

YUKON UTILITIES BOARD

IN THE MATTER OF the *Public Utilities Act*, R.S.Y. 2002, c. 186;

AND IN THE MATTER OF the ATCO Electric Yukon and Yukon Energy Corporation 2024-
2025 Terms and Conditions of Service Application

**REPLY ARGUMENT OF ATCO ELECTRIC YUKON AND THE
YUKON ENERGY CORPORATION**

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I. INTRODUCTION

1. The following is the reply of ATCO Electric Yukon ("**AEY**") and the Yukon Energy Corporation ("**YEC**" and, together with AEY, the "**Utilities**") to the written arguments of the Yukon Utilities Consumers' Group ("**UCG**"), Mr. John Maissan, and Mr. Nathaniel Yee (together, the "**Intervenors**") filed on June 10 and 12, 2025,¹ with respect to the Utilities' joint Application ("**Application**") to the Yukon Utilities Board ("**Board**") for Terms and Conditions of Service ("**T&Cs**"), including updates to the Maximum Investment Levels ("**MILs**") and to the Fees and Service Charge Summary ("**Fees Schedule**").²

2. The Utilities' Argument-in-Chief filed June 12, 2025 ("**Utility Argument**"),³ was comprehensive in nature, and the Utilities do not intend to provide specific reply to all points raised by the Intervenors. The Utilities reiterate and rely upon all of the submissions in the Utility Argument, and silence on any specific aspect of the Intervenors' arguments should not be interpreted as acceptance. Capitalized terms not otherwise defined herein have the same meaning as in the Utility Argument.

II. REPLY SUBMISSIONS OF THE UTILITIES

A. General Comments Regarding Intervener Arguments

1. Extensive New Evidence Included in Argument

3. Prior to addressing specific aspects of the Intervener arguments, the Utilities provide the following comments of general Application.

4. The Intervenors' Arguments include significant sections of new evidence not on the record of the proceeding that should be disregarded by the Board entirely. The new evidence includes various references to information obtained from internet searches,⁴ anecdotes regarding the

¹ [UCG Final Argument, June 10, 2025](#), [UCG Argument]; [John Maissan Final Argument, June 12, 2025](#) [Maissan Argument]; [Nathaniel Yee Final Argument, June 12, 2025](#) [Yee Argument].

² [ATCO Electric Yukon and Yukon Energy Corporation Terms and Conditions of Service application Dec. 20, 2024](#), para 1, PDF 3 [Application].

³ [Utilities' Written Argument – Updates to T&Cs](#), June 12, 2025 [Utility Argument].

⁴ Maissan Argument, s 1(c), PDF 5-6; UCG Argument, para 10, PDF 3.

experiences of friends and acquaintances or other utility customers,⁵ and new bill formatting proposals as well as references to evidence filed in other proceedings.⁶

5. All evidence included in the Intervener Arguments could have been filed earlier in the process in accordance with the schedule established by the Board a number of months ago, which included a specific filing date for Intervener Evidence.⁷ Had the Interveners chosen to file Evidence, the Utilities would have appropriately had an opportunity to file Rebuttal Evidence in response, also in accordance with the process established by the Board. All Interveners have previous experience participating in Board proceedings⁸ and should be aware of the applicable process.

6. Unsubstantiated assertions by Mr. Maissan regarding the purported motivation of the Utilities in proposing certain changes to the T&Cs,⁹ questions that were not raised in the Information Request ("IR") process,¹⁰ and unsupported speculation and accusations by the UCG¹¹ should be given no weight.

7. It is inappropriate and procedurally unfair for new evidence to be introduced in an Argument and, accordingly, the Utilities respectfully submit that the Board should place no weight on such new evidence in rendering its determination on the Application.

2. Consultation on Proposed Updates

8. The UCG suggests that the Utilities should not have proposed updates to the T&Cs without first consulting with customers, stating that the T&Cs relate to customer rights and obligations and therefore updates require customer input.¹²

9. Although formal consultation sessions were not part of the preparation of the Application, the Utilities emphasize that they are engaged in regular and ongoing informal customer

⁵ Maissan Argument, s 1(c) and (d), PDF 5-6, s 6, PDF 9-10, and s 7, PDF 10; Yee Argument, para 15, PDF 4.

⁶ Yee Argument, paras 2-11, PDF 2-3.

⁷ Refer to Board Orders [2025-01](#) (January 13, 2025) and [2025-03](#) (February 18, 2025).

⁸ Refer to, for example, the [YEC 2023-24 General Rate Application](#), the [AEY 2023-24 General Rate Application](#), and the [AEY and YEC Rate Rebasing](#) proceeding, in which all Interveners participated.

⁹ Maissan Argument, s 3, PDF 8, s 5, PDF 9, and s 9, PDF 12.

¹⁰ Maissan Argument, s 1(c)-(d), PDF 4-6.

¹¹ UCG Argument, paras 1-2 PDF 1; para 5, PDF 2; para 17, PDF 4; para 20, PDF 4.

¹² UCG Argument, paras 4-5, PDF 2 and final comments, PDF 5.

consultation through the various customer interactions that take place in the course of providing utility service, as detailed on the record.¹³ The Utilities also submit that, as discussed in the Utility Argument, customer consultation would not have provided significant value to the preparation of the Application because of the nature of the updates and the basis for determining the costs that are at issue.¹⁴ The Application and IR Responses also include detailed information regarding the proposed changes for consideration and testing by stakeholders, including a full MIL Study and discussion of different implementation methodologies for setting new MILs.¹⁵

3. Incorporation of Costs

10. The UCG recommends that cost changes applied for in the Application should be implemented in the Utilities' revenue requirements at the time of their next GRAs and suggests that implementation of changes to the T&Cs may exacerbate financial stress for customers and, if incorporated as requested, create a "financial windfall" for the Utilities.¹⁶ The UCG also suggests that the Application will result in retroactive costs to ratepayers.¹⁷

11. The Utilities are not requesting that any proposed changes to the T&Cs be applied on a retroactive basis. The Utilities are proposing to implement changes to the T&Cs on a prospective basis from the date of the Board's decision on the Application. The majority of the proposed changes to the T&Cs are focused on modernizing and clarifying the provisions applicable to utility service, as discussed in the Utility Argument, to better enable the Utilities to continue to work with their customers to provide safe and reliable service.¹⁸ In addition, the Utilities note that the proposed changes to the Fees Schedule involve increases to fees that are collected in specific circumstances and that, on their own, are not significant amounts and that do not significantly impact the revenue requirement. The implementation of the new fees therefore would not result in any financial windfall to the Utilities. This is further apparent when considering that the Utilities are also not requesting an update as a result of the MILs, at this time.

¹³ [Responses to YUB \(Round 2\)](#), AEY-YEC-YUB-001(a)-(b), PDF 1-2 [**Round 2 Responses to YUB**]; [Responses to UCG \(Round 2\)](#), AEY-YEC-UCG-019(a), PDF 33 [**Round 2 Responses to UCG**].

¹⁴ Refer to the Utility Argument, para 11, PDF 6.

¹⁵ Application; regarding MIL implementation, see paras 22-23, PDF 8.

¹⁶ UCG Argument paras 2, 6, PDF 1-2.

¹⁷ UCG Argument, para 1, PDF 1.

¹⁸ Utility Argument, paras 5-8, PDF 4-5.

12. As stated in the Utilities' response to AEY-YEC-UCG-002 (Round 2), the Utilities are not requesting changes to their 2025 revenue requirements associated with the proposed fees and service charges and MILs. The Utilities will apply the fees and service charges and MILs amount approved in this proceeding in their next respective General Rate Applications filed after the approval of the changes to the T&Cs.¹⁹ The Utilities submit that this is a reasonable approach that best promotes regulatory efficiency. The Utilities have also proposed an annual update process to ensure that fees and MILs reflect inflation over time, while also promoting regulatory efficiency by avoiding the need for detailed annual reviews.²⁰

4. Annual Update Process

13. With respect to the Utilities' proposed annual update process, Mr. Maissan recommends that the update process for MILs should involve both an adjustment of the prior year MIL inflation rate for the difference between the CPI and the HWI indices for that year, as well as an adjustment of the MIL rate for the current year CPI change.²¹

14. The Utilities submit that this recommendation is not necessary and should not be directed by the Board. The Utilities have proposed an annual update process that keeps MILs aligned with inflation while also ensuring regulatory efficiency and administrative ease. As explained in the Utilities' response to AEY-YEC-JM-021 (Round 1), the Utilities consider that revising MILs with prior-year HWI figures would be inefficient.²² Furthermore, as explained in the Utilities' response to AEY-YEC-JM-013 (Round 2), setting the MIL as final in the annual update process creates certainty for customers.²³ The Utilities submit that it is most straightforward, efficient, and to the benefit of customers to set MILs as final using the annual process proposed in the Application.

5. Bill Presentation

15. Mr. Yee's Argument includes significant discussion regarding his recommendations for changes to utility bill formatting.²⁴ Notwithstanding that bill presentation is outside of the scope of the subject proceeding, the Utilities note that, as explained in their response to AEY-YEC-NY-

¹⁹ [AEY-YEC Responses to UCG \(Round 1\)](#), AEY-YEC-UCG-002(a-b), PDF 2 [**Round 1 Responses to UCG**].

²⁰ Utility Argument, paras 43-45, PDF 17.

²¹ Maissan Argument, s 10, PDF 13.

²² [AEY-YEC Responses to John Maissan \(Round 1\)](#), AEY-YEC-JM-021(b), PDF 37 [**Round 1 Responses to Mr. Maissan**].

²³ [Responses to John Maissan \(Round 2\)](#), AEY-YEC-JM-013(a), PDF 21 [**Round 2 Responses to Mr. Maissan**].

²⁴ Yee Argument, paras 1-14, PDF 2-4.

001(a-b) and AEY-YEC-NY-002 (Round 2), the Board recently considered the issue of bill simplification in the rate rebasing proceeding, including submissions from Mr. Yee, and directed the Utilities to implement bill changes in Board Order 2023-08.²⁵ The Utilities followed the Board's direction in this regard, and the changes directed in Order 2023-08 were made effective in December of 2024.²⁶ The details of various riders are also provided in a sample bill calculation on the Utilities' websites.²⁷

B. Proposed Updates to T&Cs

1. Generating Customer Definition

16. Mr. Maissan recommends that the definition of "Generating Customer" in the T&Cs be revised to exclude single family residential units with micro-generation facilities installed.²⁸ Mr. Maissan's concern with the proposed definition appears to be that the Utilities will disconnect or interrupt service to customers with micro-generation facilities pursuant to Section 9.2 of the T&Cs.

17. Interruption of service under Section 9.2 of the T&Cs may take place for several reasons, including in order to maintain the safety and reliability of the Utilities' facilities and in situations of potential overloading, insufficient supply, or other circumstances that impair the Utilities' ability to provide safe and reliable service.²⁹ Mr. Maissan's submissions regarding the circumstances of potential service interruptions are new evidence that should be disregarded by the Board. The Utilities submit that it is important they be able to interrupt *any* generation, in accordance with Section 9.2, to ensure that they are not limited in their ability to respond to circumstances on the grid that may impact the provision of utility services.

18. The Utilities also require Generating Customers to provide authorization information at the time of connection and have proposed to clarify this requirement in the T&Cs.³⁰ This is important to ensure the safety and reliability of service and proper connection to avoid unintended

²⁵ [Responses to Nathaniel Yee \(Round 2\)](#), AEY-YEC-NY-001(a-b) and AEY-YEC-NY-002, PDF 2-3 and 4-5 [**Round 2 Responses to Mr. Yee**]; [Board Order 2023-08](#) (Appendix A), April 17, 2023.

²⁶ Round 2 Responses to Mr. Yee, AEY-YEC-NY-001(b), PDF 2-3.

²⁷ *Ibid.*

²⁸ Maissan Argument, s 1, PDF 2.

²⁹ Application, PDF 79.

³⁰ Round 1 Responses to UCG, AEY-YEC-UCG-005(a-c), PDF 6.

consequences from connection.³¹ The Utilities submit that micro-generation customers should be included in the definition of Generating Customer in order to ensure that the responsibilities of all generation customers are appropriately captured in the T&Cs.

2. Process for Significant Loads

19. With respect to Sections 4.5 (Change in Service Connections) and 8.1 (Service Changes), Mr. Maissan recommends that, for residential customers, the T&Cs require that the Utilities require advance notification and prior written permission for service or load changes only in certain circumstances, which he proposes be specifically described in the T&Cs, and that obligations be imposed on the Utilities with respect to system upgrades.³² The Utilities are proposing changes only to Section 4.5, in order to require customer communication with and permission from the Utilities in the event of changes in service requirements, including significant changes in load.³³ Mr. Maissan suggests that the Utilities' proposed changes seek to somehow avoid the need to provide safe and reliable service and that the Utilities have not provided load information to demonstrate that it is necessary to require permission for all load changes.³⁴ Mr. Maissan's argument also contains a number of purported facts and unsubstantiated speculation regarding the Utilities' ability to enforce the proposed requirement, none of which were raised in the evidentiary process, and all of which should be disregarded by the Board.³⁵

20. The Utilities also submit that it is not necessary, or appropriate, to require load data to demonstrate system impacts in support of this request, since the request is intended to prepare the Utilities and customers for future circumstances as loads that are not currently connected to the grid are added over time. The record is clear that the intent of the proposed changes to the T&Cs is not to micro-manage customers or to refuse service. The Utilities have confirmed that they intend to collaborate with customers and only seek to ensure that they are aware of upcoming significant changes so that system planning can occur on a proactive, rather than reactive, basis.³⁶

³¹ *Ibid.*

³² Maissan Argument, s 2, PDF 3-7.

³³ Application, PDF 65.

³⁴ Maissan Argument, s 2, PDF 3-7.

³⁵ *Ibid.*

³⁶ E.g., Round 2 Responses to Mr. Maissan, AEY-YEC-JM-004, PDF 8-9.

21. The Utilities explained in a number of IR responses that it is important to preserve flexibility in the T&Cs to allow the Utilities to adapt to changing circumstances, particularly with the energy transition that is occurring.³⁷ The limitations and specifications that Mr. Maissan proposes do not provide sufficient flexibility for the Utilities to work with customers and address system needs. Mr. Maissan's proposal to limit notice and permission requirements for load changes to heat conversion situations does not consider anticipated future developments such as Electric Vehicles (EV), new or upgraded service connections, or future load impacts.³⁸ The Utilities also explained in their response to AEY-YEC-JM-004(a) (Round 2) that an individual customer change such as the addition of an EV charger may not present a system concern on its own, but may result in a need to expedite system upgrades in the event that multiple customers are charging or upgrading load requirements at the same time.³⁹ Mr. Maissan's proposal to limit notice and permission requirements for load increases only to those increases that require specific amperage or upgrades also does not address the fact that circumstances may differ by region.⁴⁰

3. Multiple Dwellings

22. Mr. Maissan recommends that the Board direct the Utilities to work with Multiple Dwelling building owners to address a purported issue that proposed changes to the T&Cs may discourage the installation of electrically efficient central heating systems, proposing that metered energy for Multiple Dwelling heating systems should be allocated and billed equally to each dwelling unit at Residential rates.⁴¹

23. The Utilities do not agree that the proposed changes to the T&Cs will discourage efficient heating systems, which is not supported by any evidence on the record, and submit that Mr. Maissan's recommendation is not necessary and would improperly impose a responsibility on Utilities to allocate general energy costs among Multiple Dwelling residents.

³⁷ E.g., Round 1 Responses to Mr. Maissan, AEY-YEC-JM-001(a-c), PDF 1-2; Round 2 Responses to YUB, AEY-YEC-YUB-010, PDF 22-23.

³⁸ [AEY-YEC Responses to the YUB \(Round 1\)](#), AEY-YEC-YUB-026(a)-(d), PDF 50-51 [**Round 1 Responses to YUB**]; Round 2 Responses to Mr. Maissan, AEY-YEC-JM-004, PDF 8-9].

³⁹ Round 2 Responses to Mr. Maissan, AEY-YEC-JM-004(a), PDF 8.

⁴⁰ Round 1 Responses to Mr. Maissan, AEY-YEC-JM-001(a-c), PDF 1-2; Round 2 Responses to Mr. Maissan, AEY-YEC-JM-004(e), PDF 9.

⁴¹ Maissan Argument, s 5, PDF 9.

24. The proposed changes to the T&Cs do not prevent the installation of central heating systems. The Utilities have explained that it is most appropriate to bill demand for common services at the General Service rate, which includes a demand charge to offset costs incurred by the Utilities to ensure an adequate and dependable supply of electricity is available.⁴²

25. The Utilities do not have the ability to allocate costs from a Single Point of Service among Multiple Dwelling residents based on averages or proxy of usage, and submit that it should be the decision of the Multiple Dwelling owner or manager as to how costs are passed on to residents.⁴³ The Utilities do not consider that it would be appropriate for the Utilities to bill customers based on set allocations rather than measured electricity usage.⁴⁴ The Utilities' proposed approach is appropriate, reasonable, and consistent with typical utility practice in other jurisdictions.⁴⁵

4. Cost Sharing

26. The UCG asserts that a five-year cost sharing term is too short and may be exploited by customers, without evidentiary support.⁴⁶ Mr. Maissan recommends prescribed cost sharing terms of either five or ten years based on project cost, as well as changes to the proposed cost sharing amount threshold.⁴⁷ Mr. Maissan supports this recommendation with reference to purported evidence that is not on the record and suggests that the Utilities would not face a material administrative burden in administering cost sharing over a longer term.⁴⁸

27. The Utilities have explained how the cost sharing terms and thresholds are proposed to strike a balance between administrative burden on the Utilities and fairness to customers, that Utilities must track and maintain cost sharing information during the cost-sharing period, and that the probability of sharing occurring decreases later in the cost sharing period.⁴⁹ Adding different cost sharing thresholds and terms, as proposed by Mr. Maissan, would increase administrative burden for the Utilities. The UCG and Mr. Maissan have not substantiated their assertions that the

⁴² Refer to the Utility Argument, para 19, PDF 9.

⁴³ Round 2 Responses to Mr. Maissan, AEY-YEC-JM-006(a), PDF 12.

⁴⁴ Also refer to the Utility Argument, para 21, PDF 9-10.

⁴⁵ Refer to the Utility Argument, para 22, PDF 10.

⁴⁶ UCG Argument para 20, PDF 4.

⁴⁷ Maissan Argument, s 3, PDF 8.

⁴⁸ Maissan Argument, s 3, PDF 7-8.

⁴⁹ Utility Argument, paras 26-27, PDF 11-12 and, in particular, Round 1 Responses to YUB, AEY-YEC-YUB-028, PDF 54.

proposed cost sharing terms present a risk to customers from "freeloaders" or exploitative behaviours and have not demonstrated that longer cost sharing terms are necessary.

5. Cost Treatment for Upgrades to Company Facilities

28. Mr. Maissan recommends that Section 8.3 of the T&Cs be modified to add a clarification that upgrades to Company Facilities, such as an upgrade to a shared transformer, would be considered a system cost.⁵⁰

29. The Utilities submit that the proposed language should not be included in the T&Cs. The circumstances of each upgrade to the Company Facilities are unique, and the question of whether the cost of an upgrade is a system cost should be evaluated on a case-by-case basis. The Utilities' responses to AEY-YEC-JM-017 (Round 1) and AEY-YEC-JM-010 (Round 2) considered a specific hypothetical scenario,⁵¹ and may not apply in all cases. The Utilities submit that cost treatment for upgrades should not be specified in the T&Cs as proposed by Mr. Maissan in order to preserve flexibility for the Utilities to consider and address specific situations.

6. Standard Metering

30. The UCG suggests that it is premature to incorporate the use of AMI in the T&Cs because the Utilities have not yet implemented their planned AMI initiatives.⁵² Contrary to the UCG's view, now is the opportune time to add consideration of AMI into the T&Cs.

31. The Utilities indicated in their IR responses that they are in the early stages of implementing AMI.⁵³ The proposed addition of Standard Meters and associated provisions into the T&Cs will clarify what meters customers will be receiving and provide them with the option to opt out of AMI metering, should they wish to do so, as AMI implementation occurs.⁵⁴ It is important to proactively update the T&Cs in this Application in order to improve customer awareness of AMI initiatives and facilitate customer choice with respect to their metering services.

⁵⁰ Maissan Argument, s 6, PDF 9-10.

⁵¹ Round 1 Responses to Mr. Maissan, AEY-YEC-JM-017, PDF 29-31; Round 2 Responses to Mr. Maissan, AEY-YEC-JM-010, PDF 16-17.

⁵² UCG Argument, para 9, PDF 3.

⁵³ Refer to Round 2 Responses to YUB, AEY-YEC-YUB-012(a), PDF 25.

⁵⁴ Utility Argument, paras 24-25, PDF 10-11; Application, para 11, PDF 6 and PDF 72-73.

32. Furthermore, as indicated in the Utilities' response to AEY-YEC-YUB-008(c) (Round 1), during the transition to AMI metering, the Utilities will charge customers fees applicable for Non-Standard Meters until a Standard Meter (AMI) has been installed at the relevant site.⁵⁵ As indicated in the response to AEY-YEC-UCG-015-2(b) (Round 2), if a customer opts out of a Standard Meter, and has a Non-Standard Meter already, no charge will apply. The Utilities submit that this is a fair approach and that the approval of AMI-related language as part of the T&Cs in this Application, rather than after AMI implementation is complete, will not result in harm to customers.

7. Harmonic Interference

33. The UCG requests that a study be conducted on the impact of harmonic and inharmonic distortions on power efficiency in order to inform how the Utilities may modify their delivery of electricity to remedy such distortions.⁵⁶

34. The Utilities submit that such a study is not necessary and would not provide any benefit with respect to how the Utilities deliver electricity to customers. As noted in the Utilities' response to AEY-YEC-YUB-009(c) and (d) (Round 1), harmonic and interharmonic distortions are caused by a variety of load sources (not by the electrical grid).⁵⁷ As explained in the Utilities' response to AEY-YEC-UCG-016(b) (Round 2), a widely accepted approach for monitoring harmonic and interharmonic distortions is to check harmonic limits where there are significant changes in the system, such as the addition of new equipment suspected of harmonic or interharmonic pollution.⁵⁸ The UCG's assertion that power companies use sine wave noise to make appliances use more power than necessary⁵⁹ is unsubstantiated, new evidence and does not inform consideration of impacts from harmonic or interharmonic distortions.

⁵⁵ Round 1 Responses to YUB, AEY-YEC-YUB-008(c), PDF 15.

⁵⁶ UCG Argument, para 10, PDF 3.

⁵⁷ Round 1 Responses to YUB, AEY-YEC-YUB-009(c)-(d), PDF 17.

⁵⁸ Round 2 Response to UCG, AEY-YEC-UCG-016(b), PDF 30.

⁵⁹ UCG Argument, para 10, PDF 3.

8. Meter Reading and Overdue Bills

35. The UCG states that meter readings should not be estimated for more than one consecutive month, and only in the event of extreme conditions.⁶⁰

36. As detailed in the Utilities' response to AEY-YEC-YUB-032, the Utilities read meters on specific cycles and each have dedicated staff to ensure that meter reads are generally completed at least bi-monthly.⁶¹ Bi-monthly manual meter reading may not be possible in certain circumstances, which go beyond extreme weather conditions and include situations that pose safety concerns for meter readers.⁶² The Utilities submit that, in consideration of the evidence, it would not be appropriate or safe to impose specific meter reading requirements on the Utilities as recommended by the UCG. The Utilities also note that the implementation of AMI, which has remote meter reading capability, is anticipated to enable actual meter readings in circumstances where manual meter reading is not possible or safe.⁶³

37. The UCG also proposes that specific processes be incorporated into the T&Cs with respect to overdue billing notifications to customers and charges for collection of overdue accounts.⁶⁴

38. As explained in the Utilities' response to AEY-YEC-YUB-007 (Round 2), the Utilities already provide customers with a full accounting of their electric account in monthly statements which reflect unpaid balances from the previous statement, and will mail customers a Pending Disconnect Notice noting overdue amounts to notify them of arrears on their account.⁶⁵ Additional actions such as an email or phone call may also be taken prior to in-person visits.⁶⁶ The Utilities will also work with customers in arrears on a case-by-case basis and can accommodate payment arrangements or waive late payment fees in certain circumstances.⁶⁷ The T&Cs already specify

⁶⁰ UCG Argument, para 8, PDF 2-3.

⁶¹ Round 1 Responses to YUB, AEY-YEC-YUB-032, PDF 63-64.

⁶² Round 1 Responses to YUB, AEY-YEC-YUB-032(d), PDF 63; Round 2 Responses to Mr. Yee, AEY-YEC-NY-004(b), PDF 7-8.

⁶³ Round 2 Responses to Mr. Yee, AEY-YEC-NY-004(b), PDF 7-8.

⁶⁴ UCG Argument, para 12, PDF 3.

⁶⁵ Round 2 Responses to YUB, AEY-YEC-YUB-007, PDF 16-17.

⁶⁶ *Ibid.*

⁶⁷ Round 1 Responses to UCG, AEY-YEC-UCG-014(e-f), PDF 25; Round 2 Responses to Mr. Yee, AEY-YEC-NY-004(c), PDF 8.

that a fee will be charged if a personal visit is required to collect an overdue amount.⁶⁸ Accordingly, the measures described by the UCG are not necessary.

C. Proposed Updates to Fees Schedule

1. Meter Disputes

39. The UCG states that customers should not be billed up-front for meter testing in the event the customer requests meter testing as part of a meter dispute, suggesting that meter testing fees should only be charged to the customer if the customer has a history of complaints.⁶⁹

40. As explained in the Utilities' responses to AEY-UCG-009 (Round 1) and AEY-YEC-UCG-006 (Round 2), the Utilities follow a specific, step-by-step process when a metering concern is identified.⁷⁰ The Utilities will first attempt to resolve the matter with the customer, but if the customer requests a meter test or refuses to work in good faith with the utilities, then the Utilities will send the meter for testing and the testing costs will be collected from the customer.⁷¹ If the meter is found to be defective, then the costs will be refunded back to the customer.⁷²

41. In the Utilities' view, if meter testing fees are not imposed up-front in such circumstances, there would be little incentive for customers to work with the Utilities in accordance with the meter dispute process, and that customers may request meter testing in situations where they feel that their bill does not reflect their energy consumption, without a strong basis to suspect that the meter is faulty. The Utilities submit that an up-front fee should apply, as proposed in the Application, in order to avoid unnecessary use of the service and the unnecessary imposition of costs on other ratepayers.

2. Historical Usage Information Requests

42. The UCG expressed concern regarding fees set out in the T&Cs for customer usage information requests, and suggested that the Utilities should employ mechanisms to allow customers to easily access their billing histories or usages free of charge through online

⁶⁸ Application, T&Cs, s 7.4, PDF 76.

⁶⁹ UCG Argument, para 14, PDF 3-4.

⁷⁰ Round 1 Responses to UCG, AEY-UCG-009(a)-(d), PDF 14; Round 2 Responses to UCG, AEY-YEC-UCG-006(a)-(b), PDF 7-8.

⁷¹ *Ibid.*

⁷² *Ibid.*

platforms.⁷³ As noted in the Utilities' response to AEY-YEC-YUB-012(d) (Round 1), customers can already access historical bill information free of charge through the MyAccount portal.⁷⁴

43. Mr. Maissan recommends that fees should not apply for simply historical usage information requests if the requested information is readily available for the Utilities and that a \$75 historical usage information request fee apply only to more complex customer requests for technical information.⁷⁵

44. In the event the Board approves the proposed historical usage information request fees as applied for in the Application, the Utilities anticipate that this fee will generally only be incurred in cases of more complex customer requests, as envisioned by Mr. Maissan. As noted above, there is no charge for customers to access simple historical bill information on their own using MyAccount. The Utilities submit that this will encourage the use of MyAccount and avoid the incurrence of unnecessary administrative time and cost by the Utilities and the imposition of such costs on other customers.⁷⁶

3. Set Fees and Charges

45. Mr. Maissan recommends that the fees and service charges included in the Fees Schedule be set at specific amounts as listed in his argument.⁷⁷ Mr. Maissan has provided no evidence in support of the suggested fees, nor does he provide any analysis in support of the specific fee amounts.

46. Mr. Maissan also asserts that the Utilities are not improving the efficiency of their services, and alleges that the Utilities may be improperly inflating costs to increase revenue, because proposed fees and service charges do not align directly with inflation.⁷⁸ There is no basis for the assertion that the Utilities have improperly inflated the proposed fees. Utilities may find efficiencies in various aspects of providing utility services. The question of how utilities find efficiencies and pass those efficiencies on to ratepayers is properly addressed in a general rate application. Efficiencies in utility operations are generally considered to be passed on to customers

⁷³ UCG Argument, para 7, PDF 2.

⁷⁴ Round 1 Responses to YUB, AEY-YEC-YUB-012(d), PDF 27.

⁷⁵ Maissan Argument, s 9, recommendations 1 and 2, PDF 12.

⁷⁶ Round 2 Responses to YUB, AEY-YEC-YUB-006(i), PDF 15.

⁷⁷ Maissan Argument, s 9, PDF 12-13.

⁷⁸ Maissan Argument, s 9, PDF 12.

through rates, and may not be determinative of the fees and charges in the Fees Schedule, which relate to the cost of providing specific utility services. Notwithstanding the foregoing, it has been over ten years since the Fees Schedule was last updated,⁷⁹ and it is reasonable to expect that fee changes may be influenced by a number of factors and may not align exactly with inflation. The Utilities provided detailed information in their IR responses with respect to how the proposed fee updates were determined and the rationale for the fees proposed, and submit that they should be approved as filed.⁸⁰

D. Proposed Updates to Maximum Investment Levels

47. Mr. Maissan recommends that the MILs include a "middle ground" residential MIL for Multiple Dwellings with a small number of units.⁸¹ He also suggests the consideration of a separate MIL for garden suites that are on the same lot as a Single Family Dwelling, which may vary based on whether a separate service drop is required for the suite.⁸²

48. The Utilities consider that further analysis to ensure fairness among all customers would be required to implement a "middle ground" MIL for such circumstances at this time and requests that the Board approve the applied-for MIL categories, which are supported by extensive analysis captured in the MIL Study. However, the Utilities are willing to consider how Mr. Maissan's recommendation may be implemented in the next MIL review, if directed by the Board.

III. CONCLUDING REMARKS

49. As set out above and in the Utility Argument, the Utilities submit that they have provided clear, comprehensive, and credible evidence in this proceeding, which demonstrates that the requested changes to the T&Cs should be approved. The Utilities respectfully request that the Board grant the relief sought in paragraph 1 of the Utility Argument.⁸³

⁷⁹ Application, para 2, PDF 3.

⁸⁰ Refer to, e.g., Round 1 Responses to YUB, AEY-YEC-YUB-010, PDF 18-20, AEY-YEC-YUB-011, PDF 21-25, AEY-YEC-YUB-012, PDF 26-27, AEY-YEC-YUB-013, PDF 28-29, AEY-YEC-YUB-014, PDF 30-31, and AEY-YEC-YUB-015, PDF 32-33; Round 2 Responses to YUB, AEY-YEC-YUB-005, PDF 10-12, AEY-YEC-YUB-006, PDF 13-15, AEY-YEC-YUB-007, PDF 16-17.

⁸¹ Maissan Argument, s 8(1), PDF 11.

⁸² Maissan Argument, s 8(2), PDF 11.

⁸³ Utility Argument, para 1, PDF 3.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 24th day of June, 2025.

ATCO ELECTRIC YUKON

YUKON ENERGY CORPORATION