

March 14, 2025

AEY-YEC-YUB-001

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-001

Reference: AEY-YEC 2025 T&Cs Application, PDF page 3.

Issue: Stakeholder consultations

Quote: Clarity in existing sections has also been proposed to better provide guidance to customers and the utilities.

Request:

- (a) Did the Utilities undertake any stakeholder consultations regarding the review and update to the T&Cs?
- (b) If the response to part (a) is yes, please list the stakeholders involved during the consultation process and provide any notes from the consultation process.
- (c) If the response to part (a) is no, please explain why no stakeholder consultations took place.
- (d) If no stakeholder consultations took place, on what basis have the Utilities determined that the proposed clarifications will provide better guidance to customers?

Response:

- (a) The Utilities did not undertake any formal stakeholder consultations regarding the review and update to the T&Cs prior to filing.
- (b) N/A.
- (c-d) While no formal stakeholder consultations were undertaken, the Utilities are in regular contact with their customers through phone, email and in-person

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interactions with customers who contact or are contacted by each of the Utilities' respective billing staff, with respect to requests for new services and extensions, the review and connection of Generating customers and day-to-day operations of the electrical system. Through regular operations, the Utilities are also in regular contact with different levels of government, which provide incentives or rebates for end-use electrical products. Changes intended to add clarity, transparency and ease of understanding of the Terms & Conditions of Service (T&Cs) have been based on three considerations: (1) previous customer interactions where clarity in the T&Cs have been helpful to provide guidance for the utility and customer; (2) existing Government of Yukon regulations, processes and requirements related to micro-generation, electric vehicle charging services, and other electrical end-use products and services; and (3) trends seen in other jurisdictions such as micro-generator requirements in Alberta¹ and British Columbia. The current review process before the Board provides the opportunity for stakeholders to provide their comments on the proposed changes by the Utilities.

Please also refer to the response to AEY-YEC-YUB-003 (a-b).

¹ Alberta Micro-Generation Regulation, A.R. 27/2008.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-002

Reference: AEY-YEC 2025 T&Cs Application, PDF page 4.

Issue: Rate Schedules

Quote: Appendix 1 and 2 contains the proposed T&Cs to govern service under the approved Rate Schedules, including clean and blackline versions

Request:

- (a) When the Utilities reviewed the T&Cs, did the Utilities also review the wording of the rate schedules to provide more clarity and better guidance for customers?
- (b) If the response to part (a) is yes, please describe the review undertaken and the issues identified.
- (c) If the response to part (a) is no, please explain why such a review was not undertaken.

Response:

- (a) The Utilities did not specifically review the wording of the rate schedules in connection with the T&Cs.
- (b) N/A. This Application was prepared to respond specifically to the Board's direction in its March 31, 2023, letter¹ that the Utilities review their T&Cs, including the Maximum Investment Levels (MILs) and the Fee and Service Charge Summary. While the rate schedules provide guidance regarding the applicability of various

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

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approved rates, the T&Cs focus on overall governance/guidance related to service customers, including operations and the connection and disconnection processes. The rate schedules reference the T&Cs as overall guidance, and the proposed changes in the T&Cs do not impact the rate schedules.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-003

Reference: AEY-YEC 2025 T&Cs Application, PDF page 4.

Issue: Rights and Obligations

Quote: The proposed amendments to the T&Cs filed in this Application are intended to modernize the T&Cs, and enhance clarity, transparency and ease of understanding of the provisions under which electricity service is provided, including the rights and obligations of both the utility and the customer, and to reflect the Utilities' current practices and policies, legislation and regulations.

Request:

- (a) How did the Utilities ascertain the rights and obligations of the customer in the process of modernizing the T&Cs?
- (b) If the Utilities did not obtain customer input, how are the Utilities able to make the above statement about the rights and obligations of customers

Response:

- (a-b) The T&Cs provide guidance to both the utilities and customers around their roles and responsibilities to ensure a safe and reliable electricity service. As discussed in response to AEY-YEC-YUB-001(c), the Utilities are in constant communication with their customers and have updated the T&Cs based on past customer interactions and trends seen in other jurisdictions. For example, over the years the Utilities have been working with customer generators requiring certain information to ensure safe and reliable service. The updates to the T&Cs are to improve clarity and to set out in the T&Cs the information already being required by new

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Generating Customers in order to ensure safe and reliable service. Updates with respect to other areas aspects of the T&Cs, such as entrance to premises, are based on past experience and aim to address challenges the Utilities have experienced in providing service and maintaining grid stability.

In addition, the Utilities note that as directed in Board Order 2025-01, the Utilities provided copies of the Notice of Application to various parties who are eligible to participate in the current proceeding, including:

- i. public and commercial radio stations in Yukon;
- ii. local electronic newsletters or community notice boards such as the Dawson Town Crier and Buyer or the Tagish monthly community newsletter in the Utilities service area;
- iii. the known list of previous intervenors in the Yukon (for both AEY and YEC proceedings);
- iv. any other interest groups or customers who have previously contacted the utilities with concerns or questions about the Terms and Conditions; and
- v. to the Yukon Residential Landlord Association, Yukon Contractors Association, all Yukon municipalities, the Association of Yukon Communities, all Yukon First Nations, and any other organization concerns or questions about the Terms and Conditions.

The Application and supporting materials were also published and made available for download on the Utilities' websites, as well as in hard copy upon request.

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AEY-YEC-YUB-004

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-004

Reference: AEY-YEC 2025 T&Cs Application, PDF page 5.

Issue: Cost Sharing

Quote: By setting a cost-sharing limit of up to \$20,000 over a maximum term of five years and limiting it to three customers, the update ensures that the administrative burden is manageable and costs are equitably distributed.

Request:

- (a) Please describe and explain all factors that were considered when setting the cost-sharing limit at up to \$20,000.
- (b) Please detail all factors that were considered when setting the cost-sharing limit to three customers.
- (c) Please explain what the administrative burden is with respect to cost sharing. How is the current administrative burden handled?
- (d) Please explain how the proposed changes to shared costs will be equitably distributed. Are the costs being shared currently not equitably distributed? Please explain.

Response:

- (a) The Utilities submit that the main factor in setting the \$20,000 cost-sharing limit, coupled with a five-year term, is to strike a balance between administrative burden and ensuring costs are equitably distributed. In setting these cost-sharing limits, the Utilities decided to double the currently approved limit in order to account for

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considerations such as inflation, since the currently-approved limit was last reviewed prior to 2011.

- (b) The cost-sharing limit of three shares was proposed to strike a balance between minimizing administrative burden and ensuring costs are equitably distributed.
- (c) The administrative burden arises from continued tracking of shared costs, detailed calculations required to determine the portion of shared costs owed to each of the parties involved, and the processing of cost share payments. The changes proposed in the T&Cs seek to ensure that the administrative burden is manageable, while still ensuring that costs are equitably distributed where needed.
- (d) The proposed changes are made to better strike the balance between administrative burden and ensuring costs are equitably distributed. The Utilities consider that, currently, the lower cost-sharing amount limit and longer term do allow for equitable cost-sharing, but they create a high administrative burden due to the requirement to track and maintain records for projects up to the currently approved limits and duration. Further, the Utilities note that the values have not been updated since 2011 and do not reflect today's costs.

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

AEY-YEC-YUB-005

Reference: AEY-YEC 2025 T&Cs Application, PDF page 5.

Issue: Multiple Dwellings

Quote: The Utilities have updated Section 4.13 on Multiple Dwellings to include provisions for common use areas – such as hallways, lobbies, laundry rooms, elevators, and parkades – will be billed under the general service price schedule.

Request:

- (a) What designates a common area as non-residential?
- (b) Will or are there any exceptions for multiple dwellings where common areas are not billed under the general service price schedule? Please explain.
- (c) Please explain the reasons and criteria for placing common-use areas, such as hallways, laundry rooms, lobbies, elevators, and parkades, under the general service price schedule.
- (d) Is the consideration based on the totality of the common areas or each separate common area? Please explain.

Response:

- (a) Shared spaces are common areas in Multiple Dwelling properties. Common areas are collectively funded and maintained by all residents of the property, which distinguishes them from individual residential properties. For clarity and ease of understanding, the Utilities have provided examples in Clause 4.13 of the T&Cs including “hallways, lobbies, and laundry rooms, elevators, and parkades.” The

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revised wording proposed for Clause 4.13 is intended to provide clarity regarding the delineation between common areas and residential units.

- (b) There are currently no exceptions for Multiple Dwellings where common use areas would not be billed under the general service price schedule. At this point, the Utilities are not proposing any such exceptions in the updates to the T&Cs.
- (c) Please refer to response (a) above. There is not one specific customer that can be billed for electricity for these services. Rather, it is typically the condominium association, property manager, landlord or the building owner that passes on the costs to residents.
- (d) In most cases, common areas are metered at a single Point of Service; therefore, they are considered in totality. There may be unique situations where the condominium developer would require physical metering at different Points of Service.

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

AEY-YEC-YUB-006

Reference: AEY-YEC 2025 T&Cs Application, PDF page 5.

Issue: Multiple Dwellings

Quote: Additionally, the Utilities have reviewed the definition of a residential customer and accounted for situations where a single home is used for commercial purposes.

Request:

- (a) Please explain what reviewing the definition of a residential customer entailed.
- (b) Please specify where in the T&Cs the accounting for situations where a single home is used for commercial purposes is stated and/or recognized? Are any changes proposed to the T&Cs to account for this situation?
- (c) Please explain what determines “commercial purposes”?

Response:

- (a) The review entailed the use of residential premises between residential usage and commercial usage. As such, the Utilities can consider how premises classified as residential under the current T&Cs are actually used, and particularly cases where commercial activities are taking place in residential premises. The Utilities discussed the process of identifying the multi-use and whether potential changes to Section 7.8 would be required.
- (b) Section 7.8 of the T&Cs, Combined Service, accounts for situations where a single home is used for commercial purposes. After the review described in part (a)

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above, the Utilities determined that the current language in the Section is sufficient and did not require any changes.

- (c) The Utilities consider that a home is used for commercial purposes if activities are carried out on the premises which relate to operating a business. The Utilities work with all customers to match the utility requirements to their needs at the time of a customer request.

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

AEY-YEC-YUB-007

Reference: AEY-YEC 2025 T&Cs Application, PDF pages 5-6.

Issue: Canadian Electrical Code Requirements

Quote: ... and ensure the integrity of the Utilities' infrastructure and to ensure applicable requirements of the Canadian Electrical Code are met.

Request:

Please explain the significance of this change. Does this mean that the applicable requirements of the Canadian Electrical Code are currently not being met?

Response:

The proposed changes simply aim to clarify, add transparency and increase the ease of understanding of the provision. The Canadian Electrical Code (CEC) sets minimum standards for electrical installations to protect individuals, properties, and the environment from hazards such as fires and equipment failures. Compliance with the CEC is required. Many regulatory authorities, such as seen in the Yukon, enforce the CEC to ensure safe and effective electrical installations.

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AEY-YEC-YUB-008

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

AEY-YEC-YUB-008

Reference: AEY-YEC 2025 T&Cs Application, PDF page 6.

Issue: Standard Meter

Quote: By enabling customers to request Non-Standard Meters, the Utilities can accommodate specific needs and preferences. This change also helps the Utilities comply with regulatory requirements, streamline operational processes, and manage costs effectively.

Request:

- (a) What regulatory requirements does the above quote refer to?
- (b) How will the above noted operational processes be streamlined as a result of the proposed change?
- (c) Please explain how the quoted passage will assist in effectively managing costs.

Response:

- (a) Regulatory requirements refer to the Utilities' ability to comply with terms in Section 7, Meter Reading and Billing. In that context the Utilities are seeking approval of the proposed wording to clarify and increase transparency between what is a Standard versus Non-Standard Meter in the T&Cs, including proposed charges to customers who request Non-Standard Meters in Schedule D.
- (b) The proposed wording would add clarity, transparency and ease of understanding of the provision for both customers and utilities. For example, by having AMI as standard metering by default, there is a clear option for customers to opt-out and

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request a Non-Standard meter with well-defined conditions. Having a default option makes administrative and operational processes more efficient.

- (c) With the implementation of AMI meters, the Standard meters can be read remotely, while Non-Standard Meters require manual meter reads. Proposed changes to the T&Cs will ensure that additional costs for reading Non-Standard meters are properly allocated to the customer who has chosen to opt-out of the Standard meters. The Utilities consider that these changes allow for effective cost management. During the transition to AMI meters, if the Utilities have not installed an AMI meter on a site and require manual meter reads, the customer will be charged the Non-Standard charge up until the time the AMI meter with remote access is installed. The Utilities believe this is fair as the charges are based on work effort between remote access meters and conventional manual meters.

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

AEY-YEC-YUB-009

Reference: AEY-YEC 2025 T&Cs Application, PDF page 6.

Issue: Termination of Service

Quote: Changing "current limiting device" to "load limiting functionality/capability" and including a reference to harmonic and interharmonic distortions, clarifies the technical requirements and addresses specific issues that can impact service quality.

Request:

- (a) Please explain the significance of changing "current limiting device" to "load limiting functionality/capability".
- (b) For each service territory (AEY and YEC), please quantify the instances of harmonic and interharmonic distortions and the general circumstances under which the distortions occur.
- (c) What type of service causes harmonic or interharmonic distortions?
- (d) What types of services are affected by harmonic or interharmonic distortions?

Response:

- (a) The intent of this change is to provide flexibility and reflect the capabilities of new metering technologies. Standard Meters as defined in the T&Cs (e.g., AMI meters) offer functionalities such as remote disconnects and can be programmed to set a maximum load limit for each meter.
- (b) AEY and YEC do not have data on the number of instances of harmonic and interharmonic distortions that have been found.

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- (c) Harmonic distortions are caused by a number of sources such as power electronic devices, variable frequency drives (VFDs) and variable speed drives (VSDs). Interharmonics distortions are caused by saturation of induction motors, Voltage Source Converter (VSCs) and other heavy industrial machinery such as arc furnaces, welding machines.

- (d) Harmonic and interharmonic distortions can lead to issues such as equipment overheating, malfunction, and reduced efficiency in motors, transformers and other electric equipment. Moreover, interharmonic distortions produce light flicker and power line communication interferences.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-010

Reference: AEY-YEC 2025 T&Cs Application, PDF page 9.

Issue: Connection and Reconnection Fee

Quote: ... the fee is adjusted to reflect the actual work involved. The proposed connection and reconnection fees during normal business hours are set at \$87, which is an increase from the previous values of \$50 and \$60, respectively. The breakdown of the reconnection fee includes a 1-hour PLT rate of \$68, a truck roll fee of \$8, and a customer service rate of \$11 for 15 minutes.

Request:

- (a) Please provide the study that supports the claim that it takes 1 hour for a Power Lineman Technician (PLT) to connect or reconnect a service.
- (b) Does it take the same amount of time to connect or reconnect a general service versus a residential service? Please explain.
- (c) Please provide the study that supports the customer service rate of \$11 for 15 minutes.
- (d) What are the actual steps taken by customer service to connect or reconnect a customer?
- (e) Are the connection/reconnection steps taken by customer service the same for a general service customer versus a residential customer?

Response:

- (a) AEY has not performed a formal study with respect to the time to connect or reconnect a service. Rather, it has relied on the expertise of both management

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and field staff in determining the work effort of 1 hour of a Powerline Technician's time to perform connect or reconnect services. Tasks in performing connect or reconnect services include:

- Travel to site;
 - Complete safety tailboard; and
 - Complete connection (including, but not limited to pole climbing, bucket work, meter installation, ladder work, pedestal and transformer connections or disconnections).
- (b) The time difference between general compared to residential service is negligible as the process to connect/reconnect the meters is similar in each case.
- (c) The estimated time has been determined by the expertise of both management and office staff. Customer service time is estimated at \$45 / hour minimum charge = \$11 / 15 min. Please refer to response to (d) below for the activities performed.
- (d) Steps taken by customer service to connect:
- Determine service location and date to be connected;
 - Assess the need for a deposit;
 - Review cycle billing schedules;
 - Review payment methods available;
 - Collect customer information needed and make data entries to billing system; and
 - Email the customer its account / general information.

Steps taken to reconnect a customer:

- Confirm customer profile data;

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- Assess if there are outstanding arrears;
- Obtain payment (e.g. arrears if applicable);
- Assess need for deposit;
- Review payment expectations going forward;
- Complete data entries; and
- Coordinate with operations.

(e) Yes.

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

AEY-YEC-YUB-011

Reference: AEY-YEC 2025 T&Cs Application, Section 4: Fees and Service Charge Summary, PDF pages 9-10 and Schedule D: Fees and Service Charge Summary, PDF page 90 (blackline)

Issue: Schedule D: Fees and Service Charge

Quote: Customer Usage Information Requests

27. Regarding customer usage information requests, the fee applies to historical usage information requests with written authorization from the customer. This is charged per hour at the customer service rate, inclusive of engineering and IT resources, with a minimum charge of one hour. The proposed minimum cost associated with these requests is \$75.

Supplementary Meter Reads

28. Driven by modernization efforts such as AMI meters, for supplementary meter reads, standard meter reads are charged per read per meter at the customer service rate of \$11. Non-standard meter reads are proposed at \$87, similar to the reconnection fee. These charges reflect the actual time and resources required for each meter read, ensuring that the service remains cost-effective and efficient.

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Request:

- (a) For each currently approved Schedule D fees and service charges, please prepare a table that includes information under the following column headings:

Schedule D fee or service charge (title of charge)	Currently approved fee or service charge	Currently approved fee or service charge inflated at Whitehorse CPI from 2012 to 2024	Proposed fee or service charge
column (a)	column (b)	column (c)	column (d)
XX			
XX			

Please ensure the annual inflation amounts are with AEY’s response to this request.

- (b) How do the results shown in column (c) above support AEY’s request to inflate its proposed Schedule D fees and service charges, shown in column (d), by an annual inflation factor to be applied to the supplementary charges for future years?
- (c) Please explain why AEY’s proposed customer usage information request fee appears to include engineering and IT resources which it seeks to recover as part of its customer service rate.
- (d) Given AEY’s statement that supplementary meter reads are driven by modernization efforts, such as AMI meters, please clarify whether either of the standard or nonstandard meter reads, for which AEY seeks to implement a charge, are conducted using AMI meter technology.

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Response:

- (a) Please refer to the table below for approved Schedule D fees and service charges comparison.

Table 1: Fees and Service Charges Comparison

Schedule D Fee Or Service Charge (a)	Currently Approved Fee Or Service Charge (b)	Currently Approved Fee Or Service Charge Inflated At Whitehorse CPI From 2011 To 2025 (c)	Proposed Fee Or Service Charge (d)
Connection Fee - Business Hours	50.00	68.80	87.00
Connection Fee - Outside Business Hours	50.00	68.80	87.00
Reconnection Fee - Business Hours	60.00	82.56	87.00
Reconnection Fee - Outside Business Hours	60.00	82.56	87.00
Collection Fee	30.00	41.28	45.00
Dishonoured Payment Fee	25.00	34.40	45.00
Meter Accuracy Test Handling Fee, Self Contained Meter	100.00	137.59	250.00
Meter Accuracy Test Handling Fee, Instrument Meter	200.00	275.19	500.00

Although column (c) of this request proposed an inflation period from 2012 to 2024, the Utilities have used an inflation period from 2011 to 2025, adopting mid-year values. This aligns with the current effective date of July 1, 2011, and an anticipated new effective date in late 2025.

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

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

Annual inflation		
Year	CPI Index	% Change
2011	118.1	-
2012	120.8	2.3%
2013	122.8	1.7%
2014	124.4	1.3%
2015	124.1	-0.2%
2016	125.4	1.0%
2017	127.5	1.7%
2018	130.6	2.4%
2019	133.2	2.0%
2020	134.5	1.0%
2021	138.9	3.3%
2022	148.3	6.8%
2023	155.5	4.9%
2024	158.6	2.0%
2025	162.5	2.5%
Period total		37.6%

*2025 estimated (10-year average)

- (b) From Table 1, the inflated values presented in column (c) are generally consistent with the proposed fees and service charges in column (d). As the charges are based on a combination of labour and material costs, using CPI may not precisely reflect the specific costs associated with each fee and charge as costs for labour and some materials have increased more than the level of inflation since 2011. As a result, the Utilities' approach to determining the service fees is based on current labour rates, expected time to perform the service and materials (e.g., fleet costs, materials, etc.).

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- (c) Engineering resources and IT costs are included due to time needed to pull and verify site specific information such as transformers / conductor size / clearances upon request.

- (d) Once AMI is implemented, supplementary meter reads for Standard Meters will be meter reads for Standard Meters as defined in the T&Cs. Please refer to AEY-YEC-YUB-008(e) which discusses the transition period between installing AMI meters and the use of conventional meters.

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Received: February 28, 2025**

AEY-YEC-YUB-012

Reference: AEY-YEC 2025 T&Cs Application, PDF page 9.

Issue: Customer Usage Information Requests

Quote: ... the fee applies to historical usage information requests with written authorization from the customer. This is charged per hour at the customer service rate, inclusive of engineering and IT resources, with a minimum charge of one hour. The proposed minimum cost associated with these requests is \$75.

Request:

- (a) Is the \$75 charge based on one hour of customer service time? Please explain.
- (b) Please provide the study that supports the amount of customer service time to provide historical customer usage information.
- (c) Does the above fee apply to all customer usage information requests or only requests respecting usage beyond a certain period such as one year?
- (d) What consideration did the Utilities take into account that a minimum \$75 charge for customer usage information requests would discourage such requests? Please explain.

Response:

- (a) Yes, the \$75 charge is based on one hour of customer service time, engineering (to pull site specific details such as size of service, transformer feeding the service, etc.) and IT resources (special request to pull historical data from archives). This includes a Customer Service Agent, overhead costs, review, and completing documentation.

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- (b) AEY has not performed a formal study with respect to the amount of customer service time to provide historical customer usage information. AEY relied on the expertise of both management and AEY's office staff in determining this amount.
- (c) The fee would apply to all requests for historical usage information.
- (d) As these requests are customer specific, charging the customer who made the specific request and time to perform the activity were the main considerations in developing this rate. Currently, MyAccount customers now have ready access to their historical bills. Charging a fee will encourage use of MyAccount and reduce utility hours spent providing this information. Historically, the customer had paper copies or would request this information from the utility.

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Received: February 28, 2025**

AEY-YEC-YUB-013

Reference: AEY-YEC 2025 T&Cs Application, PDF page 9.

Issue: Supplementary Meter Reads

Quote: ... for supplementary meter reads, standard meter reads are charged per read per meter at the customer service rate of \$11. Non-standard meter reads are proposed at \$87, similar to the reconnection fee.

Request:

- (a) Please provide the study that supports the \$11 customer service rate for standard meter reads and the \$87 rate for non-standard meter reads.
- (b) Are the rates the same for a demand meter versus an energy-only meter? Please explain.

Response:

- (a) AEY has not performed a formal study with respect to these fees. AEY relied on the expertise of both management and office staff in determining the amounts. As outlined in AEY-YEC-YUB-012, the \$11 cost is for 15 minutes of customer service time to complete the work in our system and complete a response to the customer. Since Standard Meters will be AMI technology, once implemented, meters can be read remotely and therefore Standard Meter reads require less time and resources than Non-Standard meter reads. Non-standard meter reads will be done in person, as they are today, taking a similar amount of time as a service Reconnection. Please refer to responses AEY-YEC-YUB-10(a), (b), (c) and (d).

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- (b) The costs for supplemental meter reads outside the normal billing cycle meter reading are the same for demand meters and energy-only meters.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-014

Reference: AEY-YEC 2025 T&Cs Application, PDF pages 9-10

Issue: Late Payment and Disconnection

Quote: ... the collection fee is charged at the customer service rate proposed at \$45 compared to \$30 set previously, with a minimum charge of one hour. The late payment charge is 1.5 percent per month, which amounts to 19.56 percent per annum. Maintaining this charge encourages timely payments and helps manage the financial risk associated with late payments. The fee for dishonored payments is also charged at the customer service rate proposed at \$45 compared to \$25 set previously, with a minimum charge of one hour.

Request:

- (a) Please provide the study that supports the \$45 customer service rate and the minimum charge of one hour for collections.
- (b) Please describe the steps undertaken for the minimum one-hour charge in the collection process.

Response:

- (a) AEY has not performed a formal study, but rather has relied on the expertise of both management and office staff in determining the one hour on average required to collect late payments. The \$45 customer service charge is the charge out rate for a customer service member. Response (b) below provides the activities performed which support the one-hour charge. AEY notes that this is not a

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minimum charge; rather, it is an average charge applied to all late payment and disconnect service requests.

(b) The steps undertaken with respect to the minimum one-hour charge, when a personal visit is required to collect an overdue amount, include:

- Receiving a request from Customer Service to go get payment;
- Review account history with customer service staff;
- Travel to site;
- Collect overdue amount from the customer if the customer is on site;
- If the customer is not on site, leave a door hanger to notify the customer that an overdue amount is owing;
- Complete work order from CSR, and if required, call CSR to speak about customer interaction;
- Return to the office to provide CSR with the customer payment and completed work order; and
- CSR updates the customer account with payment (if applicable), contact details and notes from completed work order.

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

AEY-YEC-YUB-015

Reference: AEY-YEC 2025 T&Cs Application, PDF page 10 and 6.3 (b) Meter Tests and Adjustments - Appendix 2 PDF pages 73.

Issue: Meter Disputes and Meter Tests and Adjustments

Quote: 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. (PDF page 10)

If a test determines that the meter is not accurate within the limits set by government standards, the Customer's bill will be adjusted back to the time that the error can reasonably be determined to have commenced. Where the commencement of the error cannot reasonably be determined, it shall be deemed to have commenced three months before the test or on the date of the meter installation, whichever occurred later. (PDF page 33)

Request:

- (a) Please provide the study that supports the new proposed fees for meter disputes.
- (b) How did the Utilities determine that three months (or the meter installation date, whichever is more recent) is the appropriate amount of time to correct the reading from a faulty meter?

Response:

- (a) AEY has not performed a formal study, but rather has relied on the expertise of both management and office staff in determining the new proposed fees for meter disputes. To follow tasks are required as part of the dispute process:

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- Customer service time to create and process a meter exchange;
 - Travel to site to retrieve the meter and install a new meter;
 - Package meter and ship to Measurement Canada for testing;
 - Measurement Canada handling fee for testing - \$125 (which has increased since the last T&Cs review).
- (b) This requirement is outlined in – Measurement Canada – Regulations Governing Dispute Testing of Electric Meters – Section 24(1)¹

¹ <https://laws.justice.gc.ca/eng/acts/E-4/page-2.html#h-214637>.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-016

Reference: AEY-YEC 2025 T&Cs Application, PDF page 10.

Issue: Application of CPI to Fees and Service Charges

Quote: 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) Does either utility undertake initiatives to improve efficiency? Please explain.
- (b) Is it reasonable for either the Board or customers to expect efficiency improvements from the utilities? Please explain.
- (c) If the responses to the parts (a) and (b) above is yes, then should any potential increase to fees and service charges reflect efficiency gains? Please explain.
- (d) In the introduction section of the application (PDF page 3), the utilities noted that the T&Cs, MILs, and Fee Schedule were last amended effective July 1, 2011. Please describe any impediment on the part of the utilities that prevented either or both utilities from proposing updates to any of the T&Cs, MILs, or Fee Schedule after July 1, 2011.
- (e) If the Board were to approve a no-notice process to update Fees and Service Charges, what is the approximate impact on the revenues or revenue requirement for each utility?

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Response:

- (a) The Utilities are constantly working to improve on business efficiencies. From a billing perspective some examples include, but are not limited to:
- Development of My Account Customer Portal – Allows customers to receive their bill electronically, pay their bill online, and track historical consumption;
 - Introduction of Autopay – Automatic payment withdrawals from customers bank accounts or credit card – no need for customer to call or mail in a payment, reducing late payment fees; and
 - Installation of AMI meters – Remote meter reads, allow for Stop / Starts (customers cancelling accounts and new customers taking over the service) to be completed from the office. No site visit required.
- (b) Under the regulatory framework, utilities are incentivized to find efficiencies and cost-savings on a go-forward basis because utilities benefit from those efficiencies and savings until their rates are reset in General Rate Applications subject to Board oversight and approval. Importantly, any efficiencies realized in between rate applications are incorporated into the cost forecasts at the time of the next rate application. The benefits are then passed on to ratepayers through the revenue requirements approved by the Board.
- (c) The Utilities note that the CPI increase will be applied annually to the MILs and Fees and Service Charges when a rate case is not in front of the Board for consideration. As many of the service fees are labour based, CPI is not one hundred percent correlated to the expected inflation increase in labour; however, the intent of the proposal to apply CPI is to provide a mechanism to better align service fees to inflationary factors until a full review is conducted.
- (d) There was no impediment on the part of the Utilities that prevented either or both utilities from proposing updates to any of the T&Cs, MILs, or Fee Schedule after

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July 1, 2011. The Utilities work with customers daily to ensure electricity needs are being met. The currently-approved T&Cs continued to provide guidance in achieving this objective. This is demonstrated by the minimal changes being sought to the T&Cs in this Application.

- (e) Regarding Fees and Service charges, a two percent average CPI inflation applied to AEY's 2024 historical fee collections would result in an offset revenue of \$4,220 per year. For YEC, the incremental revenue would be less than \$500 per year. The Utilities note that there would also be savings relating to avoided proceeding costs which have not been contemplated in the values above.

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

AEY-YEC-YUB-017

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 58.

Issue: Electricity Purchase Agreement, EPA and Microgeneration

Quote: “Electricity Purchase Agreement” - is a contract established between the Company and independent power producers that sets out the terms for purchasing electricity by the Company. EPAs are considered out of the scope of these Terms and Conditions. The terms and conditions of EPAs are treated independently and are confined to the contractual relationship between the customer and the electricity generator under the applicable EPA. Microgeneration customers are separate from the EPAs and referenced under “Generating Customer”.

Request:

- (a) Is there a need to define “Electricity Purchase Agreement” since it is not used in the body of the T&Cs? Would the Utilities instead consider including a statement in the body of the T&Cs that says the T&C's don't apply to Electricity Purchase Agreements?
- (b) Could similar reasoning apply to microgeneration? Please explain.

Response:

- (a) The Utilities included the definition of “Electricity Purchase Agreement” for clarity and transparency and is consistent to the definition in government regulations. The Utilities are not opposed to removing the definition and including a statement in the body of the T&Cs as proposed.

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- (b) No, as indicated above, microgeneration is included in the definition of Generating Customer which is referenced in the body of the T&Cs. Therefore, the similar reasoning does not apply to micro-generation.

Based on further review, in order to protect the grid stability, the Utilities would like to add under Article 3.6 the following:

The Company has the right to refuse the connection of Generating Customers due to safety concerns or potential impacts on the grid and service reliability, including the right to terminate service to or accept power generated by Generating Customers for reasons outlined in Articles 11.2 and 11.3.

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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-YUB-018

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 58.

Issue: Electric Service Regulations

Quote: "Electric Service Regulations" – the former title of this document outlining the terms and conditions governing Service, which title has been replaced by Terms and Conditions of Service. Where reference is made to Electric Service Regulations it shall be deemed to be a reference to these Terms and Conditions of Service as amended from time to time.

Request:

- (a) Is there a need to define "Electric Service Regulation" since it is only used in paragraph 1 under the Introduction to state that the T&Cs were formerly known as the Electric Service Regulations and the T&Cs have now been in place since 2011?
- (b) If the answer to (a) is yes, what is the rationale for treating a condominium in which each residential unit is owned separately and is not a commercial enterprise the same way as an apartment in which every residential unit is owned by the same owner(s) and its operation is a commercial enterprise?

Response:

- (a) The Utilities propose that the term "Electric Service Regulations" be removed from the Section 2.1 in the final T&Cs.
- (b) As reflected in the response to (a), the Utilities do not consider that there is a need to define "Electric Service Regulation". However, the below is provided in an effort

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to be helpful to address the Board's question regarding Multiple Dwellings. The Utilities have proposed the following language in Clause 4.13 of the T&Cs, which will improve clarity and ease of understanding of the provisions to distinguish residential and commercial Points of Service:

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.

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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-YUB-019

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 59.

Issue: Multiple Dwelling

Quote: "Multiple Dwelling" - a residential building containing more than one Single Family Dwelling unit.

Preamble: The definition of "Multiple Dwelling" has not changed.

Request:

- (a) Can you please explain whether multiple dwellings include a condominium and/or a unit in an apartment building?
- (b) Would such a clarification be useful in describing the types of residential units that fall within this definition?

Response:

- (a) Both condominiums and/or a unit in an apartment building would fall under the Multiple Dwelling definition.
- (b) The Utilities believe that the current definition provides a definition that is broad enough to include various multi-dwelling and Point of Service configurations. The Utilities' concern is that being too prescriptive may limit the types of configurations that fall within the definition, which may require clarification as circumstances arise and could reduce efficiency and delay connections with customers.

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AEY-YEC-YUB-020

**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-YUB-020

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 59.

Issue: Definitions – load factor

Request:

Please explain the significance and reasoning for removing the definition of “load factor” from the T&Cs.

Response:

The inclusion of the term “Load Factor” in the T&Cs was unnecessary as it is not used in any Clauses in the current or proposed T&Cs.

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AEY-YEC-YUB-021

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-021

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 61.

Issue: Section 3.1 Board Approval

Quote: These Terms and Conditions have been approved by the Board. The Company may amend these Terms and Conditions by filing a notice of amendment with the Board and interested parties as part of General Rate Application or a separate proceeding. Included in the notice shall be notification of which Customer groups are affected by the amendment and an explanation of how affected Customers will be notified of the amendments. If the Board approves the notice of the amendment, the amendment will take effect upon the date set by the Board. If no specific date is set by the Board, then the amendment will take effect on the date of the Board's Order approving the notice of amendment.

Request:

- (a) Please explain the need for this section as it appears to refer to the manner in which an amendment to the T&Cs is made and the requirement for notice to the Board and to interested parties.
- (b) Please explain why it would not be an application to amend the T&Cs to the Board. Even with the proposed changes to section 3.1, is such a provision necessary?

Response:

- (a-b) The inclusion of Section 3.1 of the T&Cs is simply intended to provide clarity, transparency and ease of understanding to utility customers around the applicable process for amendments to the T&Cs. The Utilities do not suggest that the T&Cs could be changed without Board approval.

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

AEY-YEC-YUB-022

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 61.

Issue: Section 3.2 Terms and Conditions Prevail, subsection (c).

Quote: No agreement can provide for the waiver or alteration of any part of these Terms and Conditions unless such agreement is first filed with and approved by the Board.

Request:

- (a) Please explain the underlying rationale for this paragraph.
- (b) Why would an agreement derogating from the T&Cs be necessary?
- (c) If such agreements were to take effect, should such agreements be posted on the websites of the Utilities in conjunction with the T&Cs? Please explain.
- (d) Is it intended that one customer or group of customers can enter into an agreement with either utility to change a term or condition of the T&Cs?
- (e) Please provide an example or examples of changes by agreement that this paragraph envisions. In addition, please provide a summary of all such changes to date.
- (f) Would deleting this provision be problematic?

Response:

(a-b) The inclusion of Section 3.2(c) of the T&Cs is intended to provide clarity, transparency and ease of understanding to utility customers around the applicable process for waivers or alternations to the T&Cs. A waiver or alteration of the T&Cs

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may be required for unique scenarios, connections, or alterations not contemplated in the approved T&Cs, in which case any such waiver or alternation would require Board approval.

- (c) No. Waiver agreements and subsequent negotiations which are approved by the Board should not be posted on the Utilities' websites as these waivers would only be to address unique circumstances.
- (d) In an ideal scenario, the T&Cs will provide guidance in serving customers. However, the waiver clause in the T&Cs are set for the one-off scenarios where there are unique circumstances which are specifically addressed in the T&Cs. The clause provides both flexibility and clarity to the utility and customers with the potential course of action in these cases.
- (e) The Utilities do not have a specific example; however, the clause provides flexibility in an event such a circumstance arises in the future. In special and limited circumstances this clause can avoid connection delays for the customer.
- (f) The Utilities do not see deleting the provision as problematic.

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

AEY-YEC-YUB-023

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 62.

Issue: Customer Extensions

Request:

- (a) Please describe the issues faced by the utilities before the wording change to section 3.5.
- (b) Please quantify the frequency of the issues described in part (a) above.
- (c) Please explain how the wording change addresses the issues described in part (a) above.

Response:

- (a-c) The wording change to Clause 3.5 of the T&Cs is not directed at addressing specific issues experienced by the Utilities. Rather, the proposed changes are forward-looking and intended to clarify applicable processes for customers that would like to distribute generation or receive/transmit electricity to/from properties not owned or occupied by the customer. The Utilities believe that clear guidance will be required as new technology is brought on to the electrical system, including Distribution Energy Resources (DERs). The revised wording adds clarity and better aligns with the *PUA* guidance referencing in Section 1 of the T&Cs around property ownership and service requests. The Utilities understand that such situations are arising in other jurisdictions.

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

AEY-YEC-YUB-024

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 63.

Issue: Fees and other Charges

Quote: All additional and supplementary services provided by the Company to a Customer will be charged a separate rate or fee, such as those included, without limitation, in Schedule D herein.

Request:

- (a) Please give an example of additional or supplementary services not included in Schedule D.
- (b) Please provide a historical frequency of charges to customers that are not included in Schedule D.
- (c) If the utilities charge a customer for a service and charge not listed in Schedule D, is it an approved regulated charge? Please explain.
- (d) How will the Utilities communicate such charges to customers if they are not included in Schedule D? Please provide examples.

Response:

- (a) Examples of additional or supplementary services for which costs are not specified in Schedule D are set out below. In these cases, costs would be flowed through to the customer as discussed in the response to (c) below:
 - a. Call-out fee for after-hours reconnects, which would be based on employee overtime rates; and

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- b. Auto pay non-sufficient funds (NSF) charges.
- (b) Typical frequency of occurrences for the two examples noted above are:
 - a. Call-out fee for after-hours reconnects: Approximately 20 per year.
 - b. Auto pay NSF charges: Approximately 100 per month.
- (c) While the costs are not specified in Schedule D specifically, the costs are flowed through to customers in providing services that support our customers.
- (d) Fees for these types of additional or supplementary services are cost-recovery only and reflect the actual cost of the work done. With respect to the examples above, for after-hours callouts, the Utilities will advise the customer of the applicable charge in advance. NSF charges are outlined in the preauthorized payment form when customers sign up for autopay.

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The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-025

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 64.

Issue: Application of Rate Schedules Section 4.4(a).

Quote: The Company will make Customers aware of the various price schedules under which the Company provides service to Customer rate classes and are approved by the Board.

Request:

Please explain the significance and reason(s) of inserting Section 4.4(a).

Response:

This wording is proposed to clarify for utility customers that the Utilities can only offer rates which have been approved by the Board.

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Received: February 28, 2025**

AEY-YEC-YUB-026

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 65.

Issue: Change in Service Connections

Request:

- (a) For Section 4.5 (a), please define “reasonable prior written notice” and “significant change in load.”
- (b) Please provide a further explanation of “The Customer shall not change its requirement for a Service Connection without the Company's written permission.” Does this meaning include that a customer requires the Company’s written permission to disconnect? Please explain.
- (c) What kind of damage can occur to Company facilities if a customer changes its requirements for a Service Connection?
- (d) What criteria will the Company use in determining whether it will give written permission for the use of space heating or electric vehicle charging for isolated systems? What timing does the Company commit to in giving such permission or the denial of such permission from the time such a request is received from a customer on an isolated system?

Response:

- (a) The Utilities would not propose specific parameters on what constitutes a significant change in load since each case is unique and most likely will require specific consideration to plan and execute electrical upgrades. The intent of the proposed changes is to require customers to inform the Utilities of any substantial change in load so that the Utilities can work with customers to determine changes

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in electricity usage to ensure proper planning of generation and electrical infrastructure. For example, EV charging stations or electric heat infrastructure need to be communicated and assessed properly so that sufficient levels of generation and appropriate upgrades to local electrical infrastructure are made available or planned for.

- (b) The Utilities do not foresee scenarios where customers would need written consent from the Company to disconnect. However, Utilities must still be notified of a disconnection so that their billing account can be closed and final bill issued to the customer.
- (c) Significant changes in service connections can significantly impact the distribution of load across the grid. For instance, an increase in load can exert stress on the existing electrical system requiring more frequent maintenance or upgrades. New or upgraded service connections may require enhancements to existing infrastructure, including transformers, substations, and distribution lines to avoid stress on the system. Additional sources of generation may also need to be secured or planned to meet increased load.
- (d) As mentioned in response (a), the Utilities would not propose specific parameters on significant load change since each case is unique and most likely will require some planning on the execution of electrical upgrades. The intent is to allow changes but ensure that the Utilities can properly assess the impact to the system in enabling the change given the system conditions and potential upgrades needed.

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AEY-YEC-YUB-027

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 66.

Issue: Section 4.7 Delay in Taking Service, subsection (a).

Quote: (a) Subdivision or Multiple Dwelling Residence

In circumstances whereby the Company will install Facilities to serve a subdivision or a multiple dwelling residence, and it is determined that service will not be taken within 12 months of the In-Service date, the Customer shall pay for the entire cost of the new extension. For each Point of Service in the subdivision or multiple dwelling residence that is energized within five (5) years of the In-Service date, the Company will refund the payment for each Point of Service based on the Maximum Company Investment specified in the Schedule B. Otherwise, the Company shall be entitled to retain such payment as compensation for its costs incurred in respect of the Service Connection.

Request:

Please explain the rationale for adding paragraph (a) and including multiple dwellings in this paragraph.

Response:

The currently approved T&Cs do not contemplate either subdivisions or Multiple Dwelling Residences. The proposed wording is intended to provide more comprehensive guidance and clarity regarding the provision of services to Subdivisions or Multiple Dwelling Residences in Section 4.7.

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

AEY-YEC-YUB-028

Reference: AEY-YEC 2025 T&Cs Application, PDF page 5 and Appendix 2 – Blackline, PDF page 67.

Issue: Extension of Service – Cost sharing

Quote: By setting a cost-sharing limit of up to \$20,000 over a maximum term of five years and limiting it to three customers, the update ensures that the administrative burden is manageable and costs are equitably distributed. (PDF page 5)

If a new Customer shares a portion or all of the costs of an existing extension, the existing Customers may be entitled to Cost Sharing of the Construction Contribution based on the amount of extension shared. (PDF page 67)

Request:

- (a) Please explain why cost sharing is now limited to three shares.
- (b) How may prior incidents of cost sharing of greater than three shares have occurred?
- (c) If cost sharing is not available for projects under \$20,000, and yet that “lower than \$20,000 extension” cost is utilized by a subsequent customer, does this create inequity between those customers? Please explain.
- (d) Please explain why the cost sharing period has been reduced to a maximum of five years for all instances.
- (e) Regarding the changes to cost sharing, please provide any and all consultations with customers whereby the customers requested such changes.

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Response:

- (a) Please refer to response AEY-YEC-YUB-004(b).
- (b) Since 1999, AEY has had 11 projects with three or more cost shares. Since 2018, YEC has had one project with three or more cost shares.
- (c) The Utilities acknowledge that there will be some cases where projects are utilized by more than one customer but will not be eligible for cost sharing. For that reason, the original projects limit is proposed to be updated to reflect factors such as inflation that were not corrected since 2011. Please note that this proposed update comes in conjunction with lowering the sharing period from 10 to 5 years. The Utilities believe this approach balances the administrative burden while keeping costs equitably distributed. Setting any kind of limit will notionally imply some degree of inequity, however the guiding principles should all be considered, such as being simple to administer and applied in a consistent and transparent manner.
- (d) In the currently approved T&Cs, the original cost sharing period was 10 years for customer contributions greater than or equal to \$10,000 and five years for contributions less than \$10,000. Also, consistent with the limit of three shares, the Utilities reduced the currently approved period by half, recognizing that a longer time period adds burden to track and maintain the cost-sharing information, while the probability of sharing occurring later on in the eligible time period becomes less likely. Setting a single five-year period strikes the balance between managing the administrative burden and enabling equitable cost-sharing.
- (e) Please refer to response AEY-YEC-YUB-004(a). While no formal consultations with customers were undertaken, the Utilities note that the values have not been updated for over a decade and do not reflect today's costs.

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Received: February 28, 2025**

AEY-YEC-YUB-029

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 68.

Issue: Multiple Dwellings

Quote: (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, 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) Please explain the significance of the proposed changes to Section 4.13.
- (b) How many Multiple Dwelling buildings in the Yukon are all residential and what percentage of those buildings are serviced through individual meters for each unit? Are all common areas in these buildings separately metered or is the power usage for those areas a calculated value?
- (c) If the definition of Multiple Dwellings is not changed, can this section clarify what type of multiple dwellings exist in the Yukon and clarify that such dwellings are under the residential rate if each unit in such a building has its own meter and is billed by the utility for electrical service?

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- (d) Is it intended that the common areas in a condominium or apartment building will be charged under the general service rate?
- (e) Is paragraph 4.13 (b) added to clarify that if a multiple dwelling only has one meter, it is the general service non-residential rate that applies to all the multiple dwellings in that building?
- (f) If all the units in the building are residential, then please provide the rationale for 4.13(b). Why should a demand charge be applied to the residential units?
- (g) Please provide the rationale for charging a different rate for a residential condominium with a single meter than that charged for a residential condominium with separate meters to each residence when the type of ownership — each unit is separately titled and has a separate owner — is the same and the type of use — residential — is the same?

Response:

- (a) Please refer to responses AEY-YEC-YUB-005(a) and (c) and AEY-YEC-YUB-027.
- (b) AEY does not have the data for the number of residential Multiple Dwellings or the number of residential only Multiple Dwellings. Almost all the residential Multiple Dwellings are served by individual meters and a common area meter. The common areas are metered, not calculated.
- (c) The T&Cs provide clarification on the definition and treatment of Multiple Dwellings. As stated in clause 2.1, "Multiple Dwelling" is defined as "a residential building containing more than one Single Family Dwelling unit". Also, clause 4.13 does establish that each individual unit will be served as a separate point of service and be billed individually on the applicable residential rate.
- (d) Yes, this is correct.
- (e) Yes, this is correct.

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- (f) With a single Point of Service, as described in section (b), it would not be feasible to separate out the General Service load and notionally charge metered customers in the complex. Common areas should be billed as General Service as the electrical infrastructure required to service the instantaneous load required by service elevators, boilers and other common areas is comparable to the equipment and load of other general service customers. Furthermore, the use of the General Service rate is further supported by the bill being sent to the condominium board, property manager, or homeowner association rather than individual residential customers in the complex given the single point of service.
- (g) Please refer to responses AEY-YEC-YUB-005 (b) and (d). The Point of Service will determine the applicable rate as outlined in Section 4.13. In the event the building is serviced by a single Point of Service, or in other words one meter, then the general service rate will be used as there are no individual meters on the residential rates. In this case it will be the condominium board who is the customer to the utility and not the individual residence. If individual units are metered or each have a Point of Service, the unit will be billed individually as a customer to the utility and charged the residential rate.

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AEY-YEC-YUB-030

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-030

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 69.

Issue: Reconnection

Quote: (a) For Major Industrial and General Service customers with peak demands greater than 500kW the Customer shall pay the minimum monthly bill for each month of disconnection

(b) For all other customers, the Company may request that the Customer pay the minimum monthly bill for each month of disconnection.

The Company may add a Collection Fee as specified in Schedule D if a site visit is required to attempt collection of overdue accounts and Service is not disconnected or for delivery of a notice of pending disconnection.

Request:

- (a) What criteria does the Company use when assessing whether or not the Customer pays the minimum monthly bill for each month of disconnection?
- (b) Given that in part (a) General Service/Industrial customers shall pay the minimum monthly bill for each month of disconnection, please explain how this is not a discriminatory practice in how it is applied to the different rate classes.

Response:

- (a) The criteria used when assessing whether or not the Customer pays the minimum monthly bill for each month of disconnection is the 500 kW threshold for the general

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service customers and an industrial customer noted in the referenced clause of the T&Cs.

- (b) The requirement to pay the minimum monthly bills was first approved by Board Order 1998-1, applicable to all rate schedules, except for seasonal service. In the 2009 Phase II Application, the Utilities proposed to change the clause as the specific concerns at that time of the Board Order 1998-1 were related to the Faro Mine in particular, which had disconnected from the system and consequently sought to avoid paying minimum monthly bills related to fixed charges and demand ratchets, that would otherwise be payable regardless of the energy consumption in any given month. The revised clause was approved by the Board in Order 2011-05. The provision in the T&Cs is reasonable and does not create any discriminatory practice considering the significant impact of large customers on the Yukon grid, ensuring all other continuing ratepayers are protected from any such actions of large customers and also ensuring customers are fully apprised that such actions will not be permitted.

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AEY-YEC-YUB-031

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-031

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 70.

Issue: Right of Entry

Quote: The Company may charge a “No Access Fee” as set in Appendix D any time the Company’s entry is attempted but terminated by the Company’s employees, agents or other representatives for reasons of safety or where entry is otherwise prevented, hindered or refused.

Request:

- (a) Please explain why the Utilities deem it necessary to include the above provision.
- (b) Please provide a summary of the instances when this provision would have been necessary.
- (c) How much notice is provided to the customer to grant such access or remove any safety issues before such a fee is imposed?

Response:

- (a) The provision was part of the previous T&Cs. This wording update is to provide clear expectations for the customer in the event of a dispute.
- (b) Examples of no access when this provision would have been necessary, include: meter reading where meters are blocked by snow/ice; where junk and debris are blocking the meter; where the customer's aggressive dogs were in the yard

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preventing the safe entry of meter readers; the meter reader was told to not enter an area; and did not have a key if the meter is behind a door.

- (c) The Utilities may act upon notice of 48 hours to the customer for non-safety related access. Instances of this occurring may include no key, locked or blocked gate and animals in the yard that pose a risk.

Notice periods of 30-days are standard for non-critical safety and access concerns when contact or inspection have been completed satisfactorily. For example, formal notice of service upgrades required by electrical inspector, brushing concerns with formal notification in easement license, verification of instrument metering installation equipment, notification to a customer upon refusal and of a due for test meter exchange. For hazardous safety concerns no notice period may be required.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-032

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 75.

Issue: Reading and Estimates

Quote: Unless otherwise specifically provided in a contract with a Customer, meters shall be read monthly or bi-monthly or at such other intervals as are practical in the circumstances. Customers' bills will be based on meter readings made by the Company or on estimates for those billing periods when the meter is not read. Whenever a bill is based on an estimate, an adjustment to reflect actual Energy consumption and Demand (if applicable) used will be made when the meter is next read.

Preamble: The Board has received complaints, some of which relate to frequency of meter reads, the true-up from estimates to actual meter reads, and the timing of such true-ups.

Request:

- (a) Are meters still read through a series of meter reading cycles during the month? Please explain.
- (b) If meters are read through a series of meter reading cycles in a month, are there any spare meter reading cycles in the month?
- (c) If there are spare meter reading cycles in the month, how often are previously missed meter reads picked up during the spare meter reading cycles?
- (d) What steps can the Utilities take to ensure all meters are read at least bi-monthly during the October 1 to March 31 winter peak?

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- (e) When there are Board-approved rate schedule changes, what steps do the Utilities take to ensure that the rates apply to consumption effective the date of the approved rate schedule change and not some estimation errors from prior periods.
- (f) In response to part (e), what better steps could be taken to address that issue?

Response:

- (a) Yes. Meters are read on cycles (e.g., 1-20) based on geographical location. These locations are predetermined in order to maximize efficiency in monthly meter reading.
- (b) Yes, there are spare meter reading cycles in the month, although not consistent every month.
- (c) In the case of missed meter readings, the meter read would be estimated and not included or identified in the spare meter reading cycle.
- (d) The Utilities each have a meter reading group that keeps a monthly log or schedule that is signed off by utility staff to ensure reads are completed at least bi-monthly. Exceptions to this frequency of meter reading may occur due to unexpected labour shortages and lack of availability of contractors to read meters, and extreme temperatures and unsafe road conditions that pose safety concerns for meter readers. As described in the response AEY-YEC-YUB-008(c), the Utilities are also in the process of implementing AMI meters, which would enable remote meter reading and increase the frequency of actual meter reads.
- (e) The rates apply to the date for the billing period performed through the billing system. If there is a high estimate, charges are recalculated when actual meter reads are received.
- (f) The steps described in (e) are consistently followed to ensure that customers are receiving the proper rate charges and interim rebate.

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AEY-YEC-YUB-033

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-033

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 75.

Issue: Calculation of Bills

Quote: The Company may elect not to charge a Customer for the billing period if, during that period, Demand was five kilowatts or less, Service was provided for five days or less and Energy consumption was five kilowatt hours or less.

Request:

- (a) Does this mean that the Company will not issue a bill versus not charge a customer? (That is, that the charges will roll forward to the next billing period.) Please explain.
- (b) If the premise behind part (a) question is correct, should the wording be changed from “The Company may elect not to charge a customer...” to “The Company may elect not to issue a bill to a Customer ...” Please explain.

Response:

- (a) To confirm, the company will not issue a bill and all applicable charges will appear on the next bill statement.
- (b) The Utilities agree with the proposed wording change and would update the T&Cs as part of updates from this proceeding.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-034

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 76.

Issue: Payment and Late Payment Charges

Quote: The bills are payable by way of EFTs, cash, debit bank payments, credit cards, money order or certified cheque as noted in the bills. The customer is responsible for the additional charges that may result due to payment methods other than those noted in the bills.

Request:

- (a) Did the Utilities previously accept cheques (not certified) as a form of payment?
- (b) If the response to part (a) is yes, why is this discontinued in the proposed revision to the T&Cs?
- (c) If a customer uses any of the payment forms acceptable to the Utilities, and renders payment on or before the due date but the transaction is not deposited in the bank account of the Utilities before the due date, does a late payment charge apply? Please explain.
- (d) Can you please explain what additional charges this paragraph is referring to when it states: “The customer is responsible for the additional charges that may result due to payment methods other than those noted in the bills...”?

Response:

- (a) Confirmed, the Utilities currently still accept cheques.
- (b) N/A.

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- (c) The Utilities post payments daily. Customers providing payment on or before the due date would not be subject to late fees.
- (d) The Utilities do not charge for other forms of payment.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-035

Reference: AEY-YEC 2025 T&Cs Application, Appendix 2 – Blackline, PDF page 81.

Issue: Customer Liability

Quote: (b)... Alternatively, the Company may elect to correct the interference or disturbance at the Customer's sole expense.

(c) Customer shall design, install and operate the Customer's Facilities in such a manner as to maintain a Power Factor of not less than 90%. The Company may require any Customer not satisfying this Power Factor requirement to furnish, install, and maintain, at no cost to the Company, such corrective equipment as the Company may deem necessary under the circumstances assumed or a charge for deficient power factor may apply as per applicable rate schedule.

(d) The Customer shall indemnify and save harmless the Company from and against any claim or demand for injury to persons or damage to property (including loss of use thereof and of any other property affected by the damage to property) arising out of or in any way connected with the use of the service so long as such injury or damage is not caused by the negligent acts or omissions or willful misconduct of the Company, its employees and agents.

(e) The Customer releases the Company and its agents, directors, officers, employees, independent contractors, consultants, representatives, successors and assignees from any and all claims and liabilities whatsoever relating to or arising as a result of the Customer, or its agents, directors, officers, employees, independent contractors, consultants, representatives, successors and assignees carrying out any acts required by or related to these Terms and Conditions for the provision of Service, maintenance of Service, or any other act whatsoever arising out of or in any way connected with

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the existence or use of the Service so long as such injury or damage is not caused by the negligent acts or omissions or willful misconduct of the Company, its employees or agents.

Request:

- (a) Can the customer decline service rather than pay for the correction of interference or disturbance?
- (b) Does the second portion of the above quote apply to residential customers? Please explain.
- (c) Could the last two quoted paragraphs (parts (d) and (e)) of 10.3 in a similar vein be applied to paragraphs (b) and (c) of 10.3 in terms of assessing and addressing customer liability? That is: Will the customer be liable for costs only in the case of negligent acts or omissions or willful misconduct? Please explain.

Response:

- (a) Yes, the customer can decline service and be disconnected.
- (b) Yes, all customers have the same obligations outlined in Sections (d) and (e). However, Power Factor charges, currently, do not apply to residential customers.
- (c) The proposed Sections (b) and (c) of Clause 10.3 do not limit Customer liability in the specified circumstances to negligent acts or omissions or willful misconduct. Sections (d) and (e) address the indemnity provided by the Customer in favour of the Company and the Customer's release provided to the Company, respectively. Those sections are unrelated to the terms regarding Customer liability in Sections (a) and (b).

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-036

Reference: AEY-YEC 2025 T&Cs Application, PDF page 3, paragraph 1

Issue: Study on Maximum Investment Levels (MILs or MILs Study)

Quote: 1. ... In response to that letter, AEY and YEC proposed addressing the changes to the T&Cs as a standalone limited scope filing. The Utilities have jointly prepared the enclosed revision to the T&Cs, while the MILs and the Fees Schedule have been prepared by AEY, as AEY serves most of the distribution customers in the Yukon. The Utilities submit that, given the direction from the Board, this is a limited scope submission and elements such as the General Rate Application (GRA) (also known as Phase 1) and rate design elements (also referred to as Phase 2) are not within scope of this proceeding.

Request:

- (a) Please confirm if YEC agrees with and is in support of the “MILs and the Fees Schedule” as prepared by AEY.
- (b) If not confirmed in response to part (a), please identify the portion of the “MILs and the Fees Schedule” with which YEC takes issue and provide an explanation of why this is the case.
- (c) If the response to part (a) indicates that YEC takes no issue with the “MILs and the Fees Schedule” as prepared by AEY, why would the entirety of the T&Cs Application, including MILs and the Fees Schedule, not have been filed jointly?
- (d) Did the Utilities undertake any stakeholder consultations regarding the review and update to the MILs?
- (e) If the response to part (d) is yes, please list the stakeholders involved during the consultation process and provide any notes from the consultation process.

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- (f) If the response to part (d) is no, please explain why no stakeholder consultations took place.

Response:

- (a) The MILs proposed by AEY are developed based on a study which was provided as part of submission and YEC takes no issue with the MILs and the Fee Schedule as prepared by AEY.
- (b) N/A.
- (c) Both the MILs and T&Cs are common to both AEY and YEC. The MILs are included in the T&Cs under Schedule B. Updating the T&Cs and MILs separately would have created regulatory inefficiency, inequitable treatment of customers across the territory, conflict with the principle of “postage stamp” rates (i.e., same rate for customers in the same rate class regardless of the community they live in) which is the current practice in the Yukon, and the need to update the T&Cs on two separate occasions. While AEY conducted the MILs study, given its customer base is larger than YEC’s, consistent with past practices, YEC did provide feedback on the approach prior to filing.
- (d) The Utilities did not undertake any stakeholder consultations but rather assessed historical information and completed a desktop study to make its recommendations on the MILs.
- (e) N/A.
- (f) The review and update to the MILs employed a principled approach involving specific methods (cost per lot and Desktop Study) and consideration of longstanding regulatory principles as described in paragraphs 14 to 17 of the Application. AEY does not consider that stakeholder consultation during the MILs

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review would have significantly assisted with that work. The MILs Study has been presented to stakeholders in this proceeding and is now subject to stakeholder review and testing as well as Board oversight.

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AEY-YEC-YUB-037

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-037

Reference: AEY-YEC 2025 Terms & Conditions of Service Application (T&Cs or T&Cs Application), T&Cs Blackline version, PDF pages 58, 59, 60, 68.

Issue: Definitions and clauses related to Study on Maximum Investment Levels (MILs or MILs Study)

Quote: **“Customer”** – a person, firm, partnership, corporation, association or organization (including, without limitation, individual members of any unincorporated entity) to who the Company provides any Service hereunder including all owners and occupants of a premises, whom normally reside at the premises during the time for which Service was provided to that premises whether or not such owner or occupants name appears on the application for Service.

“Multiple Dwelling” – a residential building containing more than one Single Family Dwelling

“Single Family Dwelling” – a private residence which is not a Multiple Dwelling, consisting of single-family living quarters having, in one self-contained unit, at least sleeping quarters, and a kitchen.

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.**

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Request:

- (a) Please fully explain how the Utilities determine whether a dwelling is a Residential Single Family or a Residential Multiple Dwelling in the following situations:
- i. Townhouse with a shared wall
 - ii. Townhouse with a shared wall and common area such as a laundry or utility room
 - iii. Townhouses on one lot either with or without a common area
 - iv. Duplex with a shared wall
 - v. Duplex with a shared wall and common area such as a laundry or utility room
 - vi. Duplex on one lot either with or without a common area
 - vii. Condominium with a shared wall
 - viii. Condominium with a shared wall and common area such as a laundry or utility room
 - ix. Any other circumstance not identified in (a)(i) to (a)(viii).
- (b) In a situation where changes to zoning or building restrictions would allow for up to four residences on a residential lot, such as in the case in the zoning for the City of Whitehorse, how would each of the “residences” or “units” be classified under the proposed T&C’s (Residential Single Family or Multiple Family Dwelling) and how would the owner or owners be charged for each of these connection-types in the following situations:
- i. Garden suite
 - ii. Living suite with a living suite built
 - i. Within the existing floor area, or
 - ii. In a new floor area
 - iii. Additional units added to multifamily residential lots and cluster home lots

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In the response, please provide all assumptions upon which the response has been based.

Response:

- (a) (i-ix) As defined 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 examples listed in the request all would be classified as a Multiple Dwelling. Without specific facts, the Utilities cannot comment on other circumstances not identified in the request (part ix of the request).
- (b) (i) A single garden suite would be considered a Single Family Dwelling under the T&Cs, assuming that it would not be part of the same building as the primary residence. If there were to be two garden suites in one building (e.g., up and down) then the building would be a Multiple Dwelling and each of the suites would be a Single Family Dwelling.
- (ii) Living suite with a living suite built:
- i. Within the existing floor area – Assuming that each living suite, on its own, meets the definition of Single-Family Dwelling in the T&Cs, then the entire living suite (containing two Single Family Dwellings) would be a Multiple Dwelling.
 - ii. In a new floor area – assuming that each living suite, on its own, meets the definition of Single-Family Dwelling in the T&Cs, then the entire living suite (containing two Single Family Dwellings) would be a Multiple Dwelling.
- (iii) Additional units added to multi-family residential lots and cluster home lots would be Multiple Dwellings if they share common areas or walls with other units. If they are stand-alone buildings, then they would be Single Family Dwellings.

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AEY-YEC-YUB-038

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-038

Reference: AEY-YEC 2025 T&Cs Application, Appendix 3 – MILs Study, PDF page 98, paragraph 17; PDF page 100, paragraph 23; and PDF page 114, Appendix A – Guiding Principles

2024-12-20 Appendix B - MILs Study – Excel, tab “Dataset”

Issue: Study on Maximum Investment Levels (MILs or MILs Study) – Residential Single Family Dwelling and Residential Multi Dwelling

Quote: 17. As outlined in the approach above, in determining the cost per lot AEY has utilized 10 years of known actual data, inflating the costs to 2025 dollars and determining the median. The robust sample size used in the Residential Single Family MIL study, over 10 years of data, provides a good representation of projects for both underground and overhead services, including different extension lengths and number of sites. The calculated MIL for Residential Single Family service type has been determined to be \$10,337/site. Below are the results of AEY’s analysis.

and

23. AEY conducted a desktop study that considered the current minimum costs of an extension to supply a new customer, based on AEY’s standards of service, in Whitehorse. The typical extension cost for a new Residential customer considers a single-phase overhead connection, with one transformer, one pole, and 30 meters of cable. Table 7 shows that the calculated Residential Single-Family MIL is consistent with the typical extension costs. The value is slightly higher than the median value derived using the cost per lot methodology (\$10,337).

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Preamble: The Board requires further information in respect of the dataset used by AEY in its MILs Study for Residential Single Family and Residential Multi Dwelling

Request:

- (a) Please confirm that the Residential Single Family cost information found in Appendix B – MILs Study on the tab “Dataset” contains, on a project ID basis, cost information for both overhead and underground services.
- (b) Please confirm that the Residential Multi Dwelling cost information found in Appendix B – MILs Study on the tab “Dataset” contains, on a project ID basis, cost information for both overhead and underground services.
- (c) Please clarify if the Project ID information from Appendix B – MILs Study on the tab “Dataset” is also able to be identified by community (for example, Whitehorse, Dawson City)? If confirmed, please provide supporting “Dataset” tab information in an excel workbook, ensuring that projects can be easily identified by Community for each of Residential Single Family and a Residential Multi Dwelling.
- (d) For a Residential Single Family service, please explain the reasonableness of AEY’s comparison of:
 - (i) The current cost for a service being a “single-phase overhead connection, with one transformer, one pole, and 30 meters of cable” as found in its “desktop study”

with
 - (ii) a median cost utilizing 10 years of known actual data inflated to 2025 dollars that consisted of both underground and overhead cost data.
- (e) Referring to the statement in (d)(i), please clarify if each service is required to have its own transformer, or if a single transformer is able to be used for multiple services.
- (f) Referring to the statement in (d)(i), please clarify if each service is required to have 30 metres of cable.
- (g) Please explain how each of (d)(i) and (d)(ii) costs accord with item (4) of Appendix A - Guiding Principles, that “The current cost to connect new Customers is the

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appropriate starting point for establishing MILs.”¹ Please include a discussion of what constitutes “current costs” in relation to the two “methods” identified in part (b).

- (h) Referring to Appendix A - Guiding Principles, which states that “The current cost to connect new Customers is the appropriate starting point for establishing MILs,”² please explain why the appropriate starting point should not consider a different value such as 50 per cent customer contribution for each connection.
- (i) Please explain how each of (d)(i) and (d)(ii) costs accord with item (3) of Appendix A - Guiding Principles, that “The maximum amount that the Company invests in a new extension on behalf of all customers should consider the expected longevity or any other risks associated with the new service;”³
- (j) Referring to Appendix B – MILs Study and the tab “Dataset,” please explain the wide variation in costs for one unit of “residential single family.” For example, Project ID 778 shows, for the year 2023, one unit at a cost of \$16,292.66 whereas Project ID 773 shows, for the year 2023, one unit at an average cost of \$5,566.37.
- (k) Please provide all reasons that explain the difference between AEY’s proposal to use its 2024 desktop study results of current minimum costs of an extension to supply a new customer, being \$11,014 per Residential Single Family, as compared to the average per-unit cost shown for Project ID 773 for the year 2023, being \$5,566.37. If inflated for two years, why would the average per-unit costs for Project ID 773 not be representative of a current minimum cost of an extension to supply a new residential customer?
- (l) Has AEY’s 2024 desktop study of current minimum costs of an extension to supply a new customer, being \$11,014 per Residential Single Family, examined costs for a onetime Residential Single Family stand-alone service installation or are the estimates based on “simultaneous” multiple installations of Residential Single Family extensions, such as those installations during the development of a subdivision.

¹ AEY-YEC 2025 Terms & Conditions of Service Application, Appendix A – PDF page 114: “(4) The current cost to connect new Customers is the appropriate starting point for establishing MILs;”

² AEY-YEC 2025 Terms & Conditions of Service Application, Appendix A – PDF page 114: “(4) The current cost to connect new Customers is the appropriate starting point for establishing MILs;”

³ AEY-YEC 2025 Terms & Conditions of Service Application, Appendix A – PDF page 114: (3) The maximum amount that the Company invests in a new extension on behalf of all customers should consider the expected longevity or any other risks associated with the new service;”

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- (m) Please provide references to Project IDs from Appendix B – MILs Study on the tab “Dataset” for costs for the following construction types:
- (i) Townhouse with a shared wall
 - (ii) Townhouse with a shared wall and common area such as a laundry or utility room
 - (iii) Townhouses on one lot either with or without a common area
 - (iv) Duplex with a shared wall
 - (v) Duplex with a shared wall and common area such as a laundry or utility room
 - (vi) Duplex on one lot either with or without a common area
 - (vii) Condominium with a shared wall
 - (viii) Condominium with a shared wall and common area such as a laundry or utility Room
 - (ix) Any other circumstance not identified in (m)(i) to (m)(ix)

For each of the subparts, please explain why the construction type examples are, or alternatively, why the construction type examples are not, considered under the Residential Multi Dwelling MIL; and ensure it is clear how many units are represented by each of the Project ID costs.

- (n) Please recalculate the information described and produced in paragraph 17 separately for each of overhead and underground Residential Single Family services projects and again for Residential Multi Dwelling services projects. Please provide supporting “Dataset” tab information in an excel workbook, ensuring that overhead and underground projects can be easily identified by project for each of Residential Single Family and Residential Multi Dwelling.

Note that the revised Dataset tab information requested in this IR may included and included with the revised “Dataset” tab information requested in YUB-AEY/YEC-1- 003(c).

- (o) Please provide the assumed amperage for a “single-phase overhead connection, with one transformer, one pole, and 30 meters of cable” for a Residential Single Family service.

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- (p) Please provide the assumed amperage and equivalent equipment information for a corresponding underground Residential Single Family service.
- (q) Please provide an estimation of the percentage of Residential Single Family service projects that are overhead as compared to underground for each of the last five years.
- (r) Please fully explain if AEY considers that a Residential Single Family underground service represents a premium service.
- (s) Please cite any business cases provided by AEY that support a greater need for underground services for a Residential Single Family.

Response:

- (a) Confirmed. The dataset in Appendix B does contain cost information for both overhead and underground services from Residential Single-Family projects. Please note that the dataset does not include specific flags or classifications that would allow for direct querying or categorization by service type.
- (b) Confirmed. The dataset in Appendix B does contain cost information for both overhead and underground services from Residential Multi Dwelling projects. Please note that the dataset does not include specific flags or classifications that would allow for direct querying or categorization by service type.
- (c) Confirmed. The Project ID information can be identified by Community. Please refer to AEY-YEC-YUB-038(c) Attachment 1, tab “dataset with area names”, column “I”.
- (d) The Desktop Study was performed as a reference point for reasonableness of the Cost per Lot study, which incorporates a large sample size with 10 years of historical project data. Utilizing the median cost, as described in the MILs Study, takes ten years of data and sets a mid-point of the dataset. This is then compared to the Desktop Study which represents a typical service as support of the detailed

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cost per lot study. Although AEY considers the comparison to be reasonably fair, it emphasizes that the desktop study should serve as reference rather than a forecast or an expected value to be matched.

- (e) Residential services always require a transformer, but the transformer does not need to be dedicated to only one customer. The transformer noted in the referenced statement in (d)(i) of the request is capable of supplying up to two customers. However, the Desktop Study looks at typical installations which, for that transformer, would be where it is supplying only one customer. While the Desktop Study is a reference point, the Cost Per Lot Study considers various transformer connections, including single and multiple customers connected to one transformer.
- (f) The required cable length for each service varies based on factors such as lot size, meter location, and pole location. The Desktop Study adopted 30 meters, seen in the referenced statement in (d)(i) of the request, as a general or typical installation. During the period from 2018 to 2023, Residential Single-Family projects had a median cable length of 35 meters which was used in the Desktop Study. While the Desktop Study is a reference point, the Cost Per Lot Study considers various types of lot sizes, meter locations and pole location to attain a better representative figure.
- (g) AEY assumes that the reference to the "'methods' identified in part (b)" in the last sentence of this request refers to the two examples of costs as set out in parts (i) and (ii) of request (d) above. The noted examples of costs correlate to item (4) of the Guiding Principles because they assist in determining the current cost to connect new customers. In both cases, the costs reflect the actual expenses incurred in recent projects, providing a realistic basis for defining an adequate MIL. The cost determined in (d)(ii) is representative of project costs from the last 10

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years, adjusted to present values. This approach captures a broad range of project variations and provides stable, representative cost figures. The median value was adopted to represent the typical customer and to smooth out anomalies. The cost determined in (d)(i) is representative of current costs, being based on current, specific expenses required to connect new customers for a typical standard project. In summary, considering costs determined in (d)(ii) offers a representative long-term view, while method (d)(i) ensures that the cost figures are actual and up-to-date.

- (h) AEY does not fully understand the request but provides the following in an effort to be helpful. AEY believes that the Guiding Principles recommend adopting the current cost as the starting point to ensure a value based on actual data that realistically reflects the cost to connect a new customer. Since this is an “actual project cost” approach, there is no basis to assume any percentage as a starting point. The current cost approach aligns with the principle of cost causation, whereas using a percentage may lead to underestimating the actual costs and creating potential inequities among customers. Furthermore, the use of a percentage, and consequently a lower MIL, would increase customer investment, sending an incorrect price signal to new customers.
- (i) Item (3) guides the determination of an appropriate investment amount for the Company, while the (d)(i) and (d)(ii) costs are representative of the actual project cost.
- (j) Extension costs are influenced by several factors, including location, distance to the grid, existing installations, and number of customers. For instance, Project ID 778 is an isolated extension to a single residence, which tends to be more expensive, while Project ID 783 (AEY is assuming that the reference in this request to Project ID 773 is meant to refer to ID 783) is part of a subdivision development

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with nearly 200 residences. The number of extensions developed simultaneously allows for various economies of scale in both service and equipment.

- (k) The Desktop Study provides a reference point for the minimum extension cost required to supply a typical new customer without cost sharing. The “customer without cost sharing” case was adopted because it reflects the majority of the new extensions. For instance, from 2014 to 2023, 83 percent of Residential Single Family extensions were for a single customer without cost sharing. Projects involving hundreds of customers, such as Project ID 783 (AEY is assuming that the reference in this request to Project ID 773 is meant to refer to ID 783), accounted for less than 1 percent of the projects during the same period.
- (l) The Desktop Study examined the costs for a one-time Residential Single Family stand-alone service installation. Please refer to the response to (k) above.
- (m) The extension projects do not differentiate based on the construction types specified in the request. Consequently, the extension costs and the proposed MIL for Residential Multiple Dwelling customers are unaffected by the construction type.
- (n) The available project information does not identify overhead and underground projects, rather the sample size incorporates a mix of overhead and underground based on historical projects data.
- (o) The typical project adopted by the Desktop Study assumes a service connection with 200A.
- (p) A corresponding underground residential connection would also assume a service connection of 200A. The underground service uses similar equipment, with the pole being replaced by conduit.

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- (q) From 2019 to 2024 the estimated percentage of Residential Single-Family services is as follows:

Table 1: Residential Single Family – Underground vs Overhead Estimation

Year	Estimated Underground Percentage	Estimated Overhead Percentage
2019	59%	41%
2020	57%	43%
2021	0%*	100%
2022	0%*	100%
2023	73%	27%
2024	78%	22%

* No Whistle Bend projects were energized in 2021 or 2022.

- (r) While the underground service may offer premium benefits such as enhanced reliability, safety, and aesthetics, current rates do not differentiate customers by overhead and underground services. Rather, the Cost Per Lot analysis, which incorporates 10 years of project data, will gradually consider the mix between overhead and underground service in the median.
- (s) AEY does not have business cases to support a greater need for underground services. AEY acknowledges that consideration of the necessity of underground services generally falls under the responsibility of developers and local government authorities, as they are best positioned to assess the specific needs and preferences of the community.

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AEY-YEC-YUB-039

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-039

Reference: AEY-YEC 2025 T&Cs Application, Appendix 3 - MILs Study, PDF page 110, paragraph 50; PDF page 112, paragraph 54; and Appendix A – Guiding Principles, PDF page 114 2024-12-20 Appendix B - MILs Study – Excel, tab “Dataset”

Issue: Study on Maximum Investment Levels (MILs or MILs Study) – Street Lighting

Quote: 50. AEY then tested its proposed \$6,649 MIL per light to the number of sites over the last ten years and compared the historical total cost (inflated to 2025 dollars) versus the currently approved MIL (approved in 2011). Figure 6 shows the company investments in these two scenarios with respect to total investment. The 2025 proposed MIL would cover 84 percent of the total cost being invested by the company, whereas the 2011 approved MIL would cover only 18 percent of the average connection’s total costs. The currently approved MIL leads to an improper price signal and an undue economic discipline being imposed on customers, who are currently contributing 82 percent of project costs on average, with the utility contributing 18 percent.

The proposed MIL will better equalize the balance between customer versus utility investment and provide better price signals to customers who are making choices to invest in the Yukon.

and

54. AEY conducted a desktop study that considered the current minimum costs of an extension to supply one new streetlight, based on AEY’s standards of service, in Whitehorse. The typical extension cost for a new Streetlight considers a single-phase underground connection, with one 32 W LED light, one pole, 30 meters of cable, and contractors. The desktop study is directionally aligned with the

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cost per light study of the last 10-years of available data, which incorporates different scales of projects such as new subdivisions.

Preamble: The Board requires further information in respect of the dataset used by AEY in its MILs Study for Street Lighting.

Request:

- (a) Please explain AEYS statement in respect of improper price signals and “undue economic discipline being imposed on customers” as they relate to cost causation.
- (b) Please explain how AEY’s proposed MIL for Street Lighting will “balance of what an individual Customer pays upfront through a Customer contribution versus what all Customers in a particular rate class pay through ongoing rates”¹ and also “provide economic discipline and price signals to new customers.”²
- (c) Referring to Appendix B – MILs Study and the tab “Dataset,” please explain the wide variation in costs for one unit of “Street Lighting.” For example, Project ID 782 shows, for the year 2023, one unit at a cost of \$10,659.17, whereas Project ID 785 shows, for the year 2023, one unit at an average cost of \$5,465.23.
- (d) Under a hypothetical scenario of a project with average streetlight costs of \$5,465.23 and an applicable MIL for a streetlight fixture of \$6,449, please clarify the amount of costs that would be capitalized by AEY and the amount of costs contributed by the customer for a single light fixture. Please explain how the response provided confirms that the applicable MIL of \$6,449 will “achieve a reasonable balance of what an individual Customer pays upfront through a Customer contribution versus what all Customers in a particular rate class pay through ongoing rates.”³
- (e) Under a hypothetical scenario of a project with average streetlight costs of \$10,659.17 and an applicable MIL for a streetlight fixture of \$6,449, please clarify the amount of costs that would be capitalized by AEY and the amount of costs contributed by the customer for a single light fixture. Please explain how the response provided confirms that the applicable MIL of \$6,449 will “achieve a

¹ AEY-YEC 2025 Terms & Conditions of Service Application, Appendix A – PDF page 114: “(1) MILs should be set to achieve a reasonable balance of what an individual Customer pays upfront through a Customer contribution versus what all Customers in a particular rate class pay through ongoing rates;”

² AEY-YEC 2025 Terms & Conditions of Service Application, Appendix A – PDF page 114: “(2) MILs should provide economic discipline and price signals to new Customers;”

³ AEY-YEC 2025 Terms & Conditions of Service Application, Appendix A – PDF page 114: “(1) MILs should be set to achieve a reasonable balance of what an individual Customer pays upfront through a Customer contribution versus what all Customers in a particular rate class pay through ongoing rates;”

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reasonable balance of what an individual Customer pays upfront through a Customer contribution versus what all Customers in a particular rate class pay through ongoing rates.”⁴

- (f) Please explain why AEY does not consider the outcome of the desktop study for Street Lighting to be a reasonable cost estimate.
- (g) If the response to part (f) indicates that the desktop study for Street Lighting does not take into account unique and more costly street light installations, please explain why those unique and more costly installations should be representative of a typical extension cost for a new street light.
- (h) As stated in the quote above, AEY determined that “the typical extension cost for a new Streetlight considers a single-phase underground connection, with one 32 W LED light, one pole, 30 meters of cable, and contractors” - what were the parameters for a “new Streetlight” prior to the quoted statement.

Response:

- (a) It is important that a MIL provide an appropriate economic signal to customers to drive decision-making. For example, if a customer wants more streetlights than typical, or more expensive fixtures, then that customer should pay for the additional costs associated with the streetlights or fixtures. This is consistent with cost causation principles. AEY considers it appropriate that the MIL should cover the cost of a standard or typical streetlight, with consideration of various scenarios (e.g., large developments compared to small developments), by determining an average cost per streetlight as was done in the MILs Study. Setting a MIL too low will result in the customer being burdened by paying more than a typical amount for streetlights, with limited options to reduce their costs because the standard streetlight installation is the minimum required. This is what AEY means when referring to "undue economic discipline", and would not be consistent with the principle of cost causation. Furthermore, setting a MIL too low may not send an

⁴ AEY-YEC 2025 Terms & Conditions of Service Application, Appendix A – PDF page 114: “(1) MILs should be set to achieve a reasonable balance of what an individual Customer pays upfront through a Customer contribution versus what all Customers in a particular rate class pay through ongoing rates;”

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appropriate price signal and may discourage investment as customers must pay more. The ten-year average ensures that all types of requests are captured in the average MILs for streetlights. This was then subsequently supported by the Desktop Study.

- (b) The proposed MIL has been prepared using a relevant sample size with 10 years of historical project data to represent the typical streetlight using actual data. This was supplemented by a desktop study which utilized current costs for labour and materials. Setting the MIL at the typical cost, as determined by the cost per streetlight analysis and detailed in the MILs Study.
- (c) The streetlight costs are influenced by several factors such as location, distance to the grid, team mobilization, and number of lights. For example, Project ID 782 is an isolated extension to a single streetlight, which tends to be more expensive, while Project ID 785 is part of a subdivision development with 67 streetlights. The significantly larger number of extensions developed simultaneously meant that the cost was lower due to economies of scale in both service and equipment.
- (d) If the total capital cost of the extension is less than the approved MIL, the Customer will not be required to make any contribution. Under the scenario where the extension cost is \$5,465.23 and the MIL is \$6,449, AEY would invest the \$5,465.23. The \$5,465.23 project would then be captured in the next MIL's study in setting a future average MIL to establish the revised medium cost per lot.
- (e) Under no circumstances should the MIL exceed the customer extension costs. For the scenario where the extension cost is \$10,659.17 and the MIL is \$6,449, AEY would capitalize \$6,449 and the customer contribution would be \$4,210.17 (\$10,659.17 - \$6,449). A higher customer contribution due to a lower MIL would

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result in the customer overpaying (higher upfront versus over the length of the service through rates) and would not send an appropriate price signal.

- (f-g) AEY considers the outcome of the Desktop Study to support the MIL determined using the Cost Per Streetlight analysis. The Cost Per Streetlight analysis utilizes ten years of data, which incorporates various customer requests including various sizes of developments. While relevant, the Street Lighting desktop study is limited to one type of customer request, while not considering that not all developments or requests are the same or trends in customer requests (e.g., larger or smaller developments, multi-units versus larger lots sizes, etc.). Thus, the MILs study conducted proposes that the most representative cost is the median historical cost.
- (h) AEY notes that the parameters were determined based on what is typically installed. As the Desktop Study was not previously performed there are no prior parameters available for reference.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-040

Reference: AEY-YEC 2025 T&Cs Application, PDF page 96, Table 3: Handy-Whitman Index; PDF page 104, Table 11: Residential Multi Dwelling MIL – Three and Five-year Medians; and PDF page 113, paragraph 58 2024-12-20 Appendix B - MILs Study - Excel

Issue: Study on Maximum Investment Levels (MILs or MILs Study)

Quote: PDF page 96:

Table 3: Handy-Whitman Index

**HANDY-WHITMAN - ANNUAL AVERAGE COST INDEX (1973=100)
Cost Trends of Electric Utility Construction
Distribution Plant Costs - Plateau Region**

Year	Index	Change
2011	585.5	-
2012	608.8	4.0%
2013	630.4	3.6%
2014	649.5	3.0%
2015	668.1	2.9%
2016	674.3	0.9%
2017	696.3	3.3%
2018	726.3	4.3%
2019	756.0	4.1%
2020	793.8	5.0%
2021	832.3	4.9%
2022	974.8	17.1%
2023	1,215.0	24.6%
2024 ^a	1,297.4	6.8%
2025 ^a	1,385.4	6.8%

PDF page 104:

Table 11: Residential Multi Dwelling MIL – Three and Five-year Medians

Period	3-years (2021-2023)	5-years (2019-2023)
Number of sites	27	133
Average cost (2025\$/site)	3,994	4,271
Median cost (2025\$/site)	4,046	4,046

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PDF page 113:

58. AEY considers that an annual inflation factor should be applied for each year in which a MILs study is not conducted to ensure that the annual MILs continue to be reflective of, or approximately reflective of, changes in cost pressures with respect to material and labour. As such AEY also requests that the Board approve the use of the CPI for Whitehorse, Yukon index to annually inflate MILs until AEY's next MIL Study is conducted. While AEY believes the Handy-Whitman index is more relevant to use, since it is utility-specific, it will not be available in the timelines needed,⁸ so it is not proposed to be used. Further, AEY requests that the Board direct AEY to provide annual updates to the MILs via a no-notice application filed in in December of each year, to be applied in the following year.

Preamble: The Board requires further information respecting AEY's use of the Handy Whitman Index (HWI) in its MILs Study.

Request:

- (a) For the purposes of AEY's MILs Study, please explain why AEY chose to inflate its historical costs using the HWI as opposed to the use of Consumer Price Index (CPI) for Whitehorse?
- (b) Has AEY prepared any previous MILs Study using the HWI? If so, please identify the application in which the HWI was used.
- (c) Please explain why the HWI plateau region is applicable to the AEY service territory.
- (d) Please add a column to Table 3: Handy-Whitman Index to include the equivalent information for CPI Whitehorse. Please confirm that any cost of energy data has been treated the same (whether included or excluded) in each of the HWI or CPI information provided.
- (e) For each of AEY's three- and five-year median calculations (for Residential Single Family, Residential Multi Dwelling, General Service and Street Lighting), AEY included the years 2022 and 2023, which can be observed in Table 3 above, as the two largest percentage increases and which correspond to the years of the COVID pandemic. Please explain why it is reasonable to inflate historical costs using these percentages given that these levels of inflation are outliers in this dataset.

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- (f) The Board observes that in restating its historical costs to 2025 values, AEY similarly included the years 2022 and 2023. This can be seen, for example, in Appendix – MILs Study and the tab “Dataset” in columns F and H.¹ Please explain why it is reasonable to inflate historical costs using these percentages given that these levels of inflation are outliers in this dataset.
- (g) In AEY’s 2023-2024 GRA Application, which was submitted after the COVID pandemic, please identify and explain how any similar outlier information, inflation-related or otherwise, was treated.

Response:

- (a) The Handy-Whitman Index was adopted due to its better representation of the electric utility business, including, for example, impacts of supply costs specific to the utility industry. The CPI is more general as it represents the cost of a fixed basket of goods and services purchased by consumers.
- (b) The previous MILs study as filed in the YECL-YEC 2009 Phase II Application adopted the Electric Utility Construction Price Index (EUCPI), provided by Statistics Canada. The EUCPI was suspended in 2014. AEY currently sees the HWI as the best replacement for the EUCPI.
- (c) The HWI has data for the regions North and South Atlantic, North and South Central, Plateau, and Pacific. AEY utilized the Plateau region as the best reflection of Yukon cost inflation.
- (d) Please refer to the table below for the Handy Whitman and the Whitehorse CPI indices.

¹ As an example, Row 622, Project 620 (2020) the historical cost of \$2,484.52 was inflated using the HWI: $\$2,484.52 * 1.049 * 1.171 * 1.246 * 1.068 * 1.068$ (2021-2025, respectively) = 4,337.46.

Table 1: HWI and Whitehorse CPI

Year	Handy-Whitman		Whitehorse CPI	
	Index	% Change	Index	% Change
2011	585.5	-	118.1	-
2012	608.8	4.0%	120.8	2.3%
2013	630.4	3.6%	122.8	1.7%
2014	649.5	3.0%	124.4	1.3%
2015	668.1	2.9%	124.1	-0.2%
2016	674.3	0.9%	125.4	1.0%
2017	696.3	3.3%	127.5	1.7%
2018	726.3	4.3%	130.6	2.4%
2019	756.0	4.1%	133.2	2.0%
2020	793.8	5.0%	134.5	1.0%
2021	832.3	4.9%	138.9	3.3%
2022	974.8	17.1%	148.3	6.8%
2023	1,215.0	24.6%	155.5	4.9%
2024	1,297.4	6.8%	158.6	2.0%
2025	1,385.4	6.8%	162.5	2.5%

* Grey values were estimated by the 10-year average.

There was no treatment applied to the energy data from any source.

- (e-g) Using data from the COVID years in the MILs Study was deemed reasonable by AEY as disruptions in supply chain, for example materials used for new extensions, continue to persist today. This is driven by the energy transition and electrification around the world. For example, federal and municipal policies continue driving electric heating, electric vehicles, and grid modernization.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-041

Reference: AEY-YEC 2025 T&Cs Application, Appendix 3 - MILs Study, PDF page 98, paragraph 19; 2024-12-20 Appendix B - MILs Study - Excel

Issue: Study on Maximum Investment Levels (MILs or MILs Study) – Company Investment: Proposed vs. Approved MILs

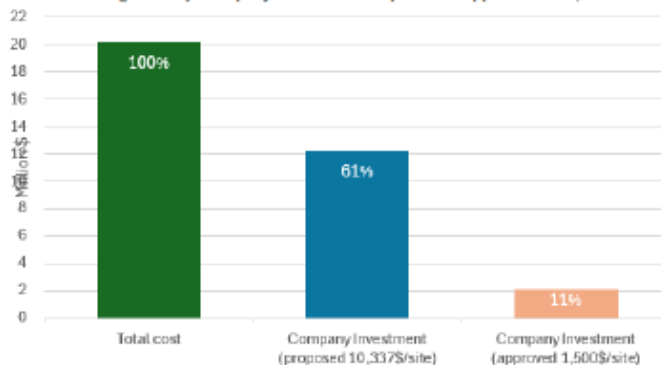
Quote: PDF page 98

19. Based on the test, the proposed 2025 MIL would cover 61 percent of the total cost being invested by the utility, whereas the 2011 approved MIL would cover only 11 percent of the average connection’s total costs. ...

2024-12-20 Appendix B - MILs Study – Excel, tab “Residential Single Family”

Extension costs	(2025\$)	
Total cost	20,226,300	100%
Company Investment (proposed 10,337\$/site)	12,259,246	61%
Company Investment (approved 1,500\$/site)	2,145,636	11%

Residential Single Family -Company Investment: Proposed vs. Approved MILs (2025 dollars)



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Preamble:

In its examination of the graphs provided by AEY which show, for each category of MIL proposed, the “Company Investment: Proposed vs. Approved MILs,” the Board is unable to replicate certain costs provided by AEY that inform AEY’s calculation of the company investment as a percentage of the total cost. The Board understands these costs are representative of 1,437 sites in the case of Residential Single Family as can be found in Appendix B, tab “Residential Single Family.”

The Board is able to follow that the total cost of \$20,226,300 has been determined by taking the sum of (number of sites x the total cost in (inflated) 2025 dollars).¹

The Board is also able to follow that the total company investment of \$2,145,636 has determined by taking the approved MIL of \$1,500 per site x 1,437 sites which is \$2,155,500 and approximates AEY’s calculation. When either number (\$2,145,636 or \$2,155,500) is taken as a per cent of the total cost of \$20,226,300, the result is roughly 11 per cent.

However, the Board is unable to confirm the total company investment of \$12,259,246 by taking the proposed MIL of \$10,337 per site x 1,437 sites which equals \$14,854,268. When \$14,854,268 is taken as a per cent of the total cost of \$20,226,300 the result is 73 per cent. This is in contrast to AEY’s results which show that a proposed MIL of \$10,337 x 1,437 sites equals a total company investment of \$12,259.636, or 61 per cent.

Similar issues arose in the other MIL categories of Residential Multi Dwelling, General Service and Street Lighting.

Request:

- (a) Please respond to the Board’s observations as noted in the preamble for each of the four MIL categories by explaining AEY’s derivation of its proposed MIL and the corresponding calculation of company investment in dollars and as a percentage of total costs in (inflated) 2025 dollars. Please show all mathematical calculations in support of AEY’s response.

¹ Column C “Sites #” x Column E “Cost, average (2025\$/site).”

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- (b) Does paragraph 19 on PDF page 98 as quoted above provide for a comparison of equivalent-type costs? For example, is there a difference between recovering “61 per cent of the **total costs being invested by the utility**” and “only 11 percent of **the average connection’s total costs?**” [emphasis added]
- (c) Please provide the approved company investment percentages approved in AEY’s previous MIL related application for each of the four MIL categories?
- (d) Referring to 2024-12-20 Appendix B - MILs Study – Excel, tab “General Service” please identify and fully explain the source and derivation of the inputs with respect to the “MIL, 2011\$” in the amount of \$1,394² found at Row 14, Column AM.

Response:

- (a) The company investment was calculated on a per-project and per-lot basis, with each cost limited by the corresponding MIL but also by the actual cost. Essentially, the total investment in the sum of each site’s cost, individually limited by the MIL. The Companies do not overinvest when the extension cost is lower than the MIL. For example, please refer to 2024-12-20 Appendix B - MILs Study – Excel, tab “Residential Single Family”. Column “N” shows the total cost of each project and column “O” shows the total cost limited by the MIL (number of sites in the project multiplied by the individual MIL). The sum of column “O” (cell S15) is the company’s total investment shown in the chart. The same process applies to the approved MIL of \$1,500 in column “P”. The tabs for the other service types present the corresponding calculations.
- (b) AEY acknowledges that the comparison of MILs percentage coverage by the utility might be confusing, as it contrasts the “total cost percentage” (61 percent, if the proposed MIL was in place) with the “average cost percentage” (11 percent, based on the current approved MIL). However, it is important to note that since the comparison adopts percentage values, the actual amounts remain unchanged,

² The cell indicates “=(5545+285*5)/5”.

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and that using the “total cost” versus “the average cost” in terms of percentage lead to the same values so the comparison remains valid.

- (c) The previous MIL Application did not have the extensive dataset available in the current Application, which prevented the calculation of the percentages as described in part (a). Additionally, the previous study based the proposed MIL values on average costs (instead of median) and combined fixed and variable amount for General Service. Therefore, comparing the percentages is not only impossible but also unfair due to the different assumptions.

As a reference, the percentage of the approved MIL in respect to the average cost is presented in the following table. However, AEY emphasizes that (i) the percentages above are not a proper comparison to the other percentages discussed in this IR and (ii) they should not be used as criteria for the approval of the MIL, as they are not directly related to the company’s investment.

Table 1: Previous MIL Application – Proposed and Approved Amounts

Previous MIL Application	Residential Service (per site)		General Service (per kW)	Municipal Street Lighting (per light)
	Single Family	Multiple Dwelling		
Proposed MIL (\$)	4,373	2,187	\$5,545+\$285/kW	2,772
Average Cost ¹ (\$)	4,373	2,187	427	2,772
Approved MIL (\$)	1,500	725	690	1,240
Approved MIL (%)	34.3%	33.2%	161.5%	44.7%

¹ The average cost for General Service was based on the average project load of 39kW (2010-03-01_YECL-YEC 2009 Phase II Application, page 5.4-11, table 10, note 2). The other service types proposed the MIL equal to the average cost.

- (d) This cell refers to the MIL value proposed by the previous MIL Study.³ That study proposed a General Service MIL with combined values, composed of a fixed \$5,545 and a variable \$285/kW. Applying this MIL to the typical customer of 5 kW,

³ 2010-03-01_YECL-YEC 2009 Phase II Application, Appendix 5.4.

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the total cost would be $\$5,545 + 5\text{kW} \times \$285/\text{kW} = \$6,970$. This amount represents the cost per kW of $\$6,970 / 5 \text{ kW} = \$1,394/\text{kW}$, that is the amount shown at cell AM14.

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

**Information Responses Round 1 to:
The Yukon Utilities Board (YUB)
Received: February 28, 2025**

AEY-YEC-YUB-042

Reference: AEY-YEC 2025 T&Cs Application, Appendix 3 - MILs Study, PDF pages 101, 104, 109, and 113; and Appendix A – Guiding Principles, PDF page 114

Issue: Consideration of Guiding Principles

Quote: (6) Changes to MILs should balance the need to attain the target MILs over a reasonable timeframe, while ensuring there is not undue upward pressure on tariff rates;

Preamble: The Board has prepared the following table from information provided in Appendix 3 - MILs Study and Board Order 2020-10-13 Appendix A, PDF Page 55

MIL category	Approved MIL (2011-2012)	Proposed MIL (effective 2025)	Percentage Increase	Proposed MIL reference to Appendix 3
Residential Single Family (per site)	1,500	10,337	6,891%	PDF 101
Residential Multi Dwelling (per site)	725	2,645	365%	PDF 104
General Service (per kW)	690	1,801	333%	PDF 109
Street Lighting (per light)	1,240	6,649	5,362%	PDF 113

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Request:

- (a) For each of the four MIL categories identified in the table above, please discuss how each of the proposed increases (expressed as a percentage above) meets the objects outlined in item (6) as quoted above.
- (b) For each of the four MIL categories identified in the table above, please discuss how each of the proposed increases (expressed as a percentage above) accords with the principle of gradualism.
- (c) Please calculate the forecast impact on each of AEY's and YEC's rates, associated with the proposed changes to AEY's MILs.

Response:

- (a-b) As outlined in paragraphs 22-23 of the Application, both a signal bump and gradual increase to the MILs were considered by the Utilities. A balance must be sought between the administrative burden and ensuring that an appropriate price signal is being sent to customers effective as of the date of the Decision on the Application. While gradualism can be applied over the five-year term alternative, reducing the upward pressure on tariff rates, the signal bump was deemed to be more appropriate to implement as it would be easiest to administer and would correct the price signal currently being sent to customers immediately. It is worth noting that the signal bump was proposed by the majority of the Intervenors in the last MIL Application and was directed by the Board¹ due to "provid[ing] more certainty for new customers and for the construction industry". However, the Utilities continue to be open to a gradual approach with a five-year implementation period if desired by the Board.
- (c) For illustration purposes, Table 1 presents the average required and collected revenues resulting from the proposed MILs, calculated as 20-year cumulative present values (CPV) per new customer. Based on the general principles outlined

¹ Board Order 2010-13 – Appendix A: Reasons for Decision, paras. 232 and 233.

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in the MIL Study, AEY notes that the findings indicate that intergenerational equity is properly balanced despite the revenue collected from a new service outweighing the revenue requirement of the MIL.

Table 1: Revenues per New Customer Due to Proposed MILs

Service Type	Revenue Collected from New Service¹ (CPV 20 yr, exc. wholesale)	Increase in Revenue Requirement² (CPV 20 yr.)
Residential	\$9,873/site	\$6,447/site
General Service	\$2,371/kW	\$1,164/kW

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

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