

1 **QUESTION:**

2  
3 Please provide the stacking order for thermal generation – two separate lists:

4  
5 a) for 2023-24

6  
7 b) for 2024-25

8  
9 **ANSWER:**

10  
11 **(a) and (b)**

12  
13 The generation stacking order changes based on available information at the time of  
14 generation, including demand, available resources, system stability requirements, etc.

15  
16 The following shows the approximate stacking order of thermal units. The stacking order  
17 for the 2024/25 winter will be revisited closer to the winter of 2024/25 based on available  
18 resources, system stability and condition of thermal units.

19  
20 The stacking order is subject to (a) total thermal operation at each site not exceeding air  
21 emissions permit under normal operation conditions and (b) where feasible, maintain each  
22 rental operational hours under 500 hrs/28 days allowance as per contract. It is also  
23 important to note that the thermal units are only run when it is required if the other resource  
24 options are not adequate to meet the demand on the system.

25

Type/ Location	Units	Notes
YEC LNG	WG1, WG2 and WG3	
Whitehorse rentals		
Faro rentals		
Mayo rentals		
YEC Whitehorse diesel	WD4, WD5, WD6, WD7	
YEC Callison diesel	New units	Two 3.25 units potentially available for 2024/25 winter [or 2025/26 winter if delayed]

Type/ Location	Units	Notes
YEC Faro diesel	New units, FD7	Two 2.5 MW new diesel units added for 2024/25 winter
YEC Dawson diesel	DD4, DD3, DD2, DD1	DD2 and DD5 to be retired in 2024
YEC Mayo diesel	MD1, MD2, MD3	

1  
2 **Revised Response based on YUB Order 2023-25, Appendix B**

3  
4 Board Order 2023-25, section 2(b), finds as follows:

5  
6 In respect of IR NY-YEC-1-04, and having considered the submissions  
7 summarized in the table in Appendix B, the Board finds that Mr. Yee's request to  
8 put the relevant capacity limits with the stacking order will provide information  
9 useful to the Board. Therefore, the Board directs YEC to reproduce the stacking  
10 order with the relevant capacity limits for each of the units referenced.

11  
12 **(a) and (b)**

13  
14 The generation stacking order changes based on available information at the time of  
15 generation, including demand, available resources, system stability requirements, etc.

16  
17 The following shows the approximate stacking order of thermal units at the time of  
18 preparation of the response. The stacking order for the remainder of the 2023/24 winter  
19 will be reviewed on an on-going basis and adjusted as considered necessary. The  
20 stacking order for the 2024/25 winter will be revisited closer to the winter of 2024/25 based  
21 on available resources, system stability and condition of thermal units, and will be adjusted  
22 on an on-going basis, as considered necessary.

23  
24 The stacking order is subject to (a) total thermal operation at each site not exceeding air  
25 emissions permit under normal operation conditions and (b) where feasible, maintain each  
26 rental operational hours under 500 hrs/ season allowance as per contract. It is also  
27 important to note that the thermal units are only run when it is required if the other resource  
28 options are not adequate to meet the demand on the system.

Type/ Location	Units	Notes
YEC LNG	WG1, WG2 and WG3	Total dependable capacity of 12.6 MW (4.2 MW each unit). See Note 1.
Whitehorse rentals	9 units 1.8 MW each, excluding one spare unit	Total dependable capacity of 16.2 MW. See Notes 1 and 2.
Faro rentals	7 units 1.8 MW each	Total dependable capacity of 12.6 MW. See Notes 1 and 2.
Mayo rentals	4 units 1.8 MW each, excluding one spare unit	Total dependable capacity of 7.2 MW. See Notes 1 and 2.
YEC Whitehorse diesel	WD4 (2.5 MW dependable capacity), WD5 (2.5 MW dependable capacity), WD6 (2.5 MW dependable capacity), WD7 (3 MW dependable capacity)	Total dependable capacity of 10.5 MW. See Note 1.
YEC Callison diesel	New units (two 3.25 MW units = 6.5 MW)	Two 3.25 units potentially available for 2024/25 winter [2023/24 GRA assumes delay to 2025/26 winter]. See Note 1.
YEC Faro diesel	New units (two 2.5 MW units = 5 MW), FD7 (3 MW dependable capacity)	Two 2.5 MW new diesel units added for 2024/25 winter. See Note 1.
YEC Dawson diesel	DD4 (1.440 MW dependable capacity), DD3 (1.030 MW dependable capacity), DD2 (1 MW dependable capacity), DD1 (0.850 MW dependable capacity)	DD2 and DD5 to be retired in 2024. See Note 1.
YEC Mayo diesel	MD1 (1 MW dependable capacity), MD2 (1 MW dependable capacity), MD3 (0.950 MW dependable capacity)	See Note 1.

1 Notes:

- 2 1. Total thermal operation at each site not exceeding air emissions permit under normal  
3 operation conditions (total is 13.2 MW for Whitehorse LNG, 16.15 MW for Whitehorse  
4 diesel, 15.5 MW for Faro diesel, 7.1 MW for Dawson diesel, 15.5 MW for Callison diesel  
5 pending completion of permitting, and 7.9 MW for Mayo diesel including 4.9 MW new  
6 permit and 3 MW for Mayo town).
- 7 2. Where feasible, maintain each rental operational hours under 500 hrs/ season allowance  
8 as per contract.

1 The generation stacking order is subject to changes based on available information at the  
2 time of generation, including demand, available resources, system stability requirements,  
3 etc. The Operations personnel can change the stacking order to respond to the demand  
4 on the system and available resources [for example, the staff can elect to run FD7 unit  
5 ahead of WD4, WD5 and WD6 units depending on the load on the grid, etc.].



1 Contractors and subcontractors include:

- 2
- 3 • General Contractor (general construction, supervision, mechanical install, civil
- 4 construction) – Wildstone Construction Group;
- 5 • Major Equipment Supplier and Commissioning Agent – Finning;
- 6 • Electrical Subcontractor – Westpark;
- 7 • Tank and mechanical material supplier – Keller;
- 8 • Formwork and reinforcing steel subcontractor – A&T;
- 9 • Concrete supplier – General Enterprises;
- 10 • Concrete finishing subcontractor – JLB;
- 11 • Containment subcontractor – Albarrie;
- 12 • Fencing subcontractor – Olson Fencing.
- 13

14 **Revised Response for “a” based on YUB Order 2023-25, Appendix B**

15

16 Board Order 2023-25, section (d), finds as follows in respect of IR NY-YEC-1-14(a), and

17 having considered the submissions in the table in Appendix B:

18

19 The Board finds that Mr. Yee’s request is reasonable, and the information

20 requested may be of assistance to the Board. The Board therefore directs YEC to

21 produce a higher resolution copy of the site layout as requested by Mr. Yee.

22 Further, if YEC has the information on the specifications and model number of the

23 generators to the FGS, it shall provide that response to Mr. Yee. If YEC does not

24 have the specifications and model numbers, then it shall confirm that fact.

25

26 **(a)**

27

28 The additional information required from YEC for the two Tier 4 engines of 2.5 MW each

29 that YEC is installing at the FGS is provided below.

30

31 Please see NY-YEC-1-14(a) REVISED Attachment 1 for a copy of Cat C175-16 Tier 4

32 Final Product Specifications brochure applicable for these two engines. Please note that

33 the power output of the CATs is 2.5 MW each at a Continuous Rating.

34

35 Please see NY-YEC-1-14(a) REVISED Attachment 2 for a copy of the following Faro site

36 layouts:

- 1           1. A higher resolution copy of the site layout originally filed, as directed by Appendix  
2           B to Order 2023-25; and  
3  
4           2. A site layout showing the location of all generators, including seven diesel rental  
5           units (four on top, one next to the fuel tank, and two next to the location for the two  
6           new engines FD8 and FD9), requested by Mr. Yee's January 5, 2024  
7           correspondence to the Board following YEC's January 4, 2024 filings on NY-YEC-  
8           1-14 REVISED.

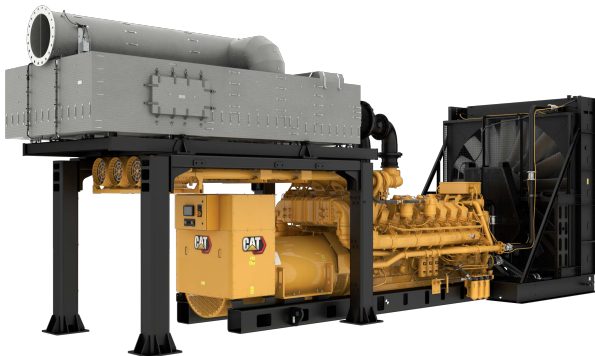
9  
10       **(b)**

11  
12       The 2023 email thread between T. Ritchie (YEC) and Elizabeth Barker (Yukon  
13       Government) regarding the FGS is included as NY-YEC-1-14(b) Attachment 1. The 2023  
14       email thread between T. Ritchie (YEC) and Emily Sessford (Yukon Government) is  
15       included as NY-YEC-1-14(b) Attachment 2.



# Cat® C175-16

## Diesel Generator Sets



Bore – mm (in)	175 (6.89)
Stroke – mm (in)	220 (8.66)
Displacement – L (in <sup>3</sup> )	84.7 (5167)
Compression Ratio	16.7:1
Aspiration	TA
Fuel System	EUI
Governor Type	ADEM™ A4

Image shown may not reflect actual configuration

Standby 60 Hz ekW (kVA)	Mission Critical 60 Hz ekW (kVA)	Prime 60 Hz ekW (kVA)	Continuous 60 Hz ekW (kVA)	Emissions Performance
3000 (3750)	3000 (3750)	2725 (3406)	2500 (3125)	U.S. EPA Tier 4 Final

### Features

#### Cat® Diesel Engine

- Meets U.S. EPA Tier 4 Final emission standards
- Reliable performance proven in thousands of applications worldwide
- Certified alternative fuels including Hydrotreated Vegetable Oil (HVO), Renewable Diesel (RD) and Hydrotreated Renewable Diesel (HRD) which meet EN 15940 or ASTM D975 can be used or blended with EN 590 diesel

#### Generator Set Package

- Accepts 100% block load in one step and meets NFPA 110 loading requirements
- Conforms to ISO 8528-5 G3 load acceptance requirements
- Reliability verified through torsional vibration, fuel consumption, oil consumption, transient performance, and endurance testing

#### Alternators

- Superior motor starting capability minimizes need for oversizing generator
- Designed to match performance and output characteristics of Cat diesel engines

#### Cooling System

- Cooling systems available to operate in ambient temperatures up to 50°C (122°F)
- Tested to ensure proper generator set cooling

#### Clean Emissions Module

- Diesel oxidation catalyst for particulate matter (PM) and hydrocarbon (HC) control
- Selective catalytic reduction (SCR) for nitrogen oxides (NOx) control
- Integrated electronics for monitoring, protection, and closed loop NOx control

#### Cat Energy Control System (ECS)

- User-friendly interface and navigation
- Scalable system to meet a wide range of installation requirements
- Expansion modules and site specific programming for specific customer requirements
- Graphical touchscreen display
- Easily upgradeable

#### Warranty

- 24 months/1000-hour warranty for standby and mission critical ratings
- 12 months/unlimited hour warranty for prime and continuous ratings
- Extended service protection is available to provide extended coverage options

#### Worldwide Product Support

- Cat dealers have over 1,800 dealer branch stores operating in 200 countries
- Your local Cat dealer provides extensive post-sale support, including maintenance and repair agreements

#### Financing

- Caterpillar offers an array of financial products to help you succeed through financial service excellence
- Options include loans, finance lease, operating lease, working capital, and revolving line of credit
- Contact your local Cat dealer for availability in your region



## C175-16 Diesel Generator Sets Electric Power

### Standard and Optional Equipment

#### Engine

##### Air Cleaner

- Single element
- Dual element

##### Starting

- Standard batteries
- Oversized batteries
- Standard electric starter(s)
- Dual electric starter(s)
- Air starter(s)
- Jacket water heater

#### Alternator

##### Output voltage

- 480V     6900V
- 600V     12470V
- 4160V     13200V
- 6300V     13800V
- 6600V

##### Temperature Rise (over 40°C ambient)

- 150°C
- 125°C/130°C
- 105°C
- 80°C

##### Winding type

- Form wound

##### Excitation

- Permanent magnet (PM)

##### Attachments

- Anti-condensation heater
- Stator and bearing temperature monitoring and protection

#### Power Termination

##### Type

- Bus bar
- Circuit breaker
- 4000A     5000A
- UL         IEC
- 3-pole
- Electrically operated

##### Trip Unit

- LSI         LSI-G
- LSIG-P

#### Control System

##### Controller

- Cat ECS 100
- EMCP 4.4

##### Attachments

- Local annunciator module
- Remote annunciator module
- Expansion I/O module
- Remote monitoring software

#### Charging

- Battery charger – 20A
- Battery charger – 35A
- Battery charger – 50A

#### Vibration Isolators

- Rubber
- Spring
- Seismic rated

#### Cat Connect

##### Connectivity

- Ethernet
- Cellular

#### Extended Service Options

##### Terms

- 2 year (prime)
- 3 year
- 5 year
- 10 year

##### Coverage

- Silver
- Gold
- Platinum
- Platinum Plus

#### Ancillary Equipment

- Automatic transfer switch (ATS)
- Paralleling switchgear
- Paralleling controls

#### Certifications

- IBC seismic certification
- OSHPD pre-approval

**Note:** Some options may not be available on all models. Certifications may not be available with all model configurations. Consult factory for availability.

## C175-16 Diesel Generator Sets Electric Power



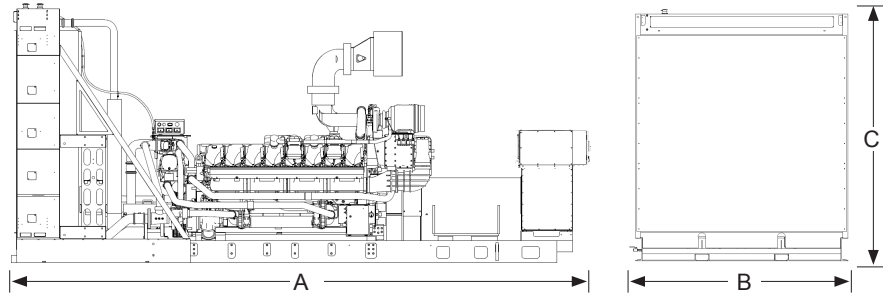
### Package Performance

Performance	Standby	Mission Critical	Prime	Continuous
Frequency	60 Hz	60 Hz	60 Hz	60 Hz
Gen set power rating with fan	3000 ekW	3000 ekW	2725 ekW	2500 ekW
Gen set power rating with fan @ 0.8 power factor	3750 kVA	3750 kVA	3406 kVA	3125 kVA
Emissions	Tier 4 Final	Tier 4 Final	Tier 4 Final	Tier 4 Final
Performance number	DM8955-05	EM0315-04	DM8956-04	DM8957-05
<b>Fuel Consumption</b>				
100% load with fan – L/hr (gal/hr)	765.1 (202.1)	765.1 (202.1)	705.0 (186.2)	637.8 (168.5)
75% load with fan – L/hr (gal/hr)	596.7 (157.6)	596.7 (157.6)	558.9 (147.6)	518.0 (136.9)
50% load with fan – L/hr (gal/hr)	451.1 (119.2)	451.1 (119.2)	429.5 (113.5)	396.8 (104.8)
25% load with fan – L/hr (gal/hr)	282.7 (74.7)	282.7 (74.7)	271.2 (71.6)	251.6 (66.5)
<b>Diesel Exhaust Fluid (DEF) Consumption</b>				
100% load with fan – L/hr (gal/hr)	50.7 (13.4)	50.7 (13.4)	45.6 (12.0)	39.2 (10.3)
75% load with fan – L/hr (gal/hr)	30.4 (8.0)	30.4 (8.0)	25.5 (6.7)	22.1 (5.7)
50% load with fan – L/hr (gal/hr)	15.7 (4.1)	15.7 (4.1)	13.8 (3.6)	12.6 (3.2)
25% load with fan – L/hr (gal/hr)	7.4 (2.0)	7.4 (2.0)	6.9 (1.8)	6.5 (1.6)
<b>Cooling System</b>				
Radiator air flow restriction (system) – kPa (in. water)	0.12 (0.48)	0.12 (0.48)	0.12 (0.48)	0.12 (0.48)
Radiator air flow – m <sup>3</sup> /min (cfm)	3188 (112583)	3188 (112583)	3188 (112583)	3188 (112583)
Engine coolant capacity – L (gal)	303.5 (80.2)	303.5 (80.2)	303.5 (80.2)	303.5 (80.2)
Radiator coolant capacity – L (gal)	685.2 (181.0)	685.2 (181.0)	685.2 (181.0)	685.2 (181.0)
Total coolant capacity – L (gal)	988.7 (261.2)	988.7 (261.2)	988.7 (261.2)	988.7 (261.2)
<b>Inlet Air</b>				
Combustion air inlet flow rate – m <sup>3</sup> /min (cfm)	259.3 (9155.0)	259.3 (9155.0)	242.7 (8570.0)	230.5 (8138.0)
<b>Exhaust System</b>				
Exhaust stack gas temperature – °C (°F)	472.3 (882.2)	472.3 (882.2)	460.0 (860.0)	452.7 (846.9)
Exhaust gas flow rate – m <sup>3</sup> /min (cfm)	667.2 (23557.7)	667.2 (23557.7)	610.0 (21540.9)	570.4 (20139.6)
Exhaust system backpressure (maximum allowable) – kPa (in. water)	6.7 (27.0)	6.7 (27.0)	6.7 (27.0)	6.7 (27.0)
CEM outlet temperature – °C (°F)	465.5 (869.9)	465.5 (869.9)	451.1 (844.0)	444.0 (831.2)
<b>Heat Rejection</b>				
Heat rejection to jacket water – kW (Btu/min)	1373 (78075)	1373 (78075)	1229 (69901)	1125 (63972)
Heat rejection to exhaust (total) – kW (Btu/min)	3112 (176964)	3112 (176964)	2796 (159003)	2587 (147112)
Heat rejection to aftercooler – kW (Btu/min)	379 (21574)	379 (21574)	329 (18728)	296 (16810)
Heat rejection to atmosphere from engine – kW (Btu/min)	175 (9978)	175 (9978)	167 (9498)	162 (9237)
Heat rejection to atmosphere from CEM – kW (Btu/min)	53 (3026)	53 (3026)	48 (2756)	45 (2534)
Heat rejection from alternator – kW (Btu/min)	112 (6369)	112 (6369)	99 (5619)	91 (5158)

## C175-16 Diesel Generator Sets Electric Power

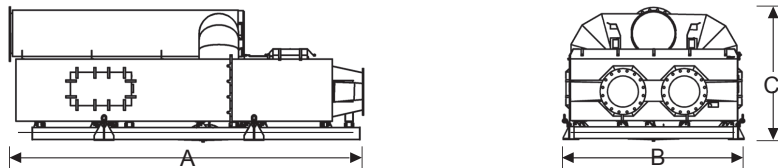


### Weights and Dimensions



Dim "A" mm (in)	Dim "B" mm (in)	Dim "C" mm (in)	Dry Weight kg (lb)
8127 (320.0)	3118 (122.8)	3614 (142.3)	20 463 (45,114)

**Note:** For reference only. Do not use for installation design. Contact your local Cat dealer for precise weights and dimensions.



Dim "A" mm (in)	Dim "B" mm (in)	Dim "C" mm (in)	Dry Weight kg (lb)
4579 (180.3)	2361 (92.9)	1735 (68.3)	2900 (6393)

### Ratings Definitions

#### Standby

Output available with varying load for the duration of the interruption of the normal source power. Average power output is 70% of the standby rated kW. Typical operation is 200 hours per year, with maximum expected usage of 500 hours per year.

#### Mission Critical

Output available with varying load for the duration of the interruption of the normal source power. Average power output is 85% of the mission critical rated kW. Typical peak demand up to 100% of rated kW for up to 5% of the operating time. Typical operation is 200 hours per year, with maximum expected usage of 500 hours per year.

#### Prime

Output available with varying load for an unlimited time. Average power output is 70% of the prime rated kW. Typical peak demand is 100% of prime rated kW with 10% overload capability for emergency use for a maximum of 1 hour in 12. Overload operation cannot exceed 25 hours per year.

#### Continuous

Output available with non-varying load for an unlimited time. Average power output is 70-100% of the continuous rated kW. Typical peak demand is 100% of continuous rated kW for 100% of the operating hours.

#### Applicable Codes and Standards

AS 1359, UL 489, UL 869A, IBC, IEC 60034-1, ISO 3046, ISO 8528, NEMA MG1-22, NEMA MG1-33, 2014/35/EU, 2006/42/EC, 2014/30/EU and facilitates compliance to NFPA 37, NFPA 70, NFPA 99, NFPA 110.

**Note:** Codes may not be available in all model configurations. Please consult your local Cat dealer for availability.

#### Data Center Applications

- All ratings Tier III/Tier IV compliant per Uptime Institute requirements.
- All ratings ANSI/TIA-942 compliant for Rated-1 through Rated-4 data centers.

#### Fuel Rates

Fuel consumption reported in accordance with ISO 3046-1, based on fuel oil of 35° API [16°C (60°F)] gravity having an LHV of 42,780 kJ/kg (18,390 Btu/lb) when used at 15°C (59°F) and weighing 850 g/liter (7.0936 lbs/U.S. gal.) All fuel consumption values refer to rated engine power.

[www.cat.com/electricpower](http://www.cat.com/electricpower)

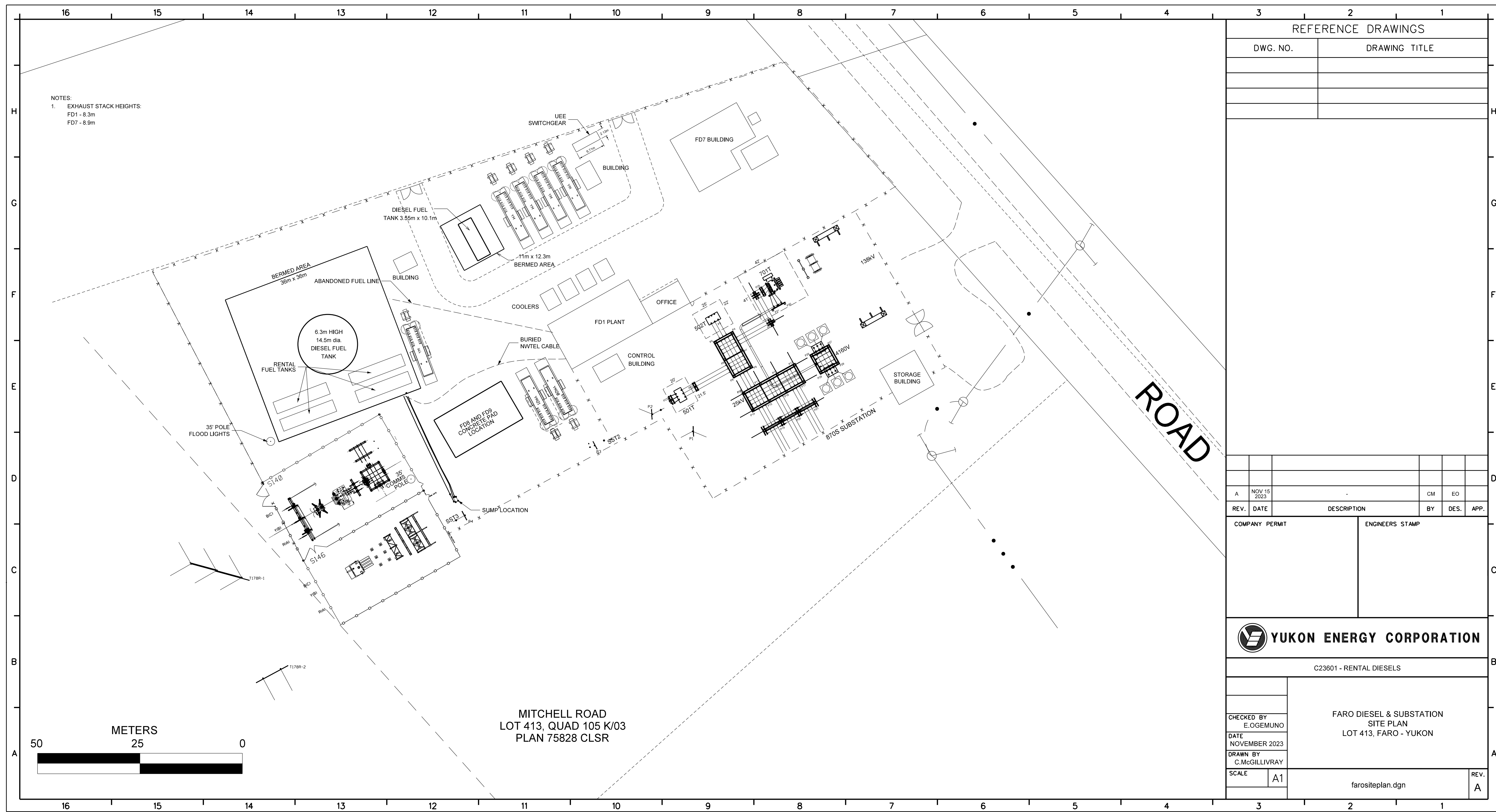
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Materials and specifications are subject to change without notice. The International System of Units (SI) is used in this publication.

# **FARO DIESEL SITE PLAN #1**



## **FARO DIESEL SITE PLAN #2**



NOTES:  
 1. EXHAUST STACK HEIGHTS:  
 FD1 - 8.3m  
 FD7 - 8.9m

REFERENCE DRAWINGS

DWG. NO.	DRAWING TITLE

REV.	DATE	DESCRIPTION	BY	DES.	APP.
A	NOV 15 2023		CM	EO	

COMPANY PERMIT	ENGINEERS STAMP



C23601 - RENTAL DIESELS

CHECKED BY  
 E.OGEMUNO  
 DATE  
 NOVEMBER 2023  
 DRAWN BY  
 C.McGILLIVRAY  
 SCALE  
 A1

FARO DIESEL & SUBSTATION  
 SITE PLAN  
 LOT 413, FARO - YUKON

farositeplan.dgn

REV.  
 A

MITCHELL ROAD  
 LOT 413, QUAD 105 K/03  
 PLAN 75828 CLSR

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**From:** [Elizabeth.Barker](#)  
**To:** [Travis.Ritchie](#)  
**Subject:** RE: [EXT] RE: Faro Station Modifications  
**Date:** February 20, 2023 9:17:11 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)

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Hi Travis,

I appreciate the additional context around YEC's operations. It's good to hear the permit capacity is built into the system controls.

I'd like to let you know that based on the information received to date, the proposed changes to the Faro station are not considered YESAB assessable. We will further evaluate and confirm this decision once we've received formal notification and more details from YEC.

Thanks,  
Liz

Elizabeth Barker  
Environmental Protection Analyst  
Environment | Standards and Approvals  
T 867-667-5456 | Yukon.ca

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**From:** Travis Ritchie <Travis.Ritchie@yec.yk.ca>  
**Sent:** Thursday, February 16, 2023 10:00 AM  
**To:** Elizabeth.Barker <Elizabeth.Barker@yukon.ca>  
**Subject:** RE: [EXT] RE: Faro Station Modifications

Hi Liz,

Thanks for your note.

For context, we are still responding to evolving operational needs and community concerns in Faro, so are only in the planning phase of any potential changes. Recent dialogue with the municipal government and residents in the Town of Faro is part of the engagement we are undertaking during this phase. Once we have a draft plan crystallized we had planned to engage your team for review and approval of the potential changes, so we will make sure Part 2, Item 5 of the permit is followed once we reach that point.

Regarding permitted operational capacity I wanted to share that the System Operators are familiar of our permit thresholds and have these rules built directly into their system controls. Any attempt to dispatch more generation at a facility beyond its permitted capacity prompts an alarm that announces to the Operator so that we maintain compliance with this permit requirement. As you may know, YEC maintains installed capacity at several of its thermal generating stations that exceeds

the operational thresholds allowed by the air emissions permits. This redundancy ensures if any units fail to start when called upon, that we have sufficient back-up resources to meet system demands. In any extraordinary circumstances where we may have an emissions exceedance we would notify your office and that of the Compliance and Inspections Unit forthwith.

Hope this additional context is helpful.

Thanks again.

Regards,

Travis

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**From:** Elizabeth.Barker <[Elizabeth.Barker@yukon.ca](mailto:Elizabeth.Barker@yukon.ca)>

**Sent:** February 16, 2023 8:37 AM

**To:** Travis Ritchie <[Travis.Ritchie@yec.yk.ca](mailto:Travis.Ritchie@yec.yk.ca)>

**Subject:** RE: [EXT] RE: Faro Station Modifications

Hi Travis,

Thanks very much for the responses. While I recognize that you have provided information about the proposed modification below, I'll still ask that prior to making any modifications at the Faro station, please send me an official notification and wait until we have approved the modifications before proceeding with them, as per Part 2.5 of the current permit as shown below.

5. The permittee shall obtain approval from an environmental protection analyst prior to:

- a) any addition, modification, removal or replacement of any equipment or components related to the release, abatement, control or treatment of air emissions; or
- b) any change in location of the source(s).

Additionally, as you are aware, the Faro station was assessed and permitted for a capacity of 15.5MW. Operation above a capacity of 15.5MW will result in non-compliance and could result in further enforcement action.

Thanks again for the quick response and I'll be in touch regarding the complaint management plan.

Cheers,

Liz

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**From:** Travis Ritchie <[Travis.Ritchie@yec.yk.ca](mailto:Travis.Ritchie@yec.yk.ca)>

**Sent:** February 14, 2023 2:47 PM

**To:** Elizabeth.Barker <[Elizabeth.Barker@yukon.ca](mailto:Elizabeth.Barker@yukon.ca)>

**Cc:** Lisa Wiklund <[lisa.wiklund@yec.yk.ca](mailto:lisa.wiklund@yec.yk.ca)>

**Subject:** RE: [EXT] RE: Faro Station Modifications

Hi Liz,

Sorry for the delay. Please see my response embedded below.

Please let me know if you need anything further or would like to discuss.

Regards,

Travis

---

**From:** Elizabeth.Barker <[Elizabeth.Barker@yukon.ca](mailto:Elizabeth.Barker@yukon.ca)>

**Sent:** February 14, 2023 1:54 PM

**To:** Travis Ritchie <[Travis.Ritchie@yec.yk.ca](mailto:Travis.Ritchie@yec.yk.ca)>

**Cc:** Lisa Wiklund <[Lisa.Wiklund@yec.yk.ca](mailto:Lisa.Wiklund@yec.yk.ca)>

**Subject:** RE: [EXT] RE: Faro Station Modifications

Hi Travis,

I need to write a response this week and I was hoping you could answer the following questions?

Are all of the following modifications going to occur at the Faro station: **RESPONSE: Yes**

- Decommissioning FD1 – Mirrlees KV16 Generator
- Adding two new “permanent” generators, FD8 and FD9.
- Moving 3 “temporary” rental generators and infrastructure to a different location in the facility.
- Removing 2 “temporary” rental generators.
- Possible addition of sound barriers around FD7 and/or two of the rentals

If yes...

What is the nameplate capacity and tier of FD8 and FD9?

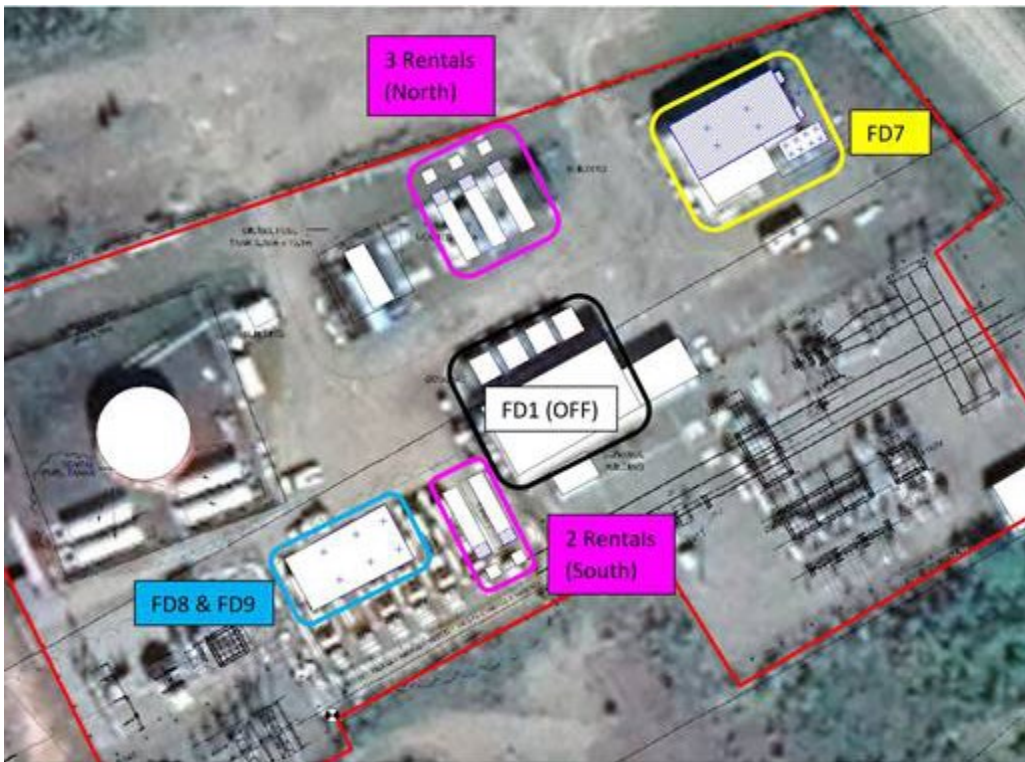
**RESPONSE: FD1 is now end of life and we are planning to replace that permitted capacity with 2 x ~2.5 MW EPA Tier 4 and CARB certified diesel generators. This represents an investment by YEC in ‘best available technology’ and will result in reduced noise and criteria air contaminant (CAC) emissions from the existing Pre-Tier FD1 unit (1960’s technology). FD1 represents 5.15 MW of the capacity at the FGS.**

Which temporary generators are being removed?

**RESPONSE: A portion of the capacity installed at the FGS is made up of rental units (currently 7 x 1.8 MW) that are in place as backup in case any other unit fails to start or is down for planned/unplanned maintenance or repair when the capacity is needed. We anticipate that with the installation of FD8 and FD9, to replace the less reliable FD1, this will allow us to remove two (2) of the seven (7) rental units of this redundant capacity at site in the near term. The temporary rental generators are as described in our previous assessment and permitting documentation (i.e., Caterpillar XQ2000/3516C, EPA Tier 2 and CARB certified units). With the revised configuration we will have approximately 2 MW of back up capacity available at site to complement the operating/production capacity of 15.5 MW allowed under our AEP.**

Which rental generators are being moved?

**RESPONSE:** Due to noise complaints we are planning to relocate 3 of the remaining 5 rental units to a location approximately 45 metres northwest of their current location. This will allow the existing FD1 building to provide some sound attenuation during their operation. We are evaluating the feasibility of additional sound attenuation for the remaining rental units as part of our planning, but don't have an engineering assessment or cost estimate completed yet. See draft site sketch below for planned locations of units.



How far from their current location? A figure would be ideal. **RESPONSE: See above and attached.**

On a side note, I received your response in regards to the Faro Station Complaint Management System and will get back to you as soon as I can so we can finalize that plan.

Thanks and have a great day,  
Liz

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**From:** Travis Ritchie <[Travis.Ritchie@yec.yk.ca](mailto:Travis.Ritchie@yec.yk.ca)>  
**Sent:** February 9, 2023 9:04 AM  
**To:** Elizabeth.Barker <[Elizabeth.Barker@yukon.ca](mailto:Elizabeth.Barker@yukon.ca)>  
**Cc:** Lisa Wiklund <[lisa.wiklund@yec.yk.ca](mailto:lisa.wiklund@yec.yk.ca)>  
**Subject:** [EXT] RE: Faro Station Modifications

Hi Liz,

Thanks for reaching out.

As part of the presentation in Faro recently we also received several questions from a member of the public and are working on responses. I will try to get our responses over to you shortly for your consideration. If after reviewing, you have any follow up questions or concerns with our responses please feel free to reach out to me. Overall, I hope that what we share makes sense and is appropriate from your perspective, so I appreciate you connecting with me on this.

Regards,

Travis



**Travis Ritchie**

Manager - Environment, Assessment, & Licensing

Telephone: 867-393-5350 | Mobile: 867-333-0300



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**From:** Elizabeth.Barker <[Elizabeth.Barker@yukon.ca](mailto:Elizabeth.Barker@yukon.ca)>

**Sent:** February 9, 2023 8:08 AM

**To:** Travis Ritchie <[Travis.Ritchie@yec.yk.ca](mailto:Travis.Ritchie@yec.yk.ca)>

**Subject:** Faro Station Modifications

Good Morning Travis,

Our minister received a message with some questions from a member of the public asking about proposed modifications to the Faro plant, as presented on January 24<sup>th</sup> by Paul Murchison and Ed Peake. The modifications described are as follows:

- Decommissioning FD1 – Mirrlees KV16 Generator
- Adding two new “permanent” generators, FD8 and FD9.
- Moving 3 “temporary” rental generators and infrastructure to a different

location in the facility.

- Removing 2 “temporary” rental generators.
- Possible addition of sound barriers around FD7 and/or two of the rentals
- YEC has stated that these modifications will change sound emissions from the

FGS

I’d like to respond as soon as possible so I’m just looking for confirmation that these modifications are being planned and that we will receive notification prior to any work as per Part 2.5 of the Faro permit.

Thanks very much,  
Liz



**Elizabeth Barker**

Environmental Protection Analyst  
Environment | Standards & Approvals  
T 867-667-5456 | Yukon.ca

**From:** [Travis Ritchie](#)  
**To:** [Emily.Sessford](#); [Elizabeth.Barker](#)  
**Cc:** [Gary Jones](#); [Attila Heipel](#); [Shannon Mallory \(shannon.mallory@yec.yk.ca\)](#); [Cody Hoy](#)  
**Subject:** RE: 2023-038-Inspection-Report  
**Date:** May 31, 2023 4:54:00 PM  
**Attachments:** [image001.png](#)  
[20230510-Inspection-report-es.pdf](#)  
[60-010-01 FARO \(2022-2031\) - signed.pdf](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Hello Emily and Elizabeth,

Thank you for the inspection report (re. AEP 60-010-01 - Faro Generating Station).

Pursuant to the corrective/follow up actions outlined in the report, I offer the following information for your consideration:

**YG Corrective Action 1:**

***Permittee is requested to follow-up regarding site changes, this includes decommissioning of generator FD-1, and the change in location of generators YM26-T1, YM25-T1, YM24-T1 and YM22-T1, as well as any other anticipated development or changes that may be occurring as required by permit.***

YEC Response CA1:

Yukon Energy will provide a schedule and description of activities related to the decommissioning of FD1 for approval prior to removal of this source from the FGS property. We hope that since this source is being removed and will no longer be making emissions to air that the requisite approval can be reasonably provided under the existing YESAA Decision Document for the facility.

As regards any changes in the location of emissions sources, we ask for your consideration that such an approval is not required when such activities are occurring within the site boundary of a permitted thermal generating station. Part 2, Clause 5(b) of the current FGS air emissions permit appears to be an inadvertent holdover from previous versions of the authorization when all of Yukon Energy's thermal generating stations were authorized under a single (or blanket) air emissions permit. Yukon Energy has always had periodic operational requirements to move mobile generators from one facility to another and it was in this context, and that of a blanket permit, that necessitated the need for such a clause in past permits. An operational need for YEC to make minor adjustments to the location of generators within an individual facility boundary would not be reasonably expected to materially vary the character of the pollutant emissions from the site in a negative way and therefore we request that, in interpreting the permit, such activities not be subject to prior approval from the Regulator. YEC will certainly continue to request approval for changes in the location of sources *between* generating stations.

**YG Corrective Action 2:**

***Permittee is requested to brief and make operators aware of the full complaint***

***management system in place.***

YEC Response CA2:

The approved Complaint Management System for the FGS includes facility-based signage and website information for the public to phone, email, or submit online complaints to the Corporation. The receipt and management of such correspondence is made by YEC's External Affairs Department and is triaged as required to satisfy the requirements of the plan and interests of our stakeholders. The inspection findings have, however, made us more aware that as members of the community our facility operators may receive complaints via direct engagement with complainants and it would be useful for them to be able to relay details of how to effectively share such complaints with the Corporation (i.e., to verbally share the information about how to register a complaint via phone, email, or online).

As such, on or before June 30, 2023, Yukon Energy Environment Department staff will provide an orientation to relevant members of its Operations Team as to the scope and function of the Complaint Management System in place for the Faro Generating Station (FGS). We will also make such awareness training a mandatory part of orientations for new/temporary plant operators at the FGS.

If you have any follow up questions, comments, or concerns with these responses to the required corrective actions please let me know.

Thank you.

Regards,

Travis



**Travis Ritchie**

Director, Risk & Compliance

Telephone: 867-393-5350 | Mobile: 867-333-0300



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**From:** Emily.Sessford <Emily.Sessford@yukon.ca>  
**Sent:** May 16, 2023 1:21 PM  
**To:** Travis Ritchie <Travis.Ritchie@yec.yk.ca>  
**Cc:** Elizabeth.Barker <Elizabeth.Barker@yukon.ca>; Gary Jones <Gary.Jones@yec.yk.ca>; Attila Heipel <Attila.Heipel@yec.yk.ca>  
**Subject:** 2023-038-Inspection-Report

Good afternoon Travis,

Please find attached Inspection Report 2023-038 for Yukon Energy Corporation's Air Emissions Permit No: 60-010-01 at Faro. Please note the corrective actions and associated deadlines.

Sincerely,



**Emily Sessford**

Environmental Compliance Officer  
Environment | Environmental Compliance & Inspections  
T 867-667-5398 | C 867-332-2945 | Yukon.ca