

UTILITIES CONSUMERS' GROUP  
Box 9300  
29 Wann Road  
Whitehorse, Yukon Y1A 4A2  
email: [rondeau@northwestel.net](mailto:rondeau@northwestel.net)

August 1, 2012

Yukon Utilities Board  
Box 31728  
Whitehorse, Yukon Y1A 6L3

Attention: Mr. Bruce McLennan, Chair

**Re: Yukon Energy Corporation – 2012 / 2013 General Rates Application  
YEC Responses to Information Requests**

Dear Mr. McLennan:

The Utilities Consumers' Group is in receipt of the responses to information requests submitted by Yukon Energy Corporation on July 27, 2012.

In reviewing YEC's responses to UCG's information requests, it is apparent that appropriate and adequate responses have not been provided in all cases. UCG submits that in order to complete a robust analysis of YEC's proposals, it is necessary to have the numbers from previous years on the record of this proceeding even if they may have been referenced in a previous proceeding since there has not been a thorough testing of these numbers since the last General Rates Application. UCG submits that any analysis of YEC's forecasts requires a significant amount of historical results in order to adequately compare and test.

UCG respectfully requests that the Yukon Utilities Board consider and provide a ruling on the following, presumably after providing YEC some time to review our requests and provide further answers.

#### NOTICE OF MOTION

The Utilities Consumers' Group requests that the Board issue an Order to the effect that:

Yukon Energy Corporation shall be required to provide adequate responses to questions submitted by the Utilities Consumers' Group that YEC has not provided to the Board's satisfaction.

In support of this Notice of Motion, the Utilities Consumers' Group provides for consideration by the Board (and all other parties to the proceeding) the following facts, information, comments, opinions, arguments and questions:

- On July 27, 2012, Yukon Energy Corporation (YEC) submitted responses to information requests related to its 2012/2013 General Rates Application.

- The general principle that proceedings before the Board should be transparent and open to the public requires that all relevant materials be available on the public record. The need for transparency is especially important where the material is directly relevant to setting rates and revenue requirement recovery policy for regulated monopolies such as YEC.
- The requested evidence is relevant to the consideration of the issues and unless the most compelling reasons can be advanced by YEC, an overarching public interest in disclosure should prevail.
- There has been no disclosure of any perceived harm from the disclosure of this information to the public record.
- The regulation of public utilities must be carried out in as transparent a process as possible. Only very exceptional circumstances should justify the exclusion from the public record of material that is used in rate-setting. UCG respectfully submits that YEC has not demonstrated exceptional circumstances.
- With respect to specific responses to information requests, the UCG submits the following:

#### **1. UCG-YEC-1-3(b)**

YEC failed to fully respond to part (b) of this information request stating that “*OIC 2012/68 is a specific direction of the Yukon Government – this question is outside the scope of the current proceeding*”.

UCG submits that given that an issues list was not determined for this proceeding, there is nothing upon which YEC can base its position that this question is out of scope.

Given the influence that OIC 2012/068 has on the rates that can be determined by the YUB in this proceeding and the coincidence of having this OIC issued the day before YEC submitted its application, UCG believes that information related to any discussions or information sharing that YEC was a party to related to the development of OIC 2012/068 is relevant to better understanding how YEC managed to incorporate the directions of OIC 2012/068 in its application within one day of its issue and to better understand whether the regulatory and stakeholdering processes were circumvented during the development of YEC’s application.

UCG requests that YEC provide the requested response to part (b) of UCG-YEC-1-3.

#### **2. UCG-YEC-1-5(c)**

YEC failed to fully respond to part (c) of this information request stating that the information requested regarding ratepayers bills at January 1997 and January 1998 was not “*directly relevant to the current revenue requirement proceeding for the 2012/13 test years*”.

UCG submits that in order to better understand what has made up the bill of Yukon ratepayers and the amounts of those bills over the last several years, it is important to see the actual numbers and components of those bills. The concern being investigated by UCG is that ratepayers have been subjected to confusion and extreme volatility since 1996 and only the utility has the actual numbers and bill format to allow for any meaningful

discussion on this issue. Providing a graph depicting changes to ratepayer bills does not provide the detail requested and needed for these arguments.

Given that YEC is able to provide a summary graph, the details of the bills from 1997 and 1998 are obviously readily available.

UCG requests that YEC provide the requested response to part (c) of UCG-YEC-1-5.

### **3. UCG-YEC-1-7**

YEC failed to respond to this information request stating that *“the information request is extensive and impractical to compile, and relates to cost of service and rate policy and regulatory considerations in other jurisdictions which is not relevant to a Yukon revenue requirement review and is consequently considered out-of-scope”*.

UCG submits that YEC's reliance on the rates in other jurisdiction to prove that Yukon's non-government residential rates remain lowest of utilities North of 60 makes this information relevant to the current application. If YEC has reviewed the rates of these other jurisdictions and can submit that the Yukon has some of the lowest rates, then parties should be able to test this positioning and are entitled to the requested background so that a legitimate comparison can be made.

UCG submits that it is not enough to simply accept the claims that YEC has made without knowing how the posted rates were established in other jurisdictions and under what circumstances. UCG submits that if YEC is relying on the rates in other jurisdictions to sell their proposed rates as reasonable, then parties to this proceeding are entitled to the requested information. Otherwise, it is a useless comparison that carries no weight.

UCG requests that YEC provide the requested response to UCG-YEC-1-7.

### **4. UCG-YEC-1-11**

YEC failed to respond to this information request referring to the response to YUB-YEC-1-2(a) which only outlines diesel fuel costs related to incremental load growth.

UCG submits that in order to justify its statement that “industrial load growth to date also continues to bring higher revenues that tend to more than offset any related incremental costs”, YEC must provide full cost allocation and revenues evidence related to these incremental loads. UCG submits that the conclusions submitted by YEC fail to acknowledge all of the costs associated with incremental industrial loads and these must be identified in full in order for parties to understand the full impact of these loads and to have evidence that these loads are paying for all incurred costs.

UCG requests that YEC provide the requested response to UCG-YEC-1-11.

**5. UCG-YEC-1-17(c)**

YEC failed to fully respond to part (c) of this information request stating that the requested data for 2005-2008 was “*not directly relevant to the current revenue requirement proceeding for the 2012/13 test years*”.

UCG submits that the requested data is needed in order to determine meaningful trends in YEC’s earnings for the past several years. In order to effectively argue about YEC’s forecasting and earnings history, it is necessary to have all relevant information on the record of this current proceeding. UCG has not seen any evidence that the requested information is not readily available from YEC’s records nor has YEC provided the requested table.

UCG requests that YEC provide the requested response to UCG-YEC-1-17(c).

**6. UCG-YEC-1-18(d)**

YEC failed to fully respond to part (d) of this information request referring to the response to YUB-YEC-1-46(d) which only totals expenditures through 2011 with no indication of when these expenditures took place.

UCG requested details of YEC’s DSM-related expenditures by year in 2005, 2006, 2007, 2008, 2009, 2010 and 2011 and their percentage of revenue requirement in order to better understand the efforts over these specific years by YEC in this area as compared to directions from the YUB. UCG also wants to better understand what percentage of approved revenue requirements are allocated to DSM.

UCG requests that YEC provide the requested response to UCG-YEC-1-18(d).

**7. UCG-YEC-1-19(b)**

YEC failed to fully respond to part (b) of this information request providing only load forecasts for 2009 to 2011 for wholesale transactions.

UCG requested a comparative table of the forecast load forecasts versus actual by customer class for 2005, 2006, 2007, 2008, 2009, 2010 and 2011 in order to better understand the load forecasting record of the Yukon utilities since these load forecasts are used for planning and rate setting purposes.

It is inconceivable that YEC does not keep records related to its own customers and unrealistic to assume that the requested data would not be readily available from the only other utility in the Yukon.

UCG requests that YEC provide the requested response to UCG-YEC-1-19(b).

**8. UCG-YEC-1-20(a)**

YEC failed to fully respond to part (a) of this information request stating that 2008 load data was *“not considered to be relevant to the current revenue requirement proceeding”*.

UCG submits that given that Minto was scheduled to be taking service as an industrial customer starting 2008 and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC’s current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-20(a).

**9. UCG-YEC-1-21(a) and (b)**

YEC failed to fully respond to parts (a) and (b) of this information request stating that 2008 sales and customer data was *“not considered to be relevant to the current revenue requirement proceeding”*.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC’s current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-21(a) and (b).

**10. UCG-YEC-1-21(d)**

YEC failed to fully respond to part (d) of this information request stating that *“this requires a cost of service study for the requested years”*.

UCG requested a table showing revenue requirement per residential customer for 2008, 2009, 2010, 2011, 2012 (forecast) and 2013 (forecast). YEC did not make any attempt to estimate the requested numbers despite having gone through a general rates application for 2008 and 2009.

UCG submits that it is impossible to measure the fairness of the rates being proposed for ratepayers without having an indication of how they compare to the costs of serving these customers.

UCG requests that YEC provide the requested response to UCG-YEC-1-21(d).

**11. UCG-YEC-1-22(a) and (b)**

YEC failed to fully respond to parts (a) and (b) of this information request stating that 2008 sales and customer data was *“not considered to be relevant to the current revenue requirement proceeding”*.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-22(a) and (b).

## **12. UCG-YEC-1-22(c)**

YEC failed to fully respond to part (c) of this information request stating that "*this requires a cost of service study for the requested years*".

UCG requested a table showing revenue requirement per general service customer for 2008, 2009, 2010, 2011, 2012 (forecast) and 2013 (forecast). YEC did not make any attempt to estimate the requested numbers despite having gone through a general rates application for 2008 and 2009.

UCG submits that it is impossible to measure the fairness of the rates being proposed for ratepayers without having an indication of how they compare to the costs of serving these customers.

UCG requests that YEC provide the requested response to UCG-YEC-1-22(c).

## **13. UCG-YEC-1-23(b) and (c)**

YEC failed to fully respond to parts (b) and (c) of this information request stating they do not "*have access to this information, as most customers in Yukon are served at the retail level by YECL, not YEC*".

UCG submits that given that the requested information related to actual consumption and how consumption levels match to the blocks used by rates in the Yukon, it is impossible to determine whether the proposed rate adjustments and revenue requirements are fair and reasonable. YEC's response to this information request highlights the problem of the Yukon utilities not working together to serve Yukoners. YEC didn't even indicate that they had tried to get the requested data.

UCG requests that YEC provide the requested response to UCG-YEC-1-23(b) and (c).

## **14. UCG-YEC-1-24(a)**

YEC failed to fully respond to part (a) of this information request stating that 2008 fuel prices was "*not considered to be relevant to the current revenue requirement proceeding*".

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-24(a).

**15. UCG-YEC-1-25(b) and (c)**

YEC failed to fully respond to parts (b) and (c) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-25(b) and (c).

**16. UCG-YEC-1-26(a) and (b)**

YEC failed to fully respond to parts (a) and (b) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-26(a) and (b).

**17. UCG-YEC-1-26(c)**

YEC failed to fully respond to part (c) of this information request without stating why they did not provide the requested information.

UCG requested an explanation of how YEC and YDC-related costs are tracked and allocated within YEC's revenue requirement. While YEC states that there are no YDC-related costs in its revenue requirement, this does not explain how costs incurred and recovered from YDC are tracked and allocated.

UCG submits that YEC has already put on record that its staff has undertaken work on behalf of YDC. UCG is looking for an explanation of how these costs are identified, tracked and recovered from YDC in order to confirm that Yukon ratepayers are not paying these costs.

UCG requests that YEC provide the requested response to UCG-YEC-1-26(c).

**18. UCG-YEC-1-27(a)**

YEC failed to fully respond to part (a) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-27(a).

**19. UCG-YEC-1-28(a)**

YEC failed to fully respond to part (a) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-28(a).

**20. UCG-YEC-1-29(a)**

YEC failed to fully respond to part (a) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-29(a).

**21. UCG-YEC-1-30(a)**

YEC failed to fully respond to part (a) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-30(a).

**22. UCG-YEC-1-31(a)**

YEC failed to fully respond to part (a) of this information request without stating why they did not provide the requested 2008 data.



UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-31(a).

### **23. UCG-YEC-1-32(a)**

YEC failed to fully respond to part (a) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-32(a).

### **24. UCG-YEC-1-33(a)**

YEC failed to fully respond to part (a) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-33(a).

### **25. UCG-YEC-1-34(a)**

YEC failed to fully respond to part (a) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-34(a).

### **26. UCG-YEC-1-35(a) and (c)**

YEC failed to fully respond to parts (a) and (c) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-35(a) and (c).

**27. UCG-YEC-1-41(a)**

YEC failed to fully respond to part (a) of this information request without stating why they did not provide the requested 2008 data.

UCG submits that given that there is a need to review the 5-year trend in the data for each of the 2012 and 2013 test years and the data is readily available, it should be up to intervenors to decide how the requested data is used to support their arguments related to YEC's current application.

UCG requests that YEC provide the requested response to UCG-YEC-1-41(a).

**28. UCG-YEC-1-43(b)**

YEC failed to fully respond to part (b) of this information request stating they "cannot provide recovery information by rate class, as the vast majority of Rider F collections occur through YEC".

UCG submits that the requested information related to recovery from ratepayers of rider charges should be readily available and provided to ensure that the proper recoveries are being made from customer classes. YEC's response to this information request highlights the problem of the Yukon utilities not working together to serve Yukoners. YEC didn't even indicate that they had tried to get the requested data.

UCG requests that YEC provide the requested response to UCG-YEC-1-43(b).

**29. UCG-YEC-1-45(d)**

YEC failed to fully respond to part (d) of this information request stating that the monthly breakdown of the proposed 2012 revenue requirement had not yet been developed.

UCG submits that the requested information is needed to properly calculate the impact of allowing YEC to recover the proposed revenue requirement. UCG submits that this information is important for arguments in this area.

UCG requests that YEC provide the requested response to UCG-YEC-1-45(d).

**30. UCG-YEC-1-48(b)**

YEC failed to fully respond to part (b) of this information request without explaining why no response was provided.

While YEC provided some information related to the capital costs of the Carmacks-Stewart Transmission Project – Stage 2, UCG requested information on the revenue requirement impact of this project in 2011, 2012 and 2013 and the impact on rates for each customer class. UCG submits that there must be some revenue requirement associated with the operation of this project even if the capital costs are fully funded by outside agencies.

UCG requests that YEC provide the requested response to UCG-YEC-1-48(b).

**31. UCG-YEC-1-49(b)**

YEC failed to fully respond to part (b) of this information request stating that *“it is not feasible or relevant in this Application to address rate impacts for each customer class. It is required that these impacts be as directed in OIC 2012/68”*.

UCG submits that the requested revenue requirement impact of the Mayo Hydro Enhancement Project in 2011, 2012 and 2013 and the impact on rates for each customer class is relevant to this application as parties try to determine the validity of YEC’s proposed revenue requirement. This is the only opportunity available to test the impact of this project and to verify its claimed benefit to ratepayers and the prudence of the related revenue requirement.

UCG submits that OIC 2012/68 addresses overall rate adjustments to customer classes and does not address how specific projects might impact specific customer classes. UCG submits that different customer classes will benefit from projects differently and the balancing of these differences need only be balanced overall per OIC 2012/68.

UCG requests that YEC provide the requested response to UCG-YEC-1-49(b).

**32. UCG-YEC-1-50(d)**

YEC failed to fully respond to part (d) of this information request stating that *“class level impacts cannot be assessed without a Cost of Service study. It is required that these impacts be as directed in OIC 2012/68”*.

UCG submits that the requested revenue requirement impact of the Aishihik 3<sup>rd</sup> Turbine by customer class in 2011, 2012 and 2013 is relevant to this application as parties try to determine the validity of YEC’s proposed revenue requirement. This is the only opportunity available to test the impact of this project and to verify its claimed benefit to ratepayers and the prudence of the related revenue requirement.

UCG submits that OIC 2012/68 addresses overall rate adjustments to customer classes and does not address how specific projects might impact specific customer classes. UCG submits that different customer classes will benefit from projects differently and the balancing of these differences need only be balanced overall per OIC 2012/68.

UCG requests that YEC provide the requested response to UCG-YEC-1-50(d).

**33. UCG-YEC-1-59(a)**

YEC failed to fully respond to part (a) of this information request stating that “*actual data for 2007 and 2008 was made available at the 2008/09 GRA*”.

UCG submits that it makes more sense to provide requested data on the record of the current proceeding to assist parties and ensure that the most current data is readily available for use in developing arguments.

UCG requests that YEC provide the requested response to UCG-YEC-1-59(a).

**34. UCG-YEC-1-59(c)**

YEC failed to fully respond to part (c) of this information request stating that the application provided “*extensive detail on all projects over \$1 million*”.

UCG’s request was for a component breakdown of project expenditures by year for all projects with a cost estimate of \$500,000 or more. UCG submits that the application only provides a general description of the costs of projects over \$1 million without identifying the cost components. UCG submits that it is impossible to test the prudence of projects costing more than \$500,000 without seeing how the money is actually being spent.

If parties are not allowed to adequately test the prudence of significant capital expenditures (i.e., over \$500,000), UCG submits that it would not be possible for the Board to approve including them in rate base.

UCG requests that YEC provide the requested response to UCG-YEC-1-59(c).

**35. UCG-YEC-1-60(a)**

YEC failed to fully respond to part (a) of this information request referring to the response to YUB-YEC-1-39(j). The referenced attachment to YUB-YEC-1-39(j) was not attached to the responses received by UCG.

UCG requests that YEC provide the requested response to UCG-YEC-1-60(a).

**36. UCG-YEC-1-61(c)**

YEC failed to fully respond to part (c) of this information request

UCG submits that it requested details of how DSM-related costs will be recovered from ratepayers and details of that recovery by rate class. If YEC knows DSM costs and has an existing cost allocation study, it should be able to provide the allocation of those costs by rate class.

UCG requests that YEC provide the requested response to UCG-YEC-1-61(c).

**37. UCG-YEC-1-62(c)**

YEC failed to fully respond to part (c) of this information request

UCG submits that it requested details of how Waste to Energy / Biomass programs-related costs will be recovered from ratepayers and details of that recovery by rate class. If YEC knows the costs of the project and has an existing cost allocation study, it should be able to provide the allocation of those costs by rate class.

UCG requests that YEC provide the requested response to UCG-YEC-1-62(c).

**38. UCG-YEC-1-63(c)**

YEC failed to fully respond to part (c) of this information request

UCG submits that it requested details of how District Heating-related costs will be recovered from ratepayers and details of that recovery by rate class. If YEC knows the costs of the project and has an existing cost allocation study, it should be able to provide the allocation of those costs by rate class.

UCG requests that YEC provide the requested response to UCG-YEC-1-63(c).

**39. UCG-YEC-1-64(c)**

YEC failed to fully respond to part (c) of this information request

UCG submits that it requested details of how LNG-related costs will be recovered from ratepayers and details of that recovery by rate class. If YEC knows the costs of the project and has an existing cost allocation study, it should be able to provide the allocation of those costs by rate class.

UCG requests that YEC provide the requested response to UCG-YEC-1-64(c).

**40. UCG-YEC-1-66(b)**

YEC failed to fully respond to part (b) of this information request by providing only overall cost data related to projects over \$1 million.

UCG's request was for a component breakdown of deferred cost project expenditures by year for all deferred cost projects with a cost estimate of \$500,000 or more. UCG submits that it is impossible to test the prudence of projects costing more than \$500,000 without seeing how the money is actually being spent.

If parties are not allowed to adequately test the prudence of significant capital expenditures (i.e., over \$500,000), UCG submits that it would not be possible for the Board to approve including them in rate base.

UCG requests that YEC provide the requested response to UCG-YEC-1-66(b).

**41. UCG-YEC-1-67(a)**

YEC failed to fully respond to part (a) of this information request stating that data for 2007 and 2008 “*was available at the time of the 2008/09 GRA*”.

UCG submits that it makes more sense to provide requested data on the record of the current proceeding to assist parties and ensure that the most current data is readily available for use in developing arguments.

UCG requests that YEC provide the requested response to UCG-YEC-1-67(a).

**42. UCG-YEC-1-68(a)**

YEC failed to fully respond to part (a) of this information request stating that data for 2007 and 2008 “*was available at the time of the 2008/09 GRA*”.

UCG submits that it makes more sense to provide requested data on the record of the current proceeding to assist parties and ensure that the most current data is readily available for use in developing arguments.

UCG requests that YEC provide the requested response to UCG-YEC-1-68(a).

The above Notice of Motion and supporting arguments are respectfully submitted for the Board’s review and consideration prior to the filing deadline for intervenor evidence.

Should you have any questions on this submission, I would ask that they be directed to me by email at [rrondeau@northwestel.net](mailto:rrondeau@northwestel.net).

Yours truly,

Roger Rondeau  
Utilities Consumers' Group