



June 27, 2016

Yukon Utilities Board
Box 31728
Whitehorse, YT, Y1A 6L3

Attention: Mr. Robert Laking
Board Chair

Dear Sir:

**RE: 2016-2017 General Rate Application
Response to Utilities Consumers' Group ("UCG") letter dated June 17, 2016**

On June 21, 2016, the Yukon Utilities Board ("Board") invited interested parties to comment on the request of the Utilities Consumers' Group ("UCG") to retain Pacific Economics Group ("PEG") to determine if it is feasible to conduct a benchmark of the costs and productivity of ATCO Electric Yukon ("AEY"). In support of this, the UCG has requested a letter of comfort from the Board, as well as identified a need to alter the current schedule. The UCG has provided no further detail or information to explain to the Board, or AEY, what is specifically being requested, other than the generic request for a "letter of comfort" and an "altered procedural schedule".

Regardless, AEY has responded to the request of the UCG in its letter to the Board on June 21, 2016. AEY continues to rely on that correspondence, and wishes to further reiterate that the UCG's request is not within the current scope of AEY's GRA, and that any "new experience" of benchmarking the costs and productivity of AEY should not be entertained. By their own submission, the UCG states there is no indication that a benchmarking exercise is even feasible in the circumstances. AEY questions what benefits this type of costly undertaking will provide to customers or the Board, particularly since, as noted in AEY's previous correspondence, the Board has already ruled that the benchmarking of other North American Utilities against Yukon utilities "is unlikely to result in relevant benchmarks" and, as a result has rejected such past requests.

Additionally, AEY submits the Board ought to deny any alternate schedule proposed by the UCG to accommodate such an exercise, as AEY's application can appropriately be tested via the current process schedule approved in Decision 2016-01.

ATCO Electric

YUKON

For these reasons, and the reasons outlined in AEY's June 21, 2016 letter, AEY respectfully requests the Board deny any change to the current schedules and deny UCG's request to engage in a costly, undefined and unproductive benchmarking exercise.

Yours truly,

Original signed by James Grattan

James Grattan, CA
Director, Regulatory