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Yukon Utilities Board  
Box 3178  
Whitehorse, YT  
Y1A 6L3  
Attn: Mr. Richard Buchan, Chair

Dear Mr. Buchan,

Re: Yukon Energy Corporation (YEC) 2023-2024 GRA interim refundable rate requests

I admit to some confusion as to exactly what increase in Rider J YEC is asking for. In YEC's cover letter to their GRA (page 2) YEC says it "is seeking YUB approval of an interim Rider J increase of 4.80 percentage points effective October 1, 2023...". In the Introduction to the YEC application page 2 (Application PDF page 3) Table 1 indicates that the proposed rate increase on October 1, 2023 is 3.34%. Our present actual bills show the "YEC temporary rate true up" (rider J1?) of about 3.00% and a present "Yukon Energy shortfall Rider" (Rider J?) of 34.85% for a total of 37.85%.

Is YEC proposing to increase the shortfall rider from 34.85% to 39.65% ( $34.85 + 4.80$ ) or to 38.19% ( $34.85 + 3.34$ )? The rate sheets on the YEC website do not clarify the situation as it shows Rider J at 22.32% and Rider J1 at 9.25% both of which expired at the end of 2019. The AEY bill calculator on its website says the YEC revenue shortfall rider is 34.08% and the true up is 1.85% for a total of 35.93% but, this does not match the actual calculator page which shows the YEC bill riders at a total of 37.85% and this matches our actual bills.

In Table 1-1 in the Application Tab 1 page 1-4 (Application PDF page 19) is a repeat of the table that appeared as Table 1 in the introduction. For clarity I will assume that the rate increases requested in Table 1 (i.e. 3.34% on October 1, 2023) and repeated in Table 1-1, are those being requested by YEC.

In addition to the requested interim rate increase effective October 1, 2023, discussed above, YEC is requesting an interim rate increase of 8.44% on January 1, 2024 (per Table 1 and Table 1-1). On page 2 of the Introduction (Application PDF page 3) YEC stated "With proposed rates timed to coincide with removal / expiry of other charges, ...".

I find it difficult to evaluate the merits of this statement as it is not clear to me: (a) when the true up rider (Rider J1), which appears to be 3.00% at present, expires, or (b) when Rider F expires as its balance in the last report on file at the YUB (to March 31, 2023) shows a balance owing of

about \$6 million, or (c) when any other charges expire. It would have been helpful if current information on these charges were either presented in the application to support the timing of interim rate increases or / and available on the utilities' websites.

I wish also to note that consumers will already see a rate increase on January 1, 2024, as AEY Rider R of 8.30% will increase to 10.80% (8.30% + 2.50% as per Board Order 2023-22).

I have not yet had time to study the much of the application and have no opinions on its merits at this time.

On the bases of the above I recommend, on an interim refundable basis, that:

1. That in Rider J be increased by 3.00% from 34.85% to 37.85 % effective October 1, 2023; or, if it cannot begin until November 1, 2023, be increased by 3.40% from 34.85% to 38.25% effective November 1, 2023, and
2. That Rider J be further increased by 6.00% from 37.85% (or 38.25% if the first increase is delayed until November 1) to 43.85% (or 44.25%) effective March 1, 2024 rather than on January 1, 2024. This later start will decrease the adverse impact of the rate increase at the coldest and most expensive time of the year for residential customers, which appears to align with YES's stated desire to consider the impacts on consumers in the timing of their increases.

Respectfully submitted,



John Maissan