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Notice of Motion: Nathaniel Yee hereby files the following notice of motion with reasons. Notice of Motion: That the Yukon Utilities Board (YUB) direct the AEY to provide a just response to the following IRs previously presented by Nathaniel Yee.

AEY-NY-004: 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.

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 actual cost 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.

I also included my first take at an improved billing statement as repeated below, asking AEY to suggest improvements and make their own version.

New billing statement:

Adding this readable summary to the left of.... the current billing statement here:

Current Charges Inclusive of Riders		CURRENT CHARGES DETAILS	
Monthly Customer Charge Including Riders	21.37	CUSTOMER CHARGE	14.65
Energy Charge Including Riders (248 kWh @ .1708 per kWh)	42.36	ENERGY CHARGE	30.10
(0 kWh @ .1825 per kWh)		AEY TEMPORARY RATE ADJUSTMENT	0.12CR
(0 kWh @ .1992 per kWh)		FUEL ADJUSTMENT RIDER	4.06
		YEC TEMPORARY RATE TRUE UP	1.35
		YECL RATE ADJUSTMENT RIDER	3.71
		YUKON ENERGY REVENUE SHORTFALL RIDER	15.59
		YUKON INTERIM ELECTRICAL REBATE	5.61CR
Sub-Total	63.73	SUB-TOTAL	63.73
GST	3.19	GST	3.19
Current Billing	66.92	CURRENT BILLING	66.92
Amount Due	66.92	AMOUNT DUE	66.92

AEY-NY-005,006,007:

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?

AEY Responded: 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.

AEY’s response refers to “effective kWh” from the Rate Rebasing proceeding, while now being asked about providing the actual 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.

I ask that AEY answer each question below separately, to avoid the confusion caused by a general answer that in the end does not answer any of the specifics requested.

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.

b) How are customers misled by being given the actual fixed cost and actual 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”?

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?

d) Please describe any varying rates between residential customers that would cause confusion.

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.

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?

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.

AEY-NY-009:

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.

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.

Quite to the contrary, Board Order 2023-08 states that this IS a GRA issue, and possible in the new billing system.

From Board Order 2023-08:

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 prohibitive. None the less, in the Board's view, this is a GRA issue.

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:

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.

For example:

"FUEL ADJUSTMENT RIDER"	could become	"FUEL ADJUSTMENT RIDER (1.635 cents/kWh)"
and		
"YEC TEMPORARY RATE TRUE UP"	becomes	"YEC TEMPORARY RATE TRUE UP 1.85% of Base Bill"

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.

AEY-NY-010:

AEY claims that discussion of the online Bill Calculator is "*beyond the scope of this Proceeding*" and notes that they periodically review it themselves.

The Bill Calculator is presented by AEY as a way "*to estimate your payments*" and "*better understand your energy consumption*". 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:

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, 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?

AEY-NY-016

I asked if there has been any consideration of SSM, voltage optimization, other technologies?

This question can be rephrased as asking AEY what they foresee in terms of Grid Modernization in addition to AMI.

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.

In asking about SSM and other technologies, I am asking if AEY has any projects working towards producing and delivering electricity more efficiently or cost effectively. This now seems to be a subset of Grid Modernization.

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.

A 2017 study from the US DOE:

<https://www.energy.gov/sites/prod/files/2017/01/f34/Voltage-Power-Optimization-Saves-Energy-Reduces-Peak-Power.pdf>

And advertising from a vendor:

<https://www.utilitydive.com/spons/how-voltage-optimization-helps-utilities-learn-more-about-their-grid/601619/>

Grid Modernization is also mentioned in AEY-NY-018 in the context of the expansion of intermittent renewable resources, but no specifics are given.

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?