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Your File No.:
Our File No.: 71310-0015

October 4, 2010

Yukon Utilities Board
Box 31728
Whitehorse, Yukon
Y1A 6L3

Attention: Mr. Bruce McLennan, Chair

Dear Sir:

**Re: 2009 YECL/YEC Joint Phase 2 Application
Option C**

On behalf of the City of Whitehorse (the "City"), we note that the latest rate design proposal ("Option C") proffered by YEC falls outside the process schedule set by the Yukon Utilities Board (the "Board"), and does not provide an opportunity for the Board and interested parties to ask Information Requests on this proposal or inquire as to YECL's position on the same. However, the City does note that, in now proposing Option C, YEC appears to acknowledge that Option A is an extreme position from which YEC is backing away. On this basis, the City will not be seeking to have Option C excluded from the hearing on procedural grounds.

We submit that this type of last-minute filing does not, as YEC suggests, assist the Board and intervenors in selecting a preferred rate option, and the City will address the issues associated with the timing of this filing further during cross-examination and argument.

Sincerely,

BROWNLEE LLP

PER:

KRISTJANA E. KELLGREN

cc. YEC, YECL and interested parties