



March 11, 2014

Mr. Bruce McLennan, Chair
Yukon Utilities Board
Box 31728
Whitehorse, Yukon Y1A 6L3

Dear Mr. McLennan:

Re: Yukon Energy Application for an Energy Project Certificate and Energy Operation Certificate regarding the Proposed Whitehorse Diesel – Natural Gas Conversion Project – Notice of Motion for an order removing from the record the evidence filed by Donald Roberts (“DR”) as being out of scope

Yukon Energy Application

Yukon Energy hereby applies for an order from the Board removing from the record the evidence filed by DR as being out of scope.

Background

On March 6, 2014, Donald Roberts DR delivered a copy of a power point presentation to the Yukon Utilities Board (“YUB” or “the Board”) via email, noting in the cover email that it was a “50 minute science based power point presentation on hydraulic fracturing” that was intended to challenge “YEC in their application to convert backup diesel generators to LNG,” and that “the main purpose for YEC proposing this change is to eventually seek LNG from Yukon shale deposits”, “unconventional drilling in shale will have devastating consequences on Yukon water, health and environment”, and Yukon Energy “is setting up a market that is not sustainable”.

To be clear, LNG from Yukon shale deposits is not identified as a supply source in Yukon Energy’s Application. Further, YESAB has itself noted that there is currently a moratorium on hydraulic fracturing in Yukon, and that the possibility of hydraulic fracturing as an activity connected to this Project is simply too remote and speculative to be included in its assessment.¹

¹ December 9, 2013 letter from YESAB to Ann Middler, YCS Energy Coordinator responding to request to include fracking and upstream impacts of natural gas in the Project scope.

Argument and order requested

The scope of the submission by DR relates to activities that occur outside of Yukon and that are not directly related to the Project defined in the Application or the terms of reference provided by the Minister. As such, Yukon Energy requests that the Yukon Utilities Board have the material filed by DR removed from the record as it is clearly out of scope and not relevant to the review of the Project pursuant to the Terms of Reference.

If you have any questions regarding the above please contact the undersigned.

Yours truly,

A handwritten signature in black ink, appearing to read 'Ed Mollard', written in a cursive style.

Ed Mollard, CGA
Chief Financial Officer