



Prince Edward Island

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April 4, 2025

Prince Edward Island Regulatory and Appeals Commission
Attn: Cheryl Bradley, CPA, CA – Senior Financial Advisor
National Bank Tower, Suite 501
PO Box 577

134 Kent Street, Charlottetown PE C1A 7L1

VIA EMAIL – electricityinquiries@irac.pe.ca

Dear Ms. Bradley:

Re: Utilities Docket UE20742

**MECL's Application re a Supplemental Budget Request for On-Island Capacity
PEIEC's Notice of Intent to Intervene as an Added Party**

1. We write on behalf of the Prince Edward Island Energy Corporation (the "PEIEC") which respectfully requests the Island Regulatory and Appeals Commission (the "Commission") permit its intervention as an "Added Party" in the above noted application (the "Application").
2. The Application seeks approval for a project to increase On-Island Capacity, focusing on three components, namely:
 - a. "a 10 MW/40 MWh Battery Energy Storage System;
 - b. a 50 MW Combustion Turbine; and
 - c. a 90 MW Reciprocating Internal Combustion Engine plant."
3. On December 18, 2024, the Maritime Electric Company, Limited ("MECL") filed the Application, pursuant to subsection 17(1) of the *Electric Power Act*, RSPEI 1988, Cap. E-4. On March 13, 2024, the Commission provided notice of the Application, which amongst other things, included a request that prospective intervenor be filed "...no later than 4:00pm on Friday April 4, 2025."
4. The within letter outlines the PEIEC's application and submissions to intervene as an "Added Party" pursuant to the Commission's *Rules of Practice & Procedure*, as amended, and the *Electric Power Act*, *supra*.

5. The PEIEC has a uniquely distinct and substantial public interest in the outcome of the Application. As a Crown Corporation established pursuant to the *Energy Corporation Act*, RSPEI 1988, Cap. E-7, it stewards the Province's energy and electricity legislation, regulations, policies, assets, interests and related concerns.
6. PEIEC submits it is important to ensure the Application, and the underlying critical service strengthening sought therein, occurs in the most timely and cost effective manner for the benefit of all PEI residents. Furthermore, PEIEC needs to ensure PEI's energy needs are met and align with its cooperation with other regional stakeholders in this regard. Finally, where the Application concerns additional generating and capacity equipment, pursuant to the *Electric Power Act*, *supra*, Government and the PEIEC have an interest in the how these assets are held and operate.
7. If appropriate, the PEIEC will engage in settlement negotiations pursuant to the Commission's *Rules of Procedure for Negotiated Settlements In Matters of Utility Regulation*. We note that Government, or its appointed agent or representative, is not required to apply for intervener status pursuant to subrule 5(a). Although this is not the subject of the within application, we are noting for completeness.
8. The PEIEC intends on actively participating in the proceeding, taking steps which may include cross-examining MECL's evidence, leading its own evidence, making submissions, engaging in settlement negotiations, and taking such other steps that are just and expedient. PEIEC's involvement should not significantly or unnecessarily increase the Application's costs and complexity.
9. PEIEC's intended submissions and involvement in the Application are to assist the Commission's consideration of the Application. The Commission has permitted the PEIEC to intervene in this regard in prior similar Applications.
10. The PEIEC and its representatives' contact particulars, respectively, are as follows:

PEI Energy Corporation
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Phone: 902-894-0288
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Legal Services Section
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95 Rochford Street,
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11. The PEIEC thanks the Commission for considering its application to intervene as an *"Added Party"* to the Application and respectfully requests that this relief be granted.

All of which is respectfully submitted on April 4, 2025.



Richard A. Collier
for Legal Services Section
Lawyers for the Intended Intervener,
Prince Edward Island Energy Corporation