

Our File: 213133

June 2, 2025

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

Dear Commissioners:

Re: UE22503 - Application for an Order to Approve Stage 1 Rate Design Changes

We acknowledge Ms. McKenna's correspondence dated May 2, 2025, setting procedural timelines for this Application; Mr. MacDonald's correspondence on behalf of the PEI Federation of Agriculture ("PEIFA") dated May 27, 2025, requesting discussion with all parties on how to proceed with this Application; and Ms. McKenna's response to same on today's date.

The PEI Energy Corporation ("PEIEC") shares the PEIFA's concerns regarding this Application and agrees that a Planning Conference or other platform for further discussion is warranted.

The Application record is stale and ought to be updated. MECL filed its Application for an Order to Approve the Stage 1 Rate Design Changes on May 14, 2021. It originally sought to implement changes, including the declining second block, in stages with the final stage to be implemented in March 2025. In other words, the data MECL provided to IRAC to approve Stage 1 of this Application was intended to be fully set in motion months prior to the date of writing this correspondence.

Given the outdated data on record, it is in the public interest to update the record such that IRAC may determine a rate design that is reasonable, justifiable and non-discriminatory. PEIEC's approach to this Application was informed by the record in 2022. It is unable to determine how to best proceed with the current record. Ultimately, it is the public that would be most prejudiced by hearing an application that is not current or relevant.

We urge you to grant the PEIFA and PEIEC's request to host a Planning Conference or other discussion platform such that this Application may be rejuvenated and determined expeditiously.

Sincerely,



Chera-Lee Gomez
Lawyer for PEIEC

C A N A D A

PROVINCE OF PRINCE EDWARD ISLAND

**BEFORE THE ISLAND REGULATORY
AND APPEALS COMMISSION**

IN THE MATTER of Sections 10, 13(1) and 20 of the *Electric Power Act* (R.S.P.E.I. 1988, Cap. E-4) and **IN THE MATTER** of the Application of Maritime Electric Company, Limited for an order approving a four year rate design plan for Stage 1 changes to Residential, General Service, Large Industrial and Street Lighting classes for electric service commencing on March 1, 2022 and for certain approvals incidental to such an order.

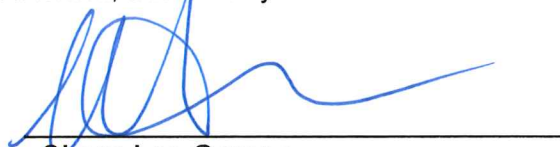
AND

IN THE MATTER of Section 12 of the *Island Regulatory and Appeals Commission Act* (R.S.P.E.I. 1988, Cap. 1-11) and **IN THE MATTER** of the Application of Maritime Electric Company, Limited for an order varying paragraph 31 of Order UE20-06 and for certain approvals incidental to such an order.

NOTICE OF CHANGE OF SOLICITOR

The Prince Edward Island Energy Corporation ("PEIEC"), formerly represented by Michael G. Drake and Chera-Lee Gomez, of McInnes Cooper, has appointed Chera-Lee Gomez of McInnes Cooper, as solicitor of record.

DATED at Charlottetown, Province of Prince Edward Island, this 2nd day of June 2025.



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AND TO: Spencer Campbell, K.C.
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AND TO: M. Lynn Murray, K.C. and Ryan MacDonald
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Lawyers for the PEI Federation of Agriculture