



Interrogatories of Commission Staff


TO: Maritime Electric Company, Limited
FROM: Cheryl Mosher, Senior Financial Advisor
DATE: April 6, 2022
RE: OATT Schedule Updates
DOCKET: UE20945

The Island Regulatory and Appeals Commission (the “Commission”), in assessing the reasonableness of the 2021 Open Access Transmission Tariff (“OATT”) Schedule Updates (the “Application”) submitted by Maritime Electric Company, Limited (“Maritime Electric” or “MECL”), requests responses to the following interrogatories:

1. Please provide a reconciliation of transmission costs according to the revised 2020 Cost Allocation Study (CAS) versus the costs identified in Appendix A of the Application.
2. Please provide an explanation for transmission operating costs identified in the revised 2020 CAS that are not consider OATT related costs, including how they do not meet the terms of the OATT Tariff.
3. According to MECL, between 2015 and 2020, the Commission approved \$49.7 million in transmission related capital expenditures. MECL proposes to include \$32.2 million of the transmission related capital expenditures in the OATT revenue requirement.
 - a. Please provide a breakdown of the \$17.5 million in transmission related capital expenditures that MECL considers to be non-OATT. Please refer to the capital budget(s) approving each expenditure.
 - b. Please explain why the expenditures are non-OATT and not included in the updated OATT revenue requirement.
4. According to MECL, the OATT transmission facilities have increased by \$32.2 million since 2015. A breakdown of the OATT transmission infrastructure additions (2015-2020) is found at slide 22 of MECL’s Stakeholder Presentation (reference slide 30 of the revised Stakeholder Presentation). Please provide further details regarding each proposed infrastructure addition, including references to the approved capital budget, and justification for including in the OATT transmission facilities.

5. According to Table 2 – Functional Allocation of Revenue Requirement – the total proposed OATT revenue requirement has increased by approximately 35.4% and the proposed Point to Point Transmission and Network Transmission rates have both increased by approximately 25.5%. Could the proposed increases be considered rate shock? Please explain.
6. What is the rate impact to MECL's distribution customers if the proposed OATT schedule updates are approved? Assume there are no other changes to the currently approved rates for distribution customers.
7. In Commission Order UE18-05 approving the OATT, the Commission approved a discount for off-Island exports based on the transmission system in its current state, which had excess capacity.
 - a. Is MECL seeking Commission approval to continue the discount for off-Island exports?
 - b. If yes, please provide justification for the continuation of the discount.
 - c. Does the transmission system continue to have excess capacity? If yes, has there been any change (i.e. increase or decrease) in excess capacity since the OATT was implemented on August 1, 2018?

Additional interrogatories may follow.



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Prince Edward Island Regulatory & Appeals Commission