

YUKON UTILITIES CONSUMERS' GROUP  
242 Squanga Avenue  
Whitehorse, Yukon Y1A 3Y6  
email: [rondeau@northwestel.net](mailto:rondeau@northwestel.net)

July 16, 2021

Yukon Utilities Board  
Box 31728  
Whitehorse, Yukon Y1A 6L3

Attention: Deana Lemke, Executive Secretary

**Re: Yukon Energy Corporation - Battery Energy Storage System  
Energy Project Certificate and Energy Operation Certificate Application  
UCG Cost Claim**

Dear Ms. Lemke:

Enclosed for the review of the Board are the costs claimed by the Yukon Utilities Consumers' Group ("UCG") for reimbursement resulting from the regulatory review of Yukon Energy Corporation's Battery Energy Storage System project.

UCG's cost claim consists of the following documents:

- a) Form 1 - Summary of total costs claimed;
- b) Form 2 - Summary of professional fees claimed by Mr. McMahon;
- c) Form 3 - Summary of disbursements claimed;
- d) Form 4 - Affidavit of fees and expenses claimed (to be filed at a later date); and
- e) an invoice detailing the time claimed for Mr. McMahon;

UCG's intentions to use the services of Mr. McMahon in this proceeding were outlined in UCG's letter dated February 28, 2021. To our knowledge, no party raised an issue with respect to the proposal throughout the course of the proceeding.

Mr. McMahon supported the intervention of a legitimately constituted ratepayer group by providing extensive consulting services without the assistance of legal counsel. UCG respectfully submits that Mr. McMahon provided his services in a manner and with the expertise that assisted in the quality and efficiency of the proceeding as a whole, and assisted UCG in making valuable and comprehensive submissions from the perspective of the ratepayers that UCG represents.

With the retainer of Mr. McMahon, UCG's need for a skilled consultant to assist and ultimately take the lead in preparing UCG's filings within this proceeding was filled with someone with not only the relevant general and specific knowledge of the industry, but also an extensive background in the history of the Yukon energy sector in particular.

With respect to Mr. McMahon's claimed hourly fee of \$225 per hour, UCG submits that this rate is well below the maximum rate allowed within the YUB's Scale of Costs for a consultant with Mr. McMahon's experience and expertise (\$270 per hour) and has been accepted by the YUB in previous cost award decisions.

UCG submits that the scope of issues in this proceeding was extensive and the amount of evidence and updates provided by YEC through various means required numerous hours of work to ensure that arguments forwarded to the YUB were comprehensive and relevant. UCG submits that the costs incurred by UCG were reasonable and were directly and necessarily related to UCG's effective participation in this regulatory review. UCG submits it acted responsibly and contributed to a better understanding of the issues to be decided by the Board.

We ask that all cost claim amounts approved for Mr. McMahon be made payable to him and sent to his attention at:

Patrick McMahon  
5 Morning Glory Lane  
Chatham, Ontario N7L 5R5

If there are any questions concerning the contents of this submission, I would ask that they be directed to me by email at [rondeau@northwestel.net](mailto:rondeau@northwestel.net) or by phone at 633-5210.

Yours truly,

Roger Rondeau  
Utilities Consumers' Group

cc (by email): Yukon Energy Corporation

**Yukon Utilities Board**

**Summary of Total Costs Claimed**

Form 1 - Page 1 of 1

Date July 16, 2021

	Total Fees	Total Disbursements	GST	Total Fees, Disbursements, & HST
			Total GST on Fees & Disbursements	
Firm/Company Name Patrick McMahon (PaTina Energy Consultants)	\$13,725.00		\$686.25	\$14,411.25
Firm/Company Name				\$0.00
Firm/Company Name				\$0.00
<b>TOTAL COSTS CLAIMED</b>	<b>\$13,725.00</b>	<b>\$0.00</b>	<b>\$686.25</b>	<b>\$14,411.25</b>

Claimant Yukon Utilities Consumers' Group

Agent/Representative Roger Rondeau

Address 242 Squanga Avenue, Whitehorse, Yukon Y1A 3Y6

Phone 633-5210 Fax \_\_\_\_\_

E-mail [rondeau@northwestel.net](mailto:rondeau@northwestel.net)

Applicant(s) Yukon Energy Corporation

Application(s) No. \_\_\_\_\_

Hearing Battery Energy Storage System Project

**Yukon Utilities Board**

**Summary of Professional Fees Claimed**

**Form 2 - Page 1 of 1**

Date July 16, 2021

PROFESSIONAL FEES											GST	Total
FIRM/COMPANY NAME	Years of Experience	Hourly Wage	Preparation and IRs		Attendance		Argument & Reply		Total Fees		Total GST on Professional Fees	Fees & GST
			Hours	Fees	Hours	Fees	Hours	Fees	Hours	Fees		
FIRM/COMPANY NAME <u>PaTina Energy Consultants</u>												
Individual Name												
<u>Patrick McMahon</u>	<u>40.0</u>	<u>\$225.00</u>	<u>33.00</u>	<u>\$7,425.00</u>	<u>21.50</u>	<u>\$4,837.50</u>	<u>6.50</u>	<u>\$1,462.50</u>	<u>61.00</u>	<u>\$13,725.00</u>	<u>\$686.25</u>	<u>\$14,411.25</u>
FIRM/COMPANY NAME <u>Utilities Consumers' Group</u>												
Individual Name												
Individual Name												
				<u>\$0.00</u>		<u>\$0.00</u>		<u>\$0.00</u>	<u>0.00</u>	<u>\$0.00</u>		<u>\$0.00</u>
<b>Total This Company</b>			<b>33.00</b>	<b>\$7,425.00</b>	<b>21.50</b>	<b>\$4,837.50</b>	<b>6.50</b>	<b>\$1,462.50</b>	<b>61.00</b>	<b>\$13,725.00</b>	<b>\$686.25</b>	<b>\$14,411.25</b>

Claimant Yukon Utilities Consumers' Group  
 Hearing Battery Energy Storage System Project

Applicant(s) Yukon Energy Corporation  
 Application(s) No. \_\_\_\_\_

**YUKON UTILITIES BOARD**

**Summary of Disbursements Claimed**

**Form 3 - Page 1 of 1**

Date July 16, 2021

<b>Disbursements Claimed (exclusive of GST)</b>	<u>Name of Claimant</u>	<u>Name of Claimant</u>	<u>Name of Claimant</u>	<u>Name of Claimant</u>	<b>Total Disbursements</b>
Airfare	\$0.00				\$0.00
Accommodation	\$0.00				\$0.00
Meals (maximum at GY rates)	\$0.00				\$0.00
Mileage (maximum at GY rates)					\$0.00
Taxi	\$0.00				\$0.00
Parking					\$0.00
Care rental					\$0.00
Transcripts					\$0.00
Postage					\$0.00
Courier/delivery					\$0.00
Telephone/long distance					\$0.00
Fax (\$1.00/page)					\$0.00
Internal photocopying (\$.10/copy)	\$0.00				\$0.00
External printing					\$0.00
Miscellaneous (please attach details)					\$0.00
Miscellaneous (please attach details)					\$0.00
Miscellaneous (please attach details)					\$0.00
Miscellaneous (please attach details)					\$0.00
<b>TOTAL DISBURSEMENTS</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
<b>Total GST/HST on Disbursements</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>

Claimant Yukon Utilities Consumers' Group

Applicant(s) Yukon Energy Corporation  
Battery Energy Storage System Project

# Yukon Utilities Board

## Affidavit of Fees and Disbursements Form 4

**Affidavit of fees and disbursements claimed in the matter of a claim for costs made by**  
\_\_\_\_\_ **for participation in a proceeding before the**  
**Yukon Utilities Board with respect to the following Application:** \_\_\_\_\_

I, \_\_\_\_\_, of the (city/town) of \_\_\_\_\_ and the Territory/Province of \_\_\_\_\_,

MAKE OATH (OR AFFIRM) AND SAY THAT:

1) I am the \_\_\_\_\_ of the cost claimant \_\_\_\_\_ (the "Claimant") and as such have personal knowledge of the matters hereinafter deposed to, except where stated to be based on information and belief, and where so stated, I do verily believe to be true.

2) The Claimant was an (applicant/intervener) in a proceeding (the "Proceeding") before the Board with respect to the above application(s).

3) The Claimant incurred fees and disbursements (exclusive of GST) in the amount of \$ \_\_\_\_\_ as a result of its participation in the Proceeding. Additionally, the Claimant incurred GST on the above fees and disbursements in the amount of \$ \_\_\_\_\_.

4) I have personally reviewed the accounts of the Claimant's [lawyer(s), consultant(s), witness(s)], including the supporting documentation as required by the *Scale of Costs*, and confirm that these accounts represent work performed at the specific request of the Claimant.

5) I have personally reviewed all receipts, invoices, or accounts for transcripts, airfare, or accommodation and confirm that they represent disbursements incurred at the specific request of the Claimant.

6) I confirm that the fees and disbursements claimed on behalf of the Claimant's lawyer(s), expert(s), or consultant(s) are reasonable and in accordance with the *Scale of Costs*.

7) (If necessary) The fees claimed on behalf of \_\_\_\_\_ are in excess of the *Scale of Costs*. However, I believe that the Claimant should be entitled to recover such costs because: \_\_\_\_\_

8) To the best of my knowledge and belief, the fees and disbursements claimed by the Claimant represent fees and disbursements incurred necessarily and reasonably for the purpose of the Proceeding.

9) (If necessary) The Claimant is entitled to a rebate in connection with the Federal Goods and Services Tax to the extent of \_\_\_\_\_%. The Claimant's GST number is \_\_\_\_\_.

SWORN (OR AFFIRMED) before me at the (City/Town, etc.) of \_\_\_\_\_, in the Province/Territory of \_\_\_\_\_ on (date) \_\_\_\_\_.

Notary Public or Commissioner of Oaths

Signature of Affiant

\_\_\_\_\_

\_\_\_\_\_

# PaTina Energy Consultants

5 Morning Glory Lane  
Chatham, Ontario, N7L 5R5

Phone: (519) 437-0759

E-mail: [stefsdad99@gmail.com](mailto:stefsdad99@gmail.com)

GST/HST Registration Number 85037 7359 RT0001

## **COST CLAIM STATEMENT**

Consultant Services to Yukon Utilities Consumers' Group by Patrick McMahon

### **Yukon Utilities Board Proceeding: Yukon Energy Corporation – Battery Energy Storage System Energy Project Certificate and Energy Operation Certificate Application**

- Preliminary discussions with UCG; detailed review of application; development of information requests related to the issues to be addressed; detailed review of responses to information requests by YEC; consultation on IR-related procedural issues. (McMahon – 33.0 hours)
- Preparation for and attendance at virtual hearing (McMahon – 21.5 hours)
- Preparation and submission of UCG's final argument. (McMahon – 6.5 hours)

Total Hours:	61.00
Hourly Rate:	\$ 225.00
Total Fees Claimed:	\$13,725.00
GST (5%):	\$ 686.25
Total Claim:	<b>\$14,411.25</b>

Details of the time logged by Mr. McMahon with respect to the review of the proposed Battery Energy Storage System are attached as Schedule A. Summary details of Mr. McMahon's efforts in specific areas are outlined below.

1. Review of application evidence and preparation of information requests

Following his review of the evidence and materials circulated in advance, Mr. McMahon prepared and submitted information requests on behalf of UCG. On March 19, 2021, 20 multi-part information requests were submitted covering a full range of issues raised in the YEC application. In preparation for this submission, Mr. McMahon reviewed the pre-filed evidence and conducted research on specific issue treatment in the Yukon and other jurisdictions. Mr. McMahon identified requests for information in numerous issue areas and then drafted and finalized the information requests submitted on behalf of UCG.

2. Detailed review of IR responses

On April 1, 2021, YEC filed its responses to information requests submitted to it by the YUB and intervenors. Mr. McMahon reviewed the IR responses to formulate issues that needed to be addressed at the oral hearing scheduled for May 2021.

3. Preparation for and attendance at oral hearing

Besides a thorough review of the evidentiary record, preparation of cross-examination materials for the hearing required an extensive discussion and exchanges with UCG. Mr. McMahon devoted considerable time to providing input into developing issue positions, identifying references to material and drafting questions for YEC witnesses. Mr. McMahon attended the virtual hearing on May 4 – 6, 2021 and cross-examined the YEC witness panel.

4. Preparation of final argument

Development of UCG's final argument required the reading of evidence put on the record by YEC, transcripts from 3 days of hearing and the responses to information requests and undertakings. Mr. McMahon developed UCG's draft final argument through an iterative process over several days involving Mr. McMahon and Mr. Rondeau with each party offering suggestions on positions and edits to make from their own backgrounds. Mr. McMahon was responsible for developing the draft final argument positions and the final product submitted to the YUB.

## **Schedule A**

Additional detail to explain functions performed by Patrick McMahon (*PaTina Energy Consultants*)

March 14 - 19, 2021 (18.0 hours)

- Review of application; correspondence / discussion with UCG re: issues to address in IRs, specific issues for argument
- Complete research, correspondence / discussion with UCG; preparation of draft IRs on YEC evidence
- Correspondence / discussion with UCG, preparation and revisions of draft IRs on YEC evidence and cross-reference documentation, preparation of final IRs and cover letter for submission; identification of corrections required to submitted IRs

April 1 - 20, 2021 (15.0 hours)

- Review IR responses from YEC
- Research on issues raised; review and analysis of YEC IR responses, review of evidentiary record, preparation of initial cross-examination questions; correspondence / discussion with UCG re: cross-examination and attendance at virtual hearing

May 1 – 13, 2021 (28.0 hours)

- Preparation for and attendance / participation at virtual hearing.
- Review of transcripts and responses to undertakings.
- Preparation and submission of final argument submission.