

YUKON UTILITIES CONSUMERS' GROUP (UCG)

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ATCO Electric Yukon (AEY) and Yukon Energy Corporation (YEC) Application
(the Utilities) to Update Terms and Conditions(T&Cs) February,2025
Reply Argument from the Yukon Utilities Consumers' Group (UCG)

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1. As a consumer ratepayer group, the Yukon Utilities Consumers Group maintains that it is essential to emphasize the importance of ensuring that these Terms and Conditions of Service prioritize affordability, transparency, and accessibility for all residents of The Yukon. Energy costs constitute a significant portion of household expenses, particularly in our region where cold climates necessitate higher energy consumption. Therefore, any proposed changes must be carefully evaluated to prevent undue financial burden on all customers of the two utilities.
2. Without provisions to support low-income households and vulnerable populations who may struggle with rising energy costs, equity becomes a factor in determining these T&Cs. A fair and inclusive approach ensures that all Yukoners can access essential energy services without compromising their financial stability.
3. After review of the Utilities final argument, the Yukon Utilities Consumers' Group stands by our argument and recommendations to be added to the T&Cs to reach some agreement.
4. The UCG witnesses that the Utilities in their argument did not present any action on their part to remedy the situation of prolonged updates on the T&Cs (i.e. since 2011 last process). We again request the Board to mandate ATCO Electric Yukon (AEY) and Yukon Energy Corporation (YEC) to update their Terms and Conditions (T&Cs) every two or three years. Or with every General Rate Application, if this would not place a burden on the amount of information to process during a GRA.
5. UCG further recommends that the Board direct the implementation of these periodic set reviews to assess the effectiveness of the Terms & Conditions to meet the quickly evolving energy needs and economic conditions of the times we are now experiencing. These reviews should be informed by comprehensive data analysis, customer

feedback, and industry best practices. Such measures will contribute to a more dynamic and responsive regulatory environment, reducing the potential for future disputes or retroactive corrections that disproportionately impact ratepayers.

6. UCG submits that the Utilities need to address the broader implications of utility management by establishing a regularized framework for ratepayer consultations. By engaging directly with customers, utilities can ensure a more inclusive and equitable approach to policy updates and service adjustments. This ongoing dialogue would also provide a platform for ratepayers to voice their concerns about affordability and service quality, fostering a more productive relationship between the utilities and the households they serve. There needs to be more than just utility staff and management personnel engaging at the counter.
7. The Utilities argue that customer interactions proposing changes to the T&Cs justified not needing specific consultation for the application process. UCG contends there was no evidence provided of these interactions identifying such consultations.
8. The Utilities then state that stakeholders were given ample notice and opportunities to provide feedback on the proposed changes during this proceeding. They then go on to claim that intervenor recommendations lack support from evidence in the record, claiming these advocates valueless .
9. UCG does not have a problem with the modifications to the Terms and Conditions, Minimum Information Requirements, and Fees and Service Charges being updated, regulated and accepted by the Board, but cannot agree that they be applied as of the effective date of the Board Order resulting from this proceeding. We submit the applications of these T&Cs should not take place until the next GRA of each utility (i.e. since the utilities increased cost charges were based on internal input, not formal studies and since labour costs were accounted for in the last GRA, UCG suggests deferring cost adjustments until the next GRA).
10. In the time passing from the end of this process decision until their next GRA, UCG emphasizes that any updates to the Terms & Conditions be communicated effectively to the public. This includes simplifying legal jargon and utilizing various communication channels such as public forums, social media, and newsletters to ensure accessibility and comprehension. Clear communication fosters transparency and enables ratepayers to fully understand the implications of policy changes and their rights as consumers.
11. UCG recommends building measures such as proposals for energy efficiency and sustainability aligns with environmental goals and long-term affordability utilizing transparent and collaborative decision-making for these new initiatives (such as smart grids and renewable energy projects). These developments must be demonstrated to the ratepayers in public input sessions along with cost-benefit analysis. In this capacity, the Utilities can align their operations with updated standards such as T&Cs building trust while ensuring equitable access to services.
12. Regarding the updated Terms and Conditions clarifying customer rights and obligations without direct customer input, UCG argues this cannot be accepted (i.e. customer consultation must precede such updates).

13. The Utilities proposed to set MIL percentage allocations citing principles like proper price signals and fair returns but again did not consult with customers. UCG recommends the Board instruct utilities to track new MIL contracts and gather ratepayer feedback on suitability and affordability.
14. UCG reiterates that by implementing all requested changes simultaneously, without prior notification to their customers, would not only result in substantial ratepayer cost increases exacerbating financial stress, but also result in consumer confusion and disputes. UCG therefore submits to implementing a phased approach to changes in fees and rates to help mitigate the shock of sudden financial burdens on customers, offering a more gradual transition and enabling utilities to gather incremental feedback.
15. This transition to updated Terms and Conditions should prioritize accountability and reflect the practical realities of both utility operations and ratepayer needs. By shaping policy through inclusive consultations, utilities can strengthen public trust and minimize resistance to necessary changes.
16. UCG submits the importance of integrating customer-focused mechanisms to ensure fairness and clarity in policy execution. This includes transparent billing practices and systematic evaluations of proposed fees and charges. UCG submits that the Board direct the utilities to engage ratepayers in workshops or public consultations prior to implementing any changes. With this practice utilities can foster a sense of inclusion, providing a platform for constructive feedback and addressing concerns pre-emptively.
17. Additionally, UCG recommends that utilities adopt proactive measures, such as leveraging data analytics to predict and meet consumption demands clearly demonstrating this on customer billings. Mr. Nathaniel Yee, as well as many others have advocated for clearer billing practices for some years now without any clear action. UCG submits that by incorporating customer education into this strategy, by providing accessible resources that explain billing processes, service changes, and energy-saving techniques, utilities can empower customers to make informed decisions. These initiatives should also consider the integration of advanced customer notification systems to ensure timely updates on potential changes in service or increases to billing resulting from regulatory processes.
18. When considering future technological advancements, such as Advanced Metering Infrastructure (AMI) systems, UCG advises a thorough feasibility study before committing substantial resources. Such studies should evaluate cost implications, expected benefits, and potential disruptions to ensure that the transition to new technologies is managed effectively and equitably.
19. UCG reiterates that Section 7 of the T&Cs specify that meters should not be estimated for more than one consecutive month, except under extreme conditions (which should be clearly identified), to maintain bill stability and ensure the accurate application of Yukon's interim electrical rebate program.

20. UCG reiterates that the Board direct the utilities to initiate an internal study on how harmonic and inharmonic distortions impact power efficiency. These noise waves affect power quality and delivery. UCG submits this study should recommend how utilities can adjust electricity delivery to address these distortions.
21. UCG reiterates that the proposed charges for connection and reconnection (\$45 per hour and \$11 per 15-minute intervals) are acceptable if they are explicitly detailed in the Terms & Conditions (T&Cs). UCG submits that added in this T&C segment, that each step of the utility process needs to be documented with time allocations to ensure transparency and fairness. If implemented, this approach would make the chart in AEY-YEC-YUB-011 unnecessary, as customer charges would be clearly itemized. For overdue charges, it is recommended that the Terms & Conditions state that the utility must notify the customer with a distinctively coloured bill indicating that their account is overdue. This will give the customer time to address the issue or inform the utility of their situation and negotiate a resolution. Additionally, when a visit is required to collect an overdue account, additional charges will be applied as specified in YUB-014 (b) and billed with those amounts clearly shown. These steps and charges should also be outlined and safeguarded in the Terms & Conditions.
22. The utilities admit AEY used staff expertise to set new fees for meter disputes without a formal study. UCG agrees with initiating tasks for meter disputes but opposes billing customers before checking the meter. If a customer disputes readings, the meter should be tested at no charge. The utility should bear the responsibility, as meters can fail over time. This exception to this would only apply if the customer had a history of meter complaints.
23. UCG stands by our argument that the utilities be denied adding CPI for Whitehorse to reflect inflation in MILs and Fees & Service Charges annually when a rate case is not in front of the Board. Since the Utilities have not proposed updates to the T&Cs since 2011, allowing this yearly increase would discourage them to use the regulatory process in future years for any desired changes.
24. UCG reiterates that the utilities suggestion to shorten the infrastructure cost-sharing period from 10 to 5 years be denied as this would lead to some customers exploiting the shorter term, unfairly leaving others with the full cost.
25. Finally, UCG submits that education and outreach initiatives must remain a top priority for each of the utilities. A well-informed customer base is key to the success of any policy change, especially those involving complex systems or new technologies. Utilities should actively engage with their communities and ratepayers through active workshops, informational campaigns, and accessible digital platforms, ensuring that every customer understands the benefits and implications of proposed changes and cost changes.

