

The unanswered items from my motion concern documents that YEC has in their possession and could easily provide in response to my IRs. Rather than providing the information, they claim that the information is not relevant to the GRA. This is both wasting everyone's time and shortchanging the process. If after receiving the information I decide that it is not useful or relevant to my argument I will not submit it. Similarly, if the Board finds part of my arguments irrelevant that is their decision and they will ignore it. YEC cannot be permitted to pick and choose what they think might be useful to interveners or the Board in the IR process. Their refusal to provide requested information is particularly odd given that the specific information requested requires no more work on the part of YEC than simply sending it. I am not asking YEC to perform any calculations they have not already performed, or to format data in any way they have not already formatted it. I am simply asking them to send it.

As an example, the Faro diesel replacement project is the single largest capital project in the GRA, and yet asking for the specifications of the generators and a plan of the site *"goes far beyond what YEC can reasonably be expected to provide for the current GRA, and will not be of assistance to the YUB in its review of YEC's 2023 and 2024 revenue requirements."*

As we review the details of the GRA, the details of the largest capital project are in fact relevant, and should be easy to provide. If YEC is unable to state what generators they are installing and has no plan, this is relevant to prudence of revenue requirements.

Another example is the uprating of all 14 installed diesel generators. While this uprating does allow YEC to meet N-1 capacity criteria, was YEC's decision to uprate all capacity done in a reasonable or prudent manner? If so, YEC would have documented the when and why of uprating each generator, and noted the most recent overhauls. It is quite reasonable to ask for this documentation in the GRA process, and again it should exist.

I request that the Board direct YEC to provide the information requested in my previously submitted motion, for reasons given below in each **Issue from Motion** section. For a few IRs, sufficient information has been provided, and this is also noted below. The original questions are provided, along with the problems submitted with the Motion, denoted as **Issue:**.

NY-YEC-1-2 (a) and (b)

Issue from Motion: It is notable that every installed diesel in YEC's fleet has been uprated since the last GRA, some even beyond nameplate capacity. Without these convenient upratings, YEC does not meet N-1 criteria for either of the test years. In asking for an updated generation inventory, I had not expected to see that every diesel generator had been uprated, as this would typically require an overhaul for each. In my motion, as shown below, I asked YEC to correct the dependable capacity totals or to provide documentation supporting that every diesel has been uprated.

YEC's response to my motion acknowledged that all capacity has been uprated but provided no documentation. It is quite reasonable for me to ask about this, as the GRA does not indicate any cost to inspect or overhaul every (or any) diesel generator. That YEC uprated the entire diesel fleet to reach N-1 criteria – with no cost or mention of it in the GRA is definitely worthy of further

questioning. If YEC has no documentation indicating why each of the 14 uprated generators was uprated, it hard to see how accepting the new capacities in the GRA would be reasonable or prudent.

I repeat what I asked in my motion, that YEC provide documentation for each unit that was uprated. YEC should be quite proud of being able to restore old generators to nameplate capacity or more at no cost, if this is what has occurred. Curious that the good news of uprated capacities is only reflected in response to this IR and does not appear in any other documents.

From motion submitted December 7, 2023:

QUESTION: (a) Please provide an updated and complete YIS Generation Inventory that includes the rentals (and spares) for 2023-24. Format should be the same as "Appendix A: Existing Resources Technical Attributes" on p. 71 of the 10-Year Renewable Electricity Plan from 2020. (b) Please provide the same table updated for 2024-25.

The generation inventory was provided, but I need confirmation that the data is correct.

Issue: The dependable capacities have increased for all YEC diesels. This seems to be an error or oversight as there was no mention of uprating all of the installed diesels in the GRA. Please provide a table with corrected dependable capacities or confirmation and documentation supporting that all YEC diesel has been uprated since 2021.

Dawson is provided as an example.

Surprised that DD2 and DD5 are uprated before being retired? If running as new, why retire? Dependable capacity from IR response:

YEC 2023/24 GRA
NY-YEC-1-2 Attachment 1

Dependable Capacity based on YEC's 2023/24 GRA Assumptions

Location	Retirement Year	Original Unit #	Prime Mover Type	Dispatchable	Name Plate Capacity (kW)	2023/24 F	2024/25 F
						Dependable Capacity (kW)	Dependable Capacity (kW)
Dawson Diesel	2050	DD1	diesel	Yes	800	850	850
	2050	DD2	diesel	Yes	1,000	1,000	0
	2050	DD3	diesel	Yes	1,000	1,030	1,030
	2050	DD4	diesel	Yes	1,440	1,440	1,440
	2050	DD5	diesel	Yes	1,500	1,500	0
	2050	YM1	diesel	Yes	1,440	1,200	1,200
7,180						7,020	4,520

Dependable capacity from 2016 and 2020, from 2020's 10 Year renewable plan p.71:

Retirement Year	Original Unit #	Current Unit #	Prime Mover Type	Dispatchable	10 Year Renewable Energy Plan		2016 IRP Dependable Capacity (IRP Table 4.2.) [kW]
					Installed Capacity [kW]	Dependable Capacity [kW]	
2050	DD1	DD1	Diesel	Yes	800	650	720
2023	DD2	DD2	Diesel	Yes	1,000	850	920
2050	DD3	DD3	Diesel	Yes	1,000	850	920
2050	DD4	FD5	Diesel	Yes	1,440	1,000	1,000
2023	DD5	DD5	Diesel	Yes	1,500	1,350	1,400
2050	YM1	FD6	Diesel	Yes	1,440	850	1,000
Subtotal					7,180	5,550	5,960

NY-YEC-1-4:

Issue from Motion: Please include relevant capacity limits with the stacking order. It is integral to the validity of the stacking order, particularly with the rentals. How many Whitehorse rentals can be running before Faro rentals begin, and how many Faro rentals are running before Mayo begins, and how many Mayo, etc. YEC must maintain this information in order to have a valid stacking order, and is wasting everyone's time in not providing it.

From the Motion:

QUESTION:

Please provide the stacking order for thermal generation – two separate lists:

a) for 2023-24

b) for 2024-25

Issue: Stacking order table provided in response to this IR is incomplete. Please indicate relevant capacity limits for each in the Notes column.

Type/ Location	Units	Notes
YEC LNG	WG1, WG2 and WG3	
Whitehorse rentals		
Faro rentals		
Mayo rentals		
YEC Whitehorse diesel	WD4, WD5, WD6, WD7	
YEC Callison diesel	New units	Two 3.25 units potentially available for 2024/25 winter [or 2025/26 winter if delayed]

Type/ Location	Units	Notes
YEC Faro diesel	New units, FD7	Two 2.5 MW new diesel units added for 2024/25 winter
YEC Dawson diesel	DD4, DD3, DD2, DD1	DD2 and DD5 to be retired in 2024
YEC Mayo diesel	MD1, MD2, MD3	

NY-YEC-1-9:

(Reply to motion sufficient)

NY-YEC-1-12:

(Reply to motion sufficient)

NY-YEC-1-13: Whitehorse diesel.

Issue from Motion: YEC had provided a table of data with no mention of where this data came from. Without context the data is not meaningful. In my motion I asked YEC for data sources, either to provide the full report(s) or at least links to the full reports.

They have provided neither, only stating that “The information provided in the IR response is calculated from Yukon Energy’s submissions under the National Pollutant Release Inventory Program. The reports are publicly available.”

YEC has not provided their calculations made in response to my original IR, nor have they provided the source reports. These calculations and the source reports need to be provided to make the data meaningful. YEC has these calculations and reports at hand, as they are supposedly the basis of their IR response. Withholding information that they have readily available and have used in an IR response is once again wasting everyone’s time.

Additionally the table includes WD8 and WD9, which I doubt have been included in YEC’s submissions to the National Pollutant Release Inventory Program, since they do not yet exist. Please provide data sources and relevant calculations for these also. Again not difficult since YEC made these calculations to answer the IR. I simply ask that they show their work.

From the original IR and the Motion:

QUESTION:

c) What are the generating efficiencies of the installed diesels compared to the rentals? Please provide a comparison of fuel consumption at 9.55 MW using the installed/permanent generators vs fuel consumption of the rentals to produce the same output? Fuel usage per MWh would also be useful.

d) Please provide a comparison of NO₂ and other pollutants at similar capacities – Installed vs rental units.

Issue: Tables were provided, but without any reference to data sources. Please provide the full reports that include this data, or at least links to the full reports. Without context the data is not meaningful.

NY-YEC-1-14:

Issue from Motion: Thermal replacement in Faro is by far the most expensive capital project in the GRA, and yet in response to IRs, YEC has failed to provide such basics as site layouts and specifications of the generators. This GRA is the time to review YEC’s plans for this project and determine if the costs involved in this project are prudent. If YEC is unable to provide basic information of what they are doing with the 18.176 million, it is difficult to have any confidence that these costs are prudent.

Again, YEC does have this information, and did provide a site layout in response to my IR but it had been reduced in size to the point of being illegible. In less than the time required to read these two sentences, YEC could have sent out the original document.

And we can assume or at least hope that YEC knows more about the generators being installed than the information provided. I asked for full specifications and model numbers, and I got was “YEC is installing two Tier 4 engines of 2.5MW each.” If this is all they know, supporting the project at this time is not prudent. If they do know more, the information requested could have been provided in less than the time it has taken to read this paragraph.

I also asked about correspondence between YEC and the Regulator. This is relevant because YEC has claimed that no YESAA assessment will be required, and to confirm this it is important to know what YEC has told the Regulator about the project. In what was supposedly full correspondence, YEC has failed to include reports and documents referenced in the provided emails. Again, simply sending requested information that is in YEC’s possession would take less time than reading this paragraph. If it is not relevant, as YEC claims, I will have wasted my time reading it and it will not be used in my argument. That would be more efficient than these exchanges and would not be wasting everyone’s time. Is YEC refusing to supply complete information helping to make a more efficient process?

YEC should be directed to provide the information requested in the IR and asked again in the motion. I am only asking YEC to supply missing documents that already exist, and this should take very little time. Again, this is YEC’s largest capital project in this GRA, so some scrutiny is justified.

From the original IR and the Motion:

QUESTION:

a) Please provide all plans, layouts, specifications, studies (noise, emissions, etc) and all other documentation relating to the modifications (2023 and 2024) to the FGS. This would also include plans, requirements and instructions given to contractors and subcontractors. Also please provide a list of contractors and subcontractors and RFPs.

ANSWER:

a) *YEC is installing two Tier 4 engines of 2.5MW each. The layout of the site is as follows:*

Issue1: The provided layout is too small, to be readable and when enlarged, too blurry. Please provide a higher resolution version of the layout. Also, please provide the 2023 and 2024 layouts, which are different. This one being too small, I am not sure which year it represents – or if both layouts are somehow shown.

Issue2: Please provide model code and specifications of the 2.5 MW generators as requested.

Issue3: Please provide sound and emissions / dispersion reports if available, otherwise indicate that none have been done.

Issue4: I had also requested plans, requirements and instructions provided to contractors and subcontractors – and none have been provided.

QUESTION:

b) Please provide all correspondence between YEC and the Department of Environment concerning the 2023 and 2024 modifications to the FGS.

Issue1: Missing document: On pdf p.65, The email dated May 31, 2023 concerns an attachment 20230510-Inspection-report-es.pdf, however this document is not included. The document is also the subject of the email on pdf p. 67. Please include this document and any further correspondence.

Issue2: At the top of pdf p. 66, a “approved Complaint Management System for the FGS” is mentioned. Please provide any documentation and correspondence associated with the “approved Complaint Management System”.

Issue3: Construction has started, and pads for FD8 & FD9 have been poured. Has YEC informed the Regulator, as required according to the emails provided? Please provide any documentation.

Issue4: In the email chain provided, YEC has not informed the Regulator of the 2024-25 20.6 MW configuration described in the GRA. Please provide documentation of YEC informing the Regulator of this configuration.

NY-YEC-1-15:

b) I find it concerning that YEC is refusing to consider sound and emissions for the proposed 2024 configuration of 20.1 MW, but accept their answer that they are not doing any analysis of the 2024 configuration. Reply to motion is sufficient.

Issue from Motion: In e) I asked for comparisons of efficiencies between rentals and installed generators in Faro, and was referred to Whitehorse answers.

In their answer to the motion, YEC claims that FD7 and WD7 have the same specifications. They do have different nameplate capacities, so this is not true, though I accept that they may be similar.

For FD8 and FD9 YEC says that these are the same as WD8 and WD9 – the future diesel replacements in Whitehorse. This is meaningless, as YEC has refused to provide model numbers and specifications for these generators as requested in NY-YEC-14 a).

From the original IR and the Motion:

QUESTION:

e) Please provide a comparison of the efficiencies of the proposed diesel replacement generators and the rentals at 5MW output. Fuel usage at 5MW, Fuel usage per MWh, and NO2 and other emissions compared.

ANSWER:

e) *Please see response to NY-YEC-1-13(f) and NY-YEC-1-13(d).*

Issue: NY-YEC-1-13 addresses Whitehorse. The Faro installed diesels are not addressed in the Whitehorse answers. Please answer the question with data relevant to Faro as requested and provide sources of data.