



**PUBLIC INTEREST ADVOCACY CENTRE**  
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|                       |            |           |
|-----------------------|------------|-----------|
| YUKON UTILITIES BOARD |            |           |
| EXHIBIT C3-10         |            |           |
| DAY                   | ENTERED BY | DATE      |
|                       | UCG        | OCT 30/06 |

October 30, 2006

Deanna Lemke  
 Board Secretary  
 Yukon Utilities Board  
 Box 31728  
 Whitehorse, Yukon  
 Y1A 6L3

Dear Ms. Lemke:

**Re: Yukon Energy Corporation 20-Year Resource Plan 2006-2025**  
**UCG Request for Further disclosure from Yukon Energy Corporation**

Pursuant to section 13(3) of the Yukon Utilities Board Rules of Practice, UCG wishes to file the following requests to the Board as we are not satisfied with the responses given by YEC to specific information requests.

UCG-YEC-2-1

UCG requested a copy of the December 7, 1992 Report to the Commissioner in Executive Council by the Yukon Utilities Board concerning the Review of the Capital Resource Plans of Yukon Energy. YEC complied with this request in Attachment #1 to its response.

Attachment #2 to YEC's response to this information request is an excerpt from a rate application by YEC and YECL which provides the companies' response to the Board's 48 recommendations to the Commissioner. We do not understand how this material is related to the specific request from UCG and we request that it be removed from the record of this proceeding. If the Board determines that it will be of assistance to have evidence related to the fallout of the Board's report to the Commissioner on the record of this current proceeding, then UCG requests that the Board direct YEC to file all such materials in this current proceeding. We do not see how the Board's due diligence efforts would be assisted by seeing only a small portion of the evidence that was based on its 1992 report to the Commissioner.

#### UCG-YEC-2-19

UCG requested details of the agreements or assurances that will be put in place for any new industrial customer proposing to come on line (e.g., to secure best practices and best available products will be used to support energy efficiency). YEC referred to the response it provided to UCG-YEC-2-15.

YEC's response to UCG-YEC-2-15 generally outlines the policy that YEC intends to follow with respect to serving industrial customers and refers to agreements with the Minto mine. In UCG's opinion, this does not respond to its' request and we ask the Board to direct YEC to file specifics of the agreements and assurances that it is putting in place with respect to new industrial customers. If YEC feels that this material must be kept confidential, UCG does not object to the information being filed on a confidential basis, and presumes the Board can give the necessary directions to ensure confidentiality.

#### UCG-YEC-2-20

UCG requested an explanation of how the proposed 20-year resource plan will move non-industrial customer class rates towards the revenue-to-cost ratio goal of 90-100% without affecting rate stabilization. In response, YEC assumed that the UCG was referring to the Yukon Government's Rate Stabilization Fund. This is not correct. We ask the Board to direct YEC to respond to the question which asks about the impact that this resource plan will have on the stability of rates in general.

#### UCG-YEC-2-24

UCG requested details of consultations conducted with other utilities and stakeholders during the development of this proposed resource plan. In response, YEC referred to "extensive discussions with various parties during the preparation of the Resource Plan" and made specific reference to meeting "numerous times with various mining companies".

UCG requests that the Board direct YEC to respond to the questions asked and provide details of the numerous discussions held during the development of this resource plan. Without the specific details, we do not understand how the Board could put any weight behind YEC's alleged consultations.

#### UCG-YEC-2-26

UCG requested a breakdown of all YEC costs associated with this YUB regulatory process up to this point and estimated YEC costs for the entire YUB regulatory process. In response, YEC indicated that it had "recorded approximately \$124,000 in costs" and that it did not have detailed forecasts for spending through the remainder of this review process.

We ask that the Board direct YEC to provide details of the costs incurred to date and details of what it has included in its budgets for this review process. Given

the time that has passed since the original response, UCG requests that YEC provide the most up-to-date total for costs incurred and the associated details.

UCG-YEC-2-44

In part (c) of our request, the UCG asked for details of all contributions to YEC from the Yukon government or Yukon Development Corporation in 2004, 2005 and 2006 to date along with an explanation as to why they were made and how they were derived. In its response, YEC assumed incorrectly that we were only looking for information related specifically to the Carmacks-Stewart project.

We ask that the Board direct YEC to provide the requested information.

In addition to these requests to have YEC properly respond to questions asked, we ask that the Board direct YEC to provide an update on its reassessment of the Marsh Lake Fall/Winter Storage Project. In response to UCG-YEC-2-38, YEC indicated that it would provide an update on this matter to the Board prior to the hearing. Given the proximity to the start of the hearing and the need for parties to properly prepare for the hearing, we ask that the Board direct YEC to provide this update immediately.

Should you have any questions, please do not hesitate to contact me.

Yours very truly,



Michael Buonaguro  
Counsel for UCG

CC: all parties