

YUKON UTILITIES BOARD

**IN THE MATTER OF ATCO ENERGY YUKON and YUKON ENERGY
Terms and Conditions**

WRITTEN ARGUMENT OF NATHANIEL YEE

12-June, 2025

Introductory Comments:

In this document I will address expression of rates on billing statements and estimated readings.

Issues not addressed in this document are not implying agreement or disagreement, but are left to other intervenors and the Board.

Arguments:

Rates – Expression on Billing Statements.

1. Customers have a right to understand what they are truly paying for electricity. When billing statements clearly show actual rates including base charges and temporary riders customers can make informed choices about their energy use and potentially reduce their costs.
2. AEY has acknowledged that this transparency empowers customers to adjust consumption and better manage their bills: *"In AEY's view, the primary advantage to customers of being informed of what they are actually paying for electricity is that it allows them to make informed decisions about energy usage, including adjusting their energy usage to save on their monthly bills. That advantage only arises if the information on billing statements is useful and comprehensible."*¹
3. I am in complete agreement with AEY in the advantages of customers being informed of what they are paying for electricity, and support making the information on billing statements more useful and comprehensible to give customers this advantage and benefit.
4. The current bill format is cluttered and opaque. It fails to present a coherent summary of what customers are paying per kilowatt-hour or for fixed charges, which undermines its usefulness. I have proposed a new two-column billing layout addresses this by placing a simplified summary showing charges inclusive of riders next to the existing detailed format. This preserves transparency, satisfies regulatory requirements for separating temporary riders, and achieves AEY's stated goal of making rates clearer and more informative.
5. AEY raised no substantive objections to this improved format during the GRA proceeding. As an additional advantage, adopting this format could reduce or eliminate the need for future rate rebasing proceedings which have failed to achieve their stated goals of making billing statements useful and comprehensible.
6. In the 2023 rebasing hearing, I was informed that actual improvements to billing statement were out of scope and would be a GRA issue.

1 AEY 2023 GRA AEY Response to Motions and YUB Directions - Oct. 27, 2023, pdf p.5 response to AEY-NY-005.

7. Despite AEY confirming that having actual rates on billing statements was advantageous to customers and the Board confirming that this was a GRA issue, it has still not been addressed.
8. It was not addressed in the GRA because AEY declined to update Terms and Conditions as requested: "In its Application (PDF page 2), AEY noted that the Board requested an update to the Terms and Conditions of Service as part of its next GRA. AEY declined to provide the update as requested, stating that it proposed to work with YEC to address potential changes to the Terms and Conditions of Service by mid-2024."²
9. So it was out of scope in the 2023 rebasing hearing, AEY declined to address it in its GRA, and now here we are in the Terms and Conditions proceeding and the Utilities alternate between claiming that showing rates on billing statements is out of scope of this Terms and Conditions proceeding³ or that the 2023 rebasing proceeding somehow answers the need for actual rates on billing statements.⁴
10. The reality is that billing statements are no more comprehensible now than they were before the rebasing proceeding, and that showing actual rates would be significant progress in the right direction. Rates are changing, customers have a right to know.
11. Recommendation:

That the Utilities Introduce a two-column billing format⁵, and that this be implemented by January 1, 2026.

Left column: Summarizes total charges inclusive of all riders, giving customers an intuitive understanding of what they are paying (e.g., total fixed charge, total energy charge per kWh).

Right column (existing format): Retains detailed rider-level breakdowns to meet regulatory transparency and disclosure requirements.

Rationale:

- Enhances customer comprehension and supports informed decision-making regarding energy usage.
- Aligns with AEY's own acknowledgment that customer awareness of actual costs is beneficial for energy management.
- Improves regulatory transparency by maintaining itemized rider presentation while providing net-rate context.
- Reduces or eliminates the need for future rate rebasing proceedings solely aimed at simplifying billing statements, as simplicity is achieved without collapsing riders into base rates.

² Board Order 2023-24: Appendix B – p.1

³ AEY-YEC-NY-002 – Round 1 March 14, 2025

⁴ AEY-YEC-NY-001 – Round 2 April 16, 2025. I ask about the advantages of showing rates on billing statements and the answer is rolling riders R and J into base rates?

⁵ As presented in AEY-YEC-NY-002 Round 1 IRs, and in AEY's responses March 14, 2025.

12. It is clear that this change would provide an advantage to customers, as AEY has stated. It is also evident that without clear direction from the Board, the Utilities will continue to claim this is out of scope or decline to address the issue.
13. I asked in an IR for a list of any issues being addressed in this proceeding that were not suggested by the Utilities or if the Utilities controlled the agenda. I got a vague answer, and nothing listed.
14. My hope is that the Board will address at least this one issue that was not suggested by the Utilities, and stand up for customers. Accordingly, the Board is requested to make this change for customers that “allows them to make informed decisions about energy usage, including adjusting their energy usage to save on their monthly bills” as AEY said so well.

Estimated Readings:

15. This past winter, four of six readings were estimated in Faro. Bills dated October, December, January and March were estimates. Inconsistent estimated readings can be difficult for customers to deal with, through no fault of their own.
16. Just as there are consequences for customers failing to pay bills on time, there should also be consequences for the failure to read meters.
17. Certainly estimated bills are sometimes necessary due to weather or staffing or other issues, just as customers may have issues that prevent bills from being paid on time.
18. Recommendation: Why should customers be penalized for failing to meet obligations where the Utilities are not? I propose a 3% credit to each account on every estimated billing statement.

AMI Meters:

19. I asked what meters are currently being installed by default and got a rather vague answer.⁶
20. Recommendation: That all new meters or replacement meters be AMI meters. They are less expensive than conventional meters and will not need to be replaced if/when the AMI project gets going. There is no reason to be installing non-AMI meters.

Respectfully submitted,

Nathaniel Yee
June 12, 2025

⁶ AEY-YEC-NY-005 (b) Round 1 IRs, March 14, 2025.