



PUBLIC INTEREST ADVOCACY CENTRE

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August 2, 2013

Yukon Utilities Board
Box 31728
Whitehorse, Yukon Y1A 6L3

Attention: Mr. Bruce McLennan, Chair

**Re: Yukon Electrical Company Limited 2013-2015 General Rates Application
YECL Request for Extension to Respond to Information Requests**

Dear Mr. McLennan:

Our client, the Utilities Consumers' Group ("UCG"), is in receipt of the August 1, 2013 request from Yukon Electrical Company Limited ("YECL") to extend the period they will have to respond to information requests in this proceeding.

YECL has committed to provide responses to less than 30% of the information requests by August 8, 2013 with the remainder of responses being submitted by August 29, 2013. YECL has then proposed that intervenors will have less than 2 weeks (including over the Labour Day weekend) to prepare evidence that they may want to submit.

UCG submits that the number of information requests submitted to YECL is directly related to the quality of detailed information contained within their application and the need for parties to understand YECL's proposals in greater details in order to form positions on them. The number of information requests is also reflective of the lack of stakeholder consultation on the application prior to its submission to the YUB.

While UCG understands that YECL now finds itself in a bind to assemble information that should have been made available prior to and within the application, UCG is concerned that YECL will not provide thorough and complete responses to the questions asked by parties.

If YECL is allowed to submit the majority of its responses on August 29, 2013, UCG submits that YECL should be directed to provide full and complete responses to all questions asked. UCG further submits that if YECL is not planning on providing requested information in response to specific information requests, it should inform the YUB and parties of its positions on these questions as part of its proposed August 8, 2013 filing.

UCG submits that if YECL does not provide full and complete responses to all questions asked, the revised procedural schedule proposed by YECL would be in jeopardy since parties may want to submit motions to have more complete disclosure of information held by YECL.

UCG requests the Board, with their decision on this request by YECL, makes provision in the procedural schedule for parties to argue for better disclosure should YECL's responses not be complete as has been the practice of Yukon utilities in the last several regulatory proceedings.

UCG also requests that YECL provide consolidated documents of all responses submitted on August 8, 2013 with embedded hyperlinks where references are made to other responses and/or documents. With its submission on August 29, 2013, UCG submits that a consolidated document containing all responses to information requests be provided.

UCG repeats its request that YECL provide responses and attachments in word-searchable PDF and/or Word format. Where responses take the form of tables with underlying calculations, UCG asks that YECL provide the related Excel file as well.

Until the responses to information requests are reviewed, UCG is not in a position to agree with the proposed procedural schedule related to the submission and review of intervenor evidence.

If the Board or YECL requires any clarification with respect to UCG's submissions, please direct all inquiries to me by email at mjanigan@piac.ca or by phone at (613) 562-4002 ext 26.

Yours truly,

Michael Janigan
Counsel for UCG

cc: YECL and Registered Parties (via email)