

# YUKON UTILITIES CONSUMERS' GROUP (UCG)

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Yukon Utilities Board

Box 31728

Whitehorse, Yukon Y1A 6L3

Attention: Acting Chair and Board Members

**Re: UCG Comments on Yukon Energy Corporation 2023/24 General Rate Application Cost Application**

Dear Ms. McCullough:

Enclosed for the review of the Board is a submission by the Yukon Utilities Consumers' Group (UCG) resulting from the Cost application filing of Yukon Energy Corporation 2023/24 General Rate Application.

From the information outlined by Yukon Energy cost claim application, they needed 4 lawyers and 7 consultants to do the job a highly paid YEC staff and administration should be responsible for, to respect their ratepayers and the Yukon citizens they represent.

Also, from the information presented, it is impossible to see which job which lawyer or which consultant was responsible for. This results in far too many duplication costs!

Accordingly, at most, only one lawyer and one consultant should be the responsibility of the ratepayer. The remainder should be paid for by the YEC shareholders who have not held their respective administration accountable to control their regulatory costs.

ATCO Electric Yukon can file a regulatory review (a General Rate Application) for \$311,000 in total costs claimed (which also has questionable sections of ad-on costs ), while our publicly owned corporation, the YEC, wants to claim \$599,000.

UCG submits, the Board must not condone this obvious overindulgence and disallow a great percentage (50% or more) of this request to be paid for by the ratepayer. Cases in point:

1. Ratepayers must not be made responsible to pay for the transition of the legal members, due to the retirement of one lawyer, of the firm hired by Yukon Energy. One and only one lawyer to be paid by the ratepayer.

2. The consultancy firm hired by the YEC brings two consultants to the hearings and then wishes to pass on to ratepayers all their cost hours at full hourly rates for the two, plane fares, rooms and food costs. One of these consultants, by observation, is simply an add-on to costs as she only attends the process and does not partake in the hearings. Yukon Energy has also now hired Mr. Najmidinov as their regulatory person. He transferred from this same consultancy firm, and he was present at all the hearing as to what appeared to be a YEC support staff. He

has enough knowledge to authenticate the evidence needed by the panel without the costs of bringing in these two outside consultants. If not, why do we need him on payroll?

To add salt to the wounds, the Board has a history of not allowing interveners fair cost recoveries during the hearings, by allowing only \$50 per half-day to those parties who have no legal representative and must be there to hear first-hand the panel evidence to be certain comprehensive answers are given. Also, these local interveners must then spend several hours in cross examination of the panel/s in which a lawyer would charge a full \$350 per hour, three and a half times more than what the Board is willing to pay an active intervener for a full day of work.

UCG maintains that the Board send a message that the utilities must not partake in outlandish imprudent external costs associated with regulatory proceedings or they will have to take on this fiscal responsibility from their own corporate profits .

If there are any questions concerning the contents of this submission, I would ask that they be directed by email to rrondeau@northwestel.net or by phone at 633-5210.

Regards,

Roger Rondeau representative/consultant for  
Yukon Utilities Consumers' Group (UCG)

P.S. As an add on, and a personal gut angst, these outside legal and consulting firms must be laughing all the way to the bank at how immature, naive and gullible the Yukon establishment is and has been for 30 or more years, making these firms millionaires.

