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Our File No.: 71310-0022

June 14, 2017

Yukon Utilities Board
Box 31728
Whitehorse, YT Y1A 6L3

Attention: Ms. Deana Lemke
Executive Secretary

Dear Madam:

Re: ATCO Electrical Yukon (AEY) 2016/17 General Rate Application (GRA)
Compliance Filing – Comments from the City of Whitehorse

Further to the correspondence dated May 29, 2017 from the Yukon Utilities Board (“YUB”) requesting comments from parties regarding ATCO Electric Yukon (“AEY”) 2016-17 Compliance Filing filed on May 26, 2017, below please find the comments of the City of Whitehorse (“City”).

From our initial review of the compliance filing, we note the following:

Direction 1, Sales forecast

AEY proposes increases in sales and purchase power costs based on YUB directions. There are no working papers in support of the increase, nor any indication of how the increased sales have been incorporated into rate forecasts

Directions 3 and 4

Again, there are no working papers in support of the calculated reductions

Direction 6

AEY provides a working paper of labour variances, there should be an opportunity to test this working paper. The working paper shows systematic over forecasting of labour.

We would recommend that the YUB set a process to test the application by a round of IRs followed by argument and reply.

Yours truly,

BROWNLEE LLP

PER:



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06/14/2017 09:15:55 am

THOMAS D. MARRIOTT, Q.C.