

Nathaniel Yee  
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Yukon Utilities Board, and all on the list for the 2021 GRA

Re: Yukon Energy Corporation – YEC 2021 General Rate Application, Nathaniel Yee 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 Yukon Energy Corporation to provide a just response to the following IRs previously presented by Nathaniel Yee.**

NY-YEC-1-7

IR was for a list of all modifications/changes to the Faro plant since the 2014 (most recent) YESAB assessment. YEC fails to list the 7 rental generators. Is this an error, or is YEC claiming that the generators do not exist? Please correct.

NY-YEC-1-6

In the stacking order provided, YEC lists all 7 Faro rental diesels, and the installed FD1 and FD7 generators. This adds up to 18.4MW – while the most recent (2014/Current) YESAB shows only FD1 and FD7 for 8.15MW. How can all Faro capacity be in the stacking order?

NY-YEC-1-8 (a) (attachment 1)

YEC was asked to provide any and all correspondence with regulators regarding the rental diesels. Earliest document provided is a response to YEC, so clearly not all correspondence was included. Please provide complete correspondence as requested. This would also include attachments referenced in emails.

NY-YEC-1-8 (c) (a) (attachment 2)

YEC provided Record of Determination of Significant Change document for amendments to the Air Emission Permit for Whitehorse Rapids Generating Station, WRGS. Please provide also for Faro Generating Station, FGS.

NY-YEC-1-8 (d)

Asked for compliance documents, decision documents and permits for the rental diesels, YEC has replied that there are none, while the incomplete email chain provided in NY-YEC-1-8 (a) includes an “Application for approval to install previously relocated and derated generating capacity” from YEC. Is there a document approving (or denying) the application? I believe this has also been referred to as “the 2020 amendment” in correspondence.

Does this document exist? Why was it not provided?

NY-YEC-1-9

Requested documentation of consultation and interaction with RRDC. Reply does not document any specific interaction or specific attempts at interaction with RRDC, and therefore does not satisfy the request. As requested, please provide dates and specifics of all interaction or attempted interaction with RRDC.

NY-YEC-1-10 (b) and (c) and others

Existing generation limit of 10.6MW? The most recent YESAB (2014) which was used for the 2014-2024 permit lists FD1 and FD7, totaling 8.5MW. Is there any valid documentation of approval of 10.6MW limit? Please provide.

NY-YEC-1-10 (f)

YEC does not address address social license for RRDC or Faro, which was the question.

NY-YEC-1-13 (a)

The sound study provided is NOT the one requested. Request was for the one referenced by Travis Ritchie of YEC on 2-Dec, 2020 in the meeting with community. The provided study is dated more than two months after the the meeting, so could not have been the one that was cited, and does not address “all the rentals” vs the “permanent generators” as stated by Travis Ritchie of YEC. Does this report exist? Please provide the sound study that YEC referenced in the public meeting.

NY-YEC-1-13 (c)

YEC was asked to explain/discuss how the rentals would affect the air dispersion modelling. The attached document uses the installed generators and 3 rentals as a baseline, and discusses the effect of adding three more rentals. This does not answer the original request.

NY-YEC-1-2 (c)

YEC replies that “...this data is not forecast by month...” However, the request was for actual, approved and forecast data. Please provide the other data requested even if forecast is not available.