

## PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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November 3, 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

UCG thanks YEC for its prompt response to the concerns raised in our letter dated October 30, 2006. In response to the points made in YEC's letter of November 1, 2006, UCG would like to make the following comments:

UCG-YEC-2-1

UCG accepts that information in the public record is available to the parties and to the Board; you will note that in our previous letter we ask as one alternative solution the inclusion of all relevant public records. Accordingly UCG renews its request that YEC put all such records before the Board. Additionally, UCG would like to provide notice that it may submit other relevant items of public record relating to this and other issues. For example, the 1992 Report in question was considered by the Energy Commission in 1998, whose recommendations are also part of the public record.

UCG-YEC-2-19

Further to YEC's response, UCG asks that YEC file a copy of any template or precedent of a Purchase Power Agreement that it has so that the Board will have at least a framework understanding of the nature of the agreements YEC enters or anticipates entering into with industrial customers. UCG would also ask the Board to consider how it will take into account any agreements that are not filed

in advance of the hearing, when such agreements are clearly relevant to the Resource Plan.

## UCG-YEC-2-24

It is precisely because UCG believes that the nature of the consultations YEC has had with the various entities it refers to in its letter dated November 1, 2006 will be useful to the Board that UCG has asked for the details of those consultations. In particular, the issues raised by YEC and the other parties in those consultations and possible resolutions to those issues as they were discussed would be of great benefit to the Board in understanding YEC's and other stakeholders' perspectives on the resource planning process. UCG urges the Board to take up YEC's offer to provide to provide detailed information from all discussions on all issues related to the Resource Plan, which should include, for example, dates, times, attendees, agenda, issues raised, and follow-up questions asked and answered.

## UCG-YEC-2-44

YEC does not appear to understand the reason for the question. UCG believes it is important to know precisely what contributions have been made to YEC from the Yukon Government and the Yukon Development Corporation and for what purpose in order to ascertain what political priorities are being imposed on YEC through external funding and how those priorities coincide or, potentially, conflict with the proper management of the utility. Accordingly UCG reasserts it request for information under this interrogatory.

## UCG-YEC-2-38

With respect to the wholesale updating of the Resource Plan with respect the Marsh Lake Fall/Winter Storage Project as indicated by YEC, UCG presumes that in will be practically impossible to review and ask proper interrogatories with respect to the new information between the time it is eventually filed and the hearing. UCG believes that once the information is filed, the Board should consider the timing of interrogatories and submissions related to any project and/or recommendation updated by YEC as distinct from the hearing process and the submissions on other issues.

Yours very truly,

Michael Buonaguro Counsel for UCG

CC: all parties