

Yukon Utilities Consumers' Group Motion to Receive Response

1. *Reference:* AEY Application AEY-UCG-04 Businesses Cases to now get regulatory approval for capital projects already placed into rate base by AEY from the years 2016 to 2022. AEY response is to see YUB-46 (a) for answer for parts a. and b. of UCG IR. This see YUB-46(a) response is a continuity report which needs a forensic accounted to remedy a decision.

What has AEY charged for each capital project in these non-test years and then placed into rate base which they claim can be done when they come into service? Do these costs that AEY have placed into rate base for each of these capital projects have overruns or change of scope of original project description ? How is this reconciled in this type of regulation?

Request:

That: AEY answer a and b of this UCG request showing changes for each capital project costs (2016-2022) with a column for the preliminary engineers' report estimated costs, a column for AEYs final costs already placed into rate base and another showing the difference.

That: AEY explains how they perceive these costs are reconciled in a regulatory process that is some 2 to 7 years after the fact.

2. *Reference:* AEY Application, Depreciation Parameters AEY-UCG-041

Request: Now that AEY has completed update on depreciation, they are now able to answer parts a, b, c and d in AEY-UCG-041.

For AEY answer to c. of this interrogatory, they state that they do not believe in deferring capital projects to a later date due to reliability constraints, but they fail to explain why and how such large expenses like the ongoing CIS Replacement, Asset Management Programs and other computer infrastructure (which have no concrete bearing on safety nor reliability of the grid) could be deferred to years when the AEY is applying for large increase in rates (i.e. 2024).

3. *Reference:* AEY Application, Risk, AEY-UCG-047

Request: AEY declares having a transformational risk but will not explain how this will affect them nor how it would compare to other utility companies or other Yukon companies. If they will not answer to this, then such a statement should not be made in their companies' application process and should be struck from the record.

4. *Reference* AEY Application, Risk, AEY-UCG-048

Request: AEY declares they have a risk of having negative and positive recovery in their risk assessment but will give any concrete examples of how this has affected them in the past and how it would affect them going forward. If they will not give factual details about negative and positive cost recovery, then such a statement should not have been made in their application process and should be struck from the record.