

Our File: 213133

August 25, 2022

Island Regulatory and Appeals Commission  
PO Box 577  
Charlottetown, PE C1A 7L1

Attn: Cheryl Mosher, CPA, CA  
Senior Financial Advisor

Dear Ms. Mosher

**Re: Prince Edward Island Energy Corporation Application to Intervene as Added Party in MECL 2023 General Rate Application**

We are solicitors for and submit this correspondence on behalf of the Prince Edward Island Energy Corporation ("PEIEC").

The PEIEC requests to intervene as an "Added Party Intervener" in Maritime Electric Company, Limited ("MECL")'s 2023 General Rate Application ("GRA") filed on June 20, 2022 (UE20946) pursuant to sections 14-16 of the Island Regulatory and Appeals Commission's ("IRAC") *Rules of Practice and Procedure* (the "Rules"). Kindly accept this correspondence as PEIEC's formal notice of its intention to intervene in the GRA.

The PEIEC has a distinct and substantial public interest in the GRA. The PEIEC is a Crown corporation that deals with the Province's energy and electricity policies, regulations, and legislation. It owns and operates wind farms in Elmira, Hermanville/Clearspring and North Cape, as well as electrical transmission facilities in Prince County. The PEIEC finances energy projects in the Province and is an important agent in ensuring the Province meets its climate change mitigation goals and obligations.

PEIEC, and its ultimate owners, the taxpayers of Prince Edward Island, could be adversely affected by the outcome of the GRA. For example, should electricity rates increase such that ratepayers (in whatever category) are unable to afford to electrify their homes and daily lives, the impact upon ratepayers and PEIEC is clear and palpable. As such, PEIEC has a direct and substantial role to play in representing the public interest as it relates to the GRA.

PEIEC intends to cross examine and challenge MECL's position to ensure IRAC has the most accurate and complete evidentiary record upon which to decide this matter. PEIEC's intervention is not expected to add to the complexity of the issues to be considered in the GRA, nor does it believe that the costs of its participation would represent a considerable increase to the overall costs of the proceedings.

PEIEC submits that its participation, which has been readily recognized in past applications, will assist IRAC resolve the issues raised in the GRA. Further, Rule 5(a) of IRAC's *Rules of Procedure for Negotiated Settlements in Matters of Utility Regulation* formally recognizes PEIEC's role in negotiations of settlements in matters of utility regulation, which is indicative of PEIEC's role in this process. In much the same way, the PEIEC requests Added Party Intervener status in this GRA.

For all matters pertaining to PEIEC's Added Party Intervention Application or this GRA, please direct correspondence to:

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Yours very truly,



Michael G. Drake and  
Chera-Lee Gomez