

YUKON UTILITIES CONSUMERS' GROUP (UCG)

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Yukon Utilities Board

Box 31728

Whitehorse, Yukon Y1A 6L3

Re: Reply to YEC Submission on Board Order 2026-07, Yukon Energy Corp.  
(YEC) LWRF and ERA

Board Members:

UCG has reviewed the March 23<sup>rd</sup>. response letter filed by the YEC on the above.  
As per Board memo we have the following to offer:

1. UCG disagrees with the YEC premise that fuel prices and fuel purchases “do not address the subject matter,”<sup>1</sup> and “is outside the scope”<sup>2</sup> of this proceeding.
2. Changes or escalation of fuel costs per litre or per kWh. reflect all aspects of YEC regulatory filings, i.e. revenue requirement, LWRF and the Rider F.
3. YEC contends that they filed the full details needed on unit fuel costs in section 3.2.1 of the GRA.<sup>3</sup>
4. UCG submits that nowhere in this section does it state how the YEC came up with the Average Weighted Fuel price of \$0.3219 kWh nor for that matter how average diesel costs per litre were determined.
5. UCG further submits that any spikes or increases in fuel costs affect both average weighted fuel price and average diesel cost per liter.
6. YEC denies any problems “ with supply chain issues” and that “supply and delivery contracts include structured pricing mechanisms designed to

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<sup>1</sup> YEC reply p. 1 p.3

<sup>2</sup> YEC reply p. 1 p.3

<sup>3</sup> YEC reply, p. 5.pgh.4

mitigate volatility including rack pricing over set periods and fixed delivery cost components.”<sup>4</sup>

7. UCG submits that the YEC has not provided the protocol for supply chain management when diesel deliveries are disrupted by road closures between Alaska and the Yukon. For example, when such closures occur would North of 60 then source their diesel from Edmonton? What is the expected time frame to deliver diesel under urgent demand conditions from Yukon Energy? When immediate supply is needed, would fuel have to be sourced locally in Whitehorse from the Suncor bulk plant. Does North 60 hold an account with Suncor? If not, must North 60 then rely on Chieftan Energy, which possesses an account and resellers license? Would Chieftan access this diesel from the Dall terminal? If so, what is the markup from the refinery to Dall, Dall to Chieftan and finally from North 60 to Yukon Energy?
8. On the matter of the term sheet approach, UCG asked the question: How can shifting back and forth from forecast to actual data reflect what is accurately taking place? We would like to receive an answer on this from both the YEC and the YUB.
9. The YEC response to this was simply that this is false and then give a non-response explanation to this.<sup>5</sup>
10. In reviewing the Term Sheet, it is obvious that the YEC uses both actual and forecast data. The public deserves the right to know how this accurately reflects what is actually taking place to determine costs from fluctuations in water levels at the hydro facilities and diesel consumption.
11. Accordingly, UCG requests the Board holds a review on this to properly determine how diesel fuel prices are recorded and determined for not only the term sheet, but for Rider F.

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<sup>4</sup> YEC reply p. 5, pgh.5

<sup>5</sup> YEC reply p.3, pgh. 3

