
- (b) Explain how you consider this as fair?

Response:

- (a-b) Please refer to AEY-YEC-UCG-015(f). There is a fair balance between single and multiple dwellings as the extension cost for a Multiple Dwelling is shared among all of its units.

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AEY-YEC-UCG-018

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

**Information Responses Round 1 to:
Yukon Utilities Consumer's Group (UCG)
Received: February 28, 2025**

AEY-YEC-UCG-018

Reference: Application dated December 20, 2024

Preamble: In the Application for and Conditions of Service page 13 of changes requested:

4.13 Multiple Dwellings

a) Each individual unit within a Multiple Dwelling will be served as a separate Point of Service and billed individually on the applicable residential rate. The Company and a Customer may agree that one bill will be issued covering all individual units in a Multiple Dwelling and, in such case, the applicable general service (non-residential) rate will apply to the Service. Common use areas such as hallways, lobbies, and laundry rooms, elevators, and parkades will be billed under the applicable general service price schedule.

b) Where the Company and a Customer have agreed that service to a Multiple Dwelling shall be delivered through a single Point of Service, the applicable general service (non-residential) price schedule will apply to the service.

Request:

- (a) Why is the utility treating this differently than the MIL methodology (i.e. why is not each separate point of service charged as an individual residential service in the MIL like they are assessed in billing)?
- (b) Give a concrete example of when one bill would be issued covering all individual units in a Multiple Dwelling?
- (c) In the request (b) above why is general service now applied to this charge?

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- (d) Why are not common areas with one point of service not charged using single residential, not general service?
- (e) Are these areas not considered for the residential customers, but business oriented? Explain.
- (f) Give rationale for 4.13b) above when a Multiple Dwelling is delivered through a single point of service, a general service price schedule is applied.

Response:

- (a) A Multi Dwelling is a separate rate class for MILs and has different attributes compared to the residential MIL class. For example, for Multi Dwelling's one extension can serve multiple units or Service Points in near proximity (e.g., an apartment building). As such the development of service extensions to multiple dwellings is generally less expensive than to individual residences. This is reflected in the MIL Study filed as part of the Application. Please also refer to AEY-YEC-UCG-015(f).
- (b) Under Section 4.13 of the T&Cs, one bill would be issued, upon an agreement between the Company and the Customer, when there is a single point of service (one utility meter to measure electricity for the complex) or all metered accounts have the same primary account holder.
- (c) Please refer to response AEY-YEC-YUB-029(g).
- (d-e) Please refer to response AEY-YEC-YUB-005(a) and (c).
- (f) Please refer to response AEY-YEC-YUB-029(g).