

August 22, 2023

Yukon Utilities Board  
Box 31728  
Whitehorse, Yukon Y1A 6L3

**Attention: Richard Buchan  
Chair**

**Re: ATCO Electric Yukon Rider S Application - Reply Comments**

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Per Board Order 2023-16,<sup>1</sup> ATCO Electric Yukon (AEY) provides the following reply comments regarding the letter received from the Yukon Utilities Consumers' Group (UCG) on August 21, 2023.<sup>2</sup>

With respect to UCG's comment that the approval of the proposed Rider S constitutes 'retroactive rate making,'<sup>3</sup> AEY submits that it originally applied to flow through Yukon Energy Corporation's (YEC) Energy Reconciliation Adjustment (ERA) of \$260,590 on June 8, 2023,<sup>4</sup> the month following AEY's payment of YEC's ERA invoice. In light of subsequent Board Order 2023-11,<sup>5</sup> whereby the Yukon Utilities Board (Board) approved an additional ERA charge of \$170,226, the Board sent a letter to AEY on June 28, 2023<sup>6</sup> directing AEY to amend and resubmit its revised Rider S Application to include directions from Board Order 2023-11.

AEY submitted its revised Rider S Application on August 4, 2023,<sup>7</sup> the month following AEY's payment of YEC's subsequent ERA invoice. Therefore, AEY submits that it initiated the previously approved Rider S flow-through mechanism within a reasonable timeframe of incurring the expense and, therefore, UCG's claim of 'retroactive rate making'<sup>8</sup> is not applicable and should be disregarded.

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<sup>1</sup> Board Order 2023-16 dated August 17, 2023.

<sup>2</sup> UCG Letter dated August 21, 2023.

<sup>3</sup> UCG Letter, point #1 dated August 21, 2023.

<sup>4</sup> AEY Rider S application dated June 8, 2023.

<sup>5</sup> Board Order 2023-11.

<sup>6</sup> Board Letter dated June 28, 2023.

<sup>7</sup> AEY Rider S revised application dated August 4, 2023.

<sup>8</sup> UCG Letter, point #1 dated August 21, 2023.

With respect to UCG's comment pertaining to AEY's 'surplus revenue,'<sup>9</sup> AEY submits that any surplus or shortfall respecting approved revenue amounts is not relevant to AEY's proposed Rider S Application.

In accordance with the above, AEY submits that its Rider S Application is a straightforward collection of an approved expense. As such, further process is not required and AEY respectfully requests that its Rider S Application be approved as filed. If you have any questions regarding this application, please contact me at [Tony.Martino@atco.com](mailto:Tony.Martino@atco.com).

Yours truly,

Tony Martino  
Senior Manager, Regulatory

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<sup>9</sup> UCG Letter, point #2 dated August 21, 2023.