



April 4, 2025

Appeals Administrator

Island Regulatory and Appeals Commission

National Bank Tower, Suite 501

134 Kent Street

Charlottetown, PE C1A 7L1

Subject: UE20742 – Supplemental Capital Budget Request for MECL's On-Island Capacity for Security of Supply Project

REQUEST: Friend of the Commission Intervener Status

Dear Appeals Administrator,

We are writing to formally make a request for “Friend of the Commission” intervener status pursuant to the Island Regulatory and Appeals Commission Act in the matter of UE20742 – Supplemental Capital Budget Request for MECL's On-Island Capacity for Security of Supply Project currently under consideration by the Island Regulatory and Appeals Commission (IRAC).

Energy Democracy Now! Co-operative Limited is a PEI community-based advocacy organization founded in January 2023 and incorporated in May 2023 (No. 20707) by a group of dedicated volunteers that believes the climate crisis imposes a shift from the corporate centralized fossil fuel-based power generation to decentralized and variable renewable energy sources within a society that is governed by local community priorities.

1. Interest in the Proceeding:

As a community organization advocating renewable and sustainable energy policies in Prince Edward Island and with a strong commitment to environmental sustainability, we have a direct and substantial interest in this proceeding. The proposed project, with a forecasted capital cost of \$427 million and an expected completion date in 2031, aims to enhance the island's energy security. However, the project's scale and financial implications necessitate a thorough examination of its overall economic, social, and environmental suitability and alignment with provincial sustainability goals.

2. Contribution to the Proceeding:

Our participation will assist the Commission by providing insights from similar leading jurisdictions in renewable energy and battery energy storage (BESS) and encouraging the integration of community, First Nations, and co-operative renewable energy and BESS sources. We aim to ensure that the project's development aligns with Prince Edward Island's commitment to reduce carbon emissions and promote green energy solutions.

3. Position Regarding the Proceeding:

While we acknowledge the importance of securing the Island's energy supply, and we understand the technical issues through our links to supporting researchers and academics, we are concerned that the current proposal does not sufficiently prioritize renewable energy integration and commits the province to decades of fossil fuel electricity generation. We urge you to carry out a comprehensive evaluation of alternative solutions that emphasize sustainability and environmental responsibility within the framework of renewable generation and BESS located in Prince Edward Island.

4. Nature and Scope of Intended Participation:

We intend to participate by:

- Reviewing and analyzing Maritime Electric's application and supporting documents.
- Submitting evidence and arguments that highlight the benefits of incorporating renewable energy sources and advanced energy storage solutions (BESS).
- Engaging in cross-examination of witnesses to ensure a thorough assessment of the project's negative social, economic and environmental effects.
- Collaborating with other stakeholders to promote a balanced approach that considers both energy security and sustainability.

5. Potential Impact on the Proceeding:

Energy Democracy Now! Co-operative is committed to contributing constructively without causing undue delays. Our involvement aims to enrich the discussion by bringing attention to sustainable alternatives that may enhance the project's long-term viability and environmental compatibility.

6. Compliance with Commission's Rules:

We have reviewed and agree to comply with the Commission's Rules of Practice & Procedure, including those pertaining to interveners.

We respectfully request that the Commission grant Energy Democracy Now! Co-operative Limited intervener status in this proceeding to ensure that environmental sustainability is duly considered in the project's evaluation.

Sincerely,

Leo Broderick

Leo Broderick, President

Mary Cowper-Smith

Mary Cowper-Smith, Vice President

Barbara Dylla

Barbara Dylla, Secretary Treasurer

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Addendum: Concise Statement of Intent