

UTILITIES CONSUMERS' GROUP
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June 3, 2014

Yukon Utilities Board
Box 31728
Whitehorse, Yukon Y1A 6L3

Attention: Mr. Bruce McLennan, Chair

**Re: Yukon Electrical Company Limited – 2013-2015 GRA Phase 1
Additional UCG Comments on Cost Claims**

Dear Mr. McLennan:

The Utilities Consumers' Group (UCG) is in receipt of the Board's June 2, 2014 email which indicated that comments on cost claims were due by June 16, 2014 and provided additional detail related to previously submitted cost claims of the Town of Watson Lake, Leading Edge and the Yukon Conservation Society.

As a general comment, UCG does not understand why the additional cost claim material is being forwarded only to the Board instead of all parties. If a party sends their original cost claim to all parties, why wouldn't they send additional material to all parties as well?

Regarding the Board's determination that parties have until June 16, 2014 to provide comments on the cost applications submitted in this proceeding, UCG submits that this appears to conflict with the Board's Scale of Costs policy which states:

5. Comments on Costs Claims

Participants may comment on costs claims filed by other participants within 14 days of the filing with the Board of a costs claim.

UCG does not understand why parties have been given until June 16, 2014 to submit comments on cost claims that were submitted between May 16 and May 23, 2014. UCG submits that there is already a track record of significant delays in Board decisions regarding cost claims and extending the comment period delays cost recovery even more.

UCG submits that the Board should do everything it can to provide a decision on cost claims within an expedited timeframe. Legal and regulatory consultants hired to provide assistance to intervenors in these proceedings have had to wait for more than a year to receive payment from the time they start providing services until a cost claim is paid by the utilities. As an example, for the YEC GRA proceeding, UCG submitted its request for intervenor status on May 14, 2012, the Board issued its Decision on the application on June 17, 2013 (Order 2013-03), the decision on the cost claims was issued on September 13, 2014 (Order 2013-08), and payments were made by the utilities in mid-October 2013. In UCG's view, this length of time does not make it easy for intervenors lacking

financial means to attract consultant help nor the expertise needed to prepare evidence if required. UCG does not know of any other jurisdiction within which cost claim decisions are not issued until 3 months after a decision on the application is issued.

In the current proceeding, UCG's consultants starting providing services shortly after the Board issued the Notice of Application and procedural schedule on June 6, 2013 (Order 2013-02). A year has already elapsed over which these individuals have provided services without payment.

With respect to the additional information provided for the Town of Watson Lake cost claim, UCG submits that the claim for costs incurred by Stantec Consulting still does not meet the requirements to qualify for recovery from ratepayers (i.e., no details on when activity was undertaken, no details of the activities undertaken, and no details on the qualifications of the individuals for whom costs have been claimed). UCG still does not understand how any determination can be provided on the validity of the activities undertaken, the reasonableness of time incurred to provide services, and the hourly rates charged. UCG repeats its previous submission that the YUB should not allow the fees claimed by the Town of Watson Lake for Stantec Consulting to be recovered through rates paid by Yukon ratepayers.

With respect to the additional information provided by the Yukon Conservation Society, UCG submits that there continues to be no documentation provided regarding a retainer / contract / qualifications related to JP Pinard which would qualify him to recover \$100 per hour for his services from Yukon ratepayers.

UCG submits that the additional information provided by the Yukon Conservation Society makes their cost claim more confusing. In its original May 22, 2014 cost claim, YCS is claiming 49 hours @ \$35 for Ms. Middler, 32 hours @ \$100 for Mr. Pinard and \$800 in total hearing attendance fees for both of these individuals. The additional detail provides explanations for the total hours claimed but does not provide details of the dates for Ms. Middler's time so it is unknown how much duplication of effort is included in the cost claim with the descriptions provided. UCG also submits that YCS should be limited to cost recovery for one individual attending the hearing.

Yours truly,

Roger Rondeau
Utilities Consumers' Group