



Additional Interrogatories of Commission Staff

TO: Maritime Electric Company, Limited

FROM: Cheryl Bradley, Director of Finance & Regulatory Affairs

DATE: October 2, 2026

RE: Land Exchange with the City of Charlottetown

DOCKET: UE21113

Contamination

10. Maritime Electric states in the Application that the MECL Property (being part of PID 338921) is a “known contaminated site”.¹
 - a. Explain the nature of the contamination at the site.
 - b. Explain when and how the MECL Property became contaminated.
 - c. Is the site contamination in any way related to the use of the MECL Property as a thermal generating station and/or the recent decommissioning of the Charlottetown Thermal Generating Station? Please explain.
11. Maritime Electric has shared with the City of Charlottetown “*an environmental report outlining the known and potential hazardous materials located on the MECL Property*”.² Please provide a complete copy of this report.

Remediation

12. What, if any, steps has Maritime Electric taken to remediate the MECL Property?
13. If Maritime Electric has not taken steps to remediate the MECL Property, explain why not.
14. Does Maritime Electric have any legal obligation to remediate or mitigate environmental risks at the MECL Property? This could include, for example, any obligations or requirements under provincial environmental protection legislation.

¹ Exhibit M-1, page 6, lines 9-10

² Exhibit M-1, page 6, lines 11-13

15. Has Maritime Electric previously requested Commission approval for any capital or operating expenses related to the remediation of the MECL Property? If so, please provide full particulars.

Risk Management Plan

16. Correspondence from the Department of Environment, Energy and Climate Action (the “Department”), dated March 22, 2024, approves “temporary stockpiling” of contaminated soil on the MECL Property during the City of Charlottetown’s road realignment project.³ Upon completion of the project, the Department required “*confirmation that an updated Risk Management Plan is in place to manage the contaminated soil on site*”.

- a. Please provide a complete copy of the updated Risk Management Plan.

Value of the MECL Property

17. In response to IR-2(b) of Commission Staff, Maritime Electric states that if the MECL Property is sold – rather than exchanged – the property would either need to be remediated or the risk assumed by the purchaser. This would “*reduce the potential proceeds to a nominal value*”.⁴
 - a. Provide evidence to support this statement. The response must include (at a minimum) evidence of the estimated cost to remediate the MECL Property, and evidence of the estimated fair market value of the MECL Property after remediation.

Future Utility Use and Regulatory Treatment

18. Maritime Electric has stated that there is no future use plan for the MECL Property and that its location and shape limit its usefulness for future development.
 - a. Describe any assessment undertaken by Maritime Electric of the potential future utility uses of the MECL Property before agreeing to transfer it to the City.
 - b. Identify whether Maritime Electric considered use of the MECL Property for future generation, battery energy storage, transmission, distribution, substation, or other utility infrastructure. If so, describe the assessment and conclusions reached. If not, explain why these potential uses were not assessed.
 - c. Confirm whether transferring the MECL Property will limit or constrain any current or reasonably foreseeable future expansion, redevelopment or use of the Charlottetown Generating Station site.
19. Was the MECL Property considered in any application, proceeding or Commission decision relating to the retirement or decommissioning of the Charlottetown Thermal Generating Station, including any determination regarding the continued utility use or rate base treatment of the land following decommissioning?

³ Exhibit M-1, Appendix B, pages 63-64

⁴ Exhibit M-3, Response to IR-2(b), page 2

- a. If yes, identify the applicable application, evidence and Commission decision and explain how the proposed transfer is consistent with the treatment of the property in that proceeding.
- b. If the MECL Property continued to be included in rate base following decommissioning of the Charlottetown Thermal Generating Station, explain the basis on which it continued to be considered utility property.

Please provide responses to the Commission by **October 16, 2026**.

Additional interrogatories may follow.



Cheryl Bradley, CA, CPA
Director of Finance & Regulatory Affairs
Prince Edward Island Regulatory & Appeals Commission