

UTILITIES CONSUMERS' GROUP
Box 9300
29 Wann Road
Whitehorse, Yukon Y1A 4A2
email: rrondeau@northwestel.net

June 16, 2014

Yukon Utilities Board
Box 31728
Whitehorse, Yukon Y1A 6L3

Attention: Mr. Bruce McLennan, Chair

Re: Yukon Energy Corporation Application to Revise the Diesel Contingency Fund and Related Amendments to the Energy Reconciliation Adjustment

Dear Mr. McLennan:

The Utilities Consumers' Group (UCG) is in receipt of a letter dated June 16, 2014 from legal counsel for Yukon Energy Corporation (YEC) that proposes changes to the procedural schedule established for reviewing proposed revisions to the Diesel Contingency Fund and related amendments to the Energy Reconciliation Adjustment.

The utilities are asking to be allowed to each file supplementary evidence by June 30, 2014 that either party may consider relevant in addressing matters raised in the filing made by the other utility. The utilities are also proposing that the information requests to the utilities remain due on July 7, 2014.

UCG notes that the supplementary evidence is proposed to be submitted on the Monday before the Canada Day holiday which leaves parties 4 business days to absorb the supplementary evidence, change information requests accordingly, and finalize them by Monday, July 7, 2014. Given the unknown nature of the supplementary evidence and the unknown issues that it may raise, UCG submits that it is unreasonable to expect parties to maintain the July 7th schedule for information requests. UCG submits that information requests on current and supplementary evidence should be due on Monday, July 14, 2014 with responses due back from the utilities by July 28, 2014.

Another issue with respect to the filing of supplementary evidence is whether this new evidence will raise issues that parties other than the YUB and UCG (the only registered intervenor) may want to investigate more. UCG submits that with the filing of supplementary evidence and positions, parties from previous rates application proceedings should be given an opportunity to request intervenor status and submit information requests, evidence and argument as they see fit. If the YUB allows time for this additional intervenor registration, UCG submits that this will impact on the timing of information requests and responses.

YEC notes in its letter that the utilities should be given the ability to provide rebuttal evidence in response to any filed intervenor evidence. UCG submits that this opportunity is already provided to the utilities in the form of argument and reply argument. UCG sees no purpose in giving the utilities an opportunity to submit additional "rebuttal evidence" when other parties are not provided the same opportunity with respect to the utilities' evidence other than through filing of their own evidence or in argument.

It is unfortunate that the utilities feel that they have to high-jack this regulatory process by trying to introduce an extra step in the review process that has not been allowed in any previous regulatory

review by the YUB. As in any other proceeding, it is up to the utilities to submit argument the same as any other party to counter whatever evidence and responses to information requests are submitted to the record by any other party that is part of this regulatory process.

Yours truly,

Roger Rondeau
Utilities Consumers' Group