

August 21, 2023

Cheryl Mosher, CPA, CA
Senior Financial Advisor

Prince Edward Island Regulatory & Appeals Commission

P.O. Box 577, Charlottetown, PE C1A 7L1

electricityinquiries@irac.pe.ca

RE: UE20605 – MECL Energy Cost Adjustment Mechanism Application

Dear Ms Mosher:

The organization Energy Democracy Now! Co-operative Limited (the “Co-op”) wishes to apply for intervener status as a Friend of the Commission Intervener.

Our reasons for doing so are the following:

- Residents of PEI should have more say and greater participation in energy matters in the province.
- Energy utilities should primarily operate to serve the needs of communities rather than the profits of shareholders.
- All Islanders should be guaranteed access to sufficient and affordable energy.
- Locally generated power can lead to a faster and more just transition to renewable energy which relies on sun, wind, water, or geothermal. These resources are perpetual and freely available.

This application is made subject to the Electric Power Act (R.S.P.E.I. 1988, Cap. E-4).

Friend of the Commission Intervener

(a) Statement

There is strong public interest in supporting and developing community energy initiatives. The public would like to see companies compete to lower electricity rates, especially given the high minimum price for renewable energy set by Maritime Electric and its monopoly.

Energy Democracy Now! Co-operative was established to promote local ownership of renewable energy that relies on sun, wind, water, or geothermal, and to facilitate collaboration among distributed energy generators such as rooftop solar photovoltaic owners. The Co-op also seeks to foster local ownership of renewable energy initiatives such as windmills and solar projects, with profits going directly back to local communities.

The Co-op members would like to see Community Solar benefit from the ability to collect credits at one location and transfer them to another meter. Maritime Electric may favour the transfer option over a feed-in tariff because it is only a matter of billing. As an example: The Souris CO-OP needs power but has no land or appropriate roof space. Neighbours, or members, of the CO-OP could install solar and have the production credited to the Souris CO-OP. The CO-OP could either finance the installations and use all the credits, or others could provide the infrastructure and the CO-OP could pay for the power supplied.

Representation of public and community-owned power generation is needed to comprehensively deal with the many issues regarding electrical generation and distribution. The Co-op seeks intervener status to begin the process of including a community voice at the table when negotiations on matters of public interest take place. Our co-operative is one of the participants in a national association of Renewable Energy Co-ops that is conducting research on best practices in community-based power generation in partnership with universities and the Social Sciences and Humanities Research Council (SSHRC). As an intervener, we can contribute both a local and a national perspective to the proceedings that will shed light on a range of options and strategies to improve and strengthen sustainable, resilient, and cost-effective energy generation and distribution.

(b) The nature and scope of the applicant's intended participation

We propose to participate by oral presentation supported by slides and documentation. We can only speculate on what the other parties will submit. Our submission will focus on innovative practices that are being successfully implemented in other jurisdictions.

(c) The extent to which the intervention will add to the costs and complexity of the proceeding

Adding our Co-operative as an intervener will add knowledge and community-based experience to the proceeding. Any additional cost would be minimal. Rather than adding complexity, making the participation more inclusive of public interest representation will render the proceeding more comprehensive.

(d) The facts that the applicant proposes to show in evidence at the proceeding

These will include statistics and success stories from other jurisdictions as well as the Mandate letter of PEI's Minister of Environment, Energy & Climate Action. We will also share facts about electricity co-operatives and their capacity to create conditions that promote more "grassroots" electricity generation. There may well be a role for a democratically governed co-operative utility that has the Island's many PV installation owners as members and can negotiate on their behalf while also ensuring adherence to appropriate standards and regulations, but the fact that such initiatives exist does not mean they will be easy to replicate on PEI.

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