



January 13, 2026

Cheryl Bradley, CPA, CA
Senior Financial Advisor

Prince Edward Island Regulatory and Appeals Commission
5th Floor, Suite 501, 134 Kent Street
Charlottetown, PE C1A 8R8

Re: Docket UE20742 — Friend of the Commission Intervention Report

Dear Ms Bradley:

Energy Democracy Now! Co-operative Limited, as an Intervener in docket UE20742 Supplemental Capital Budget Request for MECL's On-Island Capacity for Security of Supply Project, is pleased to submit its written report to the Island and Regulatory Appeals Commission, and looks forward to presenting a verbal report if and when public hearings are held. The public interest is critical to PEI's energy future. Our report will demonstrate that.

Please find enclosed three documents that collectively provide a comprehensive, independent assessment of Maritime Electric's proposed 100MW gas plant and viable clean alternatives.

The IRAC intervention report critically reviews Maritime Electric's filings to IRAC, highlighting concerns with the load and capacity forecasts, NPV assumptions, stranded asset risk under the Clean Electricity Regulations, and the limited consideration of demand-side management, virtual power plants, and large-scale storage deployed in comparable jurisdictions.

The Levelized Cost of Capacity (LCoC) analysis compares the gas plant to a 100MW grid-forming BESS, demonstrating materially lower capacity costs, capital requirements, and emissions for the BESS option under realistic operating scenarios.

The supply chain analysis evaluates the practical delivery timelines and risks for both the gas plant and a 100MW BESS, concluding that both can theoretically be delivered in the 2028–29 window, with the gas plant dependent on a time-sensitive turbine slot reservation and the BESS offering a modular, lower-emission path if interconnection is managed proactively.

Respectfully yours,

Leo Broderick *Michelle Neill* *Barbara Dylla*
Leo Broderick, President Michelle Neill, Vice president Barbara Dylla, Secretary-Treasurer

ENERGY DEMOCRACY NOW! CO-OPERATIVE LIMITED

% 81 Prince Street, Charlottetown, PE C1A 4R3

Encl.