Prince Edward Island Energy Corporation

IN THE MATTER OF The Electric Power Act, R.S.P.E.I. 1988, Cap. E-4.

- and –

IN THE MATTER OF An Application by Prince Edward Island Energy Corporation for Approval of the 2022/23-2024/25 Electricity Efficiency & Conservation ("EE&C") Plan

Application of PEI Energy Corporation

FILED

April 4, 2022

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Introduction

Approval of the plan

The Prince Edward Island Energy Corporation ("PEIEC") requests approval by the Island Regulatory and Appeals Commission (the "Commission"), of its 2022/2023 – 2024/2025 Electricity Efficiency & Conservation Plan (the "proposed Plan" or the "proposed EE&C Plan"), which is attached hereto as Appendix "A". A summary of the planned spending, expected results, and cost-effectiveness is included in Appendix "B".

This filing evidence is being submitted by PEIEC as the regulated public utility per the Electric Power Act (the "Act"). For clarity, the responsibility for the proposed Plan's execution is functionally delegated to efficiencyPEI ("ePEI") as the delivery agent of energy and electricity efficiency initiatives.

The proposed Plan is expected to deliver approximately 34.45 GWh of total net energy savings ("NES") to Islanders during its operation. It builds on the historical total NES of 4.074 GWh in the 2018/19 fiscal year and 7.978 GWh in the 2019/20 fiscal year.[1] Additionally, the proposed Plan is expected to achieve total net demand savings ("NDS") of 16.85 MW over the three-year term, building on the historical NDS of 2.202 MW in the 2018/19 fiscal year and 3.003 MW in the 2019/20 fiscal year.[2] The 2020/21 results are not readily available at the date of the proposed EE&C Plan application as they were not yet prepared by ePEI's evaluation consultant, Econoler.

Due to the effect of the COVID-19 pandemic, Commission Order UE21-06 approved PEIEC's request to extend the 2018/19-2020/21 EE&C Plan (the "current Plan" or the "current EE&C Plan") to March 31, 2022.[3] The proposed Plan's implementation date is April 1, 2022.

Background

A brief review of the key elements considered in the development of the proposed EE&C Plan have been summarized in the following sections.

Electric Power Act

The Electric Power Act[4] has not been amended since current EE&C Plan was filed in 2018. The Commission's mandate under the Act includes overseeing utilities in their planning for energy efficiency and demand-side resources that are cost effective for electricity.

The Act requires an energy efficiency and demand-side resources plan to include:[5]

- The term of the plan, which must be consistent with industry standards;
- Description of the proposed energy efficiency and demand-side resource measures;
- Projected results that the plan is expected to achieve;
- Design of the plan such that projected savings are reasonably likely;
- Reasonable estimate of financial costs and benefits for the public utility and its customers; and
- Annual reporting on the results of plan implementation.

[1] 2018/2019-2019/2020 Electricity Efficiency and Conservation (EE&C) Program Evaluation prepared by Econoler, page 2
[2] 2018/2019-2019/2020 Electricity Efficiency and Conservation (EE&C) Program Evaluation prepared by Econoler, page 3
[3] Island Regulatory Appeals Commission Order UE21-06
[4] Table of Public Acts (Updated October 2021) – Legislative Counsel Office of PEI
[5] Prince Edward Island Electric Power Act, page 13, section 5.0 and 5.1

At the time of this filing, we understand that amendments to the Act have been requested by the Official Opposition. Those amendments include the following:[6]

- A reasonable estimate of greenhouse gas and other emissions reductions to be achieved under an energy efficiency and demand-side resources plan;
- Assurance that any rates, tolls or charges that are confirmed, determined or fixed, promote energy efficiency and demand-side resource measures and not permit a reduction for a service or a portion of a service that is based upon an increase in use of electric energy by a residential class of customers. This shall not apply to the agricultural class of customers for three years following the coming into force of this proposed subsection of the Act; and
- Guarantee that any confirmed rates, tolls or charges include the option for customers to receive service through a system of time-variant rates.

While the proposed Plan has not specifically addressed the aforementioned proposed amendments to the Act, the proposed Plan is routinely monitored for performance with changes incorporated throughout the life of the proposed Plan. Any legislative amendments that may be required during the term of the Plan would be assessed at that time.

Provincial energy strategy and path towards net zero

In developing the proposed EE&C Plan, ePEI considered the 2016-2017 PEI Provincial Energy Strategy (the "Energy Strategy")[7] and the Path Towards Net-Zero (2040).[8] The Energy Strategy guides policy development and was considered in the context of the development of the proposed EE&C Plan. In addition, the proposed framework for the Path Towards Net-Zero (2040) provides a discussion document for Islanders to voice potential solutions on a sustainable future. The proposed direction focuses on reducing green-house gas ("GHG") emissions and be the first Province in Canada to reach net zero GHG emissions by 2040. To achieve this, the proposed direction looks to reduce the Island's reliance on imported fossil fuels through electrification with a focus on renewable energy solutions.[9]

Response to Order UE19-03

Electricity efficiency & conservation advisory group

In Order UE19-03, the Commission approved the current EE&C Plan.[10] This order required PEI Energy Corporation to establish an Electricity Efficiency & Conservation Advisory Group ("EECAG" or the "Advisory Group") within 90 days of the order.[11] The Advisory Group was established in response to this order. Its purpose is to support the establishment of an evaluation framework for programming approved in the current Plan, as well as provide advice on ePEI activities. Originally, the Advisory Group consisted of thirteen representatives from the public including businesses, industry stakeholders, community, and government. Currently, the Advisory Group is comprised of representatives from the following organizations:

[6] Consultation Draft – An Act to Amend the Electric Power Act, Version 6, March 2021 – Office of the Official Opposition of the Legislative Assembly of PEI
[7] PEI Provincial Energy Strategy 2016/2017 – Dunsky Energy Consulting
[8] A Path Towards Net Zero (2040): Proposed Framework – A Discussion Document for Islanders prepared by the Province of Prince Edward Island, page 6
[9] A Path Towards Net Zero (2040): Proposed Framework – A Discussion Document for Islanders prepared by the Province of Prince Edward Island, page 8
[10] Island Regulatory Appeals Commission Order UE19-03, page 18, paragraph 1
[11] Island Regulatory Appeals Commission Order UE19-03, page 20, paragraph 13

- Environmental Coalition of PEI
- Federation of Independent Business
- Mi'kmaq Confederacy of PEI
- StandardAero
- efficiencyPEI
- PEI Energy Corporation
- Federation of Municipalities
- Maritime Electric Company Limited
- Summerside Electric
- Federation of Agriculture
- Cavendish Farms
- Amalgamated Dairy Limited ("ADL")
- Residential advocate Roger King
- Habitat for Humanity
- PEI Seafood Processors Association

In addition to the members of the Advisory Group listed above, the Commission participates in meetings as an advisor only, assisting the Advisory Group with regulatory questions as required.

Throughout the term of the current Plan, the Advisory Group supported ePEI through several key matters including the development of an evaluation framework, engagement on and review of the Prince Edward Island Energy Efficiency Potential Study (the "Potential Study") by Dunsky Energy Consulting ("Dunsky"), the development of programming for business, and provided ongoing feedback on current programming progress throughout the current Plan's term. Additionally, the Advisory Group was consulted throughout the preparation of the proposed EE&C Plan and is expected to play an important role in the execution of the proposed EE&C Plan.

Evaluation framework

As mentioned, Order UE19-03 ordered PEIEC / ePEI to develop a comprehensive evaluation framework to be used when evaluating programs included in the current EE&C Plan. The evaluation framework captures objectives, guiding principles, priorities, cycles, and roles and responsibilities to ensure all programs are properly and appropriately evaluated, and that limited resourcing is prioritized. Key performance metrics identified in the evaluation framework are: [12]

[12] efficiencyPEI Evaluation Framework, page 2

- Cost-effectiveness;
- Annual gross savings;
- Annual net savings;
- Program participation;
- Benefits; and
- Budget.

These key performance metrics allow ePEI to accurately track progress against participation, energy savings, and cost-effectiveness targets outlined in the current EE&C Plan and we expect that this framework will continue to be applied throughout the execution of the proposed EE&C Plan. A copy of the Evaluation Framework has been included in Appendix “C”. Copies of the historical program evaluation reports have been included in Appendix “D”. Due to the timing of this application, the third-party results prepared by Econoler for 2020/2021 Electricity Efficiency & Conservation Program Evaluation are not available. In addition, we have included copies of the PEIEC Quarterly and Annual Reports in Appendix “E”.

The Potential Study

Furthermore, Order UE19-03 instructed PEIEC to complete a demand side management potential study. Dunsky Energy Consulting was engaged to develop the Prince Edward Island Energy Efficiency Potential Study with the purpose to inform province-wide energy efficiency and peak demand reduction targets. The Potential Study includes program design strategies for the proposed EE&C Plan. These strategies can be applied to EE&C planning periods up to 2030.

The Potential Study provided a baseline for the development (or continuation) of programming, demand response measures, enabling strategies, and peak demand reduction targets that are included in the proposed Plan. Throughout the development of the proposed Plan the Potential Study was used as a foundational document. The Potential Study is attached in Appendix “F”.

Stakeholder engagement

To ensure the proposed Plan is relevant to all Islanders, stakeholders were engaged to identify benefits and improvements to current programming, as well as opportunities for new programming.

Several stakeholder sessions were conducted with the following groups:

- **PEI Utilities:** the purpose of the engagement was to understand limitations in each utilities' abilities for certain programming, especially demand response programming, and ensure those limitations are captured in new or updated programming;
- **Electricity Efficiency & Conservation Advisory Group:** the discussion with the Advisory Group captured feedback from a wide group of organizations to better understand the current EE&C Plan impacts as a whole, and to provide space for sharing opportunities that may be incorporated into the proposed EE&C Plan;
- **Mi'kmaq Confederacy of PEI ("MCPEI"):** the purpose of this engagement was to provide Indigenous leaders and community members in Epekwitk ("PEI") an opportunity for feedback on the support they receive from ePEI. This engagement was intended to capture the communities MCPEI represents. Efforts were made to hold a session with MCPEI however, due to scheduling conflicts we gathered information from the Communities through a questionnaire. Specifically, we sent a questionnaire to representatives at Abegweit First Nation to gather information regarding their energy efficiency outlook. The purpose of the questionnaire was to consider the needs of Indigenous communities over the term of the proposed Plan and understand where the support network ePEI provides to Indigenous communities could be improved;
- **Federation of Agriculture:** this organization, and more broadly the agriculture sector in general, was identified by ePEI and the utilities as a sector that will require additional support due to the upcoming changes to the rate class that includes farms. Additionally, the agriculture sector had minimal usage of ePEI EE&C programming over the current Plan's duration, and the discussion was designed to understand why that is and what can be done to ensure programming is more relevant to agriculture; and
- **PEI Seafood Processors Association:** as an industry that can use a large amount of electricity, the PEI Seafood Processors Association was engaged to understand their electricity needs and identify possible opportunities for electricity efficiency. A session was held with the Executive Director who reached out to members directly after the session. The Executive Director provided summarized feedback from the members that engaged in the discussion. Due to the volatile commodity pricing of seafood, processors are looking to save bottom line costs wherever possible. However, their investment in electricity and energy cost savings is unique, meaning their solutions need to be tailored to their needs. Flexible electricity and cost savings solutions were developed during the 2018/19-2020/21 term in the form of the Community Energy Solutions program which will continue to be refined to meet the needs of seafood processors and other industries with unique electricity usage.

Stakeholder engagement resulted in feedback that was considered in the context of how the current Plan could be improved and what the future needs of stakeholders may be. These workshops were focused on improving the current Plan, including updating existing programs, creation of strategies, and formally documenting program and electricity efficiency support ePEI provides to various communities and groups.

Participation from PEI electricity utilities

In the current EE&C Plan, both PEI electricity utilities were involved in its development and ultimately agreed to provide investment into EE&C programming. Understanding Summerside Electric is not regulated by the Commission, ePEI will acquire a Service Delivery Agreement for Electricity Efficiency and Conservation Activities with the City of Summerside (Summerside Electric) to ensure their participation and investment is formalized. This approach is the same as what was completed in the current Plan.

Participation from both utilities involved conducting an initial stakeholder session and communications throughout the proposed Plan for information gathering purposes. Upon filing the proposed Plan with the Commission, PEIEC and ePEI will continue to work with the utilities to gather their feedback on the proposed Plan prior to the implementation date.

EE&C Plan guiding principles

The proposed EE&C Plan continues to apply the guiding principles set for the current plan with some modifications. It has been developed based on the following principals across three main categories 1) customer value, 2) customer need, and 3) customer affordability.

Categories	Guiding Principals
Customer value	• Achieving short-term and long-term energy savings. • In planning EE&C initiatives, include strategies that will build expertise and human resource capacity in PEI for the long-term success of EE&C. • Develop public education on and awareness of electricity use, energy efficiency and programs. The education includes materials and assets that can be used in classrooms across the Province and pathways for electricity users to better understand their electricity bills.
Customer need	• Continue to provide efficiency programs that are accessible and practical for all electricity consumers, including low income residents, small businesses, agriculture, and Indigenous communities. • Promote enabling strategies to support EE&C programs and energy efficient practices through engagement activities. The activities will range from tailored marketing campaigns based on audience to increase participation, home energy reports, and community-based social campaigns. Enabling strategies are foundational to the long-term success of EE&C planning and transforming customer behaviours into the future. • Incorporate demand response and reduction programs, measures, and enabling strategies to flatten the peak electricity load and reduce overall demand growth on the electricity grid and thus mitigate against resulting future rate increases.
Customer affordability	• Maximize ratepayer benefits. • Manage program costs, without hindering the ability to meet both short-term and long-term electricity savings targets, through streamlining existing processes and implementing efficient data management systems.

Balanced plan approach

Delivering a level of energy savings to PEI electricity ratepayers that fulfils their needs is fundamental to the development of the proposed Plan. The proposed Plan works towards a more balanced portfolio design that focuses on being responsive and adapting to customer needs, technologies, market conditions and regulatory requirements. It provides opportunity for efficiency services to all electricity customer classes and aims to reduce barriers to participation for low income residents or small businesses who are cost-sensitive. This approach promotes implementation of energy savings measures while designing a portfolio that balances multiple aspects of electricity efficiency and conservation for the benefit of all electricity ratepayers.

Industry trends

In order to gain perspective on industry trends, the 2020 State Energy Efficiency Scorecard Research Report ("SEES Report") prepared by the American Council for an Energy-Efficient Economy (included in Appendix "G") was one of the leading documents reviewed. This report captures policy developments and efforts made by State and local governments towards energy savings while highlighting opportunities to improve energy savings. The SEES Report demonstrates a variety of program designs in combination with existing strategies in order to achieve peak energy savings.

Historically, marginalized groups have been underserved and underrepresented in clean energy planning. In the past, the Province of PEI has identified supporting marginalized groups as an important strategy for improving energy efficiency as these groups often face disproportionally high energy burdens and spend a larger percentage of their income on energy bills. These marginalized groups have been encompassed in the proposed Plan through the Home Comfort, Winter Warming, Energy Efficient Equipment Rebates, and Home Insulation Rebates programs for residential customers. As noted in the 2021 Canadian Provincial Energy Efficiency Scorecard prepared by Efficiency Canada, PEI was first place in the efficiency programs policy area,[13] leads spending per capita in low-income programming[14] and ranks fourth in Indigenous-specific program spending and partnerships.[15]

The adoption of stringent building codes involves efficiency program administrators in building code development and support. Informally, ePEI is involved in consulting with the development of Provincial building codes from an energy efficiency lens, which includes consultation on certain commercial projects. These informal conversations allow ePEI to be involved in commercial construction and provincial building code development. The proposed Plan has captured formalized processes regarding consultations with Provincial building code development and consultation on commercial construction projects as enabling strategies to further improve electricity efficiency and conservation across PEI.

Low income programming

PEIEC's approach to EE&C for residential programs considers low income participants. Specifically, the Home Comfort program, the Winter Warming program, the Energy Efficient Equipment Rebates program, and the Home Insulation Rebates program are tailored for low income participants.

Diversifying beyond savings from lighting

Since initial demand side management efforts began, the energy market in Prince Edward Island has vastly changed. With light emitting diode ("LED") lighting being more readily available to Islanders, the balanced plan approach must adapt to incorporate energy savings into this technology-saturated market. The current EE&C Plan had a large focus on lighting products as cost-effective energy efficiency upgrade options. With increased efforts towards energy savings from lighting previously, along with the evolution of technology, the lighting market for attributable savings is declining. This market transformation has been demonstrated in previous reports from ePEI, where it was noted that

[13] The 2021 Canadian Provincial Energy Efficiency Scorecard Report, page 47
[14] The 2021 Canadian Provincial Energy Efficiency Scorecard Report, page 52
[15] The 2021 Canadian Provincial Energy Efficiency Scorecard Report, pages 59

less activity and energy savings was expected from lighting, evidently reducing the anticipated number of LED products to be sold.

As per the Potential Study, it demonstrated that while savings due to energy efficient lighting were quite high in initial years, they are projected to decline in later years. This is largely a result of the successful transition from inefficient technologies for lighting to LED lighting. The Potential Study states an assumption that residential lighting opportunities will become exhausted as LED bulbs become the baseline technology option, predicting that by 2026, LED lighting will become the norm for a majority of residential homes within PEI. For businesses customers, this transition will occur more steadily throughout the duration of the Potential Study (until 2030); however, for commercial and industrial customers, as the market becomes more saturated with LEDs, there are fewer anticipated opportunities to generate new savings. The proposed EE&C Plan responds to this vast market decline in light efficiency savings by diversifying program delivery to energy savings that go beyond lighting for the residential market. This will enhance the delivery of the Instant Energy Savings program to reflect innovative electricity solutions. Most units sold in the Instant Energy Savings program are LED lighting and adjustments will be made to the delivery of the program to find the most efficient electricity savings solutions.

Avoiding capacity investments

The proposed Plan has considered the potential value from investing efforts into capacity avoidance by investing in demand response and reduction initiatives within each of the customer electricity ratepayer sectors.

Demand reduction activities have the primary objective of reducing system coincident demand through the implementation of passive measures (proactive), which do not rely on ongoing communication with the electricity utilities in PEI and measures in the current Plan have been continued into the proposed Plan (i.e. smart thermostats). This method differs from demand response activities which have the primary objective of reducing system coincident peak demand through utility signals to customers and/or associated equipment (reactive).

The proposed Plan includes demand response and reduction activities to build experience in demand-focused EE&C. ePEI expects that there could be future potential to build on these early efforts and further expand into demand response initiatives.

Demand response

Demand response initiatives reduce utility peak loads by curtailing electricity usage on PEI homes and buildings, either through adjusting customer energy use behavior, or by the utilities' centrally controlled energy using equipment.

The proposed Plan concentrates on the achievable potential for demand response programs under the customer incentives as well as engaging large Commercial and Industrial Interruptible rate customers in demand response events. Depending on the demand reduction goal, program design, and technologies used, demand response can have a varying impact on electricity load. Measures can either reduce peak load or shift consumption from the peak period to off-peak hours. An example of peak reduction measures included within the proposed Plan would be specifically collaborating with the utilities regarding potential interruptible customers. In the context of the EE&C Plan, demand response consideration has been given by adjusting electricity users' behaviors through enabling strategies and targeted equipment rebates, coupled with implementing pilot projects that allows the utility to centrally control certain equipment at a home or business. An example of peak shifting measures included in the proposed Plan would be direct load control Wi-Fi thermostats and centrally controlled electric thermal storage systems.

Standardized filing framework approval

PEIEC is requesting the Commission to approve the standardized filing framework. The purpose of the standardized filing framework is to streamline future EE&C Plan filings. The standardized filing framework is designed to provide an agreed upon approach between both the regulator and the utilities, outlining the development process. Details on the standardized filing is detailed below.

Section	Standardized Filing Framework Details
1.0 Introduction	
1.1 Background	An introduction of the EE&C filing including an overview of any agreements reached between PEIEC and PEI's electricity utilities. All agreements between PEIEC and PEI's electricity utilities will be provided as Appendices to the filing. The background should also include relevant information necessary for the regulatory approval process, including past EE&C Plan approvals.
2.0 Previous Plan's results	
2.1 Previous Plan's expenditures and energy saving results	A summary of the most recently completed EE&C Plan's actual results. This will include a breakdown of electricity savings, portfolio costs, and the following metrics: • Net energy savings in GWh by program, sector, and portfolio; • Net demand savings in MW by program, sector, and portfolio; • Cost-effectiveness by program and portfolio, using the Program Administrator Cost ("PAC") test as the primary assessment tool and the Total Resource Cost ("TRC") test as the secondary; and • Budget by program, sector, and portfolio.
2.2 Previous Plan's EE&C programs	Discussion of the results of each program completed in the previous EE&C Plan, including any variations in planned activities compared to actual results. Details will include planned and actual participation numbers by program and planned and actual benefits by program, sector, and portfolio expressed as a dollar value.
3.0 Proposed EE&C Plan for the upcoming period	
3.1 Overall summary	An overview of the proposed EE&C Plan for the upcoming period and any proposed significant changes in program delivery. PEIEC will provide an impact analysis for the proposed EE&C Plan. To enable overall consideration of the Plan, this section will include the following metrics, presented at the portfolio level: • Incremental net energy savings; • Incremental net demand savings; and • Cost-effectiveness testing.
3.2 Program level energy savings and investment	A summary of program-level savings and investment for the upcoming period. This will also include reference to benchmarks of plans from other jurisdictions that are comparable based on depth of savings relative to load, as appropriate, to present good utility practices being applied. This will include the following metrics, presented at the program level:

Section	Standardized Filing Framework Details
	• Incremental net energy savings; • Incremental net demand savings; • Breakdown of savings and investment by sector; and • Cost-Effectiveness testing.
3.3 Program descriptions	A summary of each program and the strategies for each sector will be included in the Plan. Detailed program descriptions will be an appendix to the Plan. The following template should be followed: 1) Overview: • A brief description of the program including target market, and type of service or rebate. • A summary of the program history, enhancements made, and the market potential for the program which includes a description of target customers and barriers for the market to undertake the upgrades or services. 2) Program design: • Measures promoted – a summary of services, rebates, or financing options included in the program. • A description of the implementation strategy. • Performance indicators – a summary of targeted: o Energy and demand savings; o Annual participation and participation rates; and o Cost-effectiveness testing.
4.0 Development of the upcoming period's EE&C Plan	
4.1 Development of the upcoming EE&C Plan targets	A summary of: • The parties involved in developing the Plan; • PEI utilities' most recent integrated resource plan results (if available); • Good utility practices identified through industry trends; • Historical achievement of the past EE&C Plan to date; • Establishing an appropriate investment level; and • Cost-efficiency opportunities, if applicable.
4.2 Evaluation	If applicable, a summary of changes that are planned for evaluation activities over the upcoming period will be provided.
4.3 Reporting	A summary of PEIEC's proposed reporting schedule for the upcoming period.
5.0 Additional items	
5.1 Rate and bill impact analysis	An analysis of the forward-looking potential ratepayer impacts of the proposed EE&C Plan. A breakdown between the ratepayer sectors will be included.
5.2 Other items	If applicable, other matters deemed appropriate at the time of the filing should be included.
6.0 Conclusion	
6.1 Conclusion	A summary of the items that PEIEC is seeking regulatory approval for.

The framework above was designed to allow for flexibility in future EE&C Plan filings but incorporate key structural elements that should be included in each filing. It was developed using frameworks applied in other Atlantic Canadian provinces.

Regulatory approvals requested

With this application, PEIEC and ePEI seek approval for:

- Application of the historical overcollection (~$2.01 million) from rate payers across the duration of the proposed Plan.
- The 2022/2023 EE&C programs with an investment of $7.56 million and net electricity savings of 12.44 GWh and net demand savings of 5.71 MW. After the adjustment for the overcollection of funding during the current Plan, Maritime Electric's rate payers are expected to provide funding of $868,283. Understanding Summerside Electric is not regulated by the Commission, it is assumed their portion of funding, adjusted for overcollection, will be $96,476.
- The 2023/2024 EE&C programs with an investment of $7.34 million and electricity savings of 10.84 GWh and electricity demand savings of 5.52 MW. After the adjustment for the overcollection of funding during the current Plan, Maritime Electric's rate payers are expected to provide funding of $868,283. Understanding Summerside Electric is not regulated by the Commission, it is assumed their portion of funding, adjusted for overcollection, will be $96,476.
- The 2024/2025 EE&C programs with an investment of $9.62 million and electricity savings of 11.17 GWh and electricity demand savings of 5.62 MW. After the adjustment for the overcollection of funding during the current Plan, Maritime Electric's rate payers are expected to provide funding of $886,282. Understanding Summerside Electric is not regulated by the Commission, it is assumed their portion of funding, adjusted for overcollection, will be $96,476.
- Continued use of the PAC test at the portfolio level to determine future EE&C planning for cost-effectiveness.
- Continued use of PEI's long-term borrowing rate in the calculation for cost-effectiveness testing.
- Continued use of PEIEC's rate rider for each of Maritime Electric's rate classes, which rate riders shall be set for the term of the Plan. It is requested that the amount remitted to PEIEC is based on a fixed monthly amount. This will result in under- or over-collections being held in a regulatory deferral account managed by the utility.
- Continue to treat EE&C costs as an expense as they are incurred rather than amortized over the life of EE&C measures.
- Continued use of an independent evaluation consultant following the evaluation framework previously submitted to the Commission.
- In each year during the term of the proposed Plan, submit an annual report consistent with previous annual reports submitted to the Commission during the current Plan's term. The annual report will be filed with the Commission three months after the end of PEIEC's fiscal year.
- In each quarter during the term of the proposed Plan, submit quarterly progress reports consistent with previous quarterly reports submitted to the Commission during the current Plan's term.
- Approval of the use of the proposed standardized filing framework on a go forward basis.