

September 9, 2022

Yukon Utilities Board
PO Box 31728
Whitehorse, YK Y1A 6L3

Attention: Mr. Richard Buchan
Chair

**Re: ATCO Electric Yukon's (AEY) – Rate Relief in the Yukon
Response to John Maissan**

ATCO Electric Yukon (AEY) is in receipt of John Maissan's email, requesting the Board to compel AEY to provide a full and complete response to "AEY-JM-1-3." Based on the reasons for Mr. Maissan's request, AEY has interpreted Mr. Maissan's email as a request for a further response to AEY-JM-03.

With respect to AEY-JM-03(a), AEY has provided the information responsive to this request and in particular has provided information related to AEY's return and rate base for 2016 to 2021 in response to AEY-UCG-01. While all the components are available to calculate part (iv) in the original response, to be helpful, AEY provides the table below for Mr. Maissan. AEY submits that no further direction is necessary in respect of AEY-JM-03(a).

Response to AEY-JM-03-(a)(iv)

	2016	2017	2018	2019	2020	2021
Actual Return on Equity Above Approved (\$000s)	565	1,529	1,524	1,701	1,774	1,323

In AEY-JM-03(b), Mr. Maissan requested "business plan" forecast information for ROE and capital expenditures for 2022. As stated in its response, the information requested is not relevant to and will not assist the Board in determining the rate relief Application. Indeed, AEY's actual financial results will be available in its 2022 annual filing (submitted in April 2023). AEY notes that this aligns with longstanding reporting requirements set out for utilities that operate in the Yukon.

Mr. Maissan's request to provide 2022 forecast information for ROE and capital additions is beyond the scope of this proceeding and is tantamount to a fishing expedition. In particular, this Application seeks approval for effective rate relief measures that can be implemented in a timely matter. Contrary to Mr. Maissan's assertion, AEY's ROE for 2022 is not the basis for the Application. Furthermore, AEY's proposed rate-relief is not calculated on or dependent on AEY's 2022 forecast ROE, or actual 2022 ROE (which will not be available until April 2023).

Mr. Maissan's request – to produce AEY's forecasting information generated for business planning purposes – is not relevant to and unnecessary to adjudicate the Application and further, such information has never previously been required by the Board. Any internal forecast information that AEY may have generated at a point in time, is just that – a forecast – and will not reflect AEY's actual ROE for 2022, as that will not be known for some time. Furthermore, such forecast information for planning purposes is not generated to the same level of detail and scrutiny as required for regulatory filings.

Were AEY directed to comply with Mr. Maissan's request, AEY would need considerable time and resources to ensure the accuracy of such 2022 forecast information. This outcome does not align with the Application's objectives and would disrupt any rate relief measures. Further, AEY has not previously contemplated the burden of preparing and producing such information in its existing revenue requirement, which would invariably lead to utility cost increases.

Accordingly, AEY respectfully requests the Board dismiss Mr. Maissan's request and proceed with the hearing schedule outlined in Board Order 2022-09.

Yours truly,

Chris Cullingham
Manager, Regulatory