

UTILITIES CONSUMERS' GROUP  
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August 26, 2008

Yukons Utilities Board  
Box 31728  
Whitehorse, Yukon  
Y1A 6L3  
Attention: Wendy Shanks, Chair

**Re: UCG Request for Further Information**

Dear Ms. Shanks:

In accordance with Section 13 (3) of the Board's Rules of Practice, UCG apply to the Board for an order setting the YECL response on the following attachment.

As demonstrated in our preamble, UCG is unsatisfied with the responses and reasons given by YECL for these particular IRs.

Yours truly,

Roger Rondeau

YUKON UTILITIES BOARD		
EXHIBIT C3-8		
DAY	ENTERED BY	DATE
	UCG	Aug 25/08

**YUKON UTILITIES**

**AUG 25 2008**

**BOARD**

**YUKON ELECTRICAL COMPANY LIMITED  
2008-2009 GENERAL RATE APPLICATION**

**Utilities Consumers' Group  
Information Request No. 2**

• **YECL 2008-09 APPLICATION**

Reference Sales and Revenue

4. Please provide the amount of income from Fuel Adjustment Rider J for 2007 and proposed 2008, 2009. Provide total of Fuel Adjustment Rider J for each year. *(Should read Rider F)*

Preamble: UCG would like to understand how YECL determines how diesel costs are allocated. What costs are general, O&M, etc. and what costs are associated with Rider F. It is UCG's understanding that only the actual diesel costs above the last GRA fuel costs are to be allocated to Rider F.

Requests: UCG needs to see separation of these allocated costs associated with diesel fuel operation and maintenance to understand how it works.

Reference Sales of Land or Property in Yukon Electrical jurisdiction

6. Please provide all income from sale of lands or property of YECL since last GRA in 1996.
7. i. Please provide all income from sale of lands or property of Alberta Power Ltd. since last GRA in 1996.  
ii. Please provide all income from sale of lands or property of Canadian Utilities Ltd. since last GRA in 1996.
8. Please provide all income from sale of lands or property of ATCO since last GRA in 1996.
9. Please provide all income from lease of lands or property of YECL and all of the above

Preamble: For Q.6 YECL responded that there was no land sold after 2003, therefore they do not have to give out any information on these sales. By osmosis UCG interprets there was land sold prior to this particular year. UCG submits that ratepayers have paid for purchases, taxes, upkeep, improvements etc. of such land or properties and therefore have an interest in any such sales.

Request UCG therefore requests all the information requested from Q.6 be made available and accountable for above reasons. UCG also submits it is necessary to have this flow through from the time

of the last GRA. The same holds true for the lease of lands and property.

Preamble: For Q. 7 to 9 YECL responds that they have no knowledge of sale of lands or income made from such sales of their affiliates. They further claim that regardless this would have no impact on the current application.

UCG submits that ratepayers have paid for purchases, taxes, upkeep, improvements ect. on any property held by YECL and transferred or sold to affiliates. For sake of argument, let us assume YECL sells or leases property to one of their affiliates, for say \$1, then the said affiliate in turn sells this property for a considerable gain, then this would certainly impact ratepayers.

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Request: UCG therefore requests that all sales of land and property by YECL or their affiliates in the YECL jurisdiction, since the last 1996-97 GRA be made open and accountable. The same holds true for affiliate lease of lands and property.

#### Reference Rate Base and Return

29. Please provide chart giving rate base #s for each year since 1996 GRA.
30. Please provide chart giving **rate of return percentage and \$amounts** for each year since 1996 GRA.
31. Please provide examples of rates of return for other utilities **for each year** since last 1996 GRA.

Preamble: In their response YECL failed to give the rate base #s for each year, nor the \$ amounts for each year. Also YECL did not provide any example of return for other utilities during these years. It is very important for ratepayers to understand how much the YECL increased its rate base for each year and be accountable for all such increases. It is very important for ratepayers to see not only the percentage of return but also the dollar amounts and how over-earnings are accounted for. It is also very important for Yukon ratepayers of electricity to know that they have been paying a fair rate of return as compared to various utilities in other jurisdictions.

Request: UCG therefore requests all the above information for Q.29, 30 and 31 be made available and accountable to ratepayers.

#### Reference Rate Case Costs

32. Please explain rate case costs of \$75K documented each year for the 2006 actual and 2007 forecast.
33. Please explain rate case costs of \$86K documented each year for 2008 and 2009 test periods.

Preamble: UCG would like to determine what these numbers mean. Are they costs allocated to this rate case or prior. For example what is the \$75K documented as costs in schedules for each of the 2006 and 2007 years. Then \$86K for each year 2008 and 2009. The explanation given by YECL is insufficient to make a determination.

What we want to know is what costs YECL is allocating for general O&M for both internal and affiliates concerning rate cases and what costs are allocated to the rate base or amortization of rate case costs.

Request: UCG submits it is necessary to see a separation of all these prior costs and forecasted costs for rate case scenarios: internal, affiliate, others, etc. . What has been documented in the normal O&M costs and what is being forecasted for this GRA costs to be incorporated in the rate base. UCG also requests an explanation as to why both these type of allocations are necessary.