

March 6, 2014

Yukon Utilities Board
Box 31273
Whitehorse, Yukon Y1A 6L3

Attention: Mr. Bruce McLennan, Chair

Re: Yukon Energy Corporation (“YEC”) – Application for an Energy Project Certificate and an Energy Operation Certificate in relation to the Proposed Whitehorse Diesel to Liquefied Natural Gas Conversion Project (“Project”) – YEC Responses to Yukon Conservation Society and Leading Edge (“YCSLE”) Information Requests

Dear Sirs and Mesdames:

On behalf of our clients YCSLE, we are writing to support the Notice of Motion dated March 4, 2014 brought by the Public Interest Advocacy Centre on behalf of its client the Utilities Consumers’ Group. Complete answers to Information Requests (“IRs”) at the earliest possible date speeds the regulatory review process.

By this letter YCSLE is making its own Notice of Motion and requesting the Yukon Utilities Board (“YUB”) to direct YEC to file complete answers to certain IRs previously made by YCSLE and that are set out below.

YCSLE is mindful that when there is an oral hearing, it has an opportunity to probe answers to IRs through cross examination. Because of the lead time required to prepare the answers or the complexity of the questions set out below, follow-up cross examination will probably not be sufficient especially given the compressed time frame within which the YUB is required to respond to the Minister of Justice, Attorney General.

As set out in the Utilities Consumer’s Group Notice of Motion, transparency and openness are key factors in regulatory review processes and YCSLE makes the same arguments in support of its Notice of Motion. In addition:

1. The regulatory review process for the Project will be expedited if the answers are provided by YEC at the earliest possible date and within a reasonable period of time before the commencement of the oral phase of this review process.
2. The information being requested is not otherwise available to YCSLE and is germane to its understanding of the Project and the preparation of its case.

NOTICE OF MOTION

YCSLE requests the YUB to direct YEC to:

1. Provide complete answers to the IRs set out below that YUB responded to in part on February 28, 2014; and
2. Make reasonable efforts to contact YCSLE to resolve any uncertainty about the clarity of any of these IRs.

YCSLE IR-1-28

YEC's response to part (a) refers to Appendix E, Attachment E2 of the Yukon Energy 20 – Year Resource Plan: 2011 – 2030 ("Resource Plan"). To YCSLE's knowledge, this appendix and all the other appendices to the Resource Plan are not publicly available including being posted on YEC's website. YCSLE has repeatedly asked YEC for these appendices since the summer/ fall of 2012 and they have not yet been provided. Please provide all of the appendices to the Resource Plan.

YCSLE IR 1-30

YEC's response says: "Please note that as the request was to provide the annual numbers for the water years from 1996 to 2000, therefore long-term average generation is not provided." The request was for the long term average and monthly and annual inflows not generation. Please provide these long term inflows.

Part (b) Yukon Energy is required to provide flow and water flow level information to the Yukon Water Board pursuant to the Mayo and Aishihik water licenses on a quarterly and annual basis, so the Mayo Lake and Aishihik Lake water levels at the end of each calendar year must exist in Yukon Energy's records. Please provide this information.

Part (c) the second part of the question was not answered. Approximately how much stored energy in GWh does the volume of water between 913 meters and 915.16 meters represent?

YCSLE IR 1-41

Part (a) there may be an error in the response to this part as it appears that the reference in the Mayo hydro plant capacity relates to the pre-Mayo B era. Please correct or clarify. Also in Table 1 the question was misread – what was requested was the average minimum night time load, not the maximum. Please provide the minimum information.

YCSLE IR 1-43

The response to this question is incomplete – the expanded table does not contain the comparative information on new diesel at \$0.200 as the original Table 4-5 does. Please complete Table 1 with this information.

YCSLE IR 1-44

With a complete Table 1 in response to YCSLE IR 1-43, Table 4-6 will need to be expanded as requested to include lower LNG savings numbers. Please provide a revised Table 4-6.

Yours truly,

“David Austin”

David Austin on behalf of YCLE