

UTILITIES CONSUMERS' GROUP
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January 30, 2014

Yukon Utilities Board
Box 31728
Whitehorse, Yukon Y1A 6L3

Attention: Mr. Bruce McLennan, Chair

Re: Yukon Energy Corporation - Application for an Energy Project Certificate and an Energy Operation Certificate regarding the Proposed Whitehorse Diesel to Liquefied Natural Gas Conversion Project - UCG Registration as Intervenor

Dear Mr. McLennan:

The Utilities Consumers' Group (UCG) hereby registers as an intervenor in the proceeding to review the application by Yukon Energy Corporation ("YEC") for approval of an Energy Project Certificate and an Energy Operation Certificate for the proposed Whitehorse Diesel to Natural Gas Conversion project.

The nature of UCG's participation in this proceeding is to protect the interests of residential and small business consumers of electricity in the Yukon. Of particular concern is the potential impact this \$34.4 million project will have on the bills for these ratepayers over the next several years, particularly the more vulnerable low and fixed income earners. UCG is also particularly interested in more fully understanding when and how ratepayers will be receiving the benefits of the proposed project, the alternatives reviewed, does the proposed cost include all related work, how the project will be financed, and all related environmental and safety issue costs.

UCG has had discussions to retain the services of the Public Interest Advocacy Centre in Ottawa as legal counsel for this proceeding as well as a regulatory consultant both of whom have assisted UCG in previous regulatory proceedings before the YUB. If this is indeed the case, UCG will be submitting a cost claim at the end of these proceedings in accordance with the YUB's Rules of Practice and Scale of Costs Policy.

Until more information is provided through the information request process, it is too early to tell whether UCG will need to submit additional evidence to be placed on the record.

While the YUB's procedural schedule includes a provision for an oral public hearing including oral argument and oral reply, UCG suggests that the evidentiary needs of the YUB may be satisfied by a less costly written process.

Accordingly, UCG would like to submit a motion to make changes for this process to an entirely paper/written process. This has been the normal Board procedure for less intensive applications as opposed to a much grander General Rates Application.

As it is ultimately the ratepayer that pays for all regulatory costs, UCG stresses that the present Board prescribed process would result in major costs for wages, travel, accommodation for all the professionals needed from a hearing process, let alone extensive escalated Board costs.

UCG is aware that the YESAB process is stalled as Yukon Energy has not submitted enough evidence to satisfy this Board. Thus, it would also be our suggestion to wait and see if this project passes the environmental and safety tests, before we spend hundreds of thousands of dollars on this YUB regulatory process.

UCG would appreciate if all communications related to this application and its review would remain to be copied to UCG's Roger Rondeau (rrondeau@northwestel.net), Pat McMahon (stefsdad99@gmail.com) and Michael Janigan (mjanigan@piac.ca).

Yours truly,

Roger Rondeau
Utilities Consumers' Group