

**Yukon Utilities Board  
AEY 2023-2024 General Rate Application**

**Motion of Nathaniel Yee**

**Appendix B**

**October 10, 2023**

**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

IR Number	IR	AEY Response	Nathaniel Yee Motion and Submissions	AEY Response	Yee Reply to AEY	Board Ruling
AEY-NY-004	<p><b>Reference:</b> Please provide a mock up or sample billing statement that includes a summary with the actual cost per kwh and fixed monthly charge inclusive of all of the riders. An example is provided below, which I hope can be improved on by AEY.</p> <p>My idea is to show the effect of the individual Riders as currently shown on billing statements (the status quo), and a more understandable summary in parallel. In my example I have simply added the summary to the left of the current billing statement. The best of both worlds?</p> <p>My first take:  <i>[Example Excluded]</i></p> <p><b>Request:</b></p> <p>For this IR, we can assume that AEY has been directed to provide this information to customers. Is this the best way to do it? If not, please show what you would change and what would</p>	<p>As proposed and approved in the "AEY and YEC Rate Rebasing" proceeding and Board Order 2023-08,<sup>1</sup> a sample summary was provided in Section 3.4, Table 2 of the AEY/YEC submission, as shown below.</p> <p><i>[Example Excluded]</i></p> <p>In the Proceeding, the idea of a summarized charge per kWh was thoroughly discussed, evaluated and, ultimately, was not accepted by the Board. As approved in Board Order 2023-08, the more stable riders, Rider J and R, will be rolled into base rates on the statement, while other, more variable riders will continue to be displayed separately on the statement for greater transparency.</p>	<p>I asked AEY to “provide a mock up or sample billing statement that includes a summary with the actual cost per kWh and fixed monthly charge inclusive of all of the riders” with the idea that they may be required to provide this information on a future billing statement.</p> <p>AEY’s reply was that they were not ordered to do this in Board Order 2023-08. However, 2023-08 refers to an “effective cost per kWh”, not the <u>actual cost</u> referenced in this IR. Further, the Utilities argued that adding this information would be confusing to customers with totals being provided twice. While I agree that a confusing billing statement could be designed (the status quo?), there is no reason that improvements cannot be made. It is one thing to say something would be confusing and do nothing, and another to work to make something better. Board Order 2023-08 did not prohibit future improvements to billing statements, therefore AEY should be compelled, as asked in the IR, to provide ideas for a less confusing and more informative billing statement.</p> <p>I also included my first take at an improved billing statement as repeated below, asking AEY to suggest improvements and make their own version.</p> <p><i>[Image Excluded]</i></p>	<p>The purposes of IRs are to clarify the documentary evidence filed by another party, simplify issues, permit a full and satisfactory understanding of the matters to be considered, or to expedite the proceeding (Rule 13(1)). In this Proceeding, the Board is evaluating AEY’s request for approval of its revenue requirement for the 2023-2024 Test Period, as well as the other approvals outlined in section 1.2 of the Application. AEY is not proposing to make changes to the way that information is displayed on billing statements. The information sought by Mr. Yee will not reasonably inform the Board’s decision on AEY’s requested revenue requirement nor will it provide clarification on AEY’s evidence, simplify the issues in the Proceeding, permit better understanding of the matters at issue, or expedite the Proceeding. In AEY’s submission, it would not be relevant, nor would it be in the interest of regulatory efficiency to require AEY to provide further information in response to this request.</p> <p>AEY has provided what it considers to be a full and adequate response to this IR. Issues regarding how to incorporate riders into existing base rates were thoroughly discussed and evaluated by the Board in the AEY and YEC Rate Rebasing proceeding and determined by the Board Order 2023-08. It is not appropriate for Mr. Yee to attempt to use the IR process in this distinct GRA proceeding to provide submissions that he did not raise in the Rate Rebasing proceeding or to attempt</p>		

<sup>1</sup> Board Order 2023-08.

**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

IR Number	IR	AEY Response	Nathaniel Yee Motion and Submissions	AEY Response	Yee Reply to AEY	Board Ruling
	improve or replace the above example.			<p>to re-litigate the issues determined by the Board in that proceeding.</p> <p>AEY also notes that the IR and Motion processes are not the appropriate place for Mr. Yee to introduce his own evidence, as he has attempted to do in the references for the IR and again in the Motion. If Mr. Yee considers this issue to be relevant, then he has the opportunity to present his own evidence in accordance with the process established by the Board. AEY bears no obligation to assist Mr. Yee in advancing the positions that he wishes to raise or to contribute to the preparation of his evidence.</p> <p>For these reasons, AEY submits that the request should be denied.</p>		
<b>AEY-NY-005</b>	<p><b>Request:</b></p> <p>What are the advantages to the customer of being informed what they are actually paying for electricity – that is being told how much they are being charged per kwh and how much is a fixed monthly charge? Would this help customers make decisions about energy usage?</p>	<p>In the "AEY and YEC Rate Rebasing" proceeding, the idea of a summarized charge per kWh was thoroughly discussed, evaluated and, ultimately, was not accepted by the Board in Board Order 2023-08. As stated during the proceeding, given the complexity of variable and fixed components of utility rates, providing a total cost per kWh does not help customers make decisions about energy usage since this information misleads customers that all utility costs vary linearly with</p>	<p>in AEY-NY-005 I asked: What are the advantages to the customer of being informed what they are actually paying for electricity – that is being told how much they are being charged per kWh and how much is a fixed monthly charge? Would this help customers make decisions about energy usage?</p> <p>AEY Responded: <i>In the “AEY and YEC Rate Rebasing” proceeding, the idea of a summarized charge per kWh was thoroughly discussed, evaluated and, ultimately, was not accepted by the Board in Board Order 2023-08. As stated during the proceeding, given the complexity of variable and fixed components of utility rates, providing a total cost per kWh does not help customers make decisions about energy usage since this information misleads customers that all utility costs vary linearly with kWh. Furthermore, the total cost per kWh will vary between different customers, which could lead to greater confusion and an increase in customer service concerns.</i></p>	<p>The purposes of IRs are to clarify the documentary evidence filed by another party, simplify issues, permit a full and satisfactory understanding of the matters to be considered, or to expedite the proceeding (Rule 13(1)). In this Proceeding, the Board is evaluating AEY's request for approval of its revenue requirement for the 2023-2024 Test Period, as well as the other approvals outlined in section 1.2 of the Application. AEY is not proposing to make changes to the way that information is displayed on billing statements. The information sought by Mr. Yee will not reasonably inform the Board's decision on AEY's requested revenue requirement nor will it provide clarification on AEY's evidence, simplify the issues in the Proceeding, permit better understanding of the matters at issue, or expedite the Proceeding. In AEY's</p>		

**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

IR Number	IR	AEY Response	Nathaniel Yee Motion and Submissions	AEY Response	Yee Reply to AEY	Board Ruling
		<p>kWh. Furthermore, the total cost per kWh will vary between different customers, which could lead to greater confusion and an increase in customer service concerns.</p>	<p>AEY’s response refers to “effective kWh” from the Rate Rebasing proceeding, while now being asked about providing the <u>actual</u> base rate and energy rate on billing statements. In providing customers with the actual information, there is no implication that utility costs vary linearly, as the customer could now see the effects of usage, varying kWh/energy charges and occasionally varying fixed costs. None of these are linear over time, so customers would not see them as linear.</p> <p>I ask that AEY answer each question below <u>separately</u>, to avoid the confusion caused by a general answer that in the end does not answer any of the specifics requested.</p> <p>a) AEY-NY-005 asked about advantages to the customer of being informed of what they are actually paying for electricity. Does AEY see any advantages? If yes, please describe. If no, one word is sufficient.</p> <p>b) How are customers misled by being given the <u>actual</u> fixed cost and <u>actual</u> cost per kWh on their billing statements? Given that it will be visible to the customer that rates vary, usage varies and the fixed customer charge also occasionally varies, how will the customer be misled “that all utility costs vary linearly with kWh”?</p> <p>c) As AEY points out, “the total cost per kWh will vary between different customers, which could lead to greater confusion and an increase in customer service concerns.” AEY does not want customers to know that rates vary between different customers? Does this mean that AEY prefers to keep customers ignorant of rates?</p> <p>d) Please describe any varying rates between residential customers that would cause confusion.</p>	<p>submission, it would not be relevant, nor would it be in the interest of regulatory efficiency to require AEY to provide further information in response to this request.</p> <p>AEY has provided what it considers to be a full and adequate response to this IR. Issues regarding how to incorporate riders into existing base rates were thoroughly discussed and evaluated by the Board in the AEY and YEC Rate Rebasing proceeding and determined in Board Order 2023-08. It is not appropriate for Mr. Yee to attempt to use the IR process in this distinct GRA proceeding to provide submissions that he did not raise in the Rate Rebasing proceeding or to attempt to re-litigate the issues determined through that proceeding.</p> <p>In addition, AEY notes that the Motion process is not an opportunity for Mr. Yee to provide additional or revised IRs to AEY.</p> <p>For these reasons, AEY submits that the request should be denied.</p>		

**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

<p><b>AEY-NY-006</b></p>	<p><b>Request:</b>          Would it be useful for TOU billing and/or DSM for customers to know and understand how much they are paying per kwh?</p>	<p>Please refer to the response to AEY-NY-005.</p>	<p>e) In AEY-NY-006 I asked if cost per kWh would be useful in TOU billing and DSM, and AEY referred to their answer in AEY-NY-005. Just to confirm, AEY does not believe that cost per kWh is relevant to TOU billing and DSM? If rates are not relevant to TOU and DSM, please explain.</p>	<p>The purposes of IRs are to clarify the documentary evidence filed by another party, simplify issues, permit a full and satisfactory understanding of the matters to be considered, or to expedite the proceeding (Rule 13(1)). In this Proceeding, the Board is evaluating AEY's request for approval of its revenue requirement for the 2023-2024 Test Period, as well as the other approvals outlined in section 1.2 of the Application. AEY is not proposing to make changes to the way that information is displayed on billing statements. The information sought by Mr. Yee will not reasonably inform the Board's decision on AEY's requested revenue requirement nor will it provide clarification on AEY's evidence, simplify the issues in the Proceeding, permit better understanding of the matters at issue, or expedite the Proceeding. In AEY's submission, it would not be relevant, nor would it be in the interest of regulatory efficiency to require AEY to provide further information in response to this request.</p> <p>AEY has provided what it considers to be a full and adequate response to this IR. Issues regarding how to incorporate riders into existing base rates were thoroughly discussed and evaluated by the Board in the AEY and YEC Rate Rebasing proceeding and determined in Board Order 2023-08. It is not appropriate for Mr. Yee to attempt to use the IR process in this distinct GRA proceeding to provide submissions that he did not raise in the Rate Rebasing proceeding or to attempt to re-litigate the issues determined through that proceeding.</p>		
--------------------------	--	--	---	--	--	--

**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

IR Number	IR	AEY Response	Nathaniel Yee Motion and Submissions	AEY Response	Yee Reply to AEY	Board Ruling
				<p>In addition, AEY notes that the Motion process is not an opportunity for Mr. Yee to provide additional or revised IRs to AEY.</p> <p>For these reasons, AEY submits that the request should be denied.</p>		
<b>AEY-NY-007</b>	<p><b>Request:</b></p> <p>From a customer perspective, what are the advantages of NOT knowing the cost of electricity per kwh? (the status quo) How does it help the customer NOT to have this information on billing statements?</p>	<p>Please refer to the response to AEY-NY-005.</p>	<p>f) In AEY-NY-007 I asked what advantage the customer gets from not knowing cost per kWh and fixed cost, and AEY again referred to their answer in AEY-NY-005, which does not address the advantages of not knowing actual rates. Please clarify - What is the benefit to the customer of not knowing actual rates?</p>	<p>The purposes of IRs are to clarify the documentary evidence filed by another party, simplify issues, permit a full and satisfactory understanding of the matters to be considered, or to expedite the proceeding (Rule 13(1)). In this Proceeding, the Board is evaluating AEY's request for approval of its revenue requirement for the 2023-2024 Test Period, as well as the other approvals outlined in section 1.2 of the Application. AEY is not proposing to make changes to the way that information is displayed on billing statements. The information sought by Mr. Yee will not reasonably inform the Board's decision on AEY's requested revenue requirement nor will it provide clarification on AEY's evidence, simplify the issues in the Proceeding, permit better understanding of the matters at issue, or expedite the Proceeding. In AEY's submission, it would not be relevant, nor would it be in the interest of regulatory efficiency to require AEY to provide further information in response to this request.</p> <p>AEY has provided what it considers to be a full and adequate response to this IR. Issues regarding how to incorporate riders into existing base rates were thoroughly discussed and evaluated by the Board in the AEY and YEC Rate Rebasing proceeding and determined in Board Order 2023-08. It is not</p>		

**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

IR Number	IR	AEY Response	Nathaniel Yee Motion and Submissions	AEY Response	Yee Reply to AEY	Board Ruling
				<p>appropriate for Mr. Yee to attempt to use the IR process in this distinct GRA proceeding to provide submissions that he did not raise in the Rate Rebasing proceeding or to attempt to re-litigate the issues determined through that proceeding.</p> <p>In addition, AEY notes that the Motion process is not an opportunity for Mr. Yee to provide additional or revised IRs to AEY.</p> <p>For these reasons, AEY submits that the request should be denied.</p>		
<b>AEY-NY-008</b>	<p><b>Request:</b> Does obscuring the fixed charge and cost per kwh from the customer serve the interest of general energy literacy?</p>	Please refer to the response to AEY-NY-005.	g) In AEY-NY-008 I asked if obscuring the fixed charge and cost per kWh from the customer serves the interest of general energy literacy, and AEY referred to their answer in AEY-NY-005 which does not address this issue. Please provide a response.	<p>The purposes of IRs are to clarify the documentary evidence filed by another party, simplify issues, permit a full and satisfactory understanding of the matters to be considered, or to expedite the proceeding (Rule 13(1)). In this Proceeding, the Board is evaluating AEY's request for approval of its revenue requirement for the 2023-2024 Test Period, as well as the other approvals outlined in section 1.2 of the Application. AEY is not proposing to make changes to the way that information is displayed on billing statements. The information sought by Mr. Yee will not reasonably inform the Board's decision on AEY's requested revenue requirement nor will it provide clarification on AEY's evidence, simplify the issues in the Proceeding, permit better understanding of the matters at issue, or expedite the Proceeding. In AEY's submission, it would not be relevant, nor would it be in the interest of regulatory efficiency to require AEY to provide further information in response to this request.</p>		

**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

IR Number	IR	AEY Response	Nathaniel Yee Motion and Submissions	AEY Response	Yee Reply to AEY	Board Ruling
				<p>AEY has provided what it considers to be a full and adequate response to this IR. Issues regarding how to incorporate riders into existing base rates were thoroughly discussed and evaluated by the Board in the AEY and YEC Rate Rebasing proceeding and determined in Board Order 2023-08. It is not appropriate for Mr. Yee to attempt to use the IR process in this distinct GRA proceeding to provide submissions that he did not raise in the Rate Rebasing proceeding or to attempt to re-litigate the issues determined through in that proceeding.</p> <p>For these reasons, AEY submits that the request should be denied.</p>		
<p><b>AEY-NY-009</b></p>	<p><b>Request:</b></p> <p>What ideas does AEY have concerning making the Riders more understandable on billing statements? Please provide alternate or enhanced descriptions for all riders on the billing statement.</p> <p><i>[Image Excluded]</i></p> <p>Does AEY have better ideas for these? Please suggest improved text for each of the Riders shown on billing statements. This IR does not ask feasibility, but seeks new ideas to improve the customer experience. Some inspiration could be taken</p>	<p>AEY respectfully submits that changes to billing information and presentation have been fully addressed by the YUB in Board Order 2023-08 and that further discussion on such changes is beyond the scope of this Proceeding. AEY notes that it periodically reviews how bill statements are displayed and will consider making changes, as required and in collaboration with YEC, following a stabilization period of the new billing system.</p>	<p>I asked for ideas concerning making the Riders more understandable on billing statements, and asked AEY to provide suggestions for alternate or enhanced descriptions for all riders on the billing statement.</p> <p><i>AEY's reply was: AEY respectfully submits that changes to billing information and presentation have been fully addressed by the YUB in Board Order 2023-08 and that further discussion on such changes is beyond the scope of this Proceeding. AEY notes that it periodically reviews how bill statements are displayed and will consider making changes, as required and in collaboration with YEC, following a stabilization period of the new billing system.</i></p> <p>Quite to the contrary, Board Order 2023-08 states that this IS a GRA issue, and possible in the new billing system.</p> <p>From Board Order 2023-08:</p> <p><i>However, under the new billing system (as opposed to the existing billing system) the Utilities have not demonstrated that adding a few words to the description of a rider is cost</i></p>	<p>The purposes of IRs are to clarify the documentary evidence filed by another party, simplify issues, permit a full and satisfactory understanding of the matters to be considered, or to expedite the proceeding (Rule 13(1)). In this Proceeding, the Board is evaluating AEY's request for approval of its revenue requirement for the 2023-2024 Test Period, as well as the other approvals outlined in section 1.2 of the Application. AEY is not proposing to make changes to the way that information is displayed on billing statements. The information sought by Mr. Yee will not reasonably inform the Board's decision on AEY's requested revenue requirement nor will it provide clarification on AEY's evidence, simplify the issues in the Proceeding, permit better understanding of the matters at issue, or expedite the Proceeding. In AEY's submission, it would not be relevant, nor would it be in the interest of regulatory</p>		



**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

IR Number	IR	AEY Response	Nathaniel Yee Motion and Submissions	AEY Response	Yee Reply to AEY	Board Ruling
	<p>from the AEY online "Bill Calculator" in terms of showing the numbers.</p>		<p><i>prohibitive. None the less, in the Board's view, this is a GRA issue.</i></p> <p>As Board order 2023-08 specifically states that this is a GRA issue, it is not out of scope. I repeat my request and ask for a proper response:</p> <p>9) What ideas does AEY have concerning making the Riders more understandable on billing statements? Please provide alternate or enhanced descriptions for all riders on the billing statement.</p> <p><i>[Example Excluded]</i></p> <p>Does AEY have better ideas for these? Please suggest improved text for each of the Riders shown on billing statements. This IR does not ask feasibility, but seeks new ideas to improve the customer experience. Some inspiration could be taken from the AEY online "Bill Calculator" in terms of showing the numbers.</p>	<p>efficiency to require AEY to provide further information in response to this request.</p> <p>The quoted excerpt from Board Order 2023-08 relates specifically to Mr. Yee's proposed wording changes for the descriptions for Rider F and the YEC Temporary Adjustment Rider, and whether the implementation of such changes would be cost prohibitive (Board Order 2023-08, para 46, PDF pp. 13-14). AEY understands these comments to have been made in the context of (i) its statement that the Board direction giving rise to the AEY and YEC Rate Rebasing proceeding was not meant to re-open or re-examine fuel price or Rider F determinations, which are GRA matters (Board Order 2023-08, para 46, PDF p. 10); and (ii) the fact that an evaluation of whether something is cost prohibitive is more properly a GRA issue, as GRAs are intended to test the costs and revenue requirement of a utility.</p> <p>As described by the Board, the AEY and YEC Rate Rebasing proceeding dealt with the incorporation of riders into existing base rates and how to reduce confusion and increase customer understanding of bills (Board Order 2023-08, para 46, PDF p. 10). Mr. Yee's general questions regarding making riders more understandable on billing statements therefore relate directly to matters that were thoroughly discussed and evaluated by the Board in that proceeding.</p> <p>AEY also notes that the IR and Motion processes are not the appropriate place for Mr. Yee to introduce his own evidence, as he</p>		

**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

IR Number	IR	AEY Response	Nathaniel Yee Motion and Submissions	AEY Response	Yee Reply to AEY	Board Ruling
				<p>has attempted to do in the references for the IR and again in the Motion. If Mr. Yee considers this issue to be relevant, then he has the opportunity to present his own evidence in accordance with the process established by the Board, and AEY bears no obligation to assist Mr. Yee in advancing the positions that he wishes to raise or to contribute to the preparation of his evidence.</p> <p>In addition, the Motion process is not an opportunity for Mr. Yee to provide additional or revised IRs to AEY.</p> <p>For these reasons, AEY submits that the request should be denied.</p>		
<p><b>AEY-NY-010</b></p>	<p><b>Request:</b>  While a readable billing statement is preferred, the AEY online Bill Calculator is useful and does help in understanding how the Riders work. What are AEY's thoughts on including a summary that shows the actual monthly customer charge and actual energy charge inclusive of the Riders on the Bill Calculator? Additionally, the names of the riders on the Bill Calculator could link to the actual riders? Any further thoughts on how this could be improved while we</p>	<p>AEY respectfully submits that changes to AEY's online Bill Calculator are beyond the scope of this Proceeding and, pursuant to Rule 14(4)(a) of the YUB Rules of Practice, declines to provide the requested information. AEY notes that it periodically reviews the online Bill Calculator and will consider any required changes and improvements at the next reasonable opportunity.</p>	<p>AEY claims that discussion of the online Bill Calculator is "<i>beyond the scope of this Proceeding</i>" and notes that they periodically review it themselves.</p> <p>The Bill Calculator is presented by AEY as a way "<i>to estimate your payments</i>" and "<i>better understand your energy consumption</i>". Other than the billing statement itself, this is where AEY presents the results of the GRA to customers, and it is AEY's mechanism for explaining the Riders that result from the GRA. General energy literacy and customer understanding of the effects of the GRA are relevant to the GRA and not beyond the scope of this proceeding. AEY should be directed to respond to the IR repeated below:</p> <p>10) While a readable billing statement is preferred, the AEY online Bill Calculator is useful and does help in understanding how the Riders work. What are AEY's thoughts on including a summary that shows the actual monthly customer charge and actual energy charge inclusive of the Riders on the Bill Calculator? Additionally,</p>	<p>The purposes of IRs are to clarify the documentary evidence filed by another party, simplify issues, permit a full and satisfactory understanding of the matters to be considered, or to expedite the proceeding (Rule 13(1)). In this Proceeding, the Board is evaluating AEY's request for approval of its revenue requirement for the 2023-2024 Test Period, as well as the other approvals outlined in section 1.2 of the Application. Matters regarding AEY's online Bill Calculator and general energy literacy are not addressed in AEY's Application. Further, the place where the results of the GRA proceeding are presented to customers is in the Board's publicly issued decision and Order. The information sought by Mr. Yee will not reasonably inform the Board's decision on AEY's requested revenue requirement nor will it provide clarification on AEY's Application,</p>		

**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

IR Number	IR	AEY Response	Nathaniel Yee Motion and Submissions	AEY Response	Yee Reply to AEY	Board Ruling
	wait for billing/statement improvements?		the names of the riders on the Bill Calculator could link to the actual riders? Any further thoughts on how this could be improved while we wait for billing/statement improvements?	<p>simplify the issues in the Proceeding, permit better understanding of the matters at issue, or expedite the Proceeding. In AEY's submission, it would not be relevant, nor would it be in the interest of regulatory efficiency to require AEY to provide further information in response to this request.</p> <p>AEY also notes that the IR and Motion processes are not the appropriate place for Mr. Yee to introduce his own evidence, as he has attempted to do in the references for the IR and again in the Motion. If Mr. Yee considers this issue to be relevant, then he has the opportunity to present his own evidence in accordance with the process established by the Board, and AEY bears no obligation to assist Mr. Yee in advancing the positions that he wishes to raise or to contribute to the preparation of his evidence.</p> <p>For these reasons, AEY submits that the request should be denied.</p>		
<b>AEY-NY-016</b>	<p><b>Request:</b></p> <p>Has there been any consideration of SSM? Voltage optimization? Other technologies?</p>	<p>AEY is unclear on what the term "SSM" is intended to refer to, or what "other technologies" the request may be contemplating. Voltage optimization is standard practice within utilities and AEY continues to implement this practice.</p> <p>As noted in section 1B of the Application. AEY is undertaking steps towards Grid Modernization. These steps are required to</p>	<p>I asked if there has been any consideration of SSM, voltage optimization, other technologies?</p> <p>This question can be rephrased as asking AEY what they foresee in terms of Grid Modernization in addition to AMI.</p> <p>AEY was unclear on what was meant by SSM and other technologies, and from YEC's long ignored Charrette: "Supply Side Management includes measures to reduce the costs of production and transmission of electricity on the utility side of the customer's meter". This can also be referred to as SSE, Supply Side Enhancements according to YEC documents.</p> <p>In asking about SSM and other technologies, I am asking if AEY has any projects working towards producing and</p>	<p>AEY has provided what it considers to be a full and adequate response to this IR, and the Motion process is not an opportunity for Mr. Yee to provide additional or revised IRs to AEY.</p> <p>For these reasons, AEY submits that the request be denied.</p>		

**Appendix B**  
**AEY 2023-2024 General Rate Application**  
**Motion of Nathaniel Yee**

IR Number	IR	AEY Response	Nathaniel Yee Motion and Submissions	AEY Response	Yee Reply to AEY	Board Ruling
		<p>maintain service quality including the reliable, safe and economic operation of AEY’s distribution system in light of the evolution of customer behaviors, and the challenges presented as a result of the distribution system’s increasing size, changing utilization and complexity. Grid Modernization is increasingly recognized within the utility industry as a necessary response to changing Government policies, technologies, and customer behaviors since they will fundamentally alter the future operation of the distribution grid. These changes are driving new challenges for utilities such as bidirectional flow of power and a significant potential for localized demand spikes that cannot be ignored. One example is the AMI program. Please refer to the response to AEY-YUB-065 for further details.</p>	<p>delivering electricity more efficiently or cost effectively. This now seems to be a subset of Grid Modernization.</p> <p>I gave voltage optimization as an example of a technology that has changed significantly in recent years, and is sometimes a part of Grid Modernization.</p> <p>A 2017 study from the US DOE:  <a href="https://www.energy.gov/sites/prod/files/2017/01/f34/Voltage-Power-Optimization-Saves-Energy-Reduces-Peak-Power.pdf">https://www.energy.gov/sites/prod/files/2017/01/f34/Voltage-Power-Optimization-Saves-Energy-Reduces-Peak-Power.pdf</a></p> <p>And advertising from a vendor:  <a href="https://www.utilitydive.com/spons/how-voltage-optimization-helps-utilities-learn-more-about-their-grid/601619/">https://www.utilitydive.com/spons/how-voltage-optimization-helps-utilities-learn-more-about-their-grid/601619/</a></p> <p>Grid Modernization is also mentioned in AEY-NY-018 in the context of the expansion of intermittent renewable resources, but no specifics are given.</p> <p>To rephrase the original IR: In the GRA, AEY’s Grid Modernization seems to begin and end with AMI. What else, if anything does AEY foresee in terms of Grid Modernization? Other technologies?</p>			