



## Prince Edward Island

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January 8, 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  
National Bank Tower, Suite 501  
PO Box 577  
134 Kent Street  
Charlottetown PE C1A 7L1

Dear Ms. Bradley:

**Re: Utilities Docket UE20742**  
**MECL's Application re a Supplemental Budget Request for On-Island Capacity**  
**PEIEC's Request for Interrogatories**

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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 to MECL on December 15, 2025, and requested a response on or before January 15, 2026.
3. The PEIEC respectfully requests that the Commission direct MECL to answer the enclosed list of interrogatories. While care has been taken, there may be some overlap with what the Commission has already asked of MECL.
4. We acknowledge that in fairness to MECL, if it is directed to answer the enclosed interrogatories doing so by January 15, 2026, may not be possible. As such, the PEIEC appreciates the Commission providing MECL with a reasonable time period to do so.
5. The PEIEC feels the attached interrogatories will assist in providing a fuller review of the matters currently before the Commission, and will not unduly delay the Application.

6. We look forward to the Commission's direction on this issue.

All of which is respectfully submitted on January 8, 2026.

A handwritten signature in blue ink, appearing to read 'Richard A. Collier', with a stylized flourish above it.

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

Enclosed: Interrogatories from PEIEC

## **Interrogatories of PEI Energy Corporation**

**TO:** Maritime Electric Company, Limited  
**FROM:** PEI Energy Corporation  
**DATE:** January 8, 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"), requests responses to the following interrogatories:

1. NS Power has included a significant amount of Battery Energy Storage System ("BESS") into their 10-year system plan and recently NB Power ("NBP") launched a procurement process for adding BESS to their system. NBP is the effective systems operator for PEI. Please outline the discussions that have taken place over the past two years regarding BESS opportunities for PEI.
2. MECL, as a customer of NBP, should be part of the overall supply and demand planning for the area. Please demonstrate how your project fits well with the plans of NBP? How can you demonstrate that you have conducted recent meaningful discussions with NBP?
3. Has there been a request to the New Brunswick Transmission System Operator for conditional firm transmission related to the gas combustion turbines ("CT") project scheduled for Centre Village? Access could provide additional capacity for PEI. Such a request would trigger a system impact study and determine availability of firm transmission. If so, please provide details regarding this request and resulting system impact studies or other information arising therefrom. If no request has been made, explain why not.

4. There appears to be a short timeframe from the time a deposit is placed with ProEnergy and a finalized order is required. What are the next steps and timelines that will be carried out once a decision is reached on the deferral account? Please provide a response for both positive and negative outcomes.
5. The August 14, 2025, Supplemental Filing (Exhibit M-12) noted that the first slot reservation payment was due in September 2025 and subsequent payments due by December 1, 2025. We recognize that these dates have passed. What impact has the delay in slot reservation payments had on the proposed project, including cost and timeline? What is the revised timeline for the slot reservation payments?
6. In the November 12, 2025, response to Synapse IR3-a, MECL indicates that the company is prepared to address the effective load carrying capability of BESS to determine whether it would complement a diversified energy portfolio. When will the analysis of BESS options be completed?
7. The capacity filing is relying on Sargent and Lundy's analysis from 2023, which utilizes out of date load forecasts and an outdated systems plan. Given what is available today for forecasting, both for the Island and regionally, would revised information affect the underlying request? Please explain why or why not. If so, what additional revised information does MECL have in this regard?
8. Does MECL currently maintain an active Integrated System Plan ("ISP")? If so, please provide an overview of the current plan, including the generation alternatives considered and rationale for their inclusion or omission. If this information is not available, please outline how MECL intends to plan for the system in the future. Specifically, will future requests include information regarding what project alternatives were considered and how those alternatives are being evaluated against an evaluation matrix that weights items such as sustainability, emission reduction, cost, reliability, etc.?
9. In the initial December application, Table 16 outlines Forecast Capacity Shortages in Eastern North America. Since this information was gathered, several updates have been provided by the Northeast Power Coordinating Council. Is there updated information available for the Maritimes area that could provide an updated forecast? If so, please provide.

10. The application indicates that MECL's 190MW of capacity will continue to be required from NBP. Nowhere in the application is there an assessment of the amount of capacity that NBP will have available following the 2026 energy purchase agreement. Please comment on the plans to secure capacity from NBP and status of negotiation of the energy purchase agreement, including capacity requirements.
11. The August 14, 2025, Supplemental Filing (Exhibit M-12) indicates an in-service date of 2028 for the ProEnergy equipment based on coming to terms with the company in September 2025. What is MECL's plan to address capacity shortfalls that may occur during the winter of 2027? Have any short-term solutions been researched and evaluated? If so, please provide; if not, explain why not.
12. Increasing capacity relies on increasing trends for electrification based on population increases and the need for additional housing/building starts. Has MECL completed any sensitivity analysis to model future capacity needs under high, moderate, or low percentage increases to population? If so, please provide that analysis; if not, explain why not.
13. Part of the costs for the proposed addition of two CTs at the Cumberland Street site include a significant expansion to fuel storage facilities. Given the proximity of the bulk tanks that supply all of PEI to the proposed site, are additional tanks required? Would supply agreements provide a better economic benefit and a more environmental solution to supply needs? If so, please provide that analysis; if not, explain why not.
14. Page 112 of the December 2024 application, note 178, indicates that *"the Company is currently studying expansion of the Interconnection. Preliminary results suggest that replacing Cables 1 and 2 with cables similar to Cables 3 and 4, each with a dedicated transmission line, is the preferred option. The study will be completed early in 2025 and will be filed with the Commission upon completion."* What is the status of this study and when will results be available?
15. The application focuses only on added capacity needs for MECL customers. Section 5.2.3 of the December application, figure 14, illustrates a 27% increase in energy sales. How is the company looking to address continued increases in energy sales within a tight local energy market?

16. Increasing the on-Island capacity available for MECL through acquiring two 50MW CT units is the only option presented. There are many that believe that a true comprehensive grid modernization strategy is required. What is MECL doing to plan for a modern grid?
17. As per Exhibit M-12 Appendix A, Sergent & Lundy's August 13, 2025, letter to MECL, noted that PEI's peak load is expected to reach approximately 408 MW in 2027. Given PEI's current interconnection limit of 300MW and 104MW of dispatchable on-Island generation, PEI is at risk of being unable to meet peak load times without curtailments. Please explain how usage has been trending since the August 2025 letter, and whether the system has approached peak capacity in recent months.
18. With regards to the proposed deferral outlined in Exhibit M-12, please provide additional details, including the proposed definitions of the account, eligible cost categories, recording methodology, recovery, and timeline for reporting to the Island Regulatory and Appeals Commission.