



## Prince Edward Island

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March 13, 2026

VIA EMAIL – [electricityinquiries@irac.pe.ca](mailto:electricityinquiries@irac.pe.ca)

Prince Edward Island Regulatory  
and Appeals Commission  
Attn: Cheryl Bradley, CPA, CA – Senior Financial Advisor  
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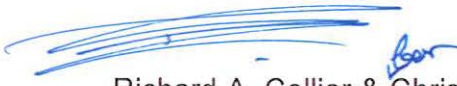
Dear Ms. Bradley:

**Re: Utilities Docket UE20742  
MECL's Application Re a Supplemental Budget Request for On-Island Capacity  
PEIEC's Response to Interrogatories of Commission Staff**

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1. We write on behalf of the Prince Edward Island Energy Corporation (the "PEIEC") with respect to the above noted Application (the "Application") by Maritime Electric Company, Limited ("MECL").
2. The Island Regulatory and Appeals Commission (the "Commission") provided Interrogatories of Commission Staff to PEIEC on February 13, 2026 and requested a response from PEIEC on or before March 6, 2026.
3. The Commission graciously provided the PEIEC a brief extension to March 13, 2026 to provide its responses to the Interrogatories, after PEIEC requested same.
4. The PEIEC feels the attached responses to the Interrogatories will assist in providing a fuller review of the matters currently before the Commission.
5. The PEIEC would like to thank the Commission for the opportunity to respond to the Interrogatories. If there is anything further required, please advise.

All of which is respectfully submitted on March 13, 2026.



Richard A. Collier & Christiana Tweedy  
for Legal Services Section  
Lawyers for the Added Party Intervener,  
Prince Edward Island Energy Corporation

Enclosed: PEIEC Response to Interrogatories of Commission Staff

## Interrogatories of PEI Energy Corporation

**TO:** Island Regulatory and Appeals Commission  
**FROM:** Prince Edward Island Energy Corporation  
**DATE:** March 13, 2026  
**RE:** On-Island Capacity for Security of Supply Project  
**DOCKET:** UE20742

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PEI Energy Corporation (“PEIEC”), in its capacity as an Added Party Intervener in the Application Requesting Approval for On-Island Capacity for Security of Supply Project (the “Application”), submitted by Maritime Electric Company, Limited (“MECL”), provides the following responses to the Interrogatories of Commission Staff dated February 13, 2026:

1. Does PEIEC intend to file the Doane Grant Thornton report as part of the evidentiary record in this proceeding?

The PEI Energy Review conducted by Doanne Grant Thornton on behalf of Government and the PEIEC was published on August 26, 2025, and is publicly available. It was not the intent of the PEIEC to provide as evidence given its public availability but if it is believed that the information in the reports will provide assistance in reaching a timely decision, the reports are available at [PEI Energy Review | Government of Prince Edward Island](#) and can form part of the record.

2. Please describe PEIEC’s position on the role of the Province and provincial entities in supporting system capacity and grid infrastructure.

The Province and its entities, including the PEIEC, respect the *Electric Power Act* which provides jurisdiction and the opportunity to MECL and Summerside to provide service to Islanders. To date, the Province has been a leader in the introduction of wind energy to the Island grid taking on the financial risk of developing and operating wind assets for more than 20 years. The Province is also interested in leveraging Federal investment to the electric system that can provide additional infrastructure at a lower cost for ratepayers.

The most recent example of this participation includes the planned installation of a transmission line in West Prince. The Province was able to secure Federal infrastructure funding to reduce the cost of the new infrastructure.

Another recent example of the Province's involvement is demonstrated through the 2017 subsea cable expansion. The addition of two 180MW cables are owned by the PEIEC. The Federal government provided a grant to offset 50% of the project costs with ratepayers funding the remaining 50% over the useful life of the asset.

The PEIEC and MECL worked together to ensure the successful completion of this significant undertaking

Where similar opportunities arise, the Province will participate.

3. The Doane Grant Thornton report (if relied upon by PEIEC) recommends that given the scale of anticipated capital expenditures, a combination of private, public, and alternative capital sources may be required to mitigate rate impacts.

- a. Please state whether PEIEC agrees with this recommendation and explain why or why not;

The Province is trying to establish a landscape where residents and business can receive the services needed to enjoy a safe and prosperous standard of living. While there is much congruence between the ratepayers and taxpayers on PEI the decision to participate in the electrical landscape is tricky. The Province will evaluate opportunities for participation and offer solutions that can help mitigate cost pressure for ratepayers but will not do so at the expense of taxpayers.

- b. Identify any specific capital structures, financing mechanisms, or ownerships models PEIEC believes should be considered; and

As noted in the response to question number 2, the Province would be looking for opportunities like installation of the 2017 subsea cable expansion as an example where value to ratepayers was achieved. The PEIEC understands that there are many projects that are needed for the

continued growth of the electric grid and more broadly the economy for PEI. There will be opportunities for the Province to partner and add value for ratepayers.

- c. Explain how such approaches could affect ratepayer risk, cost of capital, and overall electricity rates.

Ratepayers' interests will be best served if the Province and MECL work together to achieve best cost solutions to support a reliable and sustainable electric grid. While the Province does not have unlimited fiscal capacity, it will be available to make strategic investments to reduce costs for rate payers without putting the costs to the taxpayer.

4. The Doane Grant Thornton report further suggests that lower-cost capital should be accessed where possible, including by leveraging provincial borrowing capacity and cost of capital advantages. Please state PEIEC's position on this recommendation.

As noted in the response to 3 (a), the Province will evaluate opportunities for participation and offer solutions that can help mitigate cost pressure for ratepayers but will not do so at the expense of taxpayers.

5. Please advise whether PEIEC relies on the PEI Energy Strategy in forming its views on the On-Island Capacity Application and, if so, identify the specific objectives or elements of the Strategy relied upon and explain how they inform PEIEC's position.

The views in the PEI Energy Strategy are established to assist with policy formation and guide the actions for the next several years. To be clear, the Strategy is an energy strategy not just an electricity strategy. Based on the pillars contained in the Strategy there are key objectives that PEIEC's position. In particular, the "Enhance the Grid" pillar includes actions to support upgrading and expanding transmission infrastructure. Support of the Province's actions in this initiative involves an application for funding being sent to Natural Resources Canada. The application will seek funding to support preconstruction work on a new subsea cable project. The application is a joint initiative between the Province and MECL.

6. PEI has legislated economy-wide greenhouse gas emissions targets under the Net-Zero Carbon Act, including a requirement to achieve net-zero emissions by 2040.

- a. Please describe PEIEC's views on whether the proposed combustion turbine facilities, if approved, would reasonably align with these legislated emissions targets over their expected useful life.

Indirectly, if used exclusively to balance intermittent renewable energy generation, additional fossil fuel generation may allow for future electrification which drives emissions reductions if said electrification is a result of fuel switching (e.g. home heating oil to heat pumps, internal combustion vehicles to EV).

- b. In forming its views, has PEIEC considered the risk that the proposed assets could become stranded or partially stranded, including becoming underutilized, constrained, or subject to early retirement before the end of their expected useful life, in light of legislated greenhouse gas emissions targets and related policy initiatives? Please explain.

Under all possible future policy scenarios, electricity demand will grow significantly on PEI (approx. 2X 2020 electricity demand by 2040). Likelihood of on-Island generation becoming redundant or unnecessary is thereby very low considering high penetration of existing (and additional planned) renewables and relative certainty of expected demand increases.

7. The PEI Energy Strategy contemplates a transition toward a lower-emissions electricity system over time.

- a. Please identify any evidence relied upon by PEIEC that demonstrates whether the proposed combustion turbine facilities could reasonably operate within, be adapted to, or transition in a manner consistent with the type of electricity system contemplated by the Strategy, including any assumed transition pathways.

The PEI Energy Strategy is explicit in recognizing that given PEI's current electricity capacity constraints and critical near-term reliability concerns, new on-Island generation will not necessarily be non-emitting.

Recommendations in the Strategy include limiting use of peak demand periods and creating off-ramps to cleaner fuels going forward (e.g., renewable diesel).

PEIEC does not have additional evidence to provide, and nor do consultants involved in the Strategy's development, on the operational ability of the specific combustion turbines being proposed to transition to renewable diesel. As the development of Canada's domestic biofuel sector is still emerging, particularly in the Atlantic region, all experts involved in the Strategy's development acknowledged the urgent need for dispatchable generation on-Island.

8. Section 17.1 of the Electric Power Act allows the Government of Prince Edward Island to purchase new generating equipment or additional capacity. As a result, if this Application is approved, the Government may direct PEIEC to purchase the new generating equipment or additional capacity and require MECL to lease (rather than own) the assets.

- a. Please describe the circumstances under which PEIEC believes provincial acquisition or ownership of generation facilities may be an appropriate option to support system capacity or mitigate ratepayer impacts.

The responses noted for question 2 and 3 combined outline the circumstances under which the PEIEC believes that acquisition and ownership is appropriate.

- b. If this Application is approved, does the Government and/or PEIEC plan to purchase the assets and require MECL to lease the assets from PEIEC? Please explain why or why not.

Government is not planning on purchasing the two 50 MW combustion turbines being requested by MECL in the August 2025 application.

The application currently being considered identifies capacity deficits beyond the 100 MW being sought through the proposed procurement with ProEnergy. Government believes that there will be additional opportunities to participate and partner with MECL and provide benefits to ratepayers.

9. Through various contracts with PEIEC, MECL purchases the capacity and energy from 92.5 megawatts of wind energy. Approximately 70.5 MW of this wind energy is generated from wind farms that are owned and operated by PEIEC.

With the removal of 1 Turbine at Hermanville and the addition of 7 turbines as part of phase 2 Eastern Kings, the updated tables as of February 20, 2026 are as follows:

PEI Energy Corporation Wind Farms

Wind Farm	Size (MW)	In Year Service
North Cape Phase 1	5.28	2001
North Cape Phase 2	5.28	2003
Aeolus	3	2003
Eastern Kings 1	30	2007
Hermanville/Clearsprings	27	2014
Eastern Kings 2	29.4	2025
<b>Total</b>	<b>99.96</b>	

PEI Energy Corporation Contracted Wind Farms

Wind Farm	Size (MW)	In Year Service
Engie Norway	9	2007
WEICan	10	2012
<b>Total</b>	<b>19</b>	

- a. How much energy is generated by PEIEC's wind farms annually? Please include the total amount generated annually at each wind farm from 2020 to 2025.

Wind Farm	Production (GWh)					
	2020	2021	2022	2023	2024	2025
North Cape Phase 1	16	15	15	13	14	14
North Cape Phase 2	16	15	14	13	12	14
Aeolus	10	10	10	8	10	10
Eastern Kings 1	93	90	83	86	83	78
Hermanville/Clearsprings	100	86	54	29	64	75
Eastern Kings 2						17
Engie Norway	40	38	37	30	36	43
WEICan	29	28	28	24	27	28
<b>Totals</b>	<b>304</b>	<b>282</b>	<b>241</b>	<b>203</b>	<b>246</b>	<b>279</b>

- b. Of the total amount generated, how much wind energy has MECL purchased from PEIEC in each of 2020 to 2025?

The numbers provided above are at the substations or the interface with MECL. There are some losses in the system (1.2% average over the last 4 years) due to operating wind farms for things such as transmission and collector circuit losses, operating controls in the wind turbines, etc. After these losses, 100% of the energy generated from the Wind Turbines is sold to MECL.

- c. If wind energy is generated in excess of what is purchased by MECL, what happens to the excess wind energy?

The MW load on the Island has yet to exceed the 119 MW generation capacity of the existing contracted infrastructure with MECL and therefore there has never been an excess. There are times when the West Cape Wind Farm (Contracted Off Island) energy is being transmitted to the NB Grid via the subsea cables, particularly in the Spring and Fall overnight when the load is low and wind levels are optimal.

- d. What is the contracted amount of wind energy that will be purchased by MECL from PEIEC in each of the next five years (2026 to 2030)?

While Power Purchase Agreements vary for each project, the expected power anticipated to be sold to MECL by the PEIEC. North Cape 1 and 2 will both reach end of life (30 years) and repower planning is already underway. Energy yields from each farm are expected to decrease due to the aging infrastructure and are as follows:

Wind Farm (GWh)	2026	2027	2028	2029	2030	2031
North Cape 1	14	14	2			
North Cape 2	14	13	13	13	2	
Aeolus	9	9	9	9	9	9
East Kings 1	81	81	80	79	78	77
Hermanville/Clearsprings	82	81	80	79	78	77
East Kings 2	123	122	121	120	118	117
Engie Norway	36	35	34	33	33	32
WEICan	28	28	27	27	27	26
<b>Totals</b>	<b>387</b>	<b>383</b>	<b>366</b>	<b>360</b>	<b>345</b>	<b>338</b>

10. Please explain the performance and reliability of PEIEC’s existing wind turbines during extreme weather events, including (but not limited to) extreme cold and wind. PEIEC’s response should include (but not be limited to) the minimum temperature ratings, maximum wind speed ratings, and a discussion of historical performance during extreme weather events (i.e. areas of deficiency, system failures, improvements undertaken, etc.)

The following chart illustrates the operating characteristics of the existing wind turbines:

Wind Farm	Ambient Temp Operation Limit (°C)	Wind Speed Limit Details	Cut Out Wind Speed (km/h)	Re-Cut In (km/h)
North Cape 1	-20	Average Wind Speed	km/h	km/h
North Cape 2	-20	Average Wind Speed	90	72
Aeolus	-30	Average Wind Speed	90	72
East Kings 1	-30	Average Wind Speed or Sector Management*	90	72
Hermanville/ Clearsprings	-30	Average Wind Speed or Turbulence Intensity**	75.6	75.6
East Kings 2***	(-30 to -40)	Average Wind Speed	79.2 to 101	
Engie Norway	-30	Average Wind Speed	104.4	86.4
WEICan	-30	Average Wind Speed	90	72

\* Reduces cut out wind speed to 57.6 km/h when the wind is from the West (255 to 315 degrees)

\*\* Pauses turbine when turbulence levels (gusty winds) are above design parameters

\*\*\* 2025 Wind Farm with Storm Mode – Operate from 100% power down to 25% during periods of extreme cold (-40°C) and wind (up to 101 km/h average wind speed)

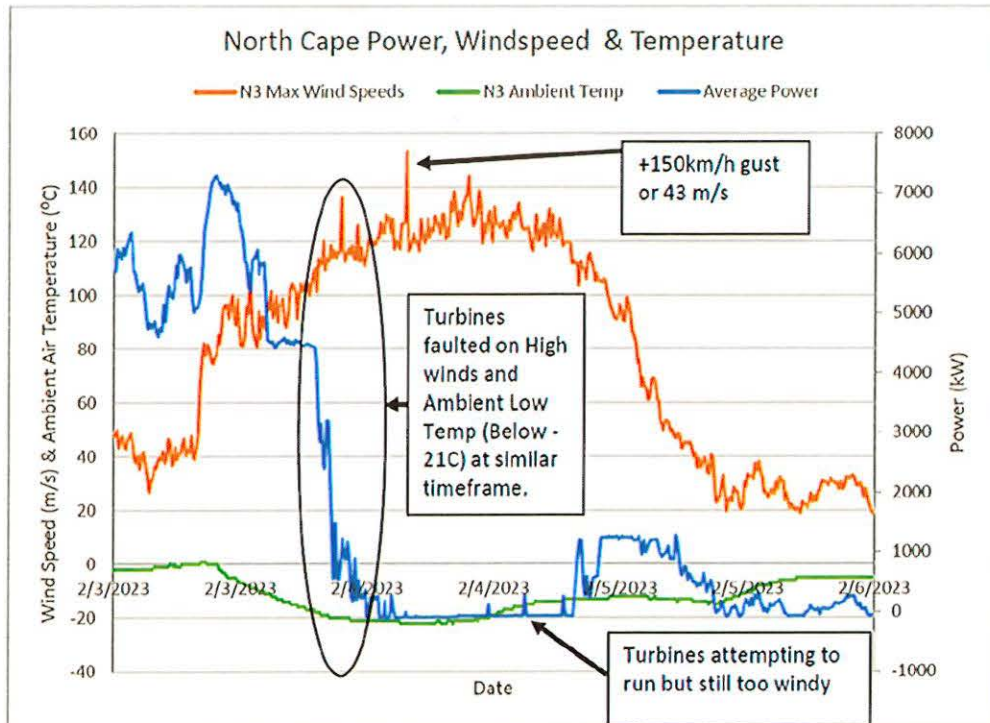
Historical performance during extreme weather events (i.e. areas of deficiency, system failures, improvements undertaken, etc.) will be discussed as part of question 11 with the polar vortex being the most

significant weather event (with regards to wind and cold at the same time) in regard to PEIEC's record keeping.

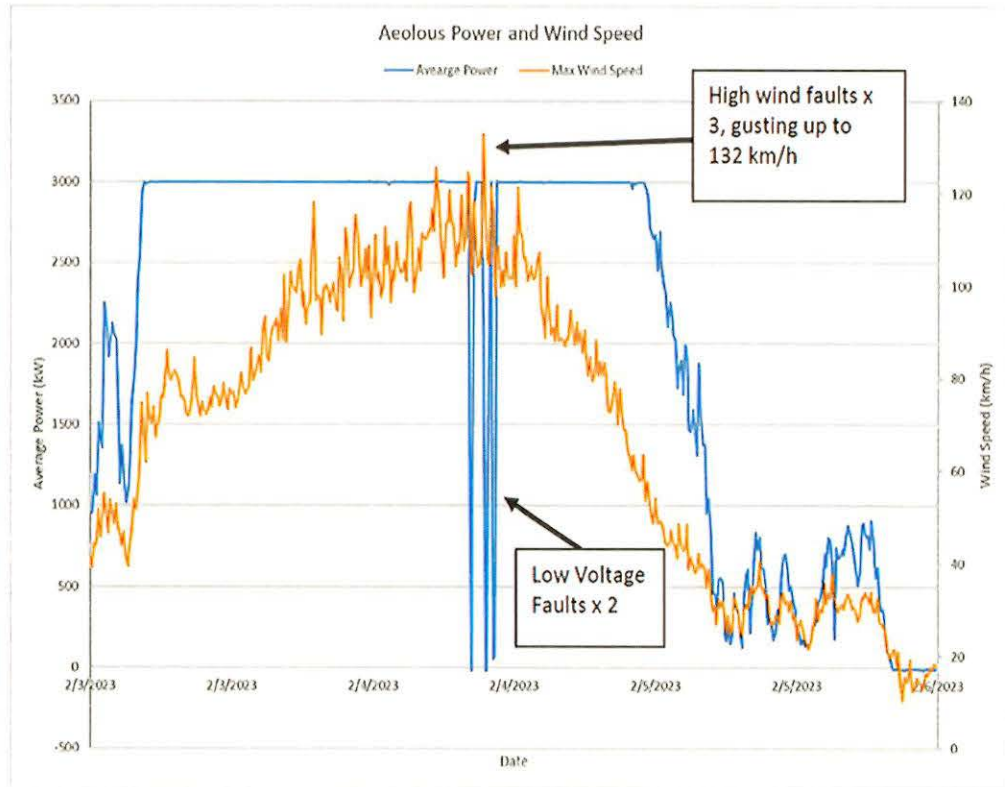
11. Following the polar vortex in February 2023, Sargent & Lundy prepared an Addendum to its Capacity Resource Study. The Addendum states that during the extreme cold weather, "wind generation dropped substantially because of a number of cascading wind generator and system failures related to the cold temperatures and high wind speed / high wind turbulence".

a. Please explain the performance of PEIEC's wind farms during the polar vortex (February 3 to 5, 2023), including (but not limited to) any system failures, the cause of those failures, and wind production during the relevant period.

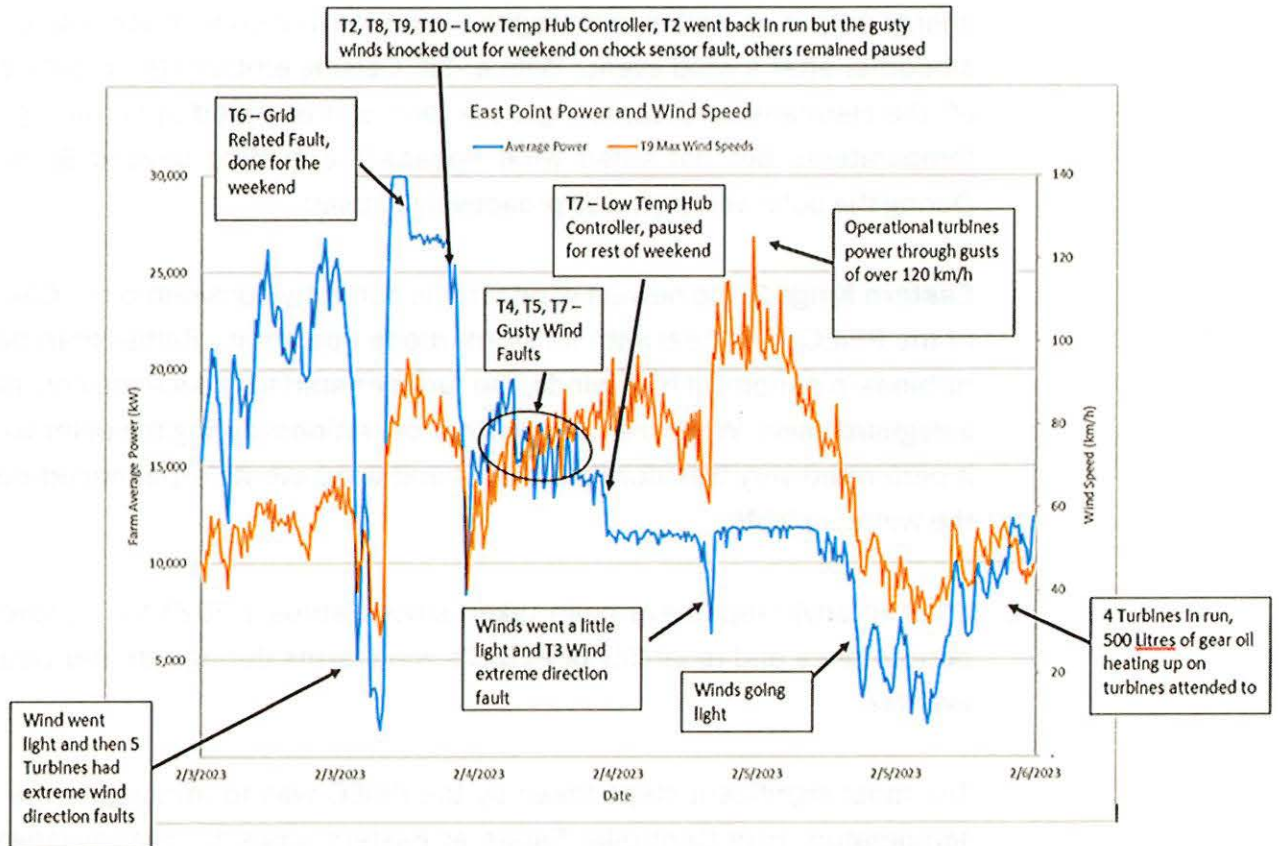
**North Cape 1 and 2** have typically performed very well in winter storms. However, at their 25<sup>th</sup> and 27<sup>th</sup> year of operation, the farm are showing their age in recent years with more yaw ring and traverse bolt issues. During the polar vortex, temperatures dropped below their -20°C ambient temperature cut off and extreme wind conditions caused the whole farm to pause. When wind and ambient temperatures came back within design parameters, turbines that had not faulted automatically went back into run as per the figure below:



The **Aeolus** turbine was one the best performing turbines during the polar vortex only pausing when wind speeds peaked at 132km/h and twice during periods of low voltage as per the graph below:



**Eastern Kings 1** was anticipated to perform well; however, a combination of factors led to only four operational turbines at the end of the polar vortex. One turbine faulted with the Electrical Grid, four on Low Temperature Hub Controller and the other remained down for the weekend after an extreme wind fault (chock sensor) as per the figure below:



Faults such as the chock sensor fault (extreme vibration) in the turbine have resulted in significant wear and tear on the turbines. In 2025, one yaw ring and three nacelle frames were found with significant damage/cracking and underwent a major repair campaign. Vestas engineers performed an analysis and determined that wind from the Westerly direction was turbulent beyond design levels and recommended implementing Wind Sector Management to reduce strain on the aging infrastructure. The PEIEC agreed to this recommendation and the new programming has been in place since Fall 2025, reducing the energy output of this farm during high wind events from the West.

**Hermanville/Clearsprings** is the most susceptible to windstorms. With a cut out and cut in wind speed at the same wind speed (very little hysteresis), the farm has a habit of the turbines constantly turning off/on (mostly off) during windstorms resulting in increased wear and tear. This cycle typically also causes the turbines to fault on various alarms. It has been found to proactively pause the wind farm allows MECL to plan for the reduction in energy output as well as allowing the wind farm to come back online a lot smoother after a wind event. With a -30° Celsius ambient temperature cut off the Hermanville/Clearsprings; the farm can be relied upon during cold temperatures but not when wind speeds are gusting beyond 90 km/h. During the polar vortex, it was proactively paused.

**Eastern Kings 2**, the newest wind farm is currently considered the Cadillac of the PEIEC wind fleet with its storm mode operation. Rather than pause turbines in periods of high winds, the turbines start to reduce their output to safeguard itself. While the farm was not operational during the polar vortex, it performed very well during the cold and wind events experienced during the winter of 2026.

- b. What (if any) steps have been taken since February 2023 to improve the performance and reliability of PEIEC's wind farms during extreme weather events?

The most significant steps taken by the PEIEC was to investigate the Low Temperature Hub Controller Faults at Eastern Kings 1. The investigation revealed two factors that would contribute to this fault; 1 – If the Blade Rain Collars were missing, and 2 – If the Hub Controller heater was not operational. The PEIEC relies on the OEM to repair both items and has pushed for both items to be repaired during the summer maintenance cycle when high temperature and low wind conditions are required to perform the repairs. This can be an annual ongoing issue, and the PEIEC will ensure it is prioritized.

12. In response to IR-14 of Synapse Energy Economics, MECL discusses the benefits of staffing wind farms 24/7 during extreme weather events.

a. Does PEIEC agree with MECL's assessment?

Wind farms are typically monitored remotely during periods of extreme weather and can be paused/started remotely. From a safety perspective, we try to avoid being around wind turbines during periods of extreme weather. Wind farms on PEI operate with a small core number of staff. Regularly there is no requirement to staff wind farms on a 24/7 basis. Wind farms are monitored by on-call personnel and warnings received from SCADA systems. In addition, many technicians live within a one-hour drive of their respective workplaces. They typically show up at 7am to work when daylight conditions would allow daylight inspections of turbines to ensure safe conditions are present before approaching any wind turbines after an extreme weather event (think freezing rain).

b. Does PEIEC currently staff, or have plans to staff, wind farms 24/7 during extreme weather events? Please explain why or why not.

As discussed above, wind farms are typically monitored remotely during periods of extreme weather. When the extreme weather occurs overnight, judgement calls are made to pause proactively or work with MECL to plan accordingly. As peak load typically does not occur overnight this has never been an issue. From a safety perspective, we do not typically recommend being at wind farms during extreme weather events.

13. In the On-Island Capacity Application filed in December 2024, MECL states that the Hermanville wind farm has had significant operational issues that reduced its capacity for a number of years.<sup>2</sup>

a. Have the operational issues at the Hermanville wind farm been resolved?

Yes, the major repair campaigns of 2023 and 2024 have yielded great results. It is by no means perfect but energy yields for several months during 2025 exceeded projections. Five spare blades stored on site will reduce downtime of any future blade related issues.

- b. What is Hermanville's current output, and is it currently operating at full capacity? Please explain and provide details.

Hermanville is currently at 8 of 9 Turbines operational with one turbine down with a gearbox bearing. The parts to repair this turbine are expected in March 2026 and once this is repaired, it will bring the farm back to 27 MW full power output.

14. The Commission understands that Phase II of the Eastern Kings wind farm project is currently underway.

- a. Please provide particulars of the project, including the number of turbines, the expected output (individually and combined), and the anticipated in-service date.

The Eastern Kings Phase II expansion project has recently added seven Enercon E-138 EP3 E2 wind energy converters capable of producing a maximum nameplate capacity of 4.2MW each. The Enercon E-138 unit utilizes a 138-meter rotor diameter on a 108-meter tower for a total height of 177m in total height. This turbine platform is modeled to provide a net capacity factor of 45% and is designed to have a 25-year operating life.

The seven new Enercon E-138 turbines connect to a new circuit which includes a new 50MVA power transformer and related protection equipment, co-located in the Phase I substation footprint. Electricity generation from both wind plant phases is stepped up and sold to MECL at 138-kV transmission voltage levels.

Noteworthy features of the E-138 platform and selected options include:

- Permanent magnet direct drive generators
- Cold weather package
- Blade heating systems
- Storm mode
- Enhanced reactive power output
- Trailing edge serration for noise reduction and increased efficiency

In service dates for each E-138 turbine are listed below, with partial plant production taking place from September to December. Substation expansion work was completed in early December 2025 with full plant production achieved on December 21, 2025. The total Phase II expansion of 29.4 MW from the seven turbines is expected to generate 120 GWh annually.

<b>Enercon E-138 Turbine #</b>	<b>In-service date</b>
<b>3</b>	21-Sep-2025
<b>2</b>	12-Oct-2025
<b>1</b>	27-Oct-2025
<b>7</b>	16-Nov-2025
<b>6</b>	30-Nov-2025
<b>4</b>	12-Dec-2025
<b>5</b>	21-Dec-2025

- b. When compared to existing turbines owned by PEIEC, will the new turbines perform better and more reliably in extreme weather conditions? Please explain and provide details (i.e. minimum temperature ratings, maximum wind speed ratings, etc.)

Generating efficiency of the Enercon E-138 is greater than the existing wind farms due to the larger rotor diameters and newer turbine generation technology. A net capacity factor of 45% is expected from the E-138 platform in Eastern Kings when compared to ~30-35% provided by the Acciona AW3.0 and Vestas V90 units.

The E-138 turbine platform is more resilient to colder temperatures when compared to other existing turbine platforms owned by PEIEC and with its storm control mode, it is better equipped to operate through high wind and turbulence events.

Additional details are summarized below with respect to design parameters:

- Cold weather package allows full nameplate production down to an ambient temperature of -30°C. Ambient temperatures below -30°C will result in reduced outputs, but will continue to operate down to -40°C.

- Blade heating systems are equipped in every turbine blade which allow for a more predictable and controlled de-icing during freezing rain events. This feature allows turbines to enter operating modes faster, rather than waiting for ambient conditions for ice removal.
- Storm control mode enables the Enercon E-138 turbines to reduce their output in a controlled manner when facing high wind events. Full 4.2MW output is generated on each E-138 up to 22 m/s (79 km/h) and is reduced to a maximum cut out speed of 28 m/s (100 km/h). Sustained average wind speeds of more than 28 m/s will pause the turbines. Note: referenced wind speeds are measured at the hub height of 108m.

15. Does PEIEC have any other wind farms, or expansions of existing wind farms, planned? If so, please provide full particulars, including (but not limited to) the location, number of turbines, the expected output (individually and combined), the in-service date, and anticipated performance and reliability during extreme weather events (i.e. extreme cold, extreme winds, etc.).

The PEIEC currently has no current plans for constructing new wind farms. As noted in response 9(d) North Cape 1 and 2 will both reach end of life (30 years) over the next five years repowering assessments and decisions will be required.

16. In its response to IR-7 issued by PEIEC, MECL states that controllable demand-side management (“DSM”) is a factor that affects MECL’s capacity forecast. PEIEC is responsible for the administration of the Electricity Efficiency & Conservation Plan (“EE&C Plan”) which was approved by the Commission effective March 1, 2023 (Order UE24-02).

According to MECL, although PEIEC projected that 20.5 MW of controllable DSM would be in service in fiscal 2024/25, to date, there is no controllable DSM operational in PEI.

- a. Does PEIEC agree with MECL’s statements about the current status of controllable DSM in PEI?

This is correct, there is currently no controllable DSM (Demand Response) operational in PEI.

- b. If yes, why hasn't PEIEC achieved the projected controllable DSM (20.5 MW by 2024/25)?

Demand response programming was introduced in the 2nd EE&C plan filed in December 2021.

Approval was granted by the Commission on April 24, 2024 retroactively to March 1, 2023.

No new activities proposed in the EE&C plan were initiated before plan approval was received. An RFP was issued for the design and delivery of demand response programs which closed March of 2025. Additional internal government processes caused delays to September 2025 for the awarding of the contract to the successful bidder. Further delays were experienced during contract negotiation with successful proponent. As a result, commencement of program activities did not happen until December 2025, which left too little time before demand event season to have a pilot program in place for 2025/26.

- c. Please provide PEIEC's updated controllable DSM forecasts, including those provided to MECL for the purpose of its capacity forecasts.

Controllable DR load forecasts were not provided to MECL, the numbers listed in the filed EE&C plan were what was likely used in their capacity forecasts. While the final estimates on what will be achievable through upcoming demand response programs/activities are unknown for the moment, it is unlikely that 20.5MW will be achieved for the 2026/27 demand event season.

- d. MECL states that it is assuming incremental DSM reductions in load of up to 20 MW by 2032, but states "this outcome appears increasingly unlikely without tangible program progress". Are MECL's assumed DSM reductions reasonable? Please explain why or why not.

Load reductions through DSM activities for 24/25 were 2.87MW (net, at generator), this is reduced from the target of ~5MW laid out in the EE&C plan as our measurement & verification consultant reduced the savings for ASHPs and uptake of program was reduced due to the large investment in

providing heat pumps through the Free Programs with the Office of Net Zero. Until a new EE&C plan is completed, it is unknown what the demand reductions by 2032 will be; however, that level of demand reduction is highly achievable with the right mix of programs and policy.