



## THE BRETON LAW GROUP

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August 12, 2022

Island Regulatory and Appeals Commission  
5th floor, Suite 501  
National Bank Tower  
134 Kent Street  
Charlottetown, PEI

**Attention: Cheryl Mosher, CA, CPA**

Dear Ms. Mosher:

**Re: UE41401 - Prince Edward Island Energy Corporation (“PEIEC”) Application for Approval of 2022-2024 Electricity Efficiency & Conservation Plan  
Response to Supplemental IRAC Interrogatories**

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Attached please find Responses to supplemental Interrogatories 22 – 32 issued by the Island Regulatory and Appeals Commission (“IRAC”) on June 17, 2022, to be filed on behalf of Prince Edward Island Energy Corporation (“PEIEC”).

In addition to the Interrogatories noted above issued in writing, three additional questions arose during a technical session held between PEIEC and IRAC on July 14, 2022. PEIEC has identified these verbal queries as Confidential Interrogatories 33 – 35.

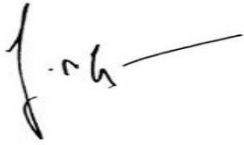
Responses to Interrogatories 22 – 32 are filed on a Non Confidential Basis. For the reasons noted below, in accordance with the Commission’s Rules of Practice, PEIEC requests responses to Interrogatories 33 - 35 be filed on a Confidential Commission Only basis.

### **Request for Confidential Filing**

The Commission has accepted and approved PEIEC’s previous request to file the Plan Model on a Commission-only Confidential basis, given the proprietary and commercially sensitive nature of the Model. The technical session held on July 14, 2022, was intended to address questions arising from the Plan Model, and in particular gave rise to IRs 33 – 35. Given the nature of the Model, and its treatment as a Commission-only Confidential filing, PEIEC respectfully requests IRs 33 -35, and the responses provided therein, be filed on a Commission-only Confidential basis.

I confirm paper copies of the Responses will be provided to the Commission.

**THE BRETON LAW GROUP**

A handwritten signature in black ink, appearing to read "J. R. Gogan", with a long horizontal line extending to the right from the end of the signature.

James R. Gogan

cc. Mike Proud, EfficiencyPEI  
Nicole McKenna, Commission Counsel