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Your File No.:
Our File No.: 71310-0023

January 16, 2018

Yukon Utilities Board
Box 31728
Whitehorse, Yukon
Y1A 6L3

Attention: Robert Laking, Chair

Dear Sir:

Re: City of Whitehorse Comments on Yukon Energy Corporation (“YEC”) Response to Board Order 2017-08 Re: Energy Reconciliation Adjustment (“ERA”)

Further to the correspondence from the Yukon Utilities Board (“the Board”) dated December 15, 2017 requesting comments from parties regarding YEC’s response to Board Order 2017-08, below are the comments of the City of Whitehorse (the “City”).

Part 1 of YEC Two- Part Application ERA 2012-2016 (Part 1 application):

The City has made a preliminary review of Part 1 of the Application and submits that, from its perspective, a round of information requests and responses, to be followed by written argument and reply, would suffice to address any issues related to Part 1 of the Application.

Part 2 of YEC Two- Part Application- ERA 2017 and Forward (Part 2 application):

The Board requested comments from parties on YEC’s position that the “contingency fund mechanism needs to be determined concurrent with the YEC GRA 2017-18 process review of hydro forecasts” and its proposals that “the Board consider its Part 2 application either prior to the current YEC GRA process or as part of the GRA proceeding.” The City agrees with YEC that Part 2 should be determined concurrently with the GRA and is of the view that once further information regarding Part 2 has been obtained, as discussed below, the remaining process schedule can be set as a combined schedule leading to the final determination of both the GRA and Part 2 application in one proceeding.

As with Part 1 of the Application, the City of Whitehorse recommends a round of written information requests and responses for Part 2. Following the review of the responses, and the output of the technical workshop related to the YECSIM Model, parties should be given the opportunity to make submissions related to the need for intervener evidence.

YECSIM Model:

Regarding the YECSIM model, the City of Whitehorse submits that both written information requests, and a technical meeting would be of benefit to parties to understand the model and its inputs. The City of Whitehorse sees value in having responses to information requests provided prior to the technical workshop, and then follow-up information requests and responses after the workshop.

It would also be helpful if YEC could provide a working version of the model in a spreadsheet to allow parties to better understand the actual workings of the model.

Yours truly,

BROWNLEE LLP

PER:



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THOMAS D. MARRIOTT, Q.C.

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